

DISTRICT COURT, CITY AND COUNTY OF DENVER,
COLORADO
1437 Bannock Street
Denver, CO 80202

PEOPLE OF THE STATE OF COLORADO

v.

PATRICK LLOYD MCGOWAN (D.O.B. 01/24/1990),
CHAD ARMAND GOW (D.O.B. 08/15/1991),
BRYAN STEVEN BURNS (D.O.B. 06/21/1991),
ROY MANUEL IBARRA-GONZALES (D.O.B. 01/24/1992),
SANTINO SANTOVENA (D.O.B. 12/28/1990),
JOSHUA SAVILLE (D.O.B. 09/03/1990),
LEVI JOHN MOORIDIAN (D.O.B. 04/26/1985),
LOUIS GABRIEL ARCHULETA (D.O.B. 09/26/1990),
MATTHEW ANTHONY DOMINGUEZ (D.O.B. 12/17/1991),
HEATH HARRIS FIGLER (D.O.B. 02/26/1993),
CHANCE ALVARADO (D.O.B. 08/09/1991),
JEREMAIH AMES (D.O.B. 02/22/1990),
JOHN MALOTT (D.O.B. 09/23/1962),
CARISSA KAY KRAUSE (D.O.B. 01/09/1993),
Defendants.

▲ COURT USE ONLY ▲

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Grand Jury Case No.: 11 CR 0001

Ctrm.: 209

COLORADO STATE GRAND JURY INDICTMENT: 2011-2012 SESSION

CHARGES:

COUNT 1: TRAFFICKING IN CHILDREN, 03071
§ 18-3-502(1)(a) C.R.S. (F2)
As to Patrick McGowan

COUNT 2: PIMPING OF A CHILD, 20051
§ 18-7-405 C.R.S. (F3)
As to Patrick McGowan

COUNT 3: INDUCEMENT OF CHILD PROSTITUTION, 20061
§ 18-7-405.5 C.R.S. (F3)
As to Patrick McGowan

COUNT 4: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
C.R.S. 18-6-701 (F4)
As to Patrick McGowan

COUNT 5: TRAFFICKING IN CHILDREN, 03071
§ 18-3-502(1)(a) C.R.S. (F2)
As to Patrick McGowan

COUNT 6: PIMPING OF A CHILD, 20051
§ 18-7-405 C.R.S. (F3)
As to Patrick McGowan

COUNT 7: INDUCEMENT OF CHILD PROSTITUTION, 20061
§ 18-7-405.5 C.R.S. (F3)
As to Patrick McGowan

COUNT 8: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
C.R.S. 18-6-701 (F4)
As to Patrick McGowan

COUNT 9: DISTRIBUTION OF A CONTROLLED SUBSTANCE –
SCHEDULE II, 82021
C.R.S. 18-18-405(1),(2)(a)(I)(A) (F3)
As to Patrick McGowan

COUNT 10:DISTRIBUTION OF A CONTROLLED SUBSTANCE –
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C.R.S. 18-18-405(1),(2)(a)(I)(A) (F3)
As to Patrick McGowan

COUNT 11:POSSESSION WITH INTENT TO MANUFACTURE OR
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As to Patrick McGowan

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As to Patrick McGowan

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As to Chad Gow

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As to Chad Gow

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As to Chad Gow

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C.R.S. 18-6-701 (F4)
As to Chad Gow

COUNT 17:TRAFFICKING IN CHILDREN, 03071
§ 18-3-502(1)(a) C.R.S. (F2)
As to Chad Gow

COUNT 18:PIMPING OF A CHILD, 20051
§ 18-7-405 C.R.S. (F3)
As to Chad Gow

COUNT 19:INDUCEMENT OF CHILD PROSTITUTION, 20061

§ 18-7-405.5 C.R.S. (F3)

As to Chad Gow

COUNT 20:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051

C.R.S. 18-6-701 (F4)

As to Chad Gow

COUNT 21:UNLAWFUL SEXUAL CONTACT, 04122

C.R.S. 18-3-404(1)(a),(2); 18-3-402(4) (F4)

As to Chad Gow

COUNT 22:TRAFFICKING IN CHILDREN, 03071

§ 18-3-502(1)(a) C.R.S. (F2)

As to Chad Gow

COUNT 23:PIMPING OF A CHILD, 20051

§ 18-7-405 C.R.S. (F3)

As to Chad Gow

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§ 18-7-405.5 C.R.S. (F3)

As to Chad Gow

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C.R.S. 18-6-701 (F4)

As to Chad Gow

COUNT 26:TRAFFICKING IN CHILDREN, 03071

§ 18-3-502(1)(a) C.R.S. (F2)

As to Chad Gow

COUNT 27:PIMPING OF A CHILD, 20051

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As to Chad Gow

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COUNT 35:TRAFFICKING IN CHILDREN, 03071
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COUNT 36:PIMPING OF A CHILD, 20051
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As to Bryan Burns

