

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO 1437 Bannock Street Denver, CO 80202	<div style="text-align: center; border-bottom: 1px solid black; padding-bottom: 5px;"> Δ COURT USE ONLY Δ </div>	
<hr/> THE PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. RICHARD DEVON McBEE JR., ADAM JOEL PACHECO, and TAWNY LEE McCURRY, Defendants.		Case No.: GJ Case No.: 24CR0001 Courtroom: 259
<hr/> PHILIP J. WEISER, Attorney General MICHAEL J. McCARTHY, Assistant Attorney General, Reg. No. 60025* 1300 Broadway, 9 th Floor Denver, CO 80203 Tel. 720-508-6701 * Counsel of Record	<div style="text-align: center; padding: 5px;"> COLORADO STATE GRAND JURY INDICTMENT </div>	

Of the 2024-2025 term of the Denver District Court in the year 2025; the 2024-2025 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT 1	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1)(a), (2)(h), 4(a), (6) [F4] 08A1G
COUNT 2	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G
COUNT 3	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G
COUNT 4	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G

COUNT 5	THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G
COUNT 6	THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A1F
COUNT 7	TAX EVASION - FAILURE TO PAY, C.R.S. 39-21-118(1) [F6] 40028
COUNT 8	FAILURE TO FILE RETURN OR PAY TAX, C.R.S. 39-21-118(3) [M] 40023

INDEX OF COUNTS

Defendant	Counts Applicable
Richard Devon McBee Jr.	1-4 and 7-8
Adam Joel Pacheco	5
Tawny Lee McCurry	6

ESSENTIAL FACTS COMMON TO ALL COUNTS

A. Colorado Lottery

1. The Colorado Lottery is an enterprise fund that is part of the Colorado Department of Revenue. The Colorado Lottery is headquartered in Pueblo County, Colorado. The Colorado Department of Revenue is headquartered in Jefferson County, Colorado.

2. The Colorado Lottery offers instant-win scratch games where prizes, if any, can be revealed by scratching off an opaque covering on the lottery ticket. Different types of scratch games are offered with different retail values, with some high-value games having a retail value of up to \$50 per ticket.

3. Lottery tickets are commonly sold in supermarkets and convenience stores. Colorado Lottery sells scratch games to retailers in packs, with each lottery ticket containing a serialized, 13-digit number that identifies the game number, pack number, and ticket number. When packs arrive at retailers, they are inactive, meaning they cannot be redeemed for their prize value. When a retailer is ready to sell a pack, they scan the back barcode and place the tickets in a specialized dispenser provided by Colorado Lottery. Retailers typically place these dispensers behind the store counter in an area that is supposed to be inaccessible to customers.

4. A customer can determine if he or she has a winning ticket by scratching off the covering or by presenting the ticket to a retailer to be validated. Some retailers

offer barcode scanners where customers can validate multiple tickets on their own. Winning tickets with prizes of less than \$600 can be redeemed at a retailer, who will pay out the prize on behalf of Colorado Lottery. Some smaller retailers will not redeem prizes at or above a certain value, such as \$200. Prizes of \$600 or more can only be redeemed at one of four Colorado Lottery claims centers.

B. Criminal Conduct

5. Between August 2023 and November 2024, Richard Devon McBee Jr. committed a series of scratch-ticket thefts across eight judicial districts and over twenty cities in Colorado. The aggregate loss from these thefts amounts to over \$175,000.

6. Although the thefts occurred on different dates and in different locations, they followed a similar pattern. Whether working on his own or with accomplices—including Brandon Hyatt, Adam Pacheco, David Goetken, and Tawny McCurry—McBee would target gas stations that were staffed by a single store clerk. McBee or his accomplice would then lure the store clerk away from the store's counter. On some occasions, someone would claim that a credit card was stuck in the gas pump. On other occasions, someone would ask for assistance in purchasing a propane tank kept in a locked, outdoor cage. And at other times, someone would spill gasoline on the ground outside.

7. While the store clerk was distracted, McBee would sneak behind the counter and steal high-value Colorado Lottery scratch tickets from the store's dispenser. Within hours of the theft, and before the theft was discovered, McBee would enter a different gas station or store to redeem the lottery tickets that he stole elsewhere. McBee did not claim prizes of \$600 or more. After redeeming the winning tickets, McBee would share the illegal proceeds with his accomplices.

8. Income from illegal activity is taxable for purposes of Colorado law. Despite earning substantial proceeds from his theft of lottery tickets in 2023, McBee did not file a tax return in that year or report his illegal income.

COUNT 1

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G

On or about and between August 2, 2023, and September 25, 2023, in the State of Colorado, **RICHARD DEVON MCBEE JR.** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the 7-Eleven, King Soopers Fuel Center, Fast Market, Rocket, Loaf N Jug, Alta Convenience, and Murphy Express stores identified below, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive permanently the Colorado Lottery and the 7-Eleven, King

Soopers Fuel Center, Fast Market, Rocket, Loaf N Jug, Alta Convenience, and Murphy Express stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 1 are as follows:

Incident No. 1

(Lot CR: LOT23000370; Grand Jury Exhibit 1, Slides 3-6)

On or August 3, 2023, Richard McBee and Brandon Hyatt entered the Circle K store located at 3185 28th Street in Boulder, Boulder County, Colorado. After Hyatt lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 18 Colorado Lottery tickets with a retail value of approximately \$780.

Within hours of the theft from the Circle K store, McBee validated stolen lottery tickets at the following locations: the Safeway store located at 3325 28th Street, Boulder, Boulder County, Colorado; and the King Soopers store located at 6550 Lookout Road in Boulder, Boulder, County, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$920.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,700.

Incident No. 2

(Lot CR: LOT23000371; Grand Jury Exhibit 1, Slides 7-10)

On or August 5, 2023, Richard McBee and Brandon Hyatt entered the Circle K store located at 32877 Baseline Rd., Boulder, Boulder County, Colorado. After Hyatt lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 32 Colorado Lottery tickets with a retail value of approximately \$1,590.

