

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

PEOPLE OF THE STATE OF COLORADO

v.

LAWRENCE RICHARD MARTINEZ (D.O.B. 9/16/90),  
a/k/a Low Key,  
ROBERT KENTH DRINK WATER-MILLS (D.O.B. 10/29/93),  
REGINALD JAMES RYAN (D.O.B. 8/19/81),  
a/k/a Tre Dub,  
ANGELA JEANINE RYAN (D.O.B. 2/20/70),  
a/k/a Angel,  
MERCEDES DEVON SANDERS (D.O.B. 6/4/90),  
a/k/a Sadie,  
HOLLIE GENE MONTOUR (D.O.B. 1/14/72),  
LEWIS JEROME SMITH (D.O.B. 11/30/70),  
a/k/a Cheddar,  
PHAEDRA LANEE ROBINSON (D.O.B. 6/3/90),  
a/k/a Pecan,  
HAYATULLAH KHAZI (D.O.B. 2/9/84),  
GRANT RICHARD SCHOENGARTH (D.O.B. 9/3/80),  
RICHARD NEIL GOTTBREHT (D.O.B. 4/5/49),  
NATHAN THEODORE HOHM (D.O.B. 10/31/76),

Defendants.

▲ COURT USE ONLY ▲

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Grand Jury Case No.: 12 CR 0001

Ctrm.: 209

**COLORADO STATE GRAND JURY INDICTMENT: 2012-2013 SESSION**

**CHARGES:**

- COUNT 1:** COCCA – VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT, § 18-17-104(3) C.R.S. (F2) 37284  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 2:** TRAFFICKING IN CHILDREN, 03071  
§ 18-3-502(1)(a) C.R.S. (F2)  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 3:** PIMPING OF A CHILD, 20051  
§ 18-7-405 C.R.S. (F3)  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 4:** PANDERING OF A CHILD, 20022  
§ 18-7-403(1)(b) C.R.S. (F3)  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 5:** SOLICITING FOR CHILD PROSTITUTION, 20011  
§ 18-7-402(1)(a) C.R.S. (F3)  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 6:** PROCUREMENT OF A CHILD, 20031  
§ 18-7-403.5 C.R.S. (F3)  
As to Lawrence Martinez and Robert Drinkwater-Mills
- COUNT 7:** INDUCEMENT OF CHILD PROSTITUTION, 20061  
§ 18-7-405.5 C.R.S. (F3)  
As to Lawrence Martinez, Robert Drinkwater-Mills and Reginald Ryan
- COUNT 8:** CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051  
§ 18-6-701 C.R.S. (F4)  
As to Lawrence Martinez, Robert Drinkwater-Mills and Reginald Ryan

- COUNT 9: PANDERING OF A CHILD, 20022**  
§ 18-7-403(1)(b) C.R.S. (F3)  
As to Angela Ryan
- COUNT 10: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Angela Ryan
- COUNT 11: PROCUREMENT OF A CHILD, 20031**  
§ 18-7-403.5 C.R.S. (F3)  
As to Mercedes Sanders
- COUNT 12: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Mercedes Sanders
- COUNT 13: PROCUREMENT OF A CHILD, 20031**  
§ 18-7-403.5 C.R.S. (F3)  
As to Hollie Montour
- COUNT 14: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Hollie Montour
- COUNT 15: TRAFFICKING IN CHILDREN, 03071**  
§ 18-3-502(1)(a) C.R.S. (F2)  
As to Lewis Smith and Phaedra Robinson
- COUNT 16: PIMPING OF A CHILD, 20051**  
§ 18-7-405 C.R.S. (F3)  
As to Lewis Smith and Phaedra Robinson
- COUNT 17: PANDERING OF A CHILD, 20022**  
§ 18-7-403(1)(b) C.R.S. (F3)  
As to Lewis Smith and Phaedra Robinson