COUNT 37:PANDERING OF A CHILD, 20022
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COUNT 38:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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COUNT 40:PIMPING OF A CHILD, 20051
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COUNT 41:PANDERING OF A CHILD, 20022
§ 18-7-403(1)(b) C.R.S. (F3)
As to Roy Ibarra-Gonzales

COUNT 42:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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As to Roy Ibarra-Gonzales

COUNT 43:TRAFFICKING IN CHILDREN, 03071
§ 18-3-502(1)(a) C.R.S. (F2)
As to Roy Ibarra-Gonzales

COUNT 44:PIMPING OF A CHILD, 20051
§ 18-7-405 C.R.S. (F3)
As to Roy Ibarra-Gonzales

COUNT 45:PANDERING OF A CHILD, 20022
§ 18-7-403(1)(b) C.R.S. (F3)
As to Roy Ibarra-Gonzales

COUNT 46:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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As to Roy Ibarra-Gonzales

COUNT 47:TRAFFICKING IN CHILDREN, 03071
§ 18-3-502(1)(a) C.R.S. (F2)
As to Roy Ibarra-Gonzales

COUNT 48:PIMPING OF A CHILD, 20051

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As to Roy Ibarra-Gonzales

COUNT 49:PANDERING OF A CHILD, 20022

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As to Roy Ibarra-Gonzales

COUNT 50:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051

C.R.S. 18-6-701 (F4)

As to Roy Ibarra-Gonzales

COUNT 51:TAMPERING WITH PHYSICAL EVIDENCE, 26062

C.R.S. 18-8-610(1)(a) (F6)

As to Roy Ibarra-Gonzales

COUNT 52:PANDERING OF A CHILD, 20022

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As to Santino Santovena

COUNT 53:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051

C.R.S. 18-6-701 (F4)

As to Santino Santovena

COUNT 54:PANDERING OF A CHILD, 20022

§ 18-7-403(1)(b) C.R.S. (F3)

As to Joshua Saville.

COUNT 55:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051

C.R.S. 18-6-701 (F4)

As to Joshua Saville

COUNT 56:PANDERING OF A CHILD, 20022

§ 18-7-403(1)(b) C.R.S. (F3)

As to Levi Mooridian

COUNT 57:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
C.R.S. 18-6-701 (F4)
As to Levi Mooridian

COUNT 58:PANDERING OF A CHILD, 20022
§ 18-7-403(1)(b) C.R.S. (F3)
As to Louis Archuleta

COUNT 59:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
C.R.S. 18-6-701 (F4)
As to Louis Archuleta

COUNT 60:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
C.R.S. 18-6-701 (F4)
As to Matthew Dominguez

COUNT 61:UNLAWFUL SEXUAL CONTACT, 04122
C.R.S. 18-3-404(1)(a),(2); 18-3-402(4) (F4)
As to Matthew Dominguez

COUNT 62:PANDERING OF A CHILD, 20022
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As to Heath Figler

COUNT 63:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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As to Heath Figler

COUNT 64:PANDERING OF A CHILD, 20022
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As to Chance Alvarado

COUNT 65:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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As to Chance Alvarado

COUNT 66:PANDERING OF A CHILD, 20022
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COUNT 67:CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051
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As to Jeremaih Ames

COUNT 68:PATRONIZING A PROSTITUTED CHILD, 20071
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As to John Malott

COUNT 69:PATRONIZING A PROSTITUTED CHILD, 20071
§ 18-7-406(1)(a) C.R.S. (F3)
As to John Malott

COUNT 70:TAMPERING WITH PHYSICAL EVIDENCE, 26062
C.R.S. 18-8-610(1)(a) (F6)
As to Carissa Krause

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

The 2011-2012 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following Indictment:

COUNT NUMBER ONE
Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan** unlawfully and feloniously sold, exchanged, bartered, or leased **I.K.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count One are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWO
Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **I.K.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Two are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THREE

Inducement of Child Prostitution (F3)
§ 18-7-405.5 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully and feloniously, by word or action, induced **I.K.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Three are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FOUR

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully and feloniously induced, aided, or encouraged **I.K.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S. and/or Unlawful Use of a Controlled Substance, § 18-18-404 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Four are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIVE

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including January 23, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan** unlawfully and feloniously sold, exchanged, bartered, or leased **B.W.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Five are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIX

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including January 23, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **B.W.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Six are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SEVEN

Inducement of Child Prostitution (F3)

§ 18-7-405.5 C.R.S.

Between and including January 23, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully and feloniously, by word or action, induced **B.W.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Seven are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER EIGHT

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including January 23, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S. and/or Unlawful Use of a Controlled Substance, § 18-18-404 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Eight are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER NINE

Distribution of a Controlled Substance – Schedule II (F3)
§ 18-18-405(1),(2)(a)(I)(A) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully, feloniously, and knowingly sold or distributed **cocaine**, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

Facts that support the offenses set forth in Count Nine are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TEN

Distribution of a Controlled Substance – Schedule II (F3)
§ 18-18-405(1),(2)(a)(I)(A) C.R.S.

