

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>SABINO MUNOZ</p> <p>YULIAN ZAMARRON-BAYLON</p> <p>GEOMAR GOMEZ-HERNANDEZ</p> <p>YESTER SAGASTUME-LEYVA</p> <p>JOVANA ROBLES-GARCIA</p> <p>JUAN LOPEZ-SAMBRANO</p> <p>JONATHAN CISNEROS</p> <p>PRIMO BORJON-RAMIREZ</p> <p>TRINADETTE RANGEL</p> <p>QURINO VIALPANDO</p> <p>JOSE MUNOZ-MIRANDA</p> <p>Defendants.</p>	<p>DATE FILED May 22, 2026 9:28 AM FILING ID: 7EB49DD4E8C52 CASE NUMBER: 2026CR1025</p> <p>▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General KEVIN SOBCZYK, Reg. No. 54441, Assistant Attorney General* ALISON K. FOLEY, Reg. No. 39358, Special Assistant Attorney General* 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6700 *Counsels of Record</p>	<p>Grand Jury Case No.: CR</p> <p>Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

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C.R.S. 18-4-409(3) [F4] **0804P**

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COUNT FIFTY-TWO

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08A1F

UNCHARGED PREDICATE OFFENSE A

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] **0804P**

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COUNT ONE

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—PATTERN OF RACKETEERING, C.R.S. § 18-17-
104(3) [F2] 37284**

Between and including July 20, 2024, and January 30, 2025, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Geomar Gomez-Hernandez, Yester Sagastume-Leyva, and Jovana Robles-Garcia**, while employed by or associated with an enterprise as defined by § 18-17-103(2), C.R.S., as amended, namely: a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT TWO

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—CONSPIRACY, C.R.S. § 18-17-104(4) [F2] 37285**

Between and including July 20, 2024, and January 30, 2025, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Geomar Gomez-Hernandez, Yester Sagastume-Leyva, and Jovana Robles-Garcia**, did unlawfully, feloniously, and knowingly conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of section 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner:

THE ENTERPRISE

The enterprise alleged in Counts One and Two is a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: Sabino Munoz, Yulian Zamarron-Baylon (“Fresa/Pepe”), Geomar Gomez-Hernandez (“Chikis/Cubano”), Primo Borjon-Ramirez, Jovana Robles-Garcia (“China”), Yester Sagastume-Leyva (“Diego”), Jose Munoz-Miranda (“Wero”), Trinadette Rangel (“Trini”), Qurino Vialpando, Juan Lopez-Sambrano, Jonathan Cisneros (“Monster”), and Bianca Delgado-Quinones, and other persons known and unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

The enterprise consists of the people identified above working in concert with each other and, at times, with other parties of known or unknown identity between July 2024 and January 2025 throughout Adams, Boulder, Denver, Douglas, Jefferson, Larimer, and Weld counties, as well as other surrounding Colorado Front Range counties. The purpose of the enterprise focused generally on thefts of motor vehicles parked in lots associated with smaller municipal airports, the surrounding hotels, and sometimes from businesses and residential areas, with a primary target of full-sized pickup trucks, trailers, and recreational utility terrain vehicles (“UTV”) from mostly

private parties. By targeting vehicles parked in airport parking lots, it often meant the owner was out of town traveling for an extended period of time and they would not learn of their vehicle being stolen for multiple days. As a result, the stolen vehicles, trailers, and UTVs could be utilized unlawfully by members of the enterprise for their own purposes and avoid detection by law enforcement and license plate readers searching for stolen vehicles on the road, because the vehicles would not be reported stolen until the victims returned home days after the thefts.

Enterprise member Sabino Munoz is an accomplished vehicle thief who utilizes vehicle reprogramming tools to steal vehicles. Mr. Munoz, along with other enterprise members, including Yulian Zamarron-Baylon, stole vehicles from regional airports and area hotels in and around Colorado's front range. Mr. Munoz sold the stolen vehicles, primarily trucks, to members and/or associates of drug cartels in Mexico. Mr. Munoz directed other enterprise members, including his brother-in-law Primo Borjon-Ramirez, to transport the stolen vehicles to Mexico and obtain fraudulent documentation for the vehicles. Mr. Munoz' girlfriend, enterprise member Trinadette Rangel, assisted with operating the criminal organization.

Enterprise member, Yulian Zamarron-Baylon is involved in the theft of motor vehicles, brokering the sale of stolen vehicles and inviting others to participate in the criminal organization. Mr. Zamarron-Baylon was involved with motor vehicle theft operations for both Mr. Munoz and enterprise member Geomar Gomez-Hernandez. Mr. Gomez-Hernandez obtained stolen vehicles and stored them in rural storage yards he operated. The storage yards also served as a meeting place for enterprise members. Mr. Gomez-Hernandez is believed to be involved in the theft of diesel fuel, some of which was used by Mr. Munoz to advance the goals of the enterprise.

While some trucks and UTVs were temporarily used as personal transportation for the members of the enterprise, the primary function of the enterprise was to steal a vehicle parked in a location where it may not be immediately reported as stolen, and often use it as a means of transportation to locate and steal more vehicles or commit other crimes using personal items located within the stolen vehicles. Ultimately, many of these vehicles were driven to or hauled on a trailer to Mexico and sold to cartels, with cartels making requests of enterprise member Sabino Munoz for specific makes and models of trucks. The enterprise would then search for those types of vehicles to steal.

Once the members of the enterprise had a stolen vehicle, to further avoid detection from law enforcement, they would often switch license plates with plates stolen from other vehicles, change the VIN tag found on the windshield, and/or affix a fabricated temporary Colorado license plate. Sometimes the stolen vehicles would be repainted to alter the vehicles appearance. The members of the enterprise would then profit buy selling the stolen vehicles to the Mexican cartels or to third-party buyer unaware of the stolen status of the vehicle.

The goals of the enterprise were in part to maintain the members' lifestyle and their continued ability to commit illicit activities, to sell stolen vehicles for money and/or controlled substances, to conceal and/or delay discovery of their illicit activities, and for personal transportation. While some members of the enterprise appeared at times to be temporarily engaged in legitimate

employment, illicit activity appeared to be a significant source of the members' financial support given the frequency and repetitive nature of their thefts.

Based on detectives' interviews with various enterprise members, concerning enterprise members' personal associations between July 2024 and January 2025 outside of the below racketeering activities, Sabino Munoz and Yulian Zamarron-Baylon were friends for at least 8 years, with Mr. Munoz having dated Mr. Zamarron-Baylon's cousin, and Zamarron-Baylon being married to Munoz's friend, per Munoz. Trinadette Rangel was Munoz's girlfriend. Primo Borjon-Ramirez had been dating Munoz's sister for about four years. Zamarron-Baylon and Geomar Gomez-Hernandez had been friends for about a year, and according to Mr. Gomez-Hernandez they were good friends. Jovana Robles-Garcia initially met Yulian Zamarron-Baylon through Jonathan Cisneros. Ms. Robles-Garcia claimed to be planning on being the godmother to Zamarron-Baylon and Bianca Delgado's child. Yester Sagastume-Leyva and Zamarron-Baylon are good friends, according to Robles-Garcia. Robles-Garcia and Jose Munoz-Miranda are friends and they have been on recorded jail calls together when contacting Yester Sagastume-Leyva, while he was in custody, discussing other enterprise members.

Members of the enterprise working in concert with each other and/or with persons known and unknown to the Grand Jury, stole an estimated forty-one (41) vehicles, including motor vehicles, trailers, and UTVs from Colorado, along with innumerable items of personal property stored in those vehicles, with a total aggregate loss well in excess of \$900,000 dollars between July 2024 and January 2025. Additionally, enterprise members caused tens of thousands of dollars' worth of damage to many of the vehicles, including broken windows, locks, and ignition switches, during the course of these scores of vehicle thefts and several attempted vehicle thefts.

PATTERN OF RACKETEERING ACTIVITY

Sabino Munoz, Yulian Zamarron-Baylon ("Fresa"), Geomar Gomez-Hernandez ("Chikis/Cubano"), Primo Borjon-Ramirez, Jovana Robles-Garcia ("China"), Yester Sagastume-Leyva ("Diego"), Jose Munoz-Miranda ("Wero"), Trinadette Rangel ("Trini"), Qurino Vialpando, Juan Lopez-Sambrano, Jonathan Cisneros ("Monster"), and Bianca Delgado-Quinones, and others known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Motor Vehicle Theft, § 18-4-409

Theft, § 18-4-401

Burglary, § 18-4-203

Possession of a Weapon by a Previous Offender, § 18-12-108

Forgery, § 18-5-102

Possession of Burglary Tools, § 18-4-205

Criminal Mischief, § 18-4-501

RACKETEERING ACTIVITY

The acts of racketeering activity that the above-named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, all identified as counts listed below, including any lesser included offenses: Uncharged Acts of Racketeering A; and Count Three through Count Fifty-Two are alleged as predicate acts for Counts One and Two. In addition, the offenses alleged in Counts One and Two were committed in the manner described immediately below and described in the factual summaries in support of the following Uncharged Acts of Racketeering and Counts, incorporated by reference herein.

