

<p>DISTRICT COURT,  <u>ARAPAHOE</u> COUNTY, COLORADO</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,  Plaintiff,</p> <p>v.</p> <p><b>OTHELLO KENTA BLAND</b>      <b>DOB 06/19/78</b>  (aka Othello Kente Bland)</p> <p><b>CHELSEA MARIE GETCHELL</b>      <b>DOB 07/08/89</b></p> <p>Defendants.</p>	<p style="text-align: center;">▲ <b>COURT USE ONLY</b> ▲</p>
<p>JOHN W. SUTHERS, Attorney General  JODY PILMER, 31347  Senior Assistant Attorneys General*  1525 Sherman Street, 7<sup>th</sup> Floor  Denver, CO 80203  (303) 866-4500  (303) 866-3955 (FAX)  jody.pilmer@state.co.us  *Counsel of Record</p>	<p>Case No.:</p> <p>Ctrm.:</p>
<p><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

COUNT ONE:                      **VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT § 18-17-104(3) C.R.S. (F2)**  
**[37284]**  
Othello Bland

COUNT TWO:                      **COMPUTER CRIME § 18-5.5-102(1)(d) C.R.S. (F3)**  
**[150A2]**  
Othello Bland, Chelsea Getchell

COUNT THREE:                      **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland, Chelsea Getchell

COUNT FOUR:                      **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**

Othello Bland, Chelsea Getchell

- COUNT FIVE: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland, Chelsea Getchell
- COUNT SIX: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland, Chelsea Getchell
- COUNT SEVEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland, Chelsea Getchell
- COUNT EIGHT: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland, Chelsea Getchell
- COUNT NINE: **CONSPIRACY TO COMMIT THEFT**  
**§§ 18-4-401(1),(2)(d);18-2-201 C.R.S. (F4)**  
**[CON 0801V]**  
Othello Bland, Chelsea Getchell
- COUNT TEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland
- COUNT ELEVEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland
- COUNT TWELVE: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland
- COUNT THIRTEEN: **THEFT § 18-4-401(1)(2)(b) C.R.S. (F-4)**  
**[0801S]**  
Othello Bland
- COUNT FOURTEEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland

COUNT FIFTEEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland

COUNT SIXTEEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland

COUNT SEVENTEEN: **THEFT § 18-4-401(1)(2)(c) C.R.S. (F-4)**  
**[0801U]**  
Othello Bland

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO, Plaintiff,</p> <p>v.</p> <p><b>OTHELLO KENTA BLAND</b>                      D.O.B. 06/19/78 <b>CHELSEA MARIE GETCHELL</b>            D.O.B. 07/08/89</p> <p>Defendants.</p>	<p style="text-align: center;">▲ <b>COURT USE ONLY</b> ▲</p>
<p>JOHN W. SUTHERS, Attorney General JODY PILMER, 31347 Senior Assistant Attorney General* 1525 Sherman Street, 7<sup>th</sup> Floor Denver, CO 80203 (303) 866-4500 (303) 866-3955 FAX jody.pilmer@state.co.us *Counsel of Record</p>	<p>Case No.: 11CR00001</p> <p>Ctrm.:</p>
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Of the 2011-2012 term of the Denver District Court in the year of 2011, the 2011-2012 State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

**COUNT ONE**

VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3)  
(F2)

Between and including December 1, 2007 and July 22, 2010, triable in the State of Colorado, OTHELLO BLAND, 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 § 18-17-104(3) and § 18-17-105, C.R.S.

### The Enterprise

The enterprise alleged in this count is a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: OTHELLO BLAND, CHELSEA GETCHELL, JODIE REED, and other persons known or unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

The enterprise consists of the people identified above working in concert with each other and, from time to time, with other parties of unknown identity for the purpose of obtaining motor vehicles by fraudulent means and reselling the motor vehicles for cash. Each known member of the enterprise was recruited, instructed, and assisted through the process by Othello Bland. The fraudulent means by which the motor vehicles were obtained included two methods. Vehicles were either purchased from private owners using forged cashier's checks or Othello Bland obtained possession by posing as a prospective buyer of a vehicle that had been advertised for sale by its owner and driving the vehicle away during the course of a test-drive or inspection. The motor vehicles obtained through these methods were advertised over the internet and resold for cash by members of the enterprise to unsuspecting purchasers.

### Pattern of Racketeering Activity

For purposes of this count, OTHELLO BLAND engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser included offenses, related to the conduct of the enterprise. The predicate acts that are hereby specifically incorporated by reference into COUNT ONE are COUNTS TWO through SEVENTEEN and UNCHARGED PREDICATE ACTS ONE through EIGHT.