Within 24 hours of the theft from the Circle K store, McBee validated stolen lottery tickets at the following locations: the 7-Eleven located at 3334 Arapahoe Road, Erie, Boulder County, Colorado; the Pump & Go store located at 290 North Highway 287 in Lafayette, Colorado; the 7-Eleven store located at 3240 Village Vista Drive, Erie, Colorado; the King Soopers located at 18805 Green Valley Ranch Boulevard, Denver, Colorado; the Gateway Convenience store located at 5910 North Tower Road, Denver, Colorado; and the All in One store located at 19245 East 56th Avenue, Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$920.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,510.

Incident No. 3

(Lot CR: LOT23000379; Grand Jury Exhibit 1, Slides 11-14)

On or August 13, 2023, Richard McBee entered the Rocket store located at 3000 28th Street in Boulder, Boulder County, Colorado. After luring the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole at least 48 Colorado Lottery tickets with a retail value of approximately \$2,400.

Within hours of the theft from the Rocket store, McBee stolen lottery tickets at the following locations: the Shortstop Gunbarrel store located at 6510 Lookout Road in Boulder, Boulder County, Colorado; the Conoco store located at 1051 South Hover Road, Longmont, Colorado; the 7-Eleven store located at 841 Ken Pratt Boulevard, Longmont, Colorado; the Everyday store located at 900 Ken Pratt Boulevard, Longmont, Colorado; the 7-Eleven store located at 3914 State Highway 119, Longmont, Colorado; the Quicktrip store located at 3979 Highway 119, Firestone, Colorado; and the Fast Market store located at 505 West 120th Street in Westminster, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,775.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,175.

Incident No. 4

(Lot CR: LOT23000383; Grand Jury Exhibit 1, Slides 15-18)

On or August 14, 2023, Richard McBee entered the 7-Eleven store located at 283 Highway 105, Monument, El Paso County, Colorado. A After luring the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole approximately 35 Colorado Lottery tickets with a retail value of approximately \$1,630.

Within hours of the theft from the 7-Eleven store, McBee stolen lottery tickets at the 7-Eleven store located at 229 Gleneagle Gate View, Colorado Springs, El Paso County, Colorado; the 7-Eleven store located at 1255 Interquest Parkway in Colorado Springs, El Paso County, Colorado; the Fast Market store located at 8105 North Academy Boulevard in Colorado Springs, El Paso County, Colorado; the Loaf N Jug store located at 161 Northgate Boulevard in Colorado Springs, El Paso County, Colorado; and the 7-Eleven store located at 6482 North Academy Boulevard in Colorado Springs, El Paso County, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,030.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,660.

Incident No. 5

(Lot CR: LOT23000415; Grand Jury Exhibit 1, Slides 19-22)

On or August 27, 2023, Richard McBee and Brandon Hyatt entered the 7-Eleven store located at 229 Gleneagle Gate View in Colorado Springs, El Paso County, Colorado. After luring the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole approximately 59 Colorado Lottery tickets with a retail value of approximately \$2,740.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the Circle K store located at 1190 West Baptist Road, Colorado Springs, El Paso County, Colorado; the King Soopers store located at 1070 West Baptist Road in Colorado Springs, El Paso County, Colorado; and the Kum & Go store located at 1319 Miner Street in Idaho Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$3,120.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$5,860.

Incident No. 6

(Lot CR: LOT23000402; Grand Jury Exhibit 1, Slides 23-26)

On or August 28, 2023, Richard McBee entered the 7-Eleven store located at 8 Nottingham Road, Avon, Eagle County, Colorado. After luring the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole approximately 30 Colorado Lottery tickets with a retail value of approximately \$1,140.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the City Market store located at 1410 Grand Avenue in Glenwood Springs, Colorado; the 7-Eleven store located at 51315 Highway 6 in Glenwood Springs, Colorado; the Alta Convenience store located at 51171 Highway 5 and 24, Glenwood Springs, Colorado; and the Kum & Go Mav store located at 2510 Gilstrap Court in Glenwood Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,210.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,350.

Incident No. 7

(Lot CR: LOT23000418; Grand Jury Exhibit 1, Slides 27-30)

On or August 31, 2023, Richard McBee entered the King Soopers Fuel Center located at 1277 Bergen Parkway in Evergreen, Jefferson County, Colorado. After luring the store attendant outside the store by way of a gas-spill distraction, McBee

snuck behind the counter and stole approximately 17 Colorado Lottery tickets with a retail value of approximately \$850.

Within hours of the theft from the King Soopers Fuel Center, McBee validated 19 of the stolen tickets at the Circle K store located at 411 West Florida Avenue in Denver, Colorado and seven of the stolen tickets at the King Soopers store located at 2727 West Evans Avenue in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,250.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,100.

Incident No. 8

(Lot CR: LOT23000424; Grand Jury Exhibit 1, Slides 31-34)

On or about September 5, 2023, Richard McBee entered the Fast Market store located at 505 West 120th Avenue in Westminster, Adams County, Colorado. After luring the store attendant outside the store by way of gas-spill distraction, McBee snuck behind the counter and stole approximately 42 Colorado Lottery tickets with a retail value of approximately \$2,010.

Within hours of the theft from the Fast Market store, McBee validated stolen lottery tickets at the following locations: the Good 2 Go store located at 107 Laura Court, Dacono, Colorado; the Kum & Go store located at 127 Laura Way, Dacono, Colorado; the Petro Shopping Center located at 2842 SE Frontage Road in Johnstown, Colorado; and the Loves Travel Stop located at 3800 State Highway 56, Berthoud, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,665.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,675.

Incident No. 9

(Lot CR: LOT23000465; Grand Jury Exhibit 1, Slides 35-38)

On or about September 12, 2023, Richard McBee entered the Rocket store located at 12851 West 32nd Avenue in Golden, Jefferson County, Colorado. After luring the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole approximately 37 Colorado Lottery tickets with a retail value of approximately \$1,850.

Within hours of the theft from the Rocket store, McBee validated stolen lottery tickets at the King Soopers store located at 3400 Youngfield Street in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,000.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,850.

Incident No. 10

(Lot CR: LOT23000443; Grand Jury Exhibit 1, Slides 39-42)

On or about September 17, 2023, Richard McBee and Adam Pacheco entered the Loaf N Jug store located at 700 Warner Drive in Golden, Jefferson County, Colorado. After Pacheco luring the store attendant outside the store, McBee snuck behind the counter and stole approximately 13 Colorado Lottery tickets with a retail value of approximately \$610.

Within hours of the theft from the Loaf N Jug store, McBee validated stolen lottery tickets at the TravelCenters of America located at 12151 West 44th Avenue in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$880.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,490.