UNCHARGED ACT OF RACKETEERING A

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 193)**

Between and including January 27, 2025 and January 30, 2025, in the State of Colorado, **Jovana Robles-Garcia** and **Jose Munoz-Miranda** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Tom Jaschke, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or removed the motor vehicle from this state, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Uncharged Act of Racketeering A are as follows:

1. On or about January 29, 2025, Tom Jaschke contacted Boulder police and reported his tan 2001 Chevrolet 2500 Silverado as stolen. He last saw the truck on the morning of January 27, 2025, parked near his residence in an office parking lot located at 1000 West Moorhead Circle, Boulder, Colorado. He confirmed that it had not been towed and no one had permission to take it.
2. CMATT detectives, utilizing a PRTT/Geo location warrant on a cellphone number associated with Jovana Robles-Garcia, determined her location on January 30, 2025 to be near West 9th Avenue and Sheridan Boulevard in Westminster, Colorado.
3. Detective relocated to that area and observed a tan 2001 Chevrolet Silverado exiting a Public Storage lot at 680 N Sheridan Boulevard, with Colorado License plate, BGEB94.

4. Detectives observed the driver to be Jose Munoz-Miranda and Jovana “China” Robles-Garcia was the passenger.
5. Detectives found license plate BGEB94 to be a misused plate, as it was registered to a GMC Sierra, and learned from the plate owner that front plate of his GMC Sierra was recently stolen.
6. Detectives followed the tan 2001 Chevrolet Silverado to a taco truck near 1st Avenue and Federal Boulevard, in Denver, Colorado, and Jovana Robles-Garcia proceeded to drive the truck with Munoz-Miranda now the passenger.
7. Robles-Garcia drove the Silverado to a hotel located at 11400 East Peakview Avenue, in Centennial, Colorado, where she circled the parking lot once, a maneuver known to detectives as an act of counter-surveillance to look for law enforcement, and parked the truck in the hotel lot.
8. Detectives had determined that the Silverado was Mr. Jaschke’s stolen truck based on distinctive stickers seen on the truck, compared to previous LPR photos of the truck. Robles-Garcia and Munoz-Miranda were both arrested.
9. Jovana Robles-Garcia was mirandized and agreed to speak to the detectives. She admitted to knowing that the vehicle was stolen and had possessed the truck for 2 to 3 days.
10. Jovana admitted to knowing Yulian Zamarron-Baylon “Fresa,” and was planning on being a godmother to Fresa’s child. She had also bought and sold stolen vehicles to Fresa in the past.

COUNT THREE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibits 102,104,114-117)**

Between and including October 18, 2024 and November 4, 2024, in the State of Colorado, **Sabino Munoz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Dominic Diorio, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or removed the motor vehicle from this state, and/or used or attempted to use the motor vehicle in the commission of the crime of Motor Vehicle Theft as set forth in section 18-4-409(3),(6)(b), C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Three are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about October 18, 2024, unidentified enterprise members stole a white 2018 Ford F150 Limited from Dominic Diorio. The vehicle was stolen from a parking lot at the Rocky Mountain Metropolitan Airport located at 11755 Airport Way in Broomfield, Colorado. The value of the stolen vehicle was approximately \$23,790.00.
3. On or about November 1, 2024, Mr. Diorio's white F150 was observed on Rocky Mountain Metropolitan Airport surveillance video as it arrived in the parking lot with at least two enterprise members. The F150 parked next to a white 2022 Ford F250 Crew Cab for about one minute. Enterprise members later returned to the lot and stole the F250.
4. The Attorney General's Office in Juarez, Chihuahua, Mexico, took custody of Mr. Diorio's stolen white Ford F150 on or about November 4, 2024. The vehicle was returned to the United States on February 27, 2025.
5. On or about November 4, 2024, enterprise member Sabino Munoz exchanged text messages with enterprise member, Primo Borjon-Ramirez during which he explained that the "Limited" was seized at the Unites States-Mexico border.

COUNT FOUR
MOTOR VEHICLE THEFT IN THE THIRD DEGREE - OBTAIN OR CONTROL,
C.R.S. 18-4-409(4)(A) [F5] 0804M
(Grand Jury Exhibits 103-106)

Between and including November 1, 2024 and November 2, 2024, in the State of Colorado, **Sabino Munoz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Matthew Copeland, and knew or reasonably should have known that it was without authorization or was by threat or deception; in violation of section 18-4-409(4)(a),(6)(c), C.R.S.

The facts supporting Count Four are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On and between November 1, 2024 and November 2, 2024, unidentified enterprise members stole a white 2022 Ford F250 Crew Cab from Matthew Copeland. The vehicle was stolen from a parking lot at the Rocky Mountain Metropolitan Airport located at 11755 Airport Way in Broomfield, Colorado. The value of the stolen vehicle was approximately \$41,363.00.
3. Enterprise member Sabino Munoz was involved in the possession of the stolen vehicle. On or about November 2, 2024, approximately 2.5 hours after the theft, Mr. Munoz captured a photo of the vehicle with his cell phone.
4. Mr. Copeland's Ford F250 has not been recovered.

COUNT FIVE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibits 108, 110-112, 127-129)

Between and including November 11, 2024 and November 12, 2024, in the State of Colorado, **Sabino Munoz** and **Primo Borjon-Ramirez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Tyler Fox, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Five are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 11, 2024, unidentified enterprise members stole a white 2019 Ford F150 Raptor Crew Cab from Tyler Fox. The vehicle was stolen from a parking lot at the Rocky Mountain Metropolitan Airport located at 11755 Airport Way in Broomfield, Colorado. The value of the stolen vehicle was approximately \$41,895.00.
3. On November 12, 2024, members of the CATPA Metro Auto Theft Task Force (“CMATT”) located Mr. Fox’s Ford Raptor as it was travelling southbound on Interstate 25 in Denver, Colorado. CMATT detectives successfully grappled the vehicle on Interstate 25 at about mile marker 174, in Larkspur, Colorado, and identified the driver as enterprise member Primo Borjon-Ramirez.
4. Mr. Fox’s Ford Raptor was traveling with a black Ford F250 being driven by enterprise member Sabino Munoz.
5. During an interview, Mr. Borjon-Ramirez told detectives he was with enterprise member Sabino Munoz when Mr. Munoz stole the Ford Raptor. Mr. Borjon-Ramirez stated that he drove the Ford Raptor and Mr. Munoz drove a black Ford F250. Mr. Borjon-Ramirez told detectives he had traveled from Mexico and was being paid to drive the truck from Colorado to Mexico.
6. Enterprise members caused over \$1,000.00 damage to the driver’s side window and electronic systems of the Ford Raptor.

COUNT SIX

ATTEMPTED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3);

18-2-101 [F5] 0804PA

(Grand Jury Exhibits 109, 112)

On or about November 11, 2024, in the State of Colorado, **Sabino Munoz**, by engaging in conduct constituting a substantial step toward the commission of Motor Vehicle Theft in the Third Degree, unlawfully, feloniously, and knowingly attempted to obtain, exercise control over, receive, or retain the motor vehicle of Calvin Drey, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Six are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 11, 2024, unidentified enterprise members attempted to steal a white 2022 Ford F150 Lariat Crew Cab from Calvin Drey. The attempted theft of this vehicle occurred in a parking lot at the Rocky Mountain Metropolitan Airport located at 11755 Airport Way in Broomfield, Colorado.
3. A small hole was found to have been drilled into the driver's side window, in an apparent attempt to stage the vehicle to be stolen. The hole enabled the door to be unlocked. Detectives learned during their investigation from statements made by Primo Borjon-Ramirez and admissions from Sabino Munoz, that Sabino Munoz often used this distinctive method to open truck doors and had learned it from the movie, *Gone in 60 seconds*.
4. Enterprise members caused over \$1,000.00 damage to driver's side window during the course of the attempted theft of the Ford F150.

COUNT SEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P (Grand Jury Exhibits 110, 131-132)

Between and including November 8, 2024 and November 16, 2024, in the State of Colorado, **Sabino Munoz** and **Primo Borjon-Ramirez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Christopher Anderson – RTC Wyoming, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, and/or used or attempted to use the motor vehicle in the commission of the crime of Motor Vehicle Theft as set forth in section 18-4-409(3), C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Seven are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On and between November 8, 2024 and November 11, 2024, unidentified enterprise members stole a black 2017 Ford F250 Lariat Super Duty from Christopher Anderson and his business Restoration and Renovation in Wyoming. The vehicle was stolen from the west economy parking lot at the Denver International Airport located at 8148 Pena Boulevard in Denver, Colorado. The value of the stolen vehicle was approximately \$41,725.00.
3. Enterprise member Sabino Munoz was involved in the possession of the stolen vehicle. On or about November 9, 2024, Mr. Munoz captured a photo of the vehicle with his cell phone. In the photo, enterprise member Primo Borjon-Ramirez is seated in the passenger seat.
4. Enterprise member Primo Borjon-Ramirez is observed operating Mr. Anderson's vehicle on Rocky Mountain Metropolitan Airport surveillance video on November 11, 2024.
5. On and between November 11, 2024 and November 12, 2024, enterprise member Sabino Munoz exchanged text messages with enterprise member Primo Borjon-Ramirez. In those messages Mr. Munoz directs Mr. Borjon-Ramirez to drive to a yard at 12563 County Road 6 in Brighton, Colorado where he can fill the vehicle up with diesel fuel. The location is a storage yard utilized by enterprise member Geomar Gomez-Hernandez. Mr. Anderson's black Ford F250 is a diesel vehicle.