### **COUNT TWO**

COMPUTER CRIME § 18-5.5-102(1)(d), C.R.S. (F3)

On or between June 15, 2010 and July 9, 2010, in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly accessed a computer, computer network, or computer system, or any part thereof to commit theft, and the loss, damage, value of services, or thing of value taken, or cost of restoration or repair was twenty thousand dollars or more; in violation of section 18-5.5-102(1)(d), C.R.S.

The essential facts that support COUNT TWO are as follows:

Othello Bland and Chelsea Getchell, each at various times and on multiple occasions, located vehicles advertised for sale over the internet through auto listing websites. Othello Bland and Chelsea Getchell worked together to contact the owners of the vehicles and to fraudulently purchase the vehicles. Othello Bland and Chelsea Getchell then worked together to place advertisements for the sale of each vehicle over the internet through auto listing websites, to answer inquiries by interested parties, and to sell the stolen vehicles to unknowing individuals for cash. The cash obtained and retained by Othello Bland and

Chelsea Getchell through the sale of vehicles stolen in this manner was in excess of \$71,000.

**COUNT THREE**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between June 15, 2010 and June 16, 2010, in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2004 Honda Accord, of Ranadeep Bhattacharya, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Ranadeep Bhattacharya of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

**COUNT FOUR**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or about June 16, 2010 in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of Mario Marquez, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Mario Marquez permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support COUNT THREE and COUNT FOUR are as follows:

Othello Bland and Chelsea Getchell located an advertisement for the sale of a 2004 Honda Accord that had been placed on craigslist.com by Ranadeep Bhattacharya. Chelsea Getchell contacted and met with Bhattacharya on or between June 15 and June 16, 2010 in Arapahoe County, Colorado. Getchell agreed to purchase the vehicle for \$9,800 and told Bhattacharya that she would provide him a check from Allstate Insurance. Othello Bland called Bhattacharya impersonating an Allstate agent and stated that he was preparing a check. Getchell provided Bhattacharya a forged check that Bland gave her for the transaction. Bland and Getchell took possession of the vehicle. Bhattacharya was unable to negotiate the \$9,800 check.

After stealing the 2004 Honda Accord from Bhattacharya, Chelsea Getchell and Othello Bland advertised the same vehicle for sale using craigslist.com. Getchell then negotiated the sale of that vehicle to Mario Marquez in Arapahoe County, Colorado and accepted \$6,000 in cash from Marquez on or about June 16, 2010. Getchell gave the cash proceeds of that transaction to Bland. The car was impounded by police and Marquez was never permitted to obtain title or retain possession.

**COUNT FIVE**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between June 14, 2010 and June 16, 2010, in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2004 Acura TL, of Scott Barton and Nicole Barton, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Scott Barton and Nicole Barton of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

**COUNT SIX**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or about June 16, 2010 in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of Toan Le, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Toan Le permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support COUNT FIVE and COUNT SIX are as follows:

Othello Bland and Chelsea Getchell located an advertisement for the sale of a 2004 Acura TL that had been placed on craigslist.com by Scott Barton. Chelsea Getchell contacted and met with Barton on or between June 14 and June 15, 2010 in Douglas County, Colorado. Getchell agreed to purchase the vehicle for \$16,500 and told Barton that she would provide him a check from her vehicle insurance provider. On June 15, 2010, Getchell provided Barton a forged check that Bland gave her for the transaction. Bland and Getchell took possession of the vehicle. Barton was unable to negotiate the \$16,500 check.

After stealing the Acura TL from Barton, Chelsea Getchell and Othello Bland advertised the same vehicle for sale for \$9,500 using craigslist.com. Getchell then negotiated the sale of that vehicle to Toan Le in Douglas County, Colorado and accepted \$8,500 in cash from Mr. Le on or about June 16, 2010. Getchell gave the cash proceeds of that transaction to Bland. The car was impounded by police and Le was not permitted to obtain title or retain possession.