- COUNT 18: SOLICITING FOR CHILD PROSTITUTION, 20011**  
§ 18-7-402(1)(a) C.R.S. (F3)  
As to Lewis Smith and Phaedra Robinson
- COUNT 19: PROCUREMENT OF A CHILD, 20031**  
§ 18-7-403.5 C.R.S. (F3)  
As to Lewis Smith and Phaedra Robinson
- COUNT 20: INDUCEMENT OF CHILD PROSTITUTION, 20061**  
§ 18-7-405.5 C.R.S. (F3)  
As to Lewis Smith and Phaedra Robinson
- COUNT 21: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Lewis Smith and Phaedra Robinson
- COUNT 22: PATRONIZING A PROSTITUTED CHILD, 20071**  
§ 18-7-406(1)(a) C.R.S. (F3)  
As to Hayatullah Khazi
- COUNT 23: SOLICITING FOR CHILD PROSTITUTION, 20012**  
§ 18-7-402(1)(b) C.R.S. (F3)  
As to Hayatullah Khazi
- COUNT 24: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Hayatullah Khazi
- COUNT 25: PATRONIZING A PROSTITUTED CHILD, 20071**  
§ 18-7-406(1)(a) C.R.S. (F3)  
As to Grant Schoengarth
- COUNT 26: SOLICITING FOR CHILD PROSTITUTION, 20012**  
§ 18-7-402(1)(b) C.R.S. (F3)  
As to Grant Schoengarth
- COUNT 27: SEXUAL ASSAULT, 0411D**  
§ 18-3-402(1)(e) C.R.S. (M1)  
As to Grant Schoengarth

- COUNT 28: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Grant Schoengarth
- COUNT 29: PATRONIZING A PROSTITUTED CHILD, 20071**  
§ 18-7-406(1)(a) C.R.S. (F3)  
As to Richard Gottbreht
- COUNT 30: SOLICITING FOR CHILD PROSTITUTION, 20012**  
§ 18-7-402(1)(b) C.R.S. (F3)  
As to Richard Gottbreht
- COUNT 31: SEXUAL ASSAULT, 0411D**  
§ 18-3-402(1)(e) C.R.S. (M1)  
As to Richard Gottbreht
- COUNT 32: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Richard Gottbreht
- COUNT 33: PATRONIZING A PROSTITUTED CHILD, 20071**  
§ 18-7-406(1)(a) C.R.S. (F3)  
As to Nathan Hohm
- COUNT 34: SOLICITING FOR CHILD PROSTITUTION, 20012**  
§ 18-7-402(1)(b) C.R.S. (F3)  
As to Nathan Hohm
- COUNT 35: SEXUAL ASSAULT, 0411D**  
§ 18-3-402(1)(e) C.R.S. (M1)  
As to Nathan Hohm
- COUNT 36: CONTRIBUTING TO THE DELINQUENCY OF A MINOR, 18051**  
§ 18-6-701 C.R.S. (F4)  
As to Nathan Hohm

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

The 2012-2013 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**

Violation of the Colorado Organized Crime Control Act ("COCCA")  
Pattern of Racketeering  
§ 18-17-104(3), C.R.S. (F2)

Between and including May 23, 2012 and September 12, 2012, in the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, while employed by or associated with an enterprise, 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.

The offense set forth in Count One was committed in the following manner:

**The Criminal Enterprise**

The criminal enterprise alleged in Count One was a group of individuals, associated in fact, although not a legal entity. The criminal enterprise included, but was not limited to, the following people:

- Lawrence Martinez
- Robert Drinkwater-Mills
- Latoi Newbins
- Lewis Smith
- Reginald Ryan
- Angela Ryan
- Mercedes Sanders
- Phaedra Robinson
- Hollie Montour

and other persons known or unknown, who were associated from time to time in racketeering activity that was related to the conduct of the criminal enterprise.

The criminal enterprise operated as a street gang that sexually exploited juveniles through human trafficking and pimping-related activities. The criminal enterprise engaged in sex trafficking operations in Denver, Aurora, Commerce City, Lakewood, Parker and Colorado Springs. Members of the criminal enterprise recruited juvenile girls to perform acts of prostitution. The subject juvenile girls were posted for sale on Backpage.com and made available to "johns" for sex acts. The juvenile girls were required to "walk the track" and engage in street-level prostitution when they were not doing "out calls" or "in calls."

Lawrence Martinez, Robert Drinkwater-Mills, Latoi Newbins, Lewis Smith, and/or Phaedra Robinson all played a role in recruiting and soliciting the juvenile girls to perform acts of prostitution, set rates that "johns" were charged to engage in sex acts with the juvenile girls, and decided the location where the juvenile girls were sexually exploited by obtaining hotel rooms, directing the juvenile girls to "walk the track" and/or driving the juvenile girls to "out calls." Cell phones were provided to the juvenile girls so they could be monitored and respond to inquiries from "johns."