6. On November 12, 2024, members of the CATPA Metro Auto Theft Task Force (“CMATT”) observed Mr. Anderson’s black F250, driven by Sabino Munoz, traveling southbound on Interstate 25 in Denver, Colorado in tandem with Mr. Fox’s white Ford Raptor.
7. During an interview on November 12, 2024, Mr. Borjon-Ramiez told detectives he was with enterprise member Sabino Munoz when Mr. Munoz used Mr. Anderson’s black Ford F250 to drive to the Rocky Mountain Metropolitan Airport to steal other vehicles.
8. The Longmont Police Department recovered Mr. Anderson’s stolen black Ford F250 on or about November 19, 2024, in the area of 1708 Main Street in Longmont, Colorado.
9. Longmont Police officers identified the driver of Mr. Anderson’s black Ford F250 as enterprise member Fernando Campos. Mr. Campos was intoxicated and initially lied about his identity.
10. Enterprise members retained possession or control over the black Ford F250 from November 9, 2024 through November 19, 2024. When the vehicle was recovered on November 19, 2024, it was displaying misused a Colorado license plate, the assigned Wyoming license plate was located under the driver’s seat.
11. Enterprise members caused over \$1,000.00 damage to the door lock mechanism and ignition switch.

COUNT EIGHT

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 134, 139, 141-143)

On or about November 27, 2024, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Yester Sagastume-Leyva, and Juan Lopez-Sambrano** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of the City of Lakewood, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, and/or **Yester Sagastume-Leyva** used or attempted to use the motor vehicle in the commission of the crime of Vehicular Eluding as set forth in section 18-9-116.5, C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT NINE

VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
(Grand Jury Exhibit 142)

On or about November 27, 2024, in the State of Colorado, **Yester Sagastume-Leyva**, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude Investigator Voss, a peace officer also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

COUNT TEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 135-136, 141, 144)

On or about November 27, 2024, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Yester Sagastume-Leyva, and Juan Lopez-Sambrano** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Merrell Short, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, and/or **Juan Lopez-Sambrano** used or attempted to use the motor vehicle in the commission of the crime of Vehicular Eluding as set forth in section 18-9-116.5, C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT ELEVEN
VEHICULAR ELUDING, C.R.S. 18-9-116.5 [F5] 27162
(Grand Jury Exhibit 142)

On or about November 27, 2024, in the State of Colorado, **Juan Lopez-Sambrano**, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude Investigator Voss, a peace officer also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

COUNT TWELVE
MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 137-138, 141, 145)

Between and including November 23, 2024, and November 27, 2024, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Yester Sagastume-Leyva, and Juan Lopez-Sambrano** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Rodrigo Garcia-Diaz, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, and/or used or attempted to use the motor vehicle in the commission of the crimes of Vehicular Eluding as set forth in section 18-9-116.5, C.R.S. and/or Motor Vehicle Theft as set forth in section 18-4-409; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTEEN
ATTEMPTED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3);
18-2-101 [F5] 0804PA
(Grand Jury Exhibits 140)

On or about November 27, 2024, in the State of Colorado, **Sabino Munoz, Yulian Zamarron-Baylon, Yester Sagastume-Leyva, and Juan Lopez-Sambrano**, by engaging in conduct constituting a substantial step toward the commission of Motor Vehicle Theft in the Second Degree, unlawfully, feloniously, and knowingly attempted to obtain, exercise control over, receive, or retain the motor vehicle of Connor Knudsen, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or attempted to cause one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course

of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), and 18-2-101, C.R.S.

The facts supporting Counts Eight through Thirteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 27, 2024, enterprise member Sabino Munoz stole a white 2018 Ford F150 Raptor owned by the City of Lakewood. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$37,495.00.
3. On or about November 23, 2024, unidentified enterprise members stole a black 2010 Jeep Grand Cherokee SRT8 from Rodrigo Garcia-Diaz. The vehicle was stolen from the area of 900 Platte Drive in Fort Lupton, Colorado. The value of the stolen vehicle was approximately \$10,400.00.
4. The Ford Raptor was a police “bait” vehicle and was equipped with interior audio and video monitoring and recording equipment as well as a GPS monitor. On November 27, 2024, at about 3:00 a.m., the bait car alerts indicated that the driver’s door had been opened. Interior cameras revealed an unidentified enterprise member in the driver’s seat of the vehicle attempting to reprogram the vehicle. Detectives arrived in the area and observed Garcia-Diaz’s black Jeep Cherokee and Mr. Short’s silver Ford F250 departing the airport on Earhart Road. Additional interior camera footage shows enterprise member, Sabino Munoz, reprogramming the Raptor, and enterprise member Yester Segastume-Leyva driving the Raptor after it was stolen.
5. In an interview with detectives, enterprise member Sabino Munoz admitted to entering the white Ford Raptor to reprogram the vehicle and successfully reprogramming the Raptor in order to steal it.
6. On or about November 27, 2024, unidentified enterprise members attempted to steal a red 2021 Ram 1500 Rebel from Connor Knudsen. The attempted theft of this vehicle occurred in a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the vehicle was approximately \$39,561.00.
7. Enterprise members caused over \$1,000.00 damage to driver’s side window during the course of the attempted theft of the Ram 1500.
8. On or about November 27, 2024, unidentified enterprise members stole a silver 2022 Ford F250 Super Duty Tremor from Merrell Short. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$41,363.00.

9. Mr. Garcia-Diaz's Capital One credit card was used at several locations after the theft of his Jeep SRT8 including a McDonald's, a Walmart, and an O'Reilly's Auto Parts store in north Denver. Surveillance video and still images from the O'Reilly's Auto Parts store showed enterprise member, Yulian Zamarron-Baylon, and an unidentified enterprise member purchasing window tint, motor oil, and a dump pack for a battery on November 23, 2024.
10. Enterprise members caused over \$1,000.00 damage to the drive train, door locking mechanism and handle, and electronic systems of the City of Lakewood's 2018 white Ford F150 Raptor.
11. Enterprise members caused over \$1,000.00 damage to the drive train and electronic systems of Mr. Short's 2022 silver Ford F250 Super Duty Tremor.
12. The bait Raptor, Mr. Short's silver F250, and Mr. Garcia-Diaz's black Jeep SRT8, traveled in tandem to a field behind a large barn located at 13630 E. 120th Ave in Brighton, Colorado. Enterprise members Sabino Munoz, Juan Lopez-Sambrano, Yester Sagastume-Leyva, and Yulian Zamarron-Baylon are observed loitering around the vehicles and disconnecting electronics, including the GPS, in the bait Raptor. The interior cameras revealed that the suspects discovered and disabled the bait car computer system, preventing detectives from being able to control the bait Raptor.
13. When detectives attempted contact, the suspects fled the area in the stolen vehicles with enterprise members Sabino Munoz and Yulian Zamarron-Baylon in Mr. Garcia-Diaz's Jeep SRT8, enterprise member Yester Sagastume-Leyva in the bait Raptor, and enterprise member Juan Lopez-Sambrano in Mr. Short's silver F250.
14. Mr. Garcia-Diaz's Jeep SRT8 drove through a field, around police vehicles, and fled westbound on 120th Ave.
15. The bait Raptor and Mr. Short's silver F250 fled eastbound on 120th Ave. and into a field where the bait Raptor attempted to drive through a barbed wire fence and was rendered immobile at which point enterprise member, Yester Sagastume-Leyva exited the driver's seat of the bait Raptor and entered the passenger seat of the silver F250. The F250 attempted to flee but detectives were able to successfully grapple the vehicle. Enterprise member Juan Lopez-Sambrano exited the driver's seat, enterprise member Yester Sagastume-Leyva exited the passenger seat.
16. On November 27, 2025, detectives located Mr. Garcia-Diaz's black Jeep SRT8 at 9451 Welby Rd., in Thornton, Colorado. The occupants of the Jeep SRT8 abandoned the vehicle and fled the area in a Hyundai sedan.
17. Enterprise members retained possession or control over the black Jeep SRT8 from November 23, 2024 through November 27, 2024. When the vehicle was recovered on November 27, 2024, it was displaying a fictitious Colorado license plate. Enterprise

members caused over \$1,000.00 damage to the door locking mechanism and handle of Mr. Garcia-Diaz's 2010 black Jeep Grand Cherokee SRT8.