Incident No. 11

(Lot CR: LOT23000456; Grand Jury Exhibit 1, Slides 43-46)

On or about September 21, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 21405 East Quincy Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 19 Colorado Lottery tickets with a retail value of approximately \$950.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the K7 G Conoco station located at 18181 East Hampden Avenue in Aurora, Colorado; the 7-Eleven store located at 3005 South Peoria in Aurora, Colorado; and the Kum & Go Mav located at 450 South Santa FE Drive in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$650.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,600.

Incident No. 12

(Lot CR: LOT23000461; Grand Jury Exhibit 1, Slides 47-50)

On or about September 22, 2023, Richard McBee and David Goetken entered the 7-Eleven store located at 3790 Wadsworth Boulevard in Wheat Ridge, Jefferson County, Colorado. After Goetken lured the store attendant outside the store by

requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 79 Colorado Lottery tickets with a retail value of approximately \$2,230.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the Circle K store located at 15065 West Colfax Avenue in Lakewood, Colorado; the Kum & Go store located at 18465 West Colfax Avenue in Golden, Colorado; and the TravelCenters of America located at 12151 West 44th Avenue in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,625.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,855.

Incident No. 13

(Lot CR: LOT23000459; Grand Jury Exhibit 1, Slides 51-54)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the Alta Convenience store located at 15201 East Hampden Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by way of a disabled-vehicle distraction, McBee snuck behind the counter and stole approximately 57 Colorado Lottery tickets with a retail value of approximately \$2,570.

Within hours of the theft from the Alta Convenience store, McBee validated stolen lottery tickets at the following locations: the King Soopers located at 18211 East Hampden Avenue in Aurora, Colorado; and the Maverik store located at 21800 East Quincy Avenue in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,740.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,310.

Incident No. 14

(Lot CR: LOT23000460; Grand Jury Exhibit 1, Slides 55-58)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 7451 South Gartrell Road in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 55 Colorado Lottery tickets with a retail value of approximately \$2,460.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 25701 East Smokey Hill Road in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,430.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,890.

Incident No. 15

(Lot CR: LOT23000462; Grand Jury Exhibit 1, Slides 59-62)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the Murphy Express store located at 21500 East Quincy Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 6 Colorado Lottery tickets with a retail value of approximately \$300.

Within hours of the theft from the Murphy Express store, McBee validated a stolen lottery ticket at the Fast Market store located at 15303 East Quincy Avenue in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$50.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$350.

Incident No. 16

(Lot CR: LOT23000464; Grand Jury Exhibit 1, Slides 63-66)

On or about September 25, 2023, Richard McBee and David Goetken entered the Rocket store located at 5096 South Yosemite Street in Greenwood Village, Arapahoe County, Colorado. After luring the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 23 Colorado Lottery tickets with a retail value of approximately \$1,110.

Within hours of the theft from the Rocket store, McBee validated stolen lottery tickets at the following locations: the 7-Eleven store located at 9171 East Arapahoe Road in Englewood, Colorado; and the 7-Eleven store located at 6630 South Yosemite Street in Greenwood Village, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$225.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,335.

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The total value of thefts for Count 1 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
1	08/03/23	\$780	\$920	\$1,700
2	08/05/23	\$1,590	\$920	\$2,510
3	08/13/23	\$2,400	\$1,775	\$4,175
4	08/14/23	\$1,630	\$1,030	\$2,660
5	08/27/23	\$2,740	\$3,120	\$5,860
6	08/28/23	\$1,140	\$1,210	\$2,350
7	08/31/23	\$850	\$1,250	\$2,100
8	09/05/23	\$2,010	\$1,665	\$3,675
9	09/12/23	\$1,850	\$2,000	\$3,850
10	09/17/23	\$610	\$880	\$1,490
11	09/21/23	\$950	\$650	\$1,600
12	09/22/23	\$2,230	\$1,625	\$3,855
13	09/23/23	\$2,570	\$1,740	\$4,310
14	09/23/23	\$2,460	\$2,430	\$4,890
15	09/23/23	\$300	\$50	\$350
16	09/25/23	\$1,110	\$225	\$1,335
TOTAL		\$25,220	\$21,490	\$46,710

COUNT 2

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] **08A1G**

On or about and between September 26, 2023, and October 11, 2023, in the State of Colorado, **RICHARD DEVON McBEE JR.** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the 7-Eleven, Circle K, Twin Star, Alta Convenience, and Rocket stores identified below, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive permanently the Colorado Lottery and the 7-Eleven, Circle K, Twin Star, Alta Convenience, and Rocket stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 2 are as follows:

Incident No. 17

(Lot CR: LOT23000471; Grand Jury Exhibit 2, Slides 3-6)

On or about September 26, 2023, Richard McBee and an unknown male accomplice entered the 7-Eleven store located at 8991 East 104th Avenue in Henderson, Adams County, Colorado. After the accomplice lured the store attendant

outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 41 Colorado Lottery tickets with a retail value of approximately \$1,920.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 750 East 104th Avenue in Thornton, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,475.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,395.

Incident No. 18

(Lot CR: LOT23000478; Grand Jury Exhibit 2, Slides 7-10)

On or about September 27, 2023, Richard McBee and an unknown male accomplice, possibly Adam Pacheco entered the 7-Eleven store located at 23830 East Smoky Hill Road in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store, McBee snuck behind the counter and stole approximately 68 Colorado Lottery tickets with a retail value of approximately \$2,500.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 4850 East 62nd Avenue in Commerce City, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,145.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,645.

Incident No. 19

(Lot CR: LOT23000479; Grand Jury Exhibit 2, Slides 11-14)

On or about September 28, 2023, Richard McBee entered the Circle K store located at 6802 Wadsworth Boulevard in Arvada, Jefferson County, Colorado. After luring the store attendant outside the store by way of a spilled-gasoline distraction, McBee snuck behind the counter and stole approximately 17 Colorado Lottery tickets with a retail value of approximately \$850.

Within hours of the theft from the Circle K store, McBee validated stolen lottery tickets at the following locations: the TravelCenters of America located at 5101 Quebec Street in Commerce City, Colorado; and the Circle K store located at the 15065 West Colfax Avenue in Lakewood, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$550.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,400.