**COUNT SEVEN**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between June 23, 2010 and June 24, 2010 in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2003 Nissan Xterra, of Shaunee Groth and

Brie Anne Groth, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Shaune Groth and Brie Anne Groth of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support COUNT SEVEN are as follows:

Othello Bland and Chelsea Getchell located an advertisement for the sale of a 2003 Nissan Xterra that had been placed on craigslist.com by Shaune Groth on behalf of her daughter, Brie Anne Groth. Chelsea Getchell contacted and met with Shaune Groth on or between June 23 and June 24, 2010 in Adams County, Colorado. Getchell agreed to purchase the vehicle for \$11,200 and told Groth that she would provide her a check from her insurance company. Othello Bland called Groth impersonating an Allstate Insurance agent and stated that he was preparing a check. Getchell provided Groth a forged check that Bland gave her for the transaction. Bland and Getchell took possession of the vehicle. Groth was unable to negotiate the \$11,200 check.

After stealing the 2003 Nissan Xterra from Groth, Chelsea Getchell and Othello Bland advertised the same vehicle for sale using craigslist.com. Getchell then negotiated the sale of that vehicle to William Brett in Denver County, Colorado and accepted \$7,200 in cash from Brett on or about June 24, 2010. Getchell gave the cash proceeds of that transaction to Bland. William Brett was able to obtain title to that vehicle and retain possession.

### **COUNT EIGHT**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between June 25, 2010 and July 9, 2010 in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2002 Lexus, of Nagina Simonov and Arthur Simonov, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Nagina Simonov and Arthur Simonov of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support COUNT EIGHT are as follows:

Othello Bland and Chelsea Getchell located an advertisement for the sale of a 2002 Lexus GS 300 that had been placed on craigslist.com by Nagina Simonov. Chelsea Getchell contacted and met with Nagina Simonov and Arthur Simonov on two occasions between June 25 and June 27, 2010 in Arapahoe County, Colorado. Getchell agreed to purchase the vehicle for \$10,500 and told the Simonovs that she would provide them a check from her insurance provider. Getchell provided the Simonovs a forged check that Bland gave her for the transaction. Bland and Getchell took possession of the vehicle. Nagina Simonov was

unable to negotiate the \$10,500 check.

After stealing the Lexus GS 300 from the Simonovs, Chelsea Getchell and Othello Bland advertised the same vehicle for sale using craigslist.com. Getchell then met with an interested party named Michael Aire at a location in Arapahoe County, Colorado and allowed him to take the Lexus on a test drive on or about July 9, 2010. Getchell held the keys to his car as security while Aire drove the car to determine whether or not he wanted to purchase it. After his brief drive, Aire returned to find that Getchell had left with his keys.

#### **COUNT NINE**

**CONSPIRACY TO COMMIT THEFT, C.R.S. §§ 18-4-401(1),(2)(d);18-2-201 (F4)**

On or between June 15, 2010 and July 9, 2010, in the State of Colorado, OTHELLO BLAND and CHELSEA GETCHELL, with the intent to promote or facilitate the commission of the crime of Theft, unlawfully and feloniously agreed with each other and a person or persons unknown to the grand jury that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1),(2)(d) and 18-2-201, C.R.S.

The essential facts that support COUNT NINE are contained within the factual narratives for COUNTS TWO through EIGHT and incorporated herein by reference.

#### **COUNT TEN**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between January 12, 2010 and January 27, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2005 Toyota Camry, of Phillip Rackers, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Phillip Rackers of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

**COUNT ELEVEN**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or about January 27, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of Manoj Joshi, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Manoj Joshi permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support COUNT TEN and COUNT ELEVEN are as follows:

Othello Bland contacted Phillip Rackers in response to an ad Rackers had posted for the sale of his 2005 Toyota Camry on craigslist.com. Bland and Rackers met in Overland Park, Kansas on or about January 12, 2010 to discuss the possible purchase of the car. While test-driving the vehicle, Bland drove away in Rackers' Camry without his permission and did not return.

After stealing the 2005 Camry from Rackers, Bland advertised the sale of the vehicle on craigslist.com. Manoj Joshi responded to Bland's advertisement, met Bland at a location in Arapahoe County, Colorado, and gave Bland \$5,800 cash for the vehicle on or about January 27, 2010. The vehicle was impounded by police and eventually returned to Rackers.

**COUNT TWELVE**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between February 15, 2010 and February 27, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2003 Audi of Nyamdorj Narangerel, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Nyamdorj Narangerel of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

**COUNT THIRTEEN**

**THEFT § 18-4-401(1),(2)(b), C.R.S. (M2)**

On or about February 27, 2010, in the State of Colorado, OTHELLO BLAND unlawfully and knowingly obtained or exercised control over a thing of value, namely: Money, of Michael Rizek and Debbie Rizek, with the value of less than five hundred dollars, without authorization, or by threat or deception, and intended to deprive Micheal Rizek and Debbie Rizek permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(b), C.R.S.