18. CMATT detectives recovered the City of Lakewood's stolen white Ford Raptor on or about November 27, 2024, in the area of 120th Avenue and Chambers Road in unincorporated Adams County, Colorado.
19. CMATT detectives recovered Mr. Short's stolen silver Ford F250 Tremor on or about November 27, 2024, in the area of 120th Avenue and Chambers Road in unincorporated Adams County, Colorado.
20. CMATT detectives recovered Mr. Garcia-Diaz's stolen silver Ford F250 Tremor on or about November 27, 2024, in the area of 9451 Welby Road in Thornton, Colorado.

COUNT FOURTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 146)

Between and including November 23, 2024 and December 1, 2024, in the State of Colorado, **Sabino Munoz** and **Trinadette Rangel** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Casey Depoy, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Fourteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 23, 2024 and December 1, 2024, unidentified enterprise members stole a grey 2015 Chrysler 300S AWD from Case Depoy. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$12,175.00.
3. In an interview with Detectives, enterprise member Sabino Munoz explained that enterprise member Trinadette Rangel wanted to steal a vehicle so he, Mr. Munoz, assisted her with reprogramming a Chrysler 300. He explained that after they stole the Chrysler 300, Ms. Rangel kept the vehicle, and he does not know where the vehicle is.
4. Mr. Depoy's Chrysler 300S has not been recovered.

COUNT FIFTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 147-148)

Between and including October 9, 2024 and November 22, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Thomas Washburn, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or and attempted to alter or remove or altered or removed the vehicle identification number, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Fifteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between October 9, 2024 and October 21, 2024, unidentified enterprise members stole a blue 2022 Ford F250 Super Duty Lariat from Thomas Washburn. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$41,363.00.
3. Enterprise member Sabino Munoz was in possession of a photo of a VIN query pertaining to Mr. Washburn's 2022 Ford F250 after it was stolen and before the theft had been reported. Further Mr. Munoz was in possession of a photo of a forged Colorado vehicle registration card for the VIN number associated to Mr. Washburn's vehicle.
4. Mr. Washburn's blue 2022 Ford F250 has not been recovered.

COUNT SIXTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibits 149-150)

Between and including October 25, 2024 and November 7, 2024, in the State of Colorado, **Sabino Munoz** and **Qurino Vialpando** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Olivia Willrett, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or used or attempted to use the motor vehicle in the commission of the crime of Theft as set forth in section 18-4-401(1), C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Sixteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between October 25, 2024 and November 3, 2024, unidentified enterprise members stole a red 2022 Ford F250 Supercab from Olivia Willrett. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$41,363.00.
3. On November 3, 2024, enterprise member Sabino Munoz captured a photo of Ms. Willrett's Ford F250 in front of his residence after it was stolen, but shortly before it was reported stolen.
4. Ms. Willrett's stolen red Ford F250 was recovered in Durango, Colorado on November 7, 2024. Inside the F250, officers located a debit card issued to enterprise member Qurino Vialpando.
5. At the time Ms. Willrett's red F250 was recovered, a stolen trailer carrying a stolen Bobcat skid-steer. The trailer and Bobcat were stolen from a Comfort Inn motel in Durango, Colorado on November 5, 2024.
6. In December of 2024, enterprise member Yulian Zamarron-Baylon told detectives that Mr. Munoz sold the red F250 to Mr. Vialpando.

COUNT SEVENTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 151)

Between and including November 7, 2024 and November 15, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Brian Nugent, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT EIGHTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 152)

Between and including November 13, 2024 and December 21, 2024, in the State of Colorado, **Sabino Munoz**, and **Trinadette Rangel** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Gary Friedenber, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Counts Seventeen and Eighteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 7, 2024 and November 17, 2024, unidentified enterprise members stole a maroon 2016 Ford F150 King Ranch from Brian Nugent. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$25,938.00.
3. On or between November 7, 2024 and November 15, 2024, unidentified enterprise members stole a red 2021 Jeep Wrangler from Gary Friedenber. The vehicle was stolen from a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$57,915.00.
4. Enterprise member Sabino Munoz was in possession of a video depicting Mr. Nugent's F150 captured after it was stolen and before the theft had been reported. Mr. Friedenber's Jeep Wrangler can be seen in the same video. Mr. Munoz was also in possession of a photos of Mr. Friedenber's Jeep Wrangler captured by Mr. Munoz's phone on November 15, 2024, after it was stolen.

5. Mr. Friedenbergs red Jeep Wrangler was recovered on December 21, 2024 in Federal Heights, Colorado at enterprise member Sabino Munozs residence.
6. On December 21, 2024, CMATT detectives observed enterprise member Trinadette Rangel removing items from the Jeep Wrangler and sitting in the drivers seat preparing to leave before fleeing on foot after she was alerted to law enforcement presence.
7. Mr. Nugent's maroon Ford F150 has not been recovered.

COUNT NINETEEN

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5) [F5] 08A1F
(Grand Jury Exhibit 153)

Between and including November 7, 2024, and November 20, 2024, in the State of Colorado, **Sabino Munoz**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2007 Yamaha YFM700 Raptor ATV, a 2018 Yamaha YZF ATV, and a 2020 Echo Trailer, with the combined value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Mena Medina permanently of their use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

The facts supporting Count Nineteen are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 7, 2024, unidentified enterprise members stole a white 2007 Yamaha YFM700 Raptor ATV, a white and red 2018 Yamaha YZF ATV, and a black 2020 Echo trailer from Mena Medina. The trailer carrying the two ATVs was stolen from 2209 Squires Street in Longmont, Colorado. The aggregate value of the stolen vehicles and trailer was approximately \$13,500.00.
3. Enterprise member Sabino Munoz was in possession of photos depicting Ms. Medina's white 2007 Yamaha Raptor ATV captured November 20, 2024, after it was stolen. Additional photos captured with Mr. Munoz's cell phone show him seated on one of the stolen ATVs.
4. Ms. Medina's white 2007 Yamaha ATV, her white and red 2018 Yamaha ATV, and her black 2020 Echo trailer have not been recovered.

COUNT TWENTY

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 154)

Between and including November 6, 2024 and November 11, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Matthew Barnett, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or removed the motor vehicle from this state, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Twenty are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 6, 2024 and November 9, 2024, unidentified enterprise members stole a grey 2020 Ford F150 from Matthew Barnett. The vehicle was stolen from the area of 1090 South High Street in Denver, Colorado. The value of the stolen vehicle was approximately \$55,745.00. In addition, there was a tent mounted to the top and a rack on the back of the truck that contained fly fishing and camping gear, valued at approximately \$20,000.00.
3. Enterprise member Sabino Munoz captured images of Mr. Barnett's F150 with his cellphone after the vehicle was stolen.
4. Mr. Barnett's grey Ford F150 was recovered on November 11, 2024 in Las Cruces, New Mexico. Enterprise members caused over \$1,000.00 damage to the ignition, and driver's side door locking mechanism of Mr. Barnett's Ford F150.
5. Enterprise member Sabino Munoz captured images with his cellphone of a cloth owner's manual holder displaying the VIN of Mr. Barnett's truck on November 11, 2024 after the vehicle was recovered in New Mexico.

COUNT TWENTY-ONE
MOTOR VEHICLE THEFT IN THE THIRD DEGREE - OBTAIN OR CONTROL,
C.R.S. 18-4-409(4)(A) [F5] 0804M
(Grand Jury Exhibit 155)

Between and including November 13, 2024 and November 14, 2024, in the State of Colorado, **Sabino Munoz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Landon Edgington, and knew or reasonably should have known that it was without authorization or was by threat or deception; in violation of section 18-4-409(4)(a),(6)(c), C.R.S.

The facts supporting Count Twenty-One are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 13, 2024 and November 14, 2024, unidentified enterprise members stole a black 2018 Ford F250 from Landon Edgington. The vehicle was stolen from the west economy parking lot at the Denver International Airport located at 8148 Pena Boulevard in Denver, Colorado. The value of the stolen vehicle was approximately \$46,710.00.
3. According to airport surveillance, the F250 was captured on video exiting the lot on November 14, 2024, at approximately 5:30am. Enterprise member Sabino Munoz captured images of Mr. Edgington's F250 with his cellphone approximately 45 minutes after the vehicle was stolen.
4. Mr. Edgington's black Ford F250 has not been recovered.

COUNT TWENTY-TWO

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 156-157)

Between and including November 11, 2024 and November 18, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Leprino Foods, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Twenty-Two are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 11, 2024 and November 12, 2024, unidentified enterprise members stole an orange 2003 Hummer H2 from Leprino Foods. The vehicle was stolen from Leprino Aviation Company located at 9566 Metro Airport Avenue in Broomfield, Colorado. The value of the stolen vehicle was approximately \$16,500.00.
3. Enterprise member Sabino Munoz used his cell phone to query the VIN from the Hummer on November 11, 2024, 11:20 PM, around the time the Hummer was stolen from Leprino Aviation.
4. Leprino Foods' orange Hummer H2 was recovered on November 18, 2024 in Aurora, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, and driver's side door locking mechanism of the orange Hummer.