Incident No. 20

(Lot CR: LOT23000487; Grand Jury Exhibit 2, Slides 15-18)

On or about September 30, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 16601 East Smokey Hill Road in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 95 Colorado Lottery tickets with a retail value of approximately \$2,360.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 19711 East Smoky Hil Road in Centennial, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,002.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,362.

Incident No. 21

(Lot CR: LOT23000484; Grand Jury Exhibit 2, Slides 19-22)

On or about October 1, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 13697 East Iliff Ave #1 in Aurora, Arapahoe County, Colorado. After Pacheco lured store attendant outside the store, McBee snuck behind the counter and stole approximately 27 Colorado Lottery tickets with a retail value of approximately \$1,230.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the Flying J store located at 16751 East 32nd Avenue in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,030.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,260.

Incident No. 22

(Lot CR: LOT23000489; Grand Jury Exhibit 2, Slides 23-26)

On or about October 2, 2023, Richard McBee and Tawny McCurry entered the Twin Star store located at 7995 Wadsworth Boulevard in Arvada, Jefferson County, Colorado. After McCurry lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 35 Colorado Lottery tickets with a retail value of approximately \$428.

Within hours of the theft from the Twin Star store, McBee validated stolen lottery tickets at the following locations: the King Soopers store located at 3400 Youngfield Street in Wheat Ridge, Colorado; and the Kum & Go located at 3432 Clear Creek Drive in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$237.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$665.

Incident No. 23

(Lot CR: LOT23000495; Grand Jury Exhibit 2, Slides 27-30)

On or about October 4, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 8900 Metro Airport Avenue in the City and County of Broomfield, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 37 Colorado Lottery tickets with a retail value of approximately \$1,730.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the TravelCenters of America located at 5101 Quebec Street in Commerce City, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,655.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,385.

Incident No. 24

(Lot CR: LOT23000505; Grand Jury Exhibit 2, Slides 31-34)

On or about October 6, 2023, Richard McBee and Tawny McCurry entered the 7-Eleven store located at 1428 West Colorado Avenue in Colorado Springs, El Paso County, Colorado. After McCurry lured the store attendant outside the store by claiming there was a problem with a gas pump, McBee snuck behind the counter and stole approximately 85 Colorado Lottery tickets with a retail value of approximately \$4,020.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Sooper store located at 1750 West Uintah Street in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,910.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$6,930.

Incident No. 25

(Lot CR: LOT23000506; Grand Jury Exhibit 2, Slides 34-38)

On or about October 6, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 283 Highway 105 in Monument, El Paso County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 61 Colorado Lottery tickets with a retail value of approximately \$2,790.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the Pilot Travel Center located at 15455 Terrazzo Drive in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,990.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,780.

Incident No. 26

(Lot CR: LOT23000514; Grand Jury Exhibit 2, Slides 39-42)

On or about October 11, 2023, Richard McBee, Adam Pacheco, and Tawny McCurry traveled together in a black van to the Alta Convenience store located at 26431 Main Street in Conifer, Jefferson County, Colorado. McBee and Pacheco entered the store while McCurry remained in the vehicle. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 70 Colorado Lottery tickets with a retail value of approximately \$2,570. From her position in the vehicle, McCurry was able to observe the store attendant and appears to have been communicating with McBee via mobile phone while he was committing the theft.

Within hours of the theft from the Alta Convenience store, McBee—accompanied by both Pacheco and McCurry—validated stolen lottery tickets at the following locations: the King Soopers located at 25637 Conifer Road in Conifer, Colorado; and the 7-Eleven store located at 4709 Tower Road in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,750.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,320.

Incident No. 27

(Lot CR: LOT23000515; Grand Jury Exhibit 2, Slides 43-46)

On or about October 11, 2023, Richard McBee and Adam Pacheco entered the Rocket store located at 16283 Morrison Road in Morrison, Jefferson County, Colorado. After Pacheco lured the store attendant outside the store by creating a distraction at a gas pump, McBee snuck behind the counter and stole approximately 33 Colorado Lottery tickets with a retail value of approximately \$1,330.

Within hours of the theft from the Rocket store, McBee validated stolen lottery tickets at the King Soopers located at 4850 East 62nd Avenue in Commerce City, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,230.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,560.

* * *

The total value of thefts for Count 2 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
17	09/26/23	\$1,920	\$1,475	\$3,395
18	09/27/23	\$2,500	\$2,145	\$4,645
19	09/28/23	\$850	\$550	\$1,400
20	09/30/23	\$2,360	\$2,002	\$4,362
21	10/01/23	\$1,230	\$1,030	\$2,260
22	10/02/23	\$428	\$237	\$665
23	10/04/23	\$1,730	\$1,655	\$3,385
24	10/06/23	\$4,020	\$2,910	\$6,930
25	10/06/23	\$2,790	\$1,990	\$4,780
26	10/11/23	\$2,570	\$1,750	\$4,320
27	10/11/23	\$1,330	\$1,230	\$2,560
TOTAL		\$21,728	\$16,974	\$38,702

COUNT 3

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G

On or about and between March 11, 2024, and April 3, 2024, in the State of Colorado, **RICHARD DEVON McBEE JR.** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the 7-Eleven, Rocket, Circle K, Fast Market, and Alta Convenience stores identified below, with the value of twenty thousand dollars or more but less than one hundred

thousand dollars, and intended to deprive permanently the Colorado Lottery and the 7-Eleven, Rocket, Circle K, Fast Market, and Alta Convenience stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 3 are as follows:

Incident No. 28

(Lot CR: LOT24000153; Grand Jury Exhibit 3, Slides 3-6)

On or about March 11, 2024, Richard McBee entered the 7-Eleven store located at 2825 Briargate Boulevard in Colorado Springs, El Paso County, Colorado, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 47 Colorado Lottery tickets with a retail value of approximately \$2,350.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the Circle K store located at 7805 North Academy Boulevard in Colorado Springs, Colorado; the Fast Market store located at 8105 North Academy Boulevard in Colorado Springs, Colorado; the QuikTrip store at the 1525 West Baptist Road in Colorado Springs, Colorado; the Fast Market store located at 1310 West Baptist Road in Colorado Springs, Colorado; and the Fast Market store located at 8105 North Academy Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,500.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,850.