The essential facts that support COUNT TWELVE and COUNT THIRTEEN are as follows:

Othello Bland contacted Nyamdorj Narangerel in response to an ad Narangerel had posted for the sale of a 2003 Audi on craigslist.com. Bland and Narangerel met at a location in Arapahoe County, Colorado on or about February 15, 2010 to discuss the possible purchase of the car. While test-driving the vehicle, Bland drove away without Narangerel's permission and did not return.

After stealing the 2003 Audi from Narangerel, Bland advertised the sale of the vehicle on craigslist.com. Michael and Debbie Rizek responded to Bland's advertisement, met Bland at a location in Jefferson County, Colorado on or about February 27, 2010, and gave Bland a \$200 cash down-payment for the vehicle. The Rizeks then contacted the Westminster Police Department with the car's Vehicle Identification Number and were informed that the car had been reported stolen. The Rizek's did not get their down-payment back and did not have possession of the vehicle.

On or about March 4, 2010, Ryan Vance answered a craigslist.com ad that had been placed by Bland for Narangerel's 2003 Audi in the Salt Lake City, Utah area. Vance and Bland met in the State of Utah and Vance gave Bland \$5,800 for the vehicle. Bland did not have the title to the vehicle at that time and agreed to meet Vance later with both the title and the vehicle. Bland never returned with either and Vance was never refunded any of his money.

On or about March 16, 2010, Toyjjuan Warren answered a craigslist.com advertisement for the same 2003 Audi. Warren and Bland met in Ada County, Idaho. Warren brought \$4,900 cash with him in order to purchase the vehicle. During the course of a test-drive of the vehicle, police attempted to stop the car while Bland was driving. Bland eluded police in the car and eventually fled on foot. He was ultimately apprehended and the car was impounded.

#### **COUNT FOURTEEN**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between April 9, 2010 and April 10, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2005 Honda Accord, of Kelly Horan and Joan Horan, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Kelly Horan and Joan Horan of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

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The essential facts that support COUNT FOURTEEN are as follows:

Othello Bland contacted Kelly Horan in response to an ad Horan had posted for the sale of her 2005 Honda Accord on craigslist.com. Bland and Horan met in Jefferson County, Colorado on or about April 9, 2010 to discuss the possible purchase of the car. Bland agreed

to purchase the vehicle for \$10,900 and provided Horan a forged check. Bland took possession of the vehicle. Horan was unable to negotiate the check.

After stealing the 2005 Honda Accord from Horan, Bland advertised the sale of the vehicle on craigslist.com. Tara and Brent Douglas responded to Bland's advertisement, met Bland at a location in Denver County, Colorado, and gave Bland \$7,200 cash for the vehicle on or about April 10, 2010. Tara and Brent Douglas were able to secure title and maintain possession of the 2005 Honda Accord by pursuing a civil action.

#### **COUNT FIFTEEN**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between April 17, 2010 and April 18, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2004 Honda Accord, of Mark Krajewski and Jayme Krajewski, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Mark Krajewski and Jayme Krajewski permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

#### **COUNT SIXTEEN**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or about April 18, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of Otoniel Iboa-Montes, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Otoniel Iboa-Montes permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support COUNT FIFTEEN and COUNT SIXTEEN are as follows:

Othello Bland contacted Jayme Krajewski in response to an ad Krajewski had posted for the sale of her 2004 Honda Accord in Autotrader magazine. Bland and Krajewski met in Arapahoe County, Colorado on or about April 17, 2010 to discuss the possible purchase of the car. Bland agreed to purchase the vehicle for \$12,500 and provided Krajewski a forged check. Bland took possession of the vehicle. Krajewski was unable to negotiate the check.

After stealing the 2004 Honda Accord from Krajewski, Bland advertised the sale of the vehicle on craigslist.com. Otoniel Iboa-Montes responded to Bland's advertisement, met Bland at a location in Arapahoe County, Colorado, and gave Bland \$7,200 cash for the vehicle on or about April 18, 2010. The car was impounded by police and Iboa-Montes was not permitted to obtain title or retain possession.

**COUNT SEVENTEEN**  
THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between May 8, 2010 and May 10, 2010, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2002 Honda CRV, of Brett Fuhrman, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Brett Fuhrman permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support COUNT SEVENTEEN are as follows:

Othello Bland contacted Brett Fuhrman in response to an ad Fuhrman had posted for the sale of his 2002 Honda CRV on craigslist.com. Bland and Fuhrman met in Denver County, Colorado on or about May 8, 2010. Bland agreed to purchase the vehicle for \$9,200, at which time Bland provided Fuhrman a forged check. Bland took possession of the 2002 Honda CRV. Fuhrman was unable to negotiate the check.

