

DISTRICT COURT, CITY AND COUNTY OF
DENVER, COLORADO

1437 Bannock Street
Denver, Colorado 80202

THE PEOPLE OF THE STATE OF COLORADO,

v.

JUAN CARLOS GONZALEZ,
MONICA GONZALEZ,
OSCAR RUVALCABA,
LUZ GONZALEZ,
MARIA ARELLANO a/k/a NENA,
PATRICK LORENZO,
ENRIQUE CAMPOS,
JENNIFER SEIPP,
JOE BAIER,
TINA LEBLANC,
FRANK HARDY,
MATTHEW SKIPP a/k/a MATEO,
JAMES LOEFFLER,
JENNIFER GANJE,
JASON JACQUEZ,
DANIELLE ULIBARRI
HUGO AREVALO,

Defendants.

▲ COURT USE ONLY ▲

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State Grand Jury Case:
14 CR 0001

Courtroom 209

COLORADO STATE GRAND JURY INDICTMENT

CHARGES

COUNT 1	VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT – PATTERN OF RACKETEERING § 18-17-104(3) C.R.S. (F2) 37284
COUNT 2	VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT – CONSPIRACY § 18-17-104(4) C.R.S. (F2) 37285
COUNTS 3, 4, 5, 17, 24, 29, 39, 46, 62	POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE – METHAMPHETAMINE – MORE THAN 112 GRAMS § 18-18-405(1),(2)(A)(I)(B) C.R.S. (DF1) 8104B
COUNT 6	POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE – SCHEDULE II – MORE THAN 225 GRAMS § 18-18-405(1),(2)(A)(I)(A) C.R.S. (DF1) 81048
COUNTS 7, 8, 16, 38, 45, 61	CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE – MORE THAN 112 GRAMS § 18-18-405(1),(2)(A)(I)(B) C.R.S (DF1) 8105P
COUNTS 9, 10, 11, 12, 13, 14, 15, 18, 19, 20, 31, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44, 47, 48, 50, 51, 53, 55, 57, 59, 60	DISTRIBUTION OF CONTROLLED SUBSTANCE § 18-18-405(1),(2)(C)(II) C.R.S. (DF3) 8202G
COUNTS 21, 49, 52, 54, 56, 58	CONSPIRACY – CONTROLLED SUBSTANCES § 18-18-405(1),(2)(C)(II) C.R.S. (DF3) 8105M
COUNT 22	MONEY LAUNDERING § 18-5-309(1)(C) C.R.S. (F3) 12215

COUNTS 23, 63	TAX EVASION § 39-21-118(1) C.R.S. (F5) 40021
COUNTS 25, 26, 27, 28	DISTRIBUTION OF CONTROLLED SUBSTANCE – METHAMPHETAMINE – 7 – 112 GRAMS § 18-18-405(1),(2)(B)(I)(B) C.R.S. (DF2) 8202H
COUNT 30	DISTRIBUTION OF CONTROLLED SUBSTANCE – METHAMPHETAMINE – MORE THAN 112 GRAMS § 18-18-405(1),(2)(A)(I)(B) C.R.S. (DF1) 8202J
COUNT 64	FILING A FALSE TAX RETURN § 39-21-118(4) C.R.S. (F5) 40024

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

The 2014-2015 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

VIOLETION OF THE COLORADO ORGANIZED CRIME CONTROL ACT
PATTERN OF RACKETEERING
§ 18-17-104(3), C.R.S. (F2)

Between and including November 16, 2013 and August 19, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Monica Gonzalez**, and others both known and unknown, 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 facts supporting Count Number One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWO

VIOLETION OF THE COLORADO ORGANIZED CRIME CONTROL ACT
CONSPIRACY
§ 18-17-104(4)

Between and including November 16, 2013 and August 19, 2014, in the State of Colorado, **Oscar Ruvalcaba, Luz Gonzalez, and/or Maria Arellano a/k/a Nena**, and others both known and unknown, did unlawfully, feloniously, and knowingly conspire and endeavor to conduct and participate, directly or indirectly, in the

enterprise, through a pattern of racketeering activity; in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

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

The Criminal Enterprise

The criminal enterprise alleged in counts one and two 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:

- Juan Carlos Gonzalez,
- Monica Gonzalez,
- Oscar Ruvalcaba,
- Luz Gonzalez,
- Maria Arellano a/k/a Nena,
- Patrick Lorenzo,
- Enrique Campos,
- Jennifer Seipp,
- Joe Baier,
- Tina Leblanc,
- Frank Hardy,
- Matthew Skipp a/k/a Mateo,
- James Loeffler,
- Jennifer Ganje,
- Jason Jacquez,
- Danielle Ulibarri,
- Hugo Arevalo

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 individuals associated with the criminal enterprise were involved from time to time in racketeering activity described herein. The primary objective

and common purpose of the criminal enterprise was to buy, sell and distribute methamphetamine, a schedule II controlled substance, to various customers throughout the Denver metro area in Colorado.

Juan Carlos Gonzalez acted as the head of the Gonzalez Drug Trafficking Organization. He coordinated with others to bring methamphetamine from Mexico into California for delivery in Colorado. Juan Carlos Gonzalez stored the supply of methamphetamine, and also delivered methamphetamine to other distributors, including but not limited to Monica Gonzalez, Patrick Lorenzo and Enrique Campos. Additionally, Juan Carlos