Incident No. 29

(Lot CR: LOT24000155; Grand Jury Exhibit 3, Slides 7-10)

On or about March 12, 2024, Richard McBee entered the 7-Eleven store located at 2350 Hancock Expressway in Colorado Springs, El Paso County, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 37 Colorado Lottery tickets with a retail value of approximately \$1,430.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the Sam's Food Market located at 3049 Jet Wing Drive in Colorado Springs, Colorado; and the King Soopers store located at 2910 South Academy Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$750.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,180.

Incident No. 30

(Lot CR: LOT24000167; Grand Jury Exhibit 3, Slides 11-14)

On or about March 18, 2024, Richard McBee entered the 7-Eleven store located at 3740 Randall Drive in Colorado Springs, El Paso County, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 47 Colorado Lottery tickets with a retail value of approximately \$2,350.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the Circle K store located at 7805 North Academy Boulevard in Colorado Springs, Colorado; the at the Fast Market store located at 8105 North Academy Boulevard; the Kum & Go Mav located at 2190 Vickers Drive in Colorado Springs, Colorado; the Loaf N Jug store located at 5825 North Academy Boulevard in Colorado Springs, Colorado; the Fast Market store located at 8105 North Academy Boulevard in Colorado Springs, Colorado; the Kum & Go Mav located at 2190 Vickers Drive in Colorado Springs, Colorado; the Corner Market located at 4315 North Academy Boulevard in Colorado Springs, Colorado; and the King Soopers located at 3820 Austin Bluffs Parkway in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,175.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,525.

Incident No. 31

(Lot CR: LOT24000236; Grand Jury Exhibit 3, Slides 15-18)

On or about March 19, 2024, Richard McBee entered the 7-Eleven store located at 5590 Powers Center Point in Colorado Springs, El Paso County, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 50 Colorado Lottery tickets with a retail value of approximately \$2,260.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 9225 North Union Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,625.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,885.

Incident No. 32

(Lot CR: LOT24000170; Grand Jury Exhibit 3, Slides 19-22)

On or about March 20, 2024, Richard McBee entered the Rocket store located at 1896 Democracy Point, Colorado Springs, El Paso County, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 52 Colorado Lottery tickets with a retail value of approximately \$2,450.

Within hours of the theft from the Rocket store, McBee validated stolen lottery tickets at the King Soopers store located at 3570 Hartsel Drive in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,450.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,900.

Incident No. 33

(Lot CR: LOT24000174; Grand Jury Exhibit 3, Slides 23-26)

On or about March 21, 2024, Richard McBee and an unidentified male accomplice entered the 7-Eleven store located at 5670 Barnes Road in Colorado Springs, Colorado. After luring the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 60 Colorado Lottery tickets with a retail value of approximately \$2,790.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the King Soopers store located at 3620 Austin Bluffs Parkway in Colorado Springs, Colorado; the Fast Market store located at 8105 North Academy Boulevard in Colorado Springs, Colorado; the King Soopers store located at 3570 Hartsel Drive in Colorado Springs, Colorado; and the King Soopers store located at 9225 North Union Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,475.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$5,265.

Incident No. 35¹

(Lot CR: LOT24000189; Grand Jury Exhibit 3, Slides 31-34)

On or about March 23, 2024, Richard McBee and an unidentified male accomplice entered the 7-Eleven store located at 2880 South Circle Drive in Colorado Springs, El Paso County, Colorado. After the accomplice lured the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter

¹ No offense is identified as Incident No. 34 in this indictment.

and stole approximately 46 Colorado Lottery tickets with a retail value of approximately \$2,300.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers located at 2910 South Academy Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,925.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,225.

Incident No. 36

(Lot CR: LOT24000192; Grand Jury Exhibit 3, Slides 35-38)

On or about March 26, 2024, Richard McBee and an unidentified male accomplice entered the 7-Eleven store located at 7692 Barnes Road in Colorado Springs, El Paso County, Colorado. After the accomplice lured the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 29 Colorado Lottery tickets with a retail value of approximately \$1,260.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers located at 6030 Stetson Hills Boulevard in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$820.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,080.

Incident No. 37

(Lot CR: LOT24000191; Grand Jury Exhibit 3, Slides 39-42)

On or about March 26, 2024, Richard McBee and an unidentified male accomplice entered the 7-Eleven store located at 312 Mountain View Lane in Colorado Springs, El Paso County, Colorado. After the accomplice lured the store attendant outside the store by way of a spilled-gas distraction, McBee snuck behind the counter and stole approximately 42 Colorado Lottery tickets with a retail value of approximately \$840.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the King Soopers located at 6930 North Academy Boulevard in Colorado Springs, Colorado; and the Circle K store located at 7055 Commerce Center Drive in Colorado Springs, Colorado. The aggregate amount

of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$465.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,305.

Incident No. 38

(Lot CR: LOT24000205; Grand Jury Exhibit 3, Slides 43-46)

On or about April 1, 2024, Richard McBee and an unknown male accomplice entered the Fast Market store located at 6910 West 120th Avenue in the City and County of Broomfield, Colorado. After the accomplice lured the store attendant outside the store by creating a distraction as a gas pump, McBee snuck behind the counter and stole approximately 27 Colorado Lottery tickets with a retail value of approximately \$1,080.

Within hours of the theft from the Fast Market store, McBee validated stolen lottery tickets at the King Soopers located at 655 Peoria Street in Aurora, Colorado. The aggregate amount of prize money paid out by this store and/or the Colorado Lottery on these stolen lottery tickets was approximately \$640.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,720.

Incident No. 39

(Lot CR: LOT24000218; Grand Jury Exhibit 3, Slides 47-50)

On or about April 3, 2024, Richard McBee and an unknown male accomplice entered the Alta Convenience store located at 13694 East Iliff Avenue in Aurora, Arapahoe County, Colorado. After the accomplice lured the store attendant outside the store by way of a gas-spill distraction, McBee snuck behind the counter and stole approximately 53 Colorado Lottery tickets with a retail value of approximately \$2,650.

Within hours of the theft from the Alta Convenience store, McBee validated stolen lottery tickets at the following locations: the King Soopers located at 15109 East Colfax Avenue in Aurora, Colorado; and the King Soopers located at 1355 Krameria Street in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,650.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,300.