After stealing the 2002 Honda CRV from Fuhrman, Bland advertised the sale of the vehicle on craigslist.com. Robert Jaffe responded to Bland's advertisement, met Bland at a location in Denver County, Colorado on or about May 10, 2010, and gave Bland \$6,300 cash for the vehicle on behalf of Peter Horigan and Just Right Motors. Fuhrman's Honda CRV was sold to Carl Johnson, who was able to obtain title and retain possession of the vehicle.

## **UNCHARGED PREDICATE ACTS**

The following UNCHARGED PREDICATE ACTS, ONE through EIGHT, are alleged to have either occurred more than three years prior to the date of the indictment or to have occurred in another jurisdiction. Each uncharged predicate act is triable against OTHELLO BLAND in the state of Colorado under C.R.S. § 18-17-104(3) and C.R.S. § 18-17-103(5) as evidence of a pattern of racketeering activity in support of COUNT ONE of this indictment. UNCHARGED PREDICATE ACTS ONE through EIGHT are incorporated by reference, along with COUNTS TWO through SEVENTEEN, into COUNT ONE.

### **UNCHARGED PREDICATE ACT ONE**

THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or about March 4, 2010, in the State of Utah and triable in the State of Colorado as a predicate act under C.R.S. §§ 18-17-103(5) and 18-17-104(3), OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of Ryan Vance, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Ryan Vance permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT ONE are contained within the factual narrative for COUNTS TWELVE and THIRTEEN and incorporated herein by reference.

### **UNCHARGED PREDICATE ACT TWO**

ATTEMPTED THEFT § 18-4-401(1)(a),(2)(c); 18-2-101, C.R.S. (F5)

On or about March 16, 2010, in the State of Idaho and triable in the State of Colorado as a predicate act under C.R.S. §§ 18-17-103(5) and 18-17-104(3), by engaging in conduct constituting a substantial step toward the commission of Theft, OTHELLO BLAND unlawfully, feloniously, and knowingly attempted to obtain or exercise control over a thing of value, namely: Money, of Toyjijuan Warren, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Toyjijuan Warren permanently of its use or benefit; in violation of sections 18-4-401(1)(a),(2)(c), C.R.S. and 18-2-101, C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT TWO are contained within the factual narratives for COUNTS TWELVE and THIRTEEN and incorporated herein by reference.

### **UNCHARGED PREDICATE ACT THREE**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or about August 16, 2007, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2001 Subaru Outback, of Andrew Emery, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Andrew Emery of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT THREE are as follows:

Othello Bland and Jodie Reed located an advertisement for the sale of a 2001 Subaru Outback that had been placed on craigslist.com by Andrew Emery. Jodie Reed contacted and met with Emery on or about August 16, 2007 in Arapahoe County, Colorado. Reed agreed to purchase the vehicle for \$10,000. Reed provided Emery a forged check that was given to her by Bland for the transaction. Reed took possession of Emery's vehicle and turned it over to Bland. Emery was unable to negotiate the \$10,000 check. Emery's 2001 Subaru Outback was later abandoned by Reed and Bland in Arapahoe County, Colorado.

### **UNCHARGED PREDICATE ACT FOUR**

**THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)**

On or between August 15, 2007 and August 18, 2007, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2001 Subaru Outback, of Patrick Breen, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Patrick Breen of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT FOUR are as follows:

Othello Bland and Jodie Reed located an advertisement for the sale of a 2001 Subaru Outback that had been placed on craigslist.com by Patrick Breen. Jodie Reed contacted and met with Breen on or between August 15 and August 16, 2007 in Arapahoe County, Colorado. Reed agreed to purchase the vehicle for \$9,000. Reed provided Breen a forged check that Bland gave her for the transaction. Reed took possession of the vehicle and turned it over to Bland. Breen was unable to negotiate the \$9,000 check.

After stealing the 2001 Subaru Outback from Breen, Othello Bland and Jodie Reed advertised the same vehicle for sale using craigslist.com. Reed then negotiated the sale of

that vehicle to Mark Legler at a location in Jefferson County, Colorado and accepted \$6,300 in cash from Legler on or about August 18, 2007. Getchell gave the cash proceeds of that transaction to Bland. Legler was able to obtain title and permitted to retain possession of the vehicle.