COUNT TWENTY-THREE

ATTEMPTED MOTOR VEHICLE THEFT IN THE THIRD DEGREE, C.R.S. 18-4-409(4);

18-2-101 [F6] 0804MA

(Grand Jury Exhibits 159)

Between and including October 18, 2024 and November 4, 2024, in the State of Colorado, **Sabino Munoz**, by engaging in conduct constituting a substantial step toward the commission of Motor Vehicle Theft in the Third Degree, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Dylan Searle, and knew or reasonably should have known that it was without authorization or was by threat or deception; in violation of section 18-4-409(4)(a),(6)(c), and 18-2-101, C.R.S.

The facts supporting Count Twenty-Three are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about November 14, 2024, Sabino Munoz attempted to steal a white 2021 Ford F150 from Dylan Searle. The attempted theft occurred in a parking lot at the Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado.
3. The vehicle displayed damage including a hole drilled through the driver's side door window directed at the inside door lock mechanism, a distinctive method to gain entry into a vehicle known to be utilized by Munoz. The estimated cost of the damage was \$350.00.
4. Several items had been taken from Mr. Searle's F150 including a Glock 17 9mm handgun, multiple Milwaukee power tools, portable toolboxes, hand tools, cordless tools, and electrical tools. The total estimated value of the stolen items was \$11,310.00.

COUNT TWENTY-FOUR

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 160-162)

Between and including November 16, 2024 and November 29, 2024, in the State of Colorado, **Yester Sagastume-Leyva** and **Yulian Zamarron-Baylon** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Kameron Coby, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Twenty-Four are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between November 16, 2024 and November 20, 2024, unidentified enterprise members stole a maroon 2001 Chevrolet Silverado from Kameron Coby. The vehicle was stolen from Northern Colorado Regional Airport located at 4900 Earhart Road in Loveland, Colorado. The value of the stolen vehicle was approximately \$8,100.00.
3. Mr. Coby's maroon Silverado was recovered on November 29, 2024, in Aurora, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, the steering column, and the driver's side door locking mechanism of Mr. Coby's Ford F150.
4. Upon recovery fingerprints were collected from the rear-view mirror and the exterior of the driver door of the maroon Silverado, those prints were identified as belonging to enterprise member Yester Sagastume-Leyva.
5. Upon recovery DNA was collected from the steering wheel of the maroon Silverado, those prints were identified as belonging to enterprise member Yulian Zamarron-Baylon.

COUNT TWENTY-FIVE

ATTEMPTED MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3);

18-2-101 [F5] 0804PA

(Grand Jury Exhibits 163)

On or about December 20, 2024, in the State of Colorado, **Sabino Munoz**, by engaging in conduct constituting a substantial step toward the commission of Motor Vehicle Theft in the Second Degree, unlawfully, feloniously, and knowingly attempted to obtain, exercise control over, receive, or retain the motor vehicle of Allen Meredith, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of attempting to obtain control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), and 18-2-101, C.R.S.

The facts supporting Count Twenty-Five are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 20, 2024, enterprise member Sabino Munoz attempted to steal a white 2023 Ram 1500 TRX from Allen Meredith. The attempted theft occurred at the Embassy Suites Hotel located at 4705 Clydesdale Parkway in Loveland, Colorado.
3. Enterprise members caused over \$1,000.00 damage to the driver's side door handle and the rear window of the Ram 1500 TRX.
4. Witnesses to the left observed a male exit Mr. Meredith's TRX through the back window and flee in a black Jeep Cherokee. The suspect left behind a key fob, and some tools.
5. Enterprise member Trinadette Rangel told CMATT detectives that enterprise member Sabino Munoz sent her messages in December of 2024 about trying to steal the white Ram TRX but being unable to reprogram it.

COUNT TWENTY-SIX

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 164)

Between and including December 12, 2024 and December 15, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of NU Car Rentals, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Twenty-Six are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or between December 12, 2024 and December 13, 2024, unidentified enterprise members stole a silver 2023 Jeep Gladiator from NU Car Rentals. The vehicle was stolen from the Westin Hotel located at 10600 North Westminster Boulevard in Westminster, Colorado. The value of the stolen vehicle was approximately \$44,788.00.
3. NU Car Rental's silver Jeep Gladiator was recovered on December 15, 2024 in the area of 9310 Lillian Lane in Thornton, Colorado.
4. At the time of recovery, two men, Javier Vargas-Ruiz and Ivan Cano-Gutierrez were in possession of the Jeep Gladiator. Mr. Cano-Gutierrez was in possession of less than one gram of Methamphetamine. Mr. Vargas-Ruiz was in possession of a generic key fob which was programmed to start the Jeep Gladiator.
5. Mr. Cano-Gutierrez told detectives that he received the Jeep Gladiator a few hours prior from a friend of his named "Sabino" and was able to describe where "Sabino" lived and identify the residence as 9140 Fayette Street. CMATT detectives know this to be the residence of enterprise member Sabino Munoz.
6. Enterprise member Trinadette Rangel told CMATT detectives that enterprise member Sabino Munoz sent her messages in December of 2024 which included pictures of a Jeep Gladiator that he stated he had acquired. Ms. Rangel stated that Mr. Munoz told her he had given the Jeep to a male named "Ivan" who was supposed to drive the Jeep to Mexico.

COUNT TWENTY-SEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 165-166)

Between and including December 6, 2024, and December 21, 2024, in the State of Colorado, **Sabino Munoz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Marc Rouanne, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Twenty-Seven are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 6, 2024, unidentified enterprise members stole a grey 2022 Jeep Wrangler from Marc Rouanne. The vehicle was stolen from the east economy parking lot at the Denver International Airport located at 8148 Pena Boulevard in Denver, Colorado. The value of the stolen vehicle was approximately \$61,090.00.
3. On December 20, 2024, enterprise member Sabino Munoz was observed driving the grey Jeep Wrangler to and from his residence at 9140 Fayette Street in Federal Heights, Colorado.
4. The Colorado license plate, AVL-N21, assigned to Mr. Rouanne's grey Jeep Wrangler, and the Colorado registration for this vehicle, were recovered from the bedroom of enterprise member Sabino Munoz.
5. Mr. Rouanne's grey Jeep Wrangler was recovered on December 21, 2024, in the area of 1820 Hopkins Driver in unincorporated Adams County, Colorado. When it was recovered, Mr. Rouanne's Jeep Wrangler was being driven by Christian Acosta-Garcia who stated he purchased the vehicle from enterprise member Sabino Munoz.

COUNT TWENTY-EIGHT
FORGERY, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibits 167-170)

On or about December 21, 2024, in the State of Colorado, **Sabino Munoz** with the intent to defraud a person or persons to the Grand Jury unknown, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: State of Colorado Motor Vehicle titles, officially issued or created by the Colorado Department of Revenue, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT TWENTY-NINE
FORGERY, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibits 167-170)

On or about December 21, 2024, in the State of Colorado, **Sabino Munoz** with the intent to defraud a person or persons to the Grand Jury unknown, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument that was or purported to be, or that was calculated to become or to represent if completed, a written instrument, namely: State of Colorado Motor Vehicle registration, officially issued or created by the Colorado Division of Motor Vehicles, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT THIRTY
POSSESSION OF BURGLARY TOOLS, C.R.S. 18-4-205 [M2] 06053
(Grand Jury Exhibits 167-170)

On or about December 21, 2024, in the State of Colorado, **Sabino Munoz** unlawfully possessed an explosive, tool, instrument, or other article, namely: an Xtool vehicle programming device, an Autel vehicle programming device, and miscellaneous motor vehicle key fobs, adapted, designed, or commonly used for committing or facilitating the commission of an offense involving forcible entry into premises or theft by physical taking, and the defendant intended, or knew another intended, to use the thing possessed in the commission of such an offense; in violation of section 18-4-205, C.R.S.

The facts supporting Counts Twenty-Eight through Thirty are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.

2. On or about December 21, 2024, detectives conducted a search at the residence of enterprise member Sabino Munoz located at 9140 Fayette Street in Federal Heights, Colorado.
3. In the bedroom belonging to Mr. Munoz, detectives located two fraudulent Colorado vehicle titles bearing control numbers E8596601 and E8813930, and listing Sabino Munoz as the title holder with an address at 9595 Pecos St Lot 443 in Thornton, CO. Detectives also located two fraudulent Colorado vehicle registrations listing Sabino Munoz as the registered owner, and a fraudulent vehicle insurance card listing Sabino Munoz as the driver.
4. Also in the bedroom belonging to Mr. Munoz, detectives located an Xtool and an Autel vehicle diagnostic/key programming tool, as well as several key fobs.
5. Detectives, based on their training and experience, know that these devices are used to access the computer control systems of vehicles, without authorization, to gain control of the targeted vehicles and allow them to start and drive away in the stolen vehicles. Key fobs are programmed to create unauthorized duplicate keys to vehicles to allow thieves access to vehicles to steal them.