Reginald Ryan, Lawrence Martinez, Robert Drinkwater-Mills and/or Latoi Newbins monitored the juvenile girls and physically assaulted them if they were non-compliant. Reginald Ryan and/or Lawrence Martinez also provided illegal drugs to the juvenile girls. On some occasions at least one of the juvenile girls was required to carry illegal drugs for one or more members of the criminal enterprise.

Angela Ryan took photos of the juvenile girls, posted ads offering the juvenile girls for sale on Backpage.com, and influenced the rates that were charged for "johns" to engage in sex acts with the juvenile girls.

Mercedes Sanders was a driver. She drove the juvenile girls to "out calls" to perform sex acts for money. Hollie Montour often loaned her car to the criminal enterprise so the juvenile girls could be transported to "out calls."

Lawrence Martinez, Robert Drinkwater-Mills, Latoi Newbins, Lewis Smith and/or Phaedra Robinson required the juvenile girls to pay them money the "johns" paid for sex acts, whether the money was paid for "out calls," "in calls" or street-level prostitution. Other members of the criminal enterprise were also compensated financially or with other items (cigarettes,

gasoline...) for facilitating the sex trafficking operation by posting ads on Backpage.com, providing transportation for "out calls," and /or monitoring the juvenile girls on the street as an enforcer.

Lawrence Martinez, Reginald Ryan, Angela Ryan and Lewis Smith have all previously admitted street gang affiliation to law enforcement officers.

#### Pattern of Racketeering Activity

For purposes of these counts, the defendants engaged in acts related to the conduct of the enterprise, including: **Trafficking in Children; Pimping of a Child; Pandering of a Child**, and any lesser included offenses of these charges. The last of the above-referenced acts of racketeering activity occurred within ten years of a prior act of racketeering activity and within three years of the date of this indictment.

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

#### PREDICATE ACT NUMBER ONE

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

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills** unlawfully and feloniously sold, exchanged, bartered, or leased **D.R. and/or L.T.**, a child or children, and received money or other consideration or thing of value for the child or children as a result of the transaction; in violation of section 18-3-502(1)(a), C.R.S.

**Facts that support the offense set forth in Predicate Act One are set forth after Count Eight, and are incorporated by reference as if fully set forth herein.**

**PREDICATE ACT NUMBER TWO**

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills** 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 or children, **D.R. and/or L.T.**, through prostitution; in violation of section 18-7-405, C.R.S.

**Facts that support the offense set forth in Predicate Act Two are set forth after Count Eight, and are fully incorporated by reference as if set forth herein.**

**PREDICATE ACT NUMBER THREE**

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **D.R. and/or L.T.**, a child or children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

**Facts that support the offense set forth in Predicate Act Three are set forth after Count Eight, and are fully incorporated by reference as if set forth herein.**

**PREDICATE ACT NUMBER FOUR**

Soliciting for Child Prostitution (F3)

§ 18-7-402(1)(a) C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, unlawfully and feloniously solicited **D.R. and/or L.T.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(a), C.R.S.

**Facts that support the offense set forth in Predicate Act Four are set forth after Count Eight, and are fully incorporated by reference as if set forth herein.**

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

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills** unlawfully and feloniously sold, exchanged, bartered, or leased **D.R. and/or L.T.**, 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.

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

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

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills** 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 or children, **D.R. and/or L.T.**, through prostitution; in violation of section 18-7-405, C.R.S.

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

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

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a

situation in which **D.R. and/or L.T.**, a child or children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

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

**COUNT NUMBER FIVE**  
Soliciting for Child Prostitution (F3)  
§ 18-7-402(1)(a) C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, unlawfully and feloniously solicited **D.R. and/or L.T.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(a), C.R.S.

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

**COUNT NUMBER SIX**  
Procurement of a Child (F3)  
§ 18-7-403.5 C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills**, unlawfully, feloniously, and intentionally gave, transported, provided, made available, or offered to give, transport, provide, or make available **D.R. and/or L.T.**, a child or children, to another person for the purpose of prostitution of the child; in violation of section 18-7-403.5, C.R.S.