* * *

The total value of thefts for Count 3 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
28	03/11/24	\$2,350	\$1,500	\$3,850
29	03/12/24	\$1,430	\$750	\$2,180
30	03/18/24	\$2,350	\$2,175	\$4,525
31	03/19/24	\$2,260	\$1,625	\$3,885
32	03/20/24	\$2,450	\$1,450	\$3,900
33	03/21/24	\$2,790	\$2,475	\$5,265
34	03/22/24	\$1,850	\$2,210	\$4,060
36	03/26/24	\$1,260	\$820	\$2,080
37	03/26/24	\$840	\$465	\$1,305
38	04/01/24	\$1,080	\$640	\$1,720
39	04/03/24	\$2,650	\$1,650	\$4,300
TOTAL		\$21,310	\$15,760	\$37,070

COUNT 4

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G

On or about and between May 12, 2024, and November 10, 2024, in the State of Colorado, **RICHARD DEVON McBEE JR.** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the Alta Convenience, Fast Market, 7-Eleven, and Circle K stores identified below, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive permanently the Colorado Lottery and the Alta Convenience, Fast Market, 7-Eleven, and Circle K stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 4 are as follows:

Incident No. 40

(Lot CR: LOT240002069; Grand Jury Exhibit 4, Slides 3-6)

On or about May 12, 2024, Richard McBee entered the Alta Convenience store located at 1228 Royal Gorge Boulevard in Cañon City, Fremont County, Colorado. After luring the store attendant outside the store by way of asking to purchase a propane tank, McBee snuck behind the counter and stole approximately 67 Colorado Lottery tickets with a retail value of approximately \$2,850.

Within hours of the theft from the Alta Convenience store, McBee validated stolen lottery tickets at the Love's Travel Stop in 690 Doc Holiday Drive in Cañon City, Fremont County, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,890.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,740.

Incident No. 41

(Lot CR: LOT24000279; Grand Jury Exhibit 4, Slides 7-10)

On or about May 19, 2024, Richard McBee and an unknown male accomplice entered the Fast Market store located at 715 Cheyenne Meadows Road in Colorado Springs, El Paso County, Colorado. After the accomplice lured the store attendant outside the store by asking to purchase a propane tank, McBee snuck behind the counter and stole approximately 46 Colorado Lottery tickets with a retail value of approximately \$2,180.

Within hours of the theft from the Fast Market store, McBee validated stolen lottery tickets at the King Soopers located at 815 Cheyenne Meadows Road in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,570.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,750.

Incident No. 42

(Lot CR: LOT24000317; Grand Jury Exhibit 4, Slides 11-14)

On or about May 31, 2024, Richard McBee and an unknown male accomplice entered the 7-Eleven store located at 12057 Pecos Street in Westminster, Adams County, Colorado. After the accomplice lured the store attendant outside the store by asking to purchase a propane tank, McBee snuck behind the counter and stole approximately 37 Colorado Lottery tickets with a retail value of approximately \$1,800.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the King Soopers store located at 3801 East 120th Avenue in Thornton, Colorado; the King Soopers store located at 2355 West 136th Avenue in the City and County of Broomfield, Colorado; and the King Soopers located at 3801 East 120th Avenue in Thornton, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,680.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,480.

Incident No. 43

(Lot CR: LOT24000347; Grand Jury Exhibit 4, Slides 15-18)

On or about June 24, 2024, Richard McBee and an unknown male accomplice, entered the Circle K store located at 9207 West Jewell Avenue in Lakewood, Jefferson County, Colorado. After the accomplice lured the store attendant outside the store by asking to purchase a propane tank, McBee snuck behind the counter and stole approximately 39 Colorado Lottery tickets with a retail value of approximately \$1,300.

Within hours of the theft from the Circle K store, McBee validated stolen lottery tickets at the King Soopers store located at 12043 West Alameda Parkway in Lakewood, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,300.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,600.

Incident No. 44

(Lot CR: LOT24000407; Grand Jury Exhibit 4, Slides 19-22)

On or about August 11, 2024, Richard McBee and an unknown male accomplice entered the 7-Eleven store located at 8002 Chase Drive in Arvada, Jefferson County, Colorado. After the accomplice lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 139 Colorado Lottery tickets with a retail value of approximately \$6,110.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the King Soopers located at 8055 Sheridan Boulevard in Aurora, Colorado; the 7-Eleven store located at 8378 North Sheridan Boulevard in Westminster, Colorado; and the Circle K store located at 8290 North Washington Street in Thornton, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$4,570.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$10,680.

Incident No. 45

(Lot CR: LOT24000497; Grand Jury Exhibit 4, Slides 24-27)

On or about October 7, 2024, Richard McBee and an unknown male accomplice entered the 7-Eleven store located at 4709 Tower Road in the City and County of Denver, Colorado. After the accomplice lured the store attendant outside the store, McBee snuck behind the counter and stole approximately 77 Colorado Lottery tickets with a retail value of approximately \$3,100.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the 7-Eleven store located at 17050 Smith Road in Aurora, Colorado; the Murphy Express store located at 3470 North Tower Road in Aurora, Colorado; the 7-Eleven store located at 3800 Tower Road in Aurora, Colorado; the Kum & Go Mav located at 4720 Tower Road in Denver, Colorado; the All in One store located at 19245 East 56th Avenue in Denver, Colorado; the Gateway Convenience store located at 5910 North Tower Road in Denver, Colorado; and the 7-Eleven located at 18449 East 65th Avenue in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,010.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$5.110.

Incident No. 46

(Lot CR: LOT24000556; Grand Jury Exhibit 4, Slides 28-31)

On or about November 9, 2024, Richard McBee entered the Circle K store located at 15593 East Iliff Avenue in Aurora, Arapahoe County, Colorado. After the store clerk stepped outside the store to smoke a cigarette, McBee snuck behind the counter and stole approximately 16 Colorado Lottery tickets with a retail value of approximately \$560.

Within hours of the theft from the Circle K store, McBee validated stolen lottery tickets at the following locations: the K&T gas station located at 15351 East Iliff Avenue in Aurora, Colorado; and the 7-Eleven store located at 14250 East Iliff Avenue in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$565.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,125.