On or about December 15, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully, feloniously, and knowingly sold or distributed **methamphetamine**, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

Facts that support the offenses set forth in Count Ten are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER ELEVEN

Possession with Intent to Manufacture or Distribute a Controlled Substance –
Schedule II (F3)
§ 18-18-405(1),(2)(a)(I)(A) C.R.S.

On or about December 21, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute **methamphetamine**, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

Facts that support the offenses set forth in Count Eleven are set forth after Count Twelve, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWELVE

Introducing Contraband in the First Degree (F4)
§ 18-8-203(1)(a)

On or about December 21, 2011, within the State of Colorado, **Patrick McGowan**, unlawfully, feloniously, and knowingly introduced or attempted to introduce a controlled substance, namely: **methamphetamine**, into the Jefferson County Detention Facility, a detention facility; in violation of section 18-8-203(1)(a), C.R.S.

Facts that support the offenses set forth in Counts One, Two, Three, Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve are as follow:

Between approximately January 18, 2011 and June 23, 2011, Patrick McGowan provided cocaine to I.K. and/or B.W. During that time frame, both girls, I.K. and B.W., were under the age of eighteen (18).

Additionally, around January 18, 2011, Patrick McGowan introduced I.K. to the idea of performing acts of prostitution as a way to make money. B.W. was convinced to join the juvenile sex trafficking ring on approximately January 23, 2011. During the relevant time frame, Patrick McGowan posted ads on the internet advertising I.K. and/or B.W. for prostitution. Patrick McGowan also rented hotel rooms in Grand Junction, Glenwood Springs, Boulder and/or Denver. Those hotel rooms were provided to I.K. and/or B.W. for places to use cocaine and perform acts of prostitution. Additionally, Patrick McGowan drove I.K. and/or B.W. to

“out calls” to perform acts of prostitution. Patrick McGowan used drugs and threats of violence to coerce I.K. and/or B.W. into performing acts of prostitution. Patrick McGowan repeatedly sold I.K. and/or B.W. to third parties so the girls would earn money by engaging in acts of prostitution. Patrick McGowan made I.K. and/or B.W. pay money over to him that they received through prostitution.

On December 15, 2011, Patrick McGowan sold approximately .95 grams of methamphetamine to an undercover police officer at a Taco Bell on South Federal Boulevard in Denver, Colorado. Methamphetamine is a schedule II controlled substance.

On December 21, 2011, Patrick McGowan arranged for another sale of methamphetamine to an undercover police officer. This time, the meeting occurred at Casa Bonita in Lakewood, Colorado. Approximately 1.95 grams of methamphetamine was recovered from Patrick McGowan and he was taken into custody. Patrick McGowan attempted to sneak 14.95 grams of methamphetamine into the Jefferson County Jail Facility by concealing the drugs in his underwear.

COUNT NUMBER THIRTEEN

Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Chad Gow** unlawfully and feloniously sold, exchanged, bartered, or leased **I.K.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Thirteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FOURTEEN

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Chad Gow** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **I.K.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Fourteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTEEN

Inducement of Child Prostitution (F3)

§ 18-7-405.5 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously, by word or action, induced **I.K.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Fifteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTEEN

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously induced, aided, or encouraged **I.K.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Sixteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SEVENTEEN

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including January 23, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow** unlawfully and feloniously sold, exchanged, bartered, or leased **B.W.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Seventeen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER EIGHTEEN

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including January 23, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **B.W.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Eighteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER NINETEEN

Inducement of Child Prostitution (F3)

§ 18-7-405.5 C.R.S.

Between and including January 23, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously, by word or action, induced **B.W.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Nineteen are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including January 23, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Twenty are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-ONE

Unlawful Sexual Contact (F4)
§§ 18-3-404(1)(a),(2); 18-3-402(4) C.R.S.

Between and including August 12, 2011 and August 30, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously , and knowingly subjected **B.W.** to sexual contact, and the defendant knew the victim did not consent. Further, the defendant caused submission of the victim through the actual application of physical force or physical violence; in violation of sections 18-3-404(1)(a),(2) and 18-3-402(4)(a), C.R.S.

Facts that support the offenses set forth in Count Twenty-One are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-TWO

Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Chad Gow** unlawfully and feloniously sold, exchanged, bartered, or leased **N.L.Z.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Twenty-Two are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-THREE

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Chad Gow** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **N.L.Z.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Twenty-Three are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-FOUR

Inducement of Child Prostitution (F3)

§ 18-7-405.5 C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously, by word or action, induced **N.L.Z.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Twenty-Four are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-FIVE

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously induced, aided, or encouraged **N.L.Z.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Twenty-Five are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-SIX

Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including November 24, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow** unlawfully and feloniously sold, exchanged, bartered, or leased **A.R.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Twenty-Six are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-SEVEN

Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including November 24, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **A.R.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Twenty-Seven are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-EIGHT

Inducement of Child Prostitution (F3)

§ 18-7-405.5 C.R.S.