**Facts that support the offense set forth in Count Six are set forth after Count Eight, 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 May 23, 2012 and September 12, 2012, within the State of Colorado, **Lawrence Martinez and/or Robert Drinkwater-Mills and/or Reginald Ryan**, unlawfully and feloniously, by word or action, induced **D.R.**

**and/or L.T., a child or children, 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 offense set forth in Count Seven are set forth after Count Eight, 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 May 23, 2012 and September 12, 2012, within the State of Colorado, Lawrence Martinez and/or Robert Drinkwater-Mills and/or Reginald Ryan, unlawfully and feloniously induced, aided, or encouraged D.R. and/or L.T., a child or children, to violate any state law namely: Prostitution, § 18-7-201 C.R.S. and/or Unlawful Possession of a Controlled Substance, § 18-18-403.5 C.R.S.; in violation of section 18-6-701, C.R.S.**

**Facts that support the offenses set forth in Counts One through Eight are as follow:**

**Between approximately May 23, 2012 and September 12, 2012, Lawrence Martinez and/or Robert Drinkwater-Mills operated a sex trafficking organized crime ring. Lawrence Martinez and/or Robert Drinkwater-Mills recruited and solicited juvenile girls to perform acts of prostitution, set rates that "johns" were charged to engage in sex acts with the juvenile girls, and decided the location where the juvenile girls were sexually exploited by obtaining hotel rooms, directing the juvenile girls to "walk the track" and/or driving the juvenile girls to "out calls." Cell phones were provided to the juvenile girls so they could be monitored and respond to inquiries from "johns."**

**Lawrence Martinez and/or Robert Drinkwater-Mills and/or Reginald Ryan monitored the juvenile girls and physically assaulted them if they were non-compliant. Lawrence Martinez and/or Reginald Ryan also provided illegal drugs to the juvenile girls. On some occasions at least one of the juvenile girls was required to carry illegal drugs for one or more members of the criminal enterprise.**

**During the relevant time, Lawrence Martinez and/or Robert Drinkwater-Mills required the juvenile girls to pay them money the "johns" paid for sex**

acts, whether the money was paid for "out calls," "in calls" or street-level prostitution. Lawrence Martinez and/or Robert Drinkwater-Mills ensured that other members of the criminal enterprise were also compensated financially or with other items (cigarettes, gasoline...) for facilitating the sex trafficking operation by posting ads on backpage.com, providing transportation for "out calls," and /or monitoring the juvenile girls on the street as an enforcer.

Lawrence Martinez, Reginald Ryan and some other members of the criminal enterprise have previously admitted street gang affiliation to law enforcement officers.

During all relevant times, D.R. and L.T. were under the age of eighteen years old.

**COUNT NUMBER NINE**

**Pandering of a Child (F3)**

**§ 18-7-403(1)(b) C.R.S.**

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Angela Ryan**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **D.R. and/or L.T.**, a child or children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

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

**COUNT NUMBER TEN**

**Contributing to the Delinquency of a Minor (F4)**

**§ 18-6-701 C.R.S.**

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, **Angela Ryan**, unlawfully and feloniously induced, aided, or encouraged **D.R. and/or L.T.**, a child or 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 Nine and Ten are as follow:**

Between and including May 23, 2012 and September 12, 2012, Angela Ryan arranged situations for minors to be sexually exploited through acts of prostitution by taking photos of the juvenile girls and posting ads on Backpage.com advertising D.R. and/or L.T. for sale under the adult entertainment section. Angela Ryan also told the minor girls what rates to charge for acts of prostitution. By posting sexually suggestive ads on Backpage.com advertising D.R. and/or L.T., and by setting rates for acts of prostitution, Angela Ryan aided and encouraged the minors to engage in acts of prostitution in and around the Denver metro area. During all relevant times, D.R. and L.T. were under the age of eighteen years old.

**COUNT NUMBER ELEVEN**

Procurement of a Child (F3)

§ 18-7-403.5 C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, Mercedes Sanders, unlawfully, feloniously, and intentionally gave, transported, provided, made available, or offered to give, transport, provide, or make available D.R. and/or L.T., a child or children, to another person for the purpose of prostitution of the child; in violation of section 18-7-403.5, C.R.S.

**Facts that support the offense 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**

Contributing to the Delinquency of a Minor (F4)

§ 18-6-701 C.R.S.