COUNT THIRTY-ONE

SECOND DEGREE BURGLARY - DWELLING, C.R.S. 18-4-203(1),(2)(B)(I) [F3] 06036
(Grand Jury Exhibit 189)

On or about August 8, 2024, in the State of Colorado, **Jovana Robles-Garcia** and **Jonathan Cisneros** unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Todd Millis, located at 3402 Holden Lane, Johnston, Colorado with the intent to commit therein the crime of Motor Vehicle Theft; in violation of section 18-4-203(1),(2)(b)(I), C.R.S.

COUNT THIRTY-TWO

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 189)

On or about August 8, 2024, in the State of Colorado, **Jovana Robles-Garcia** and **Jonathan Cisneros** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Todd Millis, and knew or reasonably should have known it was without authorization, or by threat or deception, in the course of receiving, or in the course of retaining the motor vehicle, and/or used or attempted to use the motor vehicle in the commission of the crime of Unauthorized Use of a Financial Transaction Device-Under \$300, as set forth in section 18-5-702(1),(3)(C) C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-THREE

POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER, C.R.S. 18-12-108(1) [F5]
(Grand Jury Exhibit 189)

On or about August 8, 2024, in the State of Colorado, **Jonathan Cisneros** unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: a handgun, and **Jonathan Cisneros** was previously convicted of a felony, namely: Felony Menacing-Real/Simulated Weapon, as defined by Section 18-3-206(1)(a)/(b), C.R.S., in Denver District Court on July 15, 2022, under case number 2021CR6021; in violation of section 18-12-108(1), C.R.S.

COUNT THIRTY-FOUR

MOTOR VEHICLE THEFT IN THE THIRD DEGREE - OBTAIN OR CONTROL,
C.R.S. 18-4-409(4)(A) [F5] 0804M
(Grand Jury Exhibit 189-190)

Between and including August 7, 2024 and August 8, 2024, in the State of Colorado, **Yester Sagastume-Leyva**, unlawfully, feloniously, and knowingly obtained or exercised control over the

motor vehicle of Benjamin Grajeda, and knew or reasonably should have known that it was without authorization or was by threat or deception; in violation of section 18-4-409(4)(a),(6)(c), C.R.S.

COUNT THIRTY-FIVE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 191)

Between and including July 20, 2024 and August 8, 2024, in the State of Colorado, **Jovana Robles-Garcia** and **Jonathan Cisneros** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Diana Cordova, and knew or reasonably should have known it was without authorization, or by threat or deception, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-SIX

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 192)

Between and including June 25, 2024 and August 8, 2024, in the State of Colorado, **Jose Munoz-Miranda** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Jessika Lopez, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offenses alleged in Counts Thirty-One through Thirty-Six were committed in the following manner:

1. As to Counts Thirty-One and Thirty-Two, on August 8, 2024, at approximately 4:30am, Jonathan Cisneros, without permission, entered the unlocked BMW SUV of Todd Millis, which was parked in the driveway of his home, located at 3402 Holden Lane, Johnstown, Colorado. Cisneros was assisted by Jovana Robles-Garcia, who had driven him there in a stolen 2014 Ford Edge, further detailed below concerning Count Thirty-Five, and also acted as a lookout.
2. As Robles-Garcia watched from the stolen 2014 Ford edge, Jonathan Cisneros found and used the garage door opener inside the BMW to open Mr. Millis' closed garage door. Without authorization, Jonathan Cisneros then went inside Mr. Millis's attached garage and entered his white 2024 GMC Sierra truck, CO License Plate #EIVH53.
3. Mr. Millis briefly awakened around that time, to what sounded like his garage opening, and at approximately 4:50am, he received an email from his OnStar vehicle monitoring

service notifying him of a security risk in his GMC Sierra, likely concerning the unauthorized entry into his truck, but Mr. Millis fell back asleep.

4. Utilizing the GMC's key in the center console, Cisneros started the truck, and drove away in it, as Robles-Garcia followed in the stolen Ford Edge. Also stolen with the truck was Mr. Millis' wallet, found inside the vehicle, containing approximately \$460 in cash and debit/cards, which were used for unauthorized transactions noted below.
5. Mr. Millis found his GMC Sierra was stolen later that morning, around 7:00am, and contacted the police and OnStar.
6. Mr. Millis eventually learned of two unauthorized transactions on his debit card for \$24.70 at Walmart, made by Jovana Robles-Garcia, and for \$1.06 on Amazon Prime. There was also an unauthorized transaction on his American Business bank card for \$1,520.85.
7. Utilizing vehicle location tracking in the GMC Sierra through OnStar, law enforcement determined the truck was driven to the Panorama Hotel, located at 505 Sheridan Boulevard, in Lakewood, Colorado. Detectives from CMATT relocated to the Panorama hotel and began surveilling the hotel's parking lot.
8. Detectives observed Mr. Millis' white GMC Sierra in the lot. Jovana Robles-Garcia was observed walking up the white GMC, talking to its occupants, then entering the truck.
9. As to County Thirty-Four, a blue 1999 GMC Sierra, CO temporary license plate # 6418914, was observed parked next to the white GMC and detectives determined it had been reported stolen out of Thornton, Colorado.
10. The owner of the blue 1999 GMC Sierra, Benjamin Grajedo, reported it stolen the morning of August 8, 2024 when Mr. Grajedo found the 1999 GMC Sierra missing. He last saw the vehicle the evening of August 7, 2024, parked at or around 10101 Jackson Court, Thornton, Colorado. No one else had the keys or permission to drive the truck.
11. CMATT detectives observed both Mr. Milli's white 2024 GMC Sierra and Mr. Grajedo's blue 1999 GMC Sierra drive out of the Panorama Hotel parking lot together.
12. Both stolen trucks were followed by detectives and they observed the blue 1999 GMC Sierra park near 5990 West 5th Avenue, driven by Yester Sagastume-Leyva. Sagastume-Leyva was observed exiting the driver's side door of Mr. Grajedo's blue GMC Sierra and leaving the truck there. He then entered the white 2024 GMC Sierra,

which had pulled up next to him to pick him up, and then the white GMC Sierra left the area with all its occupants.

13. CMATT detectives continued to follow Mr. Millis' white GMC Sierra and decided to stop the vehicle. With the assistance of OnStar, a signal was sent to the GMC Sierra which slowed the vehicle and the detectives utilized a grapple to fully stop the vehicle at the intersection of West 5th Avenue and Sheridan Boulevard in Lakewood, Colorado.
14. When the GMC was immobilized, four occupants exited the vehicle and began fleeing in different directions. All four occupants were eventually detained and identified as Jonathan Cisneros, the white 2024 GMC Sierra driver, Yester Sagastume-Leyva, the blue 1999 GMC Sierra driver, Jovana Robles-Garcia, and Jose Munoz-Miranda.
15. Regarding Count Thirty-Three, upon arrest, Jonathan Cisneros was found to be in possession of a 9mm handgun located within a fanny pack on his person. Cisneros was previously convicted of Felony Menacing-Real/Simulated Weapon, an F5 felony, on July 15, 2022, in Denver District Court, under case number 2021CR6021.
16. Jose Munoz-Miranda was found in possession of a key to room 10 of the Panorama Hotel and detectives relocated back to the hotel to continue the investigation.
17. As to Counts Thirty-Five and Thirty-Six, parked in front of room 10 of the Panorama Hotel were two vehicles detectives learned were also stolen.
18. Concerning Count Thirty-Five, one of the stolen cars was a 2014 Ford Edge with a fictitious plate, BMJG34, attached. The Ford Edge belonged to Diana Cordova, and its actual license plate was a Texas plate, SXC9721, and she reported it being stolen on July 20, 2024.
19. That day, between 12pm and 12:30pm, she had parked it and left it running with the keys in the vehicle while she was inside Metal Works, at 4770 North Ivy Street, Denver, Colorado. Her vehicle was missing when she came back outside at 12:30pm and no one else had been permitted to drive it.
20. Multiple power tools and a jack, with an approximate value of \$2,000, were also inside the Ford Edge and stolen with her vehicle.
21. Regarding Count Thirty-Six, the other discovered stolen vehicle was found to be a purple 1998 Dodge Ram 1500 with a punched-out ignition. The Dodge Ram belonged to Jessika Lopez.
22. Enterprise members caused over \$1,000.00 damage to the ignition mechanism of the Ram 1500.