Between and including November 24, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously, by word or action, induced **A.R.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

Facts that support the offenses set forth in Count Twenty-Eight are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER TWENTY-NINE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including November 24, 2011 and December 7, 2011, within the State of Colorado, **Chad Gow**, unlawfully and feloniously induced, aided, or encouraged **A.R.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Twenty-Nine are set forth after Count Thirty, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY

Tampering with Physical Evidence (F6)
§ 18-8-610(1)(a) C.R.S.

Between and including December 7, 2011 and December 27, 2011, within the State of Colorado, **Chad Gow**, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

Facts that support the offenses set forth in Counts Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Five, Twenty-Six, Twenty-Seven, Twenty-Eight, Twenty-Nine and Thirty are as follow:

Between approximately January 18, 2011 and June 23, 2011, Chad Gow coerced I.K., a girl under the age of eighteen at the time, to perform acts of prostitution as a way to make money. Chad Gow posted ads on the internet advertising I.K. for prostitution. Chad Gow also arranged for hotel rooms in Grand Junction, Glenwood Springs, Boulder, Lakewood and/or Denver. These hotel rooms were provided to I.K. for places to use alcohol, drugs, and perform acts of prostitution. Additionally, Chad Gow arranged transportation for I.K. to get to the hotel rooms, and for I.K. to respond to “out calls” to perform acts of prostitution. Chad Gow used threats of violence to coerce I.K. into performing acts of prostitution. Chad Gow repeatedly sold I.K. to third parties so she could earn money by engaging in acts of prostitution. Chad Gow made I.K. pay money over to him that was received through prostitution.

On approximately January 23, 2011, Chad Gow convinced B.W. to join I.K. and perform acts of prostitution. Between January 23, 2011 and December 7, 2011, Chad Gow posted ads on the internet advertising B.W. for prostitution. Chad Gow also arranged for hotel rooms in Grand Junction, Glenwood Springs, Boulder, Lakewood and/or Denver. These hotel rooms were provided to B.W. for places to use alcohol, drugs, and perform acts of prostitution. Additionally, Chad Gow arranged transportation for B.W. to get to the hotel rooms, and for B.W. to respond to “out calls” to perform acts of prostitution. Chad Gow used threats of violence to

coerce B.W. into performing acts of prostitution. Chad Gow repeatedly sold B.W. to third parties so she could earn money by engaging in acts of prostitution. Chad Gow made B.W. pay money over to him that was received through prostitution. Sometime between August 12, 2011 and August 30, 2011, Chad Gow and Matthew Dominguez forcibly held B.W. down on a hotel bed in Boulder, Colorado, and subjected B.W. to sexual contact without her consent.

Between approximately August 14, 2011 and August 18, 2011, Chad Gow used the internet to recruit N.L.Z. to perform acts of prostitution. N.L.Z. was a girl under the age of eighteen at the time. Chad Gow used B.W. to encourage N.L.Z. to perform acts of prostitution. Chad Gow posted ads on the internet advertising N.L.Z. for prostitution. Chad Gow also arranged for a hotel rooms in Denver and/or Lakewood. The hotel rooms were provided to N.L.Z. for places to use alcohol and perform acts of prostitution. Additionally, Chad Gow arranged transportation for N.L.Z. to get to the hotel rooms, and for N.L.Z. to respond to "out calls" to perform acts of prostitution. Chad Gow used threats of violence to coerce N.L.Z. into performing acts of prostitution. Chad Gow repeatedly sold N.L.Z. to third parties so she could earn money by engaging in acts of prostitution. Chad Gow made N.L.Z. pay money over to him that was received through prostitution.

Between approximately November 24, 2011 and December 7, 2011, Chad Gow used B.W. to encourage A.R. to perform acts of prostitution. A.R. was a girl under the age of eighteen at the time. Chad Gow posted ads on the internet advertising B.W. and/or A.R. for prostitution. Chad Gow also arranged for a hotel rooms in Denver and/or Lakewood. The hotel rooms were provided to A.R. for places to use alcohol and perform acts of prostitution. Additionally, Chad Gow arranged transportation for A.R. to get to the hotel rooms, and for A.R. to respond to "out calls" to perform acts of prostitution. Chad Gow used threats of violence to coerce A.R. into performing acts of prostitution. Chad Gow sold A.R. to third parties so she could earn money by engaging in acts of prostitution. Chad Gow told A.R. that she had to pay money over to him that was received through prostitution.

Chad Gow was working with Roy Ibarra-Gonzales to operate a criminal enterprise that recruited and pimped juvenile girls. Chad Gow and Roy Ibarra-Gonzales referred to themselves at the "RAH clique." RAH was an abbreviation for Rappin' and Hustlin', and both Chad Gow and Roy Ibarra-Gonzales had tattoos showing their association to the criminal enterprise.