Between and including May 23, 2012 and September 12, 2012, within the State of Colorado, Mercedes Sanders, unlawfully and feloniously induced, aided, or encouraged D.R. and/or L.T., a child or 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 Eleven and Twelve are as follow:**

Between and including May 23, 2012 and September 12, 2012, Mercedes Sanders encouraged D.R. and/or L.T. to commit acts of prostitution, and pay the money earned from acts of prostitution to other members of the criminal enterprise, including but not limited to Lawrence Martinez. Mercedes Sanders also drove

D.R. and/or L.T. to "out calls" to commit acts of prostitution with "johns" in and around the Denver metro area. Mercedes Sanders was paid money earned from the acts of prostitution that were committed by D.R. and/or L.T. for her participation as a driver. During all relevant times, D.R. and L.T. were under the age of eighteen years old.

**COUNT NUMBER THIRTEEN**

Procurement of a Child (F3)  
§ 18-7-403.5 C.R.S.

Between and including May 23, 2012 and July 10, 2012, within the State of Colorado, **Hollie Montour**, unlawfully, feloniously, and intentionally gave, transported, provided, made available, or offered to give, transport, provide, or make available **D.R. and/or L.T.**, a child or children, to another person for the purpose of prostitution of the child; in violation of section 18-7-403.5, C.R.S.

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

**COUNT NUMBER FOURTEEN**

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

Between and including May 23, 2012 and July 10, 2012, within the State of Colorado, **Hollie Montour**, unlawfully and feloniously induced, aided, or encouraged **D.R. and/or L.T.**, a child or 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 Thirteen and Fourteen are as follow:**

Between and including May 23, 2012 and July 10, 2012, **Hollie Montour** aided and encouraged **D.R. and/or L.T.** to commit acts of prostitution by loaning her car to members of the criminal enterprise to transport **D.R. and/or L.T.** to "out calls" to commit acts of prostitution with "johns" in and around the Denver metro area. During all relevant times, **D.R. and L.T.** were under the age of eighteen years old.

**COUNT NUMBER FIFTEEN**

Trafficking in Children (F2)

§ 18-3-502(1)(a) C.R.S.

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson** unlawfully and feloniously sold, exchanged, bartered, or leased **D.R. and/or L.T.**, 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.

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

**COUNT NUMBER SIXTEEN**

Pimping of a Child (F3)

§ 18-7-405 C.R.S.

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson** 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 or children, **D.R. and/or L.T.**, through prostitution; in violation of section 18-7-405, C.R.S.

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

**COUNT NUMBER SEVENTEEN**

Pandering of a Child (F3)

§ 18-7-403(1)(b) C.R.S.

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson**, for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **D.R. and/or L.T.**, a child or children, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

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

**COUNT NUMBER EIGHTEEN**  
**Soliciting for Child Prostitution (F3)**  
**§ 18-7-402(1)(a) C.R.S.**

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson**, unlawfully and feloniously solicited **D.R. and/or L.T.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(a), C.R.S.

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

**COUNT NUMBER NINETEEN**  
**Procurement of a Child (F3)**  
**§ 18-7-403.5 C.R.S.**

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson**, unlawfully, feloniously, and intentionally gave, transported, provided, made available, or offered to give, transport, provide, or make available **D.R. and/or L.T.**, a child or children, to another person for the purpose of prostitution of the child; in violation of section 18-7-403.5, C.R.S.

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

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

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson**, unlawfully and feloniously,

by word or action, induced **D.R. and/or L.T.**, a child or children, 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 offense set forth in Count Twenty are set forth after Count Twenty-One, and are fully incorporated by reference as if set forth herein.**

**COUNT NUMBER TWENTY-ONE**

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

Between and including June 20, 2012 and June 27, 2012, within the State of Colorado, **Lewis Smith and/or Phaedra Robinson**, unlawfully and feloniously induced, aided, or encouraged **D.R. and/or L.T.**, a child or 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 Fifteen through Twenty-One are as follow:**

Between and including approximately June 20, 2012 and June 27, 2012, Lewis Smith and/or Phaedra Robinson recruited and solicited D.R. and/or L.T. to engage in street prostitution and "out calls" with "johns" in and around the Denver metro area and Colorado Springs.