23. Ms. Lopez reported it stolen from the 3600 block of Wynkoop Street, sometime between 10pm on June 25, 2024, when she last saw it at approximately 8am, and on June 26, 2024, she discovered it was taken without permission.
24. Surveillance footage of the Panorama Hotel parking lot was viewed by detectives and they observed the Dodge Ram park in the hotel lot on August 8, 2024, at approximately 6:15am. The driver, later identified as Jose Munoz-Miranda, was observed exiting the driver's side door of the Ram.
25. Jovana Robles-Garcia was mirandized and agreed to speak to detectives. In summary and not verbatim, she admitted that she had been driving the Ford Edge (Count Thirty-Five) for over a week and, at least for the last few days knew it was stolen. She had driven the Ford Edge around Johnstown with Jonathan Cisneros. She drove the Ford Edge to look for cars with Cisneros, which he would then enter to steal property from within. She was present when Cisneros took Mr. Millis' white 2024 GMC Sierra (Counts Thirty-One and Thirty-Two). She also admitted to using a credit card found in Mr. Millis' GMC Sierra to purchase some clothes from Walmart.
26. Jovana Robles-Garcia admitted to knowing Yulian Zamarron-Baylon as "Fresa." She was originally introduced to Fresa through Jonathan Cisneros, she had helped Fresa in the past, and she had also met with him earlier that day. They were going to buy the purple Dodge Ram from Fresa, which had been driven there by Jose Munoz-Miranda.
27. Robles-Garcia knows Fresa has a shop on East 50th Avenue and Washington Street, where he sells cars, and Jonathan Cisneros and Yester Sagastume-Leyva also help him out.
28. Jonathan Cisneros was mirandized and agreed to speak to detectives. In summary and not verbatim, he admitted to trespassing into a vehicle to open the garage to steal Mr. Millis' white 2024 GMC Sierra. He also admitted be driven up to Johnstown by Jovana Robles-Garcia in the Ford Edge.
29. Jose Munoz-Miranda was mirandized and agreed to speak to detectives. In summary and not verbatim, he admitted to getting the purple Dodge Ram in Thornton from Yulian Zamarron-Baylon, whom he knew as "Fernando." Munoz-Miranda had to use a screwdriver in the ignition to start the Dodge Ram.
30. Munoz-Miranda admitted that Yulian, or "Fernando," was a friend he has known for about 3 months. He admitted to moving cars for Yulian before, in that Yulian would take him to a vehicle and Munoz-Miranda would drive them to another location.

COUNT THIRTY-SEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 194-196)

Between and including October 19, 2024 and January 20, 2025, in the State of Colorado, **Jovana Robles-Garcia** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Samantha Slofkiss, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The facts supporting Count Thirty-Seven are as follows:

1. On October 20, 2024, Samantha Slofkiss reported to Denver Police that her white 2019 Mercedes-Benz GLA 250 was stolen while parked in front of 3920 North Quivas Street, Denver, Colorado. She last saw the vehicle there at 10pm on October 19, 2024. No one had permission to take the vehicle, and Ms. Slofkiss was still in possession of the keys.
2. During the course of an investigation following the January 30, 2025 arrest of Jovana Robles-Garcia (Uncharged Act of Racketeering A, above), Jovana was found in possession of an Android phone and an Apple iPhone which she claimed as her property.
3. Ms. Robles-Garcia consented to a search of her two phones and detectives found pictures on her iPhone of her sitting inside the stolen Mercedes-Benz in the driver's seat, a text message picture of the rear of the vehicle displaying a temporary license plate registered to a trailer instead of the temporary license that had been displayed by the actual owner, and texts under that picture which included the stolen vehicle's VIN. In that text, Jovana provided the text recipient with her name and address, likely in an attempt to create a fake registration in her name for the stolen vehicle.
4. Detectives found on Ms. Roble-Garcia's Android phone an online vehicle report for the stolen Mercedes-Benz, a tactic known to detectives where car thieves search to see if a car has been reported stolen.

COUNT THIRTY-EIGHT

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 171-172)

Between and including December 10, 2024 and December 18, 2024, in the State of Colorado, **Yulian Zamarron-Baylon** and **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Juan Cortez Irazoque, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-NINE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibits 171, 173-174)

Between and including December 12, 2024 and December 18, 2024, in the State of Colorado, **Yulian Zamarron-Baylon** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Michael Dwyer-Cova Tree, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle, and/or used or attempted to use the motor vehicle in the commission of the crime of Criminal Mischief as set forth in section 18-4-501, C.R.S.; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) (F5) [F5] 08A1F
(Grand Jury Exhibit 171, 173-174)

On or between the dates of December 12, 2024 to December 18, 2024, in the State of Colorado, **Yulian Zamarron-Baylon**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, multiple things of value, namely: two 2011 Polaris RZR utility vehicles and a trailer, with the combined value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Scotty Miller permanently of their use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT FORTY-ONE
CRIMINAL MISCHIEF, C.R.S. 18-4-501 [F5] 0901K
(Grand Jury Exhibits 171-174)

On or about December 18, 2024, in the State of Colorado, **Yulian Zamarron-Baylon** in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of Petie's RV & Boat Storage, the aggregate damage being five thousand dollars or more but less than twenty thousand dollars; in violation of section 18-4-501(1),(4)(e), C.R.S.

COUNT FORTY-TWO
POSSESSION OF BURGLARY TOOLS, C.R.S. 18-4-205 [M2] 06053
(Grand Jury Exhibits 171-174)

On or about December 18, 2024, in the State of Colorado, **Yulian Zamarron-Baylon** unlawfully possessed an explosive, tool, instrument, or other article, namely: a screwdriver, pliers, pruning shears, a flash light, handheld radios, and miscellaneous motor vehicle key fobs, adapted, designed, or commonly used for committing or facilitating the commission of an offense involving forcible entry into premises or theft by physical taking, and the defendant intended, or knew another intended, to use the thing possessed in the commission of such an offense; in violation of section 18-4-205, C.R.S.

The facts supporting Counts Thirty-Eight through Forty-Two are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about December 10, 2024, enterprise member Yulian Zamarron-Baylon and another unidentified enterprise member(s) stole a grey 2006 Ford F350 from Colorado Transmission and Diesel, and Juan Cortez Irazoque, through the use a white older model Chevrolet Silverado observed on surveillance footage (Exhibit #172). The Ford F350 was stolen from the area of 1021 Denver Avenue in Fort Lupton, Colorado. The value of the stolen vehicle was approximately \$10,992.00.
3. On or about December 12, 2024, enterprise member Yulian Zamarron-Baylon and another unidentified enterprise member stole a white 2007 Ford F450 from Michael Dwyer, and his business, Cova Tree. The vehicle was stolen from the area of 4918 Plum Avenue in Sedalia, Colorado. The value of the stolen Ford F450 was approximately \$5,250.00. Enterprise members caused over \$1,000.00 damage to the driver's side door locking mechanism of Mr. Dwyer's Ford F450.
4. On or about December 12, 2024, enterprise member Yulian Zamarron-Baylon and another unidentified enterprise member stole two red 2011 Polaris RZR utility task vehicles and

the trailer they were stored on from Scotty Miller. The vehicles and trailer were stolen from Petie's RV & Boat Storage located at 5699 Peterson Road in Sedalia, Colorado. The value of the stolen vehicles was approximately \$10,350.00. The value of the trailer was approximately \$3,500.00.

5. On December 12, 2024, at about 2:00am, two large white trucks, a white Chevrolet Silverado and Mr. Dwyer's white Ford F450, rammed the front gate of Petie's RV & Boat Storage, entered the property and stole Mr. Miller's trailer and UTVs. The white Chevrolet Silverado observed in surveillance footage appears identical to the white Chevrolet Silverado used during the theft of the grey Ford F350 (See Exhibits #172 and #174). The damage to the fence was estimated at \$5,000.00.
6. On December 17, 2024, enterprise member Yulian Zamarron-Baylon, is observed driving Mr. Miller's stolen red Polaris RZR UTVs.
7. On December 17, 2024, enterprise member Geomar Gomez-Hernandez is observed driving Mr. Irazoque's grey Ford F350.
8. Mr. Dwyer's white Ford F450 was recovered on December 18, 2024, at the Hampton Inn located at 992 Platte River Boulevard in Brighton, Colorado after enterprise member Yulian Zamarron-Baylon, is observed driving Mr. Dwyer's white Ford F450. Mr. Zamarron-Baylon was in possession of hand tools including a screwdriver, pliers, and pruning shears, a flash light, several key fobs, handheld radios, and a fictitious Monterrey Mexico ID with the name Hector Martinez.
9. Mr. Zamarron-Baylon told CMATT detectives that he stole Mr. Dwyer's white Ford F450 by using a screwdriver to defeat the ignition. Zamarron-Baylon also admitted to learning how to steal that type of Ford truck from Yester "Diego" Sagastume-Layva. He admitted using the F450 to open the gate at 5699 Peterson Road on December 12, 2024, so that Mr. Miller's UTVs and trailer could be stolen. He also told detectives that white Chevrolet Silverado (also seen being used in the Ford F350 theft, per Exhibit 172) was used by "Cocho" to haul the trailer with RZR's away. Zamarron-Baylon also admitted to possessing the F450 from the time it was stolen until the time it was recovered.
10. One of Mr. Millers's red Polaris UTVs was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado.
11. Mr. Irazoque's grey Ford F350 was recovered on December 18, 2024, in the area of 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition and the driver's side door locking mechanism of Mr. Irazoque's Ford F350.
12. Mr. Miller's trailer and one of the red Polaris UTVs have not been recovered.