* * *

The total value of thefts for Count 4 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
40	05/12/24	\$2,850	\$1,890	\$4,740
41	05/19/24	\$2,180	\$2,570	\$4,750
42	05/31/24	\$1,800	\$2,680	\$4,480
43	06/24/24	\$1,300	\$1,300	\$2,600
44	08/11/24	\$6,110	\$4,570	\$10,680
45	10/07/24	\$3,100	\$2,010	\$5,110
46	11/09/24	\$560	\$565	\$1,125

TOTAL		\$17,900	\$15,585	\$33,485
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COUNT 5

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1), (2)(h), 4(a), (6) [F4] 08A1G

On or about and between September 17, 2023, and October 11, 2023, in the State of Colorado, **ADAM JOEL PACHECO** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the Loaf N Jug, 7-Eleven, Alta Convenience, Murphy Express, and Rocket stores identified below, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive permanently the Colorado Lottery and the Loaf N Jug, 7-Eleven, Alta Convenience, Murphy Express, and Rocket stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 5 are as follows:

Incident No. 10

(Lot CR: LOT23000443; Grand Jury Exhibit 1, Slides 43-46)

On or about September 17, 2023, Richard McBee and Adam Pacheco entered the Loaf N Jug store located at 700 Warner Drive in Golden, Jefferson County, Colorado. After Pacheco luring the store attendant outside the store, McBee snuck behind the counter and stole approximately 13 Colorado Lottery tickets with a retail value of approximately \$610.

Within hours of the theft from the Loaf N Jug store, McBee validated stolen lottery tickets at the TravelCenters of America located at 12151 West 44th Avenue in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$880.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,490.

Incident No. 11

(Lot CR: LOT23000456; Grand Jury Exhibit 1, Slides 47-50)

On or about September 21, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 21405 East Quincy Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 19 Colorado Lottery tickets with a retail value of approximately \$950.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the following locations: the K7 G Conoco station located at 18181

East Hampden Avenue in Aurora, Colorado; the 7-Eleven store located at 3005 South Peoria in Aurora, Colorado; and the Kum & Go Mav located at 450 South Santa FE Drive in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$650.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$1,600.

Incident No. 13

(Lot CR: LOT23000459; Grand Jury Exhibit 1, Slides 55-58)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the Alta Convenience store located at 15201 East Hampden Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by way of a disabled-vehicle distraction, McBee snuck behind the counter and stole approximately 57 Colorado Lottery tickets with a retail value of approximately \$2,570.

Within hours of the theft from the Alta Convenience store, McBee validated stolen lottery tickets at the following locations: the King Soopers located at 18211 East Hampden Avenue in Aurora, Colorado; and the Maverik store located at 21800 East Quincy Avenue in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,740.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,310.

Incident No. 14

(Lot CR: LOT23000460; Grand Jury Exhibit 1, Slides 59-62)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 7451 South Gartrell Road in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 55 Colorado Lottery tickets with a retail value of approximately \$2,460.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 25701 East Smokey Hill Road in Aurora, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,430.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,890.

Incident No. 15

(Lot CR: LOT23000462; Grand Jury Exhibit 1, Slides 63-66)

On or about September 23, 2023, Richard McBee and Adam Pacheco entered the Murphy Express store located at 21500 East Quincy Avenue in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 6 Colorado Lottery tickets with a retail value of approximately \$300.

Within hours of the theft from the Murphy Express store, McBee validated a stolen lottery ticket at the Fast Market store located at 15303 East Quincy Avenue in Aurora, Colorado. The amount of prize money paid out by these stores and/or the Colorado Lottery on this stolen lottery ticket was approximately \$50.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$350.

Incident No. 20

(Lot CR: LOT23000487; Grand Jury Exhibit 2, Slides 19-22)

On or about September 30, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 16601 East Smokey Hill Road in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 95 Colorado Lottery tickets with a retail value of approximately \$2,360.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Soopers store located at 19711 East Smoky Hil Road in Centennial, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,002.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,362.

Incident No. 21

(Lot CR: LOT23000484; Grand Jury Exhibit 2, Slides 23-26)

On or about October 1, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 13697 East Iliff Ave #1 in Aurora, Arapahoe County, Colorado. After Pacheco lured the store attendant outside the store, McBee snuck behind the counter and stole approximately 27 Colorado Lottery tickets with a retail value of approximately \$1,230.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the Flying J store located at 16751 East 32nd Avenue in Aurora,

Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,030.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,260.

Incident No. 23

(Lot CR: LOT23000495; Grand Jury Exhibit 2, Slides 31-34)

On or about October 4, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 8900 Metro Airport Avenue in the City and County of Broomfield, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 37 Colorado Lottery tickets with a retail value of approximately \$1,730.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the TravelCenters of America located at 5101 Quebec Street in Commerce City, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,655.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$3,385.

Incident No. 25

(Lot CR: LOT23000506; Grand Jury Exhibit 2, Slides 39-42)

On or about October 6, 2023, Richard McBee and Adam Pacheco entered the 7-Eleven store located at 283 Highway 105 in Monument, El Paso County, Colorado. After Pacheco lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 61 Colorado Lottery tickets with a retail value of approximately \$2,790.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the Pilot Travel Center located at 15455 Terrazzo Drive in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,990.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,780.

Incident No. 26

(Lot CR: LOT23000514; Grand Jury Exhibit 2, Slides 43-46)

On or about October 11, 2023, Richard McBee, Adam Pacheco, and Tawny McCurry traveled together in a black van to the Alta Convenience store located at

26431 Main Street in Conifer, Jefferson County, Colorado. McBee and Pacheco entered the store while McCurry remained in the vehicle. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 70 Colorado Lottery tickets with a retail value of approximately \$2,570. From her position in the vehicle, McCurry was able to observe the store attendant and appears to have been communicating with McBee via mobile phone while he was committing the theft.

Within hours of the theft from the Alta Convenience store, McBee—accompanied by both Pacheco and McCurry—validated stolen lottery tickets at the following locations: the King Soopers located at 25637 Conifer Road in Conifer, Colorado; and the 7-Eleven store located at 4709 Tower Road in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,750.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,320.

Incident No. 27

(Lot CR: LOT23000515; Grand Jury Exhibit 2, Slides 47-50)

On or about October 11, 2023, Richard McBee and Adam Pacheco entered the Rocket store located at 16283 Morrison Road in Morrison, Jefferson County, Colorado. After Pacheco lured the store attendant outside the store by creating a distraction at a gas pump, McBee snuck behind the counter and stole approximately 33 Colorado Lottery tickets with a retail value of approximately \$1,330.