Lewis Smith and/or Phaedra Robinson set rates that "johns" were charged to engage in sex acts with the juvenile girls, and decided the location where the juvenile girls were sexually exploited by obtaining hotel rooms and/or driving the juvenile girls to "out calls." Cell phones were provided to the juvenile girls so they could be monitored and respond to inquiries from "johns." Lewis Smith and/or Phaedra Robinson also provided clothing that the juvenile girls were required to wear during their sexual exploitation.

Lewis Smith and/or Phaedra Robinson sold the minor girls to "johns" and required the minor girls to pay over half of the monetary proceeds earned from acts of prostitution.

During all relevant times, D.R. and L.T. were under the age of eighteen years old.

**COUNT NUMBER TWENTY-TWO**

**Patronizing a Prostituted Child (F3)**

**§ 18-7-406(1)(a) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Hayatullah Khazi**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **D.R.**, 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 offense set forth in Count Twenty-Two are set forth after Count Twenty-Four, and are fully incorporated by reference as if set forth herein.**

**COUNT NUMBER TWENTY-THREE**

**Soliciting for Child Prostitution (F3)**

**§ 18-7-402(1)(b) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Hayatullah Khazi**, unlawfully and feloniously arranged or offered to arrange a meeting of **D.R.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(b), C.R.S.

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

**COUNT NUMBER TWENTY-FOUR**

**Contributing to the Delinquency of a Minor (F4)**

**§ 18-6-701 C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Hayatullah Khazi**, unlawfully and feloniously induced, aided, or encouraged **D.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 Counts Twenty-Two through Twenty-Four are as follow:**

Between approximately June 1, 2012 and July 11, 2012, Hayatullah Khazi responded to a sexually suggestive advertisement on Backpage.com or other similar internet-based ad, and arranged to meet the advertised female. Hayatuallah Khazi paid money to have sexual intercourse with juvenile D.R., a child under the age of eighteen who was not Hayatullah Khazi's spouse. During all relevant times, Hayatullah Khazi was more than ten (10) years older than juvenile D.R.

**COUNT NUMBER TWENTY-FIVE**

**Patronizing a Prostituted Child (F3)**

**§ 18-7-406(1)(a) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Grant Schoengarth**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **D.R.**, 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 offense set forth in Count Twenty-Five are set forth after Count Twenty-Eight, and are fully incorporated by reference as if set forth herein.**

**COUNT NUMBER TWENTY-SIX**

**Soliciting for Child Prostitution (F3)**

**§ 18-7-402(1)(b) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Grant Schoengarth**, unlawfully and feloniously arranged or offered to arrange a meeting of **D.R.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(b), C.R.S.

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

**COUNT NUMBER TWENTY-SEVEN**

Sexual Assault (M1)  
§ 18-3-402(1)(e) C.R.S.

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Grant Schoengarth**, unlawfully and knowing inflicted sexual intrusion or sexual penetration on **D.R.**, a person not the defendant's spouse, and at the time of the commission of the act the victim was at least fifteen years of age but less than seventeen years of age, and the defendant was at least ten years older than the victim; in violation of section 18-3-402(1)(e), C.R.S.

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

**COUNT NUMBER TWENTY-EIGHT**

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

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Grant Schoengarth**, unlawfully and feloniously induced, aided, or encouraged **D.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 Counts Twenty-Five through Twenty-Eight are as follow:**

Between approximately June 1, 2012 and July 11, 2012, Grant Schoengarth responded to a sexually suggestive advertisement on Backpage.com or other similar internet-based ad, and arranged to meet the advertised female. Grant Schoengarth paid money to have sexual intercourse with juvenile **D.R.**, a child under the age of eighteen who was not Grant Schoengarth's spouse. During all relevant times, Grant Schoengarth was more than ten (10) years older than juvenile **D.R.**

**COUNT NUMBER TWENTY-NINE**

**Patronizing a Prostituted Child (F3)**

**§ 18-7-406(1)(a) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Richard Gottbreht**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **D.R.**, 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 offense set forth in Count Twenty-Nine are set forth after Count Thirty-Two, and are fully incorporated by reference as if set forth herein.**

**COUNT NUMBER THIRTY**

**Soliciting for Child Prostitution (F3)**

**§ 18-7-402(1)(b) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Richard Gottbreht**, unlawfully and feloniously arranged or offered to arrange a meeting of **D.R.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(b), C.R.S.