**UNCHARGED PREDICATE ACT FIVE**  
THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between August 1, 2007 and August 6, 2007, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2002 Honda Accord, of Tayson Haw, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and intended to deprive Tayson Haw permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT FIVE are as follows:

Othello Bland and Jodie Reed located an advertisement for the sale of a 2001 Honda Accord that had been placed on craigslist.com by Tayson Haw. Reed contacted and met with Haw on or between August 1 and August 2, 2007 in Arapahoe County, Colorado. Reed agreed to purchase the vehicle for \$10,500. Reed provided Haw a forged check that Bland gave her for the transaction. Reed took possession of the vehicle and turned it over to Bland. Haw was unable to negotiate the \$10,500 check.

After stealing the 2001 Honda Accord from Haw, Jodie Reed and Othello Bland advertised the same vehicle for sale for using craigslist.com. Getchell then negotiated the sale of that vehicle to Abdulla Khdr at a location in Arapahoe County, Colorado and accepted \$6,300 in cash from Khdr on or about August 6, 2007. Reed gave the cash proceeds of that transaction to Bland. Khdr maintained possession of the vehicle and was able to obtain valid title in the State of Louisiana.

**UNCHARGED PREDICATE ACT SIX**  
THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between August 1, 2007 and August 3, 2007, in the State of Colorado, OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2002 Toyota Camry, of Timothy Heins, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Timothy Heins of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT SIX are as follows:

Othello Bland and Jodie Reed located an advertisement for the sale of a 2002 Toyota Camry that had been placed on craigslist.com by Timothy Heins. Reed contacted and met with Heins on or between August 1 and August 2, 2007, in Arapahoe County, Colorado. Reed agreed to purchase the vehicle for \$10,200. Reed provided Heins a forged check that Bland gave her for the transaction. Reed took possession of the vehicle and turned it over to Bland. Heins was unable to negotiate the \$10,200 check.

After stealing the 2002 Toyota Camry from Heins, Jodie Reed and Othello Bland advertised the same vehicle for sale using craigslist.com. Reed then negotiated the sale of that vehicle to Carl Battista at a location in Arapahoe County, Colorado and accepted \$4,000 in cash from Battista on or about August 18, 2007. Reed gave the cash proceeds of that transaction to Bland. Battista was permitted to obtain title and retain possession of the vehicle.

**UNCHARGED PREDICATE ACT SEVEN**  
THEFT § 18-4-401(1),(2)(c), C.R.S. (F4)

On or between December 2, 2007 and December 4, 2007, in the State of Utah and triable in the State of Colorado as a predicate act under C.R.S. §§ 18-17-103(5) and 18-17-104(3), OTHELLO BLAND unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: 2000 Toyota 4-Runner, of Bryan Fong, with the value of one thousand dollars or more but less than twenty thousand dollars, without authorization, or by threat or deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Bryan Fong of its use or benefit; in violation of section 18-4-401(1)(b),(2)(c), C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT SEVEN are as follows:

Othello Bland and Jodie Reed located an advertisement for the sale of a 2000 Toyota Forerunner that had been placed on craigslist.com by Bryan Fong. Reed contacted and met with Fong on or between December 2 and December 3, 2007, in Salt Lake City, Utah. Reed agreed to purchase the vehicle for \$11,500. Reed provided Fong a forged check that was given to her by Bland for the transaction. Reed took possession of the vehicle and turned it over to Bland. Fong was unable to negotiate the \$11,500 check.

After stealing the 2000 Toyota Forerunner from Fong, Jodie Reed and Othello Bland advertised the same vehicle for sale using craigslist.com. Reed then attempted to negotiate the sale of that vehicle to a police officer posing as a potential buyer on December 4, 2007 in Salt Lake City, Utah. Reed was apprehended. Bland was neither apprehended nor implicated by Reed at the time of her arrest.

**UNCHARGED PREDICATE ACT EIGHT**  
CONSPIRACY TO COMMIT THEFT § 18-4-401(1),(2)(d); 18-2-201 (F4)

On or between August 1, 2007 and December 4, 2007, in the State of Colorado and the State of Utah, OTHELLO BLAND, with the intent to promote or facilitate the commission of the crime of Theft, unlawfully and feloniously agreed with JODIE REED and a person or persons unknown to the grand jury that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1),(2)(d) and 18-2-201, C.R.S.

The essential facts that support UNCHARGED PREDICATE ACT EIGHT are contained within the factual narratives for UNCHARGED PREDICATE ACTS ONE through SEVEN and incorporated herein by reference.