Within hours of the theft from the Rocket store, McBee validated stolen lottery tickets at the King Soopers located at 4850 East 62nd Avenue in Commerce City, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,230.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$2,560.

* * *

The total value of thefts for Count 5 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
10	09/27/23	\$610	\$880	\$1,490
11	09/21/23	\$950	\$650	\$1,600
13	09/23/23	\$2,570	\$1,740	\$4,310
14	09/23/23	\$2,460	\$2,430	\$4,890
15	09/23/23	\$300	\$50	\$350
20	09/30/23	\$2,360	\$2,002	\$4,362
21	10/01/23	\$1,230	\$1,030	\$2,260
23	10/04/23	\$1,730	\$1,655	\$3,385
25	10/06/23	\$2,790	\$1,990	\$4,780
26	10/11/23	\$2,570	\$1,750	\$4,320
27	10/11/23	\$1,330	\$1,230	\$2,560
TOTAL		\$18,900	\$15,407	\$34,307

COUNT 6

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A1F

On or about and between October 2, 2023, and October 11, 2023, in the State of Colorado, **TAWNY LEE McCURRY** unlawfully, feloniously, and knowingly, without authorization or by deception, obtained, retained, or exercised control over a thing of value, namely, prize money of the Colorado Lottery and/or lottery tickets of the Twin Star, 7-Eleven, and Alta Convenience stores identified below, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive permanently the Colorado Lottery and the Twin Star, 7-Eleven, and Alta Convenience stores identified below of its use or benefit, in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The essential facts in support of Count 5 are as follows:

Incident No. 22

(Lot CR: LOT23000489; Grand Jury Exhibit 2, Slides 27-30)

On or about October 2, 2023, Richard McBee and Tawny McCurry entered the Twin Star store located at 7995 Wadsworth Boulevard in Arvada, Jefferson County, Colorado. After McCurry lured the store attendant outside the store by claiming a credit card was stuck in a gas pump, McBee snuck behind the counter and stole approximately 35 Colorado Lottery tickets with a retail value of approximately \$428.

Within hours of the theft from the Twin Star store, McBee validated stolen lottery tickets at the following locations: the King Soopers store located at 3400 Youngfield Street in Wheat Ridge, Colorado; and the Kum & Go located at 3432 Clear Creek Drive in Wheat Ridge, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$237.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$665.

Incident No. 24

(Lot CR: LOT23000505; Grand Jury Exhibit 2, Slides 35-38)

On or about October 6, 2023, Richard McBee and Tawny McCurry entered the 7-Eleven store located at 1428 West Colorado Avenue in Colorado Springs, El Paso County, Colorado. After McCurry lured the store attendant outside the store by claiming there was a problem with a gas pump, McBee snuck behind the counter and stole approximately 85 Colorado Lottery tickets with a retail value of approximately \$4,020.

Within hours of the theft from the 7-Eleven store, McBee validated stolen lottery tickets at the King Sooper store located at 1750 West Uintah Street in Colorado Springs, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$2,910.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$6,930.

Incident No. 26

(Lot CR: LOT23000514; Grand Jury Exhibit 2, Slides 43-46)

On or about October 11, 2023, Richard McBee, Adam Pacheco, and Tawny McCurry traveled together in a black van to the Alta Convenience store located at 26431 Main Street in Conifer, Jefferson County, Colorado. McBee and Pacheco entered the store while McCurry remained in the vehicle. After Pacheco lured the store attendant outside the store by requesting to purchase a propane tank, McBee snuck behind the counter and stole approximately 70 Colorado Lottery tickets with a retail value of approximately \$2,570. From her position in the vehicle, McCurry was able to observe the store attendant and appears to have been communicating with McBee via mobile phone while he was committing the theft.

Within hours of the theft from the Alta Convenience store, McBee—accompanied by both Pacheco and McCurry— validated stolen lottery tickets at the following locations: the King Soopers located at 25637 Conifer Road in Conifer, Colorado; and the 7-Eleven store located at 4709 Tower Road in Denver, Colorado. The aggregate amount of prize money paid out by these stores and/or the Colorado Lottery on these stolen lottery tickets was approximately \$1,750.

The total amount of the stolen Colorado Lottery tickets' retail value and the prize money paid out on those stolen lottery tickets was approximately \$4,320.

* * *

The total value of thefts for Count 6 is as follows:

Incident	Date	Retail Value	Prize money	Total Value
22	10/02/23	\$428	\$237	\$665
24	10/06/23	\$4,020	\$2,910	\$6,930
26	10/11/23	\$2,570	\$1,750	\$4,320
TOTAL		\$7,018	\$4,897	\$11,915

COUNT 7

TAX EVASION - FAILURE TO PAY, C.R.S. 39-21-118(1) [F6] 40028

On or about October 15, 2024, in the State of Colorado, **RICHARD DEVON McBEE JR.** unlawfully, feloniously, and knowingly attempted to evade or defeat a tax administered by the Colorado Department of Revenue, or the payment thereof, namely, state income tax for the 2023 tax year, in violation of section 39-21-118(1), C.R.S.

COUNT 8

FAILURE TO FILE RETURN OR PAY TAX, C.R.S. 39-21-118(3) [M] 40023

On or about October 15, 2024, in the State of Colorado, **RICHARD DEVON McBEE JR.** unlawfully and willfully failed to pay a tax or estimated tax, make a return, keep tax records, or supply tax information as required for the 2023 tax year, in violation of section 39-21-118(3), C.R.S.

PHILIP J. WEISER

Attorney General

MICHAEL MCCARTHY, #60025

Assistant Attorney General

Special Prosecutions Unit

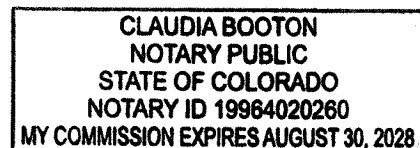
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado,
this 24th day of April 2025.



Notary Public

My commission expires: 8/30/28



The 2024-2025 Colorado Statewide Grand Jury presents the within
Indictment, and the same is hereby ORDERED FILED this ~~23rd~~
24th day of April, 2025.

Pursuant to §13-73-107, C.R.S., the Court designates El Paso County,
Colorado as the county of venue for the purposes of trial.



Hon. Christopher J. Baumann
Presiding Judge, Statewide Grand Jury