On December 7, 2011, Chad Gow was taken into custody. Between approximately December 7, 2011 and December 27, 2011, Chad Gow directed Audreana Hernandez to sell his computer, and to make sure the police do not get it. Chad Gow also directed Audreana Hernandez to put his cell phone in a safe place where no one can find it. Additionally, Chad Gow directed Audreana Hernandez to delete his Facebook account. Chad Gow repeatedly told Audreana Hernandez that she needed to “make moves” for him.

COUNT NUMBER THIRTY-ONE

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Bryan Burns** unlawfully and feloniously sold, exchanged, bartered, or leased **I.K.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Thirty-One are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-TWO

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Bryan Burns** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **I.K.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Thirty-Two are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-THREE

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Bryan Burns**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **I.K.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Thirty-Three are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-FOUR

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Bryan Burns**, unlawfully and feloniously induced, aided, or encouraged **I.K.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Thirty-Four are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-FIVE

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including January 23, 2011 and August 30, 2011, within the State of Colorado, **Bryan Burns** unlawfully and feloniously sold, exchanged, bartered, or leased **B.W.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Thirty-Five are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-SIX

Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including January 23, 2011 and August 30, 2011, within the State of Colorado, **Bryan Burns** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **B.W.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Thirty-Six are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-SEVEN

Pandering of a Child (F3)
§ 18-7-403(1)(b) C.R.S.

Between and including January 23, 2011 and August 30, 2011, within the State of Colorado, **Bryan Burns**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **B.W.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Thirty-Seven are set forth after Count Thirty-Eight, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER THIRTY-EIGHT

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including January 23, 2011 and August 30, 2011, within the State of Colorado, **Bryan Burns**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Thirty-One, Thirty-Two, Thirty-Three, Thirty-Four, Thirty-Five, Thirty-Six, Thirty-Seven and Thirty-Eight are as follow:

Between approximately January 18, 2011 and June 23, 2011, Bryan Burns coerced I.K., a girl under the age of eighteen at the time, to perform acts of prostitution as a way to make money. Bryan Burns posted ads on the internet advertising I.K. for prostitution. Bryan Burns also arranged for hotel rooms in Grand Junction, Glenwood Springs, Boulder, Lakewood and/or Denver. These hotel rooms were provided to I.K. for places to use alcohol, drugs, and perform acts of prostitution. Additionally, Bryan Burns arranged transportation for I.K. to get to the hotel rooms, and for I.K. to respond to "out calls" to perform acts of prostitution. Bryan Burns used threats of violence to coerce I.K. into performing acts of prostitution. Bryan Burns repeatedly sold I.K. to third parties so she could earn money by engaging in acts of prostitution. Bryan Burns made I.K. pay money over to him that was received through prostitution.

On approximately January 23, 2011, Bryan Burns convinced B.W. to join I.K. and perform acts of prosecution. Between January 23, 2011 and August 30, 2011, Bryan Burns posted ads on the internet advertising B.W. for prostitution. Bryan Burns also arranged for hotel rooms in Grand Junction, Glenwood Springs, Boulder, Lakewood and/or Denver. These hotel rooms were provided to B.W. for places to use alcohol, drugs, and perform acts of prostitution. Additionally, Bryan Burns arranged transportation for B.W. to get to the hotel rooms, and for B.W. to respond to "out calls" to perform acts of prostitution. Bryan Burns used threats of violence to coerce B.W. into performing acts of prostitution. Bryan Burns repeatedly sold I.K. to third parties so she could earn money by engaging in acts of prostitution. Bryan Burns made B.W. pay money over to him that was received through prostitution.

COUNT NUMBER THIRTY-NINE

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including June 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully and feloniously sold, exchanged, bartered, or leased **B.W.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Thirty-Nine are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY

Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including June 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **B.W.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Forty are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-ONE

Pandering of a Child (F3)
§ 18-7-403(1)(b) C.R.S.

Between and including June 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **B.W.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Forty-One are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-TWO

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including June 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Forty-Two are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-THREE

Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully and feloniously sold, exchanged, bartered, or leased **N.L.Z.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Forty-Three are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-FOUR

Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **N.L.Z.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Forty-Four are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-FIVE

Pandering of a Child (F3)
§ 18-7-403(1)(b) C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **N.L.Z.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Forty-Five are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-SIX

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including August 14, 2011 and August 18, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, unlawfully and feloniously induced, aided, or encouraged **N.L.Z.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Forty-Six are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-SEVEN

Trafficking in Children (F2)
§ 18-3-502(1)(a) C.R.S.

Between and including November 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully and feloniously sold, exchanged, bartered, or leased **A.R.**, a child, and received money or other consideration or thing of value for the child as a result of the transaction; in

violation of section 18-3-502(1)(a), C.R.S., formerly codified at section 18-6-402(1)(a), C.R.S.

Facts that support the offenses set forth in Count Forty-Seven are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-EIGHT

Pimping of a Child (F3)
§ 18-7-405 C.R.S.

Between and including November 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **A.R.**, through prostitution; in violation of section 18-7-405, C.R.S.