COUNT FORTY-THREE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 175)

Between and including October 14, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Jose Bastida-Ocampo, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-FOUR

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 176)

Between and including October 14, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Berkenkotter Motors, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-FIVE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 177-179)

Between and including September 25, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez and Yulian Zamarron-Baylon** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Emerson Frames LLC, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the

exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-SIX

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 180)

Between and including July 31, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Levi Watt, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-SEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 181)

Between and including August 13, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Raul Gomora-Ocampo, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-EIGHT

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 182)

Between and including August 9, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Pablo Perez, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more

property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-NINE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 183)

Between and including September 29, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Daniel Vogel, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FIFTY

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 184)

Between and including July 28, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Carlos Perez-Gutierrez, and knew or reasonably should have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FIFTY-ONE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 185)

Between and including September 26, 2024 and December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of Michael Thompson, and knew or reasonably should

have known it was without authorization, or by threat or deception, and/or retained possession or control over the motor vehicle for more than twenty-four hours, and/or caused one thousand dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over, in the exercise of control of the motor vehicle, in the course of receiving, or in the course of retaining the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FIFTY-TWO

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

(Grand Jury Exhibit 186)

On or between the dates of July 1, 2024 to December 18, 2024, in the State of Colorado, **Geomar Gomez-Hernandez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2015 Heartland North Trail 28BRS Travel Trailer, with the combined value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive Carie Mascarello permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

The facts supporting Counts Forty-Three through Fifty-Two are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 25, 2024, unidentified enterprise members stole a white 2005 Ford F550 from Emerson Frames LLC. The vehicle was stolen from 14479 Mead Court in Mead, Colorado. The value of the stolen vehicle was approximately \$5,995.00.
3. Emerson Frames' white Ford F550 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, the steering column, and the driver's side door locking mechanism of the Ford F550.
4. 12563 County Road 6 is a rural storage yard rented and occupied by enterprise member Geomar Gomez-Hernandez.
5. On or about October 14, 2024, unidentified enterprise members stole a black 2003 Ford F250 from Jose Bastida-Ocampo. The vehicle was stolen from 1021 Denver Avenue in Fort Lupton, Colorado. The value of the stolen vehicle was approximately \$10,200.00.
6. Mr. Bastida-Ocampo's black Ford F250 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00

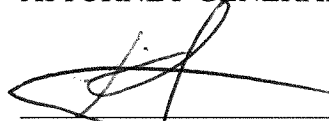
damage to the ignition, the steering column, and the driver's side door locking mechanism of Mr. Bastida-Ocampo's Ford F250.

7. On or about October 14, 2024, unidentified enterprise members stole a white 1999 Ford F350 from Berkenkotter Motors. The vehicle was stolen from 1021 Denver Avenue in Fort Lupton, Colorado. The value of the stolen vehicle was approximately \$11,650.00.
8. Berkenkotter Motors' white Ford F350 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, the steering column, and the driver's side door locking mechanism of the white F350.
9. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that both the black F250 and the white F350 belonged to someone else who was in Mexico, he didn't know the man's name, but the man dropped the two trucks off, and they had been on his lot for three or four months. Mr. Gomez-Hernandez told CMATT detectives that an unknown person dropped off the white F550 several months ago, and that he wanted to purchase the F550 from the owner.
10. Upon recovery of Emerson Frames' white F550, fingerprints were collected from the exterior of the driver's door, those prints were identified as belonging to enterprise member Yulian Zamarron-Baylon. DNA collected from the gear selector lever were identified as belonging to enterprise member Geomar Gomez-Hernandez.
11. On or about July 31, 2024, unidentified enterprise members stole a brown 2006 Ford F350 from Levi Wait. The vehicle was stolen from 6000 West 55th Place in Arvada, Colorado. The value of the stolen vehicle was approximately \$10,992.00.
12. Mr. Wait's brown Ford F350 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the front end of the F350 where several parts appeared to have been removed as well as damage to the ignition, the steering column, and the driver's side door locking mechanism.
13. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that the brown F350 belonged to someone else who kept other Ford trucks on his lot.
14. On or between August 13, 2024 and August 14, 2024, unidentified enterprise members stole a grey 2002 Ford F350 from Raul Gomora-Ocampo. The vehicle was stolen from 5490 Krameria Street in Commerce City, Colorado. The value of the stolen vehicle was approximately \$12,900.00.
15. Mr. Gomora-Ocampo's grey Ford F350 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, the steering column, and the driver's side door locking mechanism of the Ford F350. In addition, the grey truck had been painted white.

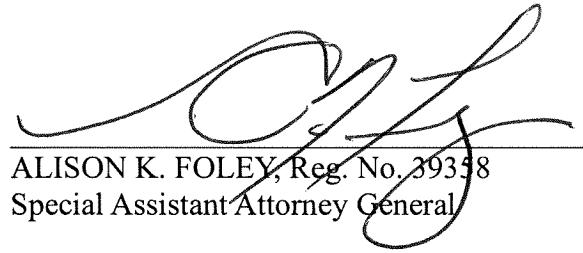
16. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that the owner of the F350 brought it to his lot after it was painted and left it there.
17. On or about August 9, 2024, unidentified enterprise members stole a white 2007 Ford F450 from Pablo Perez. The vehicle was stolen from 19637 East 58th Avenue in Aurora, Colorado. The value of the stolen vehicle was approximately \$9,542.00. At the time it was stolen, Mr. Perez's F450 was in good working condition with no missing parts.
18. Mr. Perez's white Ford F450 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the front end of the F350 where several parts appeared to have been removed including the engine, as well as to the interior cab where the seats had been removed.
19. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that the owner of the F450 brought it to his lot with no engine and left it there.
20. On or between September 29, 2024 and September 30, 2024, unidentified enterprise members stole a white 2002 Ford F350 from Daniel Vogel. The vehicle was stolen from 18137 East Mansfield Avenue in Aurora, Colorado. The value of the stolen vehicle was approximately \$12,900.00. When it was stolen, Mr. Vogel's F350 contained tools, a ladder, and roofing material valued at approximately \$1,100.00.
21. Mr. Vogel's white Ford F350 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition, the steering column, and the driver's side door locking mechanism of the Ford F350.
22. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that he had been inside of the white F350 before when it was parked on his lot.
23. On or about July 28, 2024, unidentified enterprise members stole a maroon 1999 Ford F250 from Carlos Perez-Gutierrez. The vehicle was stolen from 4664 North Flanders Way in Denver, Colorado. The value of the stolen vehicle was approximately \$8,700.00.
24. Mr. Perez-Gutierrez's maroon Ford F250 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the ignition and the steering column of the Ford F250. In addition, the truck had been painted black.
25. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that he painted the maroon F250 black.
26. On or about September 26, 2024, unidentified enterprise members stole a red 1999 Ford F250 from Michael Thompson. The vehicle was stolen from 340 South Hudson Street in Denver, Colorado. The value of the stolen vehicle was approximately \$9,300.00.

27. Mr. Thompson's red Ford F250 was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. Enterprise members caused over \$1,000.00 damage to the front end of the Ford F250 where several parts appeared to have been removed including the engine, as well as to the interior cab where the entire dashboard and components had been removed.
28. Enterprise member Geomar Gomez-Hernandez told CMATT detectives that the red F250 arrived at his lot in the condition in which it was recovered.
29. On or between July 1, 2024 and July 31, 2024, unidentified enterprise members stole a 2015 Heartland North Trail 28 BRS Travel Trailer from Carie Mascarello. The vehicle was stolen from AA RV Storage located at 4255 County Road 6 in Erie, Colorado. The value of the stolen camper was approximately \$11,950.00.
30. Ms. Mascarello's Heartland camper was recovered on December 18, 2024, at 12563 County Road 6 in Weld County, Colorado. When it was recovered, the camper had damage to entry door.

PHILIP J. WEISER
ATTORNEY GENERAL



KEVIN SOBCHYK, Reg. No. 54441
Assistant Attorney General II
Criminal Justice Section



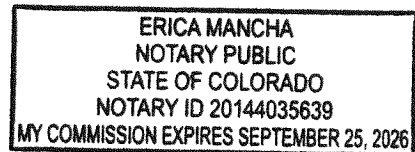
ALISON K. FOLEY, Reg. No. 39358
Special Assistant Attorney General

Subscribed and sworn before me in the City and County of Denver, State of Colorado, this
21st day of May, 2026.

Erica Mancha
NOTARY PUBLIC

SEAL

My commission expires: 9/25/2026



The 2025 – 2026 State Grand Jury presents the within Indictment, and the same is hereby
Ordered filed this 21st day of MAY, 2026.

Pursuant to C.R.S. 13073-107, the Court hereby designates the County of Jefferson,
Colorado as the county of venue for the purposes of trial.



CHRISTOPHER J. BAUMANN
Chief Judge, Second Judicial District