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

**COUNT NUMBER THIRTY-ONE**

**Sexual Assault (M1)**

**§ 18-3-402(1)(e) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Richard Gottbreht**, unlawfully and knowing inflicted sexual intrusion or sexual penetration on **D.R.**, a person not the defendant's spouse, and at the time of the commission of the act the victim was at least fifteen years of age but less than seventeen years of age, and the defendant was at least ten years older than the victim; in violation of section 18-3-402(1)(e), C.R.S.

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

**COUNT NUMBER THIRTY-TWO**

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

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Richard Gottbreht**, unlawfully and feloniously induced, aided, or encouraged **D.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 Counts Twenty-Nine through Thirty-Two are as follow:**

Between approximately June 1, 2012 and July 11, 2012, Richard Gottbreht responded to a sexually suggestive advertisement on Backpage.com or other similar internet-based ad, and arranged to meet the advertised female. Richard Gottbreht paid money to have sexual intercourse with juvenile **D.R.**, a child under the age of eighteen who was not Richard Gottbreht's spouse. During all relevant times, Richard Gottbreht was more than ten (10) years older than juvenile **D.R.**

**COUNT NUMBER THIRTY-THREE**

**Patronizing a Prostituted Child (F3)  
§ 18-7-406(1)(a) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Nathan Hohm**, unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **D.R. and/or L.T.**, 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 offense set forth in Count Thirty-Three are set forth after Count Thirty-Six, and are fully incorporated by reference as if set forth herein.**

**COUNT NUMBER THIRTY-FOUR**

**Soliciting for Child Prostitution (F3)**

**§ 18-7-402(1)(b) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Nathan Hohm**, unlawfully and feloniously arranged or offered to arrange a meeting of **D.R. and/or L.T.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(b), C.R.S.

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

**COUNT NUMBER THIRTY-FIVE**

**Sexual Assault (M1)**

**§ 18-3-402(1)(e) C.R.S.**

Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Nathan Hohm**, unlawfully and knowing inflicted sexual intrusion or sexual penetration on **D.R. and/or L.T.**, a person not the defendant's spouse, and at the time of the commission of the act the victim was at least fifteen years of age but less than seventeen years of age, and the defendant was at least ten years older than the victim; in violation of section 18-3-402(1)(e), C.R.S.

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

**COUNT NUMBER THIRTY-SIX**

**Contributing to the Delinquency of a Minor (F4)**

**§ 18-6-701 C.R.S.**

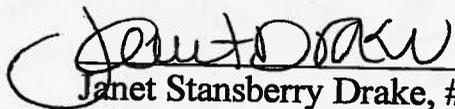
Between and including June 1, 2012 and July 11, 2012, within the State of Colorado, **Nathan Hohm**, unlawfully and feloniously induced, aided, or encouraged **D.R. and/or L.T.**, a child, to violate any state law namely: Prostitution, § 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

**Facts that support the offenses set forth in Counts Thirty-Three through Thirty-Six are as follow:**

Between approximately June 1, 2012 and July 11, 2012, Nathan Hohm responded to a sexually suggestive advertisement on Backpage.com or other similar internet-based ad, and arranged to meet the advertised female(s). Nathan Hohm paid money to have sexual intercourse with juvenile(s) D.R. and/or L.T., a child/children under the age of eighteen who was/were not Nathan Hohm's spouse. During all relevant times, Nathan Hohm was more than ten (10) years older than juvenile D.R. and/or L.T.

Dated this 10th day of December 2012.

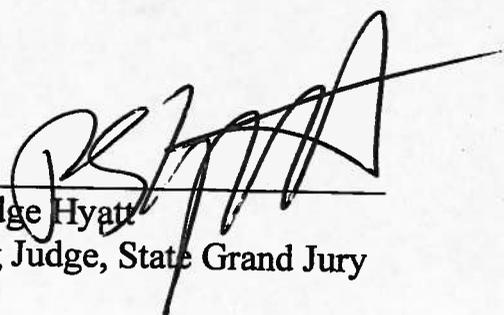
JOHN W. SUTHERS  
ATTORNEY GENERAL STATE OF COLORADO

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

The 2012-2013 Colorado Statewide Grand Jury presents this Indictment, and the same is hereby ORDERED FILED this 6th day of December 2012.

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

Dated this 6th day of December 2012.

  
\_\_\_\_\_  
Chief Judge Hyatt  
Presiding Judge, State Grand Jury