Facts that support the offenses set forth in Count Forty-Eight are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FORTY-NINE

Pandering of a Child (F3)
§ 18-7-403(1)(b) C.R.S.

Between and including November 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **A.R.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Forty-Nine are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including November 24, 2011 and December 6, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, unlawfully and feloniously induced, aided, or encouraged **A.R.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Fifty are set forth after Count Fifty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY-ONE

Tampering with Physical Evidence (F6)
§ 18-8-610(1)(a) C.R.S.

Between and including December 6, 2011 and December 16, 2011, within the State of Colorado, **Roy Ibarra-Gonzales**, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

Facts that support the offenses set forth in Counts Thirty-Nine, Forty, Forty-One, Forty-Two, Forty-Three, Forty-Four, Forty-Five, Forty-Six, Forty-Seven, Forty-Eight, Forty-Nine, Fifty and Fifty-One are as follow:

On approximately June 24, 2011, Roy Ibarra-Gonzales joined Chad Gow and participated in a multi-jurisdictional sex trafficking operation that exploited juvenile girls. Between June 24, 2011 and December 6, 2011, Roy Ibarra-Gonzales posted ads on the internet advertising B.W. for prostitution. B.W. was a girl under the age of eighteen at the time. Roy Ibarra-Gonzales arranged transportation for B.W. to get to the hotel rooms, and for B.W. to respond to “out calls” to perform acts of prostitution. Roy Ibarra-Gonzales used threats of violence to coerce B.W. into performing acts of prostitution. Roy Ibarra-Gonzales repeatedly sold B.W. to third parties so she could earn money by engaging in acts of prostitution. Roy Ibarra-Gonzales made B.W. pay money over to him that was received through prostitution.

Between approximately August 14, 2011 and August 18, 2011, Roy Ibarra-Gonzales drove Chad Gow, B.W. and/or N.L.Z. to hotels and other locations so B.W. and/or N.L.Z. could perform acts of prostitution. N.L.Z. was a girl under the age of eighteen at the time. Roy Ibarra-Gonzales used threats of violence to coerce N.L.Z. into performing acts of prostitution. Roy Ibarra-Gonzales repeatedly sold N.L.Z. to third parties so she could earn money by engaging in acts of prostitution. Roy Ibarra-Gonzales made N.L.Z. pay money over to him that was received through prostitution.

Between approximately November 24, 2011 and December 6, 2011, Roy Ibarra-Gonzales drove Chad Gow, B.W. and/or A.R. to hotels and other locations so B.W. and/or A.R. could perform acts of prostitution. A.R. was a girl under the age of eighteen at the time. Roy Ibarra-Gonzales used threats of violence to coerce A.R. into performing acts of prostitution. Roy Ibarra-Gonzales sold A.R. to third parties so she could earn money by engaging in acts of prostitution. Roy Ibarra-Gonzales told A.R. that she had to pay money over to him that was received through prostitution.

Chad Gow was working with Roy Ibarra-Gonzales to operate a criminal enterprise that recruited and pimped juvenile girls. Chad Gow and Roy Ibarra-Gonzales referred to themselves at the "RAH clique." RAH was an abbreviation for Rappin' and Hustlin', and both Chad Gow and Roy Ibarra-Gonzales had tattoos showing their association to the criminal enterprise.

On December 6, 2011, Roy Ibarra-Gonzales was taken into custody. Between approximately December 6, 2011 and December 16, 2011, Roy Ibarra-Gonzales directed Carissa Krause to de-activate his Facebook account, and to delete another computer account. Roy Ibarra-Gonzales also directed Carissa Krause to phone A.R., one of the juvenile victims to "deal with this."

COUNT NUMBER FIFTY-TWO

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Santino Santovena**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **I.K. and/or B.W.**, both children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Fifty-Two are set forth after Count Fifty-Three, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY-THREE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Santino Santovena**, unlawfully and feloniously induced, aided, or encouraged **I.K. and/or B.W.**, both children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Fifty-Two and Fifty-Three are as follow:

Between approximately January 18, 2011 and June 23, 2011, Santino Santovena assisted Patrick McGowan, Chad Gow and/or Bryan Burns in furtherance of a juvenile sex trafficking operation. During the relevant dates, Santino Santovena drove I.K. and/or B.W. to hotels and/or “out calls” to perform acts of prostitution. I.K. and B.W. were both under eighteen years of age. Santino Santovena received money from Patrick McGowan, Chad Gow and/or Bryan Burns for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER FIFTY-FOUR

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Joshua Saville**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **I.K. and/or B.W.**, both children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Fifty-Four are set forth after Count Fifty-Five, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY-FIVE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Joshua Saville**, unlawfully and feloniously induced, aided, or encouraged **I.K. and/or B.W.**, both children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Fifty-Four and Fifty-Five are as follow:

Between approximately January 18, 2011 and June 23, 2011, Joshua Saville assisted Patrick McGowan, Chad Gow and/or Bryan Burns in furtherance of a juvenile sex trafficking operation. During the relevant dates, Joshua Saville drove I.K. and/or B.W. to hotels and/or “out calls” to perform acts of prostitution. I.K. and B.W. were both under eighteen years of age. Joshua Saville received money from Patrick McGowan, Chad Gow and/or Bryan Burns for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER FIFTY-SIX

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Levi Mooridian**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **I.K. and/or B.W.**, both children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Fifty-Six are set forth after Count Fifty-Seven, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY-SEVEN

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **Levi Mooridian**, unlawfully and feloniously induced, aided, or encouraged **I.K. and/or B.W.**, both children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Fifty-Six and Fifty-Seven are as follow:

Between approximately January 18, 2011 and June 23, 2011, Levi Mooridian assisted Patrick McGowan, Chad Gow and/or Bryan Burns in furtherance of a juvenile sex trafficking operation. During the relevant dates, Levi Mooridian drove I.K. and/or B.W. to hotels and/or “out calls” to perform acts of prostitution. I.K. and B.W. were both under eighteen years of age. Levi Mooridian received money and/or drugs from Patrick McGowan, Chad Gow and/or Bryan Burns for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER FIFTY-EIGHT

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including January 18, 2011 and August 18, 2011, within the State of Colorado, **Louis Archuleta**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **I.K., B.W. and/or N.L.Z.**, all children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Fifty-Eight are set forth after Count Fifty-Nine, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER FIFTY-NINE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including January 18, 2011 and August 18, 2011, within the State of Colorado, **Louis Archuleta**, unlawfully and feloniously induced, aided, or encouraged **I.K., B.W. and/or N.L.Z.**, all children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Fifty-Eight and Fifty-Nine are as follow:

Between approximately January 18, 2011 and August 18, 2011, Louis Archuleta assisted Patrick McGowan, Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales in furtherance of a juvenile sex trafficking operation. During the relevant dates, Louis Archuleta drove I.K. and/or B.W. to hotels and/or “out calls” to perform acts of prostitution. I.K. and B.W. were both under eighteen years of age. Louis Archuleta received money from Patrick McGowan, Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER SIXTY

Contributing to the Delinquency of a Minor (F4)
§ 18-6-701 C.R.S.

Between and including June 24, 2011 and December 6, 2011, within the State of Colorado, **Matthew Dominguez**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Count Sixty are set forth after Count Sixty-One, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTY-ONE

Unlawful Sexual Contact (F4)
§§ 18-3-404(1)(a),(2); 18-3-402(4) C.R.S.

Between and including August 12, 2011 and August 30, 2011, within the State of Colorado, **Matthew Dominguez**, unlawfully and feloniously, and knowingly subjected **B.W.** to sexual contact, and the defendant knew the victim did not consent. Further, the defendant caused submission of the victim through the actual application of physical force or physical violence; in violation of sections 18-3-404(1)(a),(2) and 18-3-402(4)(a), C.R.S.

Facts that support the offenses set forth in Counts Sixty and Sixty-One are as follow:

Between approximately June 24, 2011 and December 6, 2011, Matthew Dominguez assisted Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales in furtherance of a juvenile sex trafficking operation. During the relevant dates, Matthew Dominguez provided accommodations for B.W. to perform acts of prostitution. Matthew Dominguez also accompanied B.W. to hotels and/or “out calls” where she was required to perform acts of prostitution. B.W. was under eighteen years of age during the relevant time period. Sometime between August 12, 2011 and August 30, 2011, Chad Gow and Matthew Dominguez forcibly held

B.W. down on a hotel bed in Boulder, Colorado, and subjected B.W. to sexual contact without her consent.

COUNT NUMBER SIXTY-TWO

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including June 24, 2011 and August 18, 2011, within the State of Colorado, **Heath Figler**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **B.W. and/or N.L.Z.**, both children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Sixty-Two are set forth after Count Sixty-Three, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTY-THREE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including June 24, 2011 and August 18, 2011, within the State of Colorado, **Heath Figler**, unlawfully and feloniously induced, aided, or encouraged **B.W. and/or N.L.Z.**, both children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Sixty-Two and Sixty-Three are as follow:

Between approximately June 24, 2011 and August 18, 2011, Heath Figler assisted Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales in furtherance of a juvenile sex trafficking operation. During the relevant dates, Heath Figler provided accommodations for B.W. and/or N.L.Z. to perform acts of prostitution. Heath Figler also accompanied B.W. and/or N.L.Z. to hotels and/or “out calls” where they were required to perform acts of prostitution. B.W. and N.L.Z. were under eighteen years of age during the relevant time period. Heath Figler received money from Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales for making arrangements that furthered the juvenile sex trafficking operation.

COUNT NUMBER SIXTY-FOUR

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including June 24, 2011 and August 18, 2011, within the State of Colorado, **Chance Alvarado**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **B.W. and/or N.L.Z.**, both children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Sixty-Four are set forth after Count Sixty-Five, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTY-FIVE

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including June 24, 2011 and August 18, 2011, within the State of Colorado, **Chance Alvarado**, unlawfully and feloniously induced, aided, or encouraged **B.W. and/or N.L.Z.**, both children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Sixty-Four and Sixty-Five are as follow:

Between approximately June 24, 2011 and August 18, 2011, Chance Alvarado assisted Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales in furtherance of a juvenile sex trafficking operation. During the relevant dates, Chance Alvarado drove B.W. and/or N.L.Z. to hotels and/or “out calls” to perform acts of prostitution. B.W. and N.L.Z. were both under eighteen years of age. Chance Alvarado received money from Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER SIXTY-SIX

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including June 24, 2011 and September 4, 2011, within the State of Colorado, **Jeremaih Ames**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **B.W.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

Facts that support the offenses set forth in Count Sixty-Six are set forth after Count Sixty-Seven, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTY-SEVEN

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including June 24, 2011 and September 4, 2011, within the State of Colorado, **Jeremaih Ames**, unlawfully and feloniously induced, aided, or encouraged **B.W.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

Facts that support the offenses set forth in Counts Sixty-Six and Sixty-Seven are as follow:

Between approximately June 24, 2011 and September 4, 2011, Jeremaih Ames assisted Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales in furtherance of a juvenile sex trafficking operation. During the relevant dates, Jeremaih Ames drove B.W. to hotels and/or “out calls” to perform acts of prostitution. Jeremaih Ames also provided accommodations for B.W. to perform acts of prostitution. B.W. was under eighteen years of age. Jeremaih Ames received money from Chad Gow, Bryan Burns and/or Roy Ibarra-Gonzales for driving the juvenile girls to hotels and/or “out calls.”

COUNT NUMBER SIXTY-EIGHT

Patronizing a Prostituted Child (F3)

§ 18-7-406(1)(a) C.R.S.

Between and including January 18, 2011 and June 23, 2011, within the State of Colorado, **John Malott**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **I.K.**, a child and a person not the defendant's spouse; in violation of section 18-7-406(1)(a), C.R.S.

Facts that support the offenses set forth in Count Sixty-Eight are set forth after Count Sixty-Nine, and are fully incorporated by reference as if set forth herein.

COUNT NUMBER SIXTY-NINE

Patronizing a Prostituted Child (F3)

§ 18-7-406(1)(a) C.R.S.

Between and including January 23, 2011 and June 23, 2011, within the State of Colorado, **John Malott**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **B.W.**, a child and a person not the defendant's spouse; in violation of section 18-7-406(1)(a), C.R.S.

Facts that support the offenses set forth in Count Sixty-Eight and Count Sixty-Nine are as follow:

Starting on approximately January 18, 2011, John Malott paid to have sex with I.K. Around January 23, 2011, B.W. joined I.K. on "out calls." Until approximately June 23, 2011, John Malott met I.K. and/or B.W. and paid them to perform acts of prostitution. John Malott often met I.K. and/or B.W. at hotels in Denver, Wheat Ridge, Lakewood and Boulder. All of the times John Malott met with I.K. and/or B.W., he paid for sex with the girl(s). On at least one occasion, John Malott paid I.K. to perform a sex act in his car. During the relevant time, I.K. and B.W. were both girls under the age of eighteen.

COUNT NUMBER SEVENTY
Tampering with Physical Evidence (F6)
§ 18-8-610(1)(a) C.R.S.

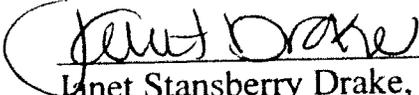
Between and including December 6, 2011 and December 16, 2011, within the State of Colorado, **Carissa Krause**, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

Facts that support the offense set forth in Count Seventy are as follow:

On December 6, 2011, Roy Ibarra-Gonzales was taken into custody. Between approximately December 6, 2011 and December 16, 2011, Roy Ibarra-Gonzales directed Carissa Krause to de-activate his Facebook account, and to delete another computer account. Roy Ibarra-Gonzales also directed Carissa Krause to phone A.R., one of the juvenile victims to “deal with this.” Carissa Krause agreed to delete the accounts and did take steps to destroy and/or alter relevant evidence.

Dated this 26th day of January 2012.

JOHN W. SUTHERS
ATTORNEY GENERAL STATE OF COLORADO

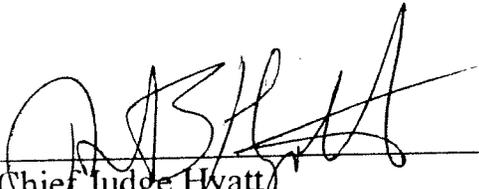


Janet Stansberry Drake, #27697
Senior Assistant Attorney General
Criminal Justice Section
Special Prosecution Unit

The 2011-2012 Colorado Statewide Grand Jury presents this Indictment, and the same is hereby ORDERED FILED this 26 day of January 2012.

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

Dated this 26 day of January 2012.



Chief Judge Hyatt
Presiding Judge, State Grand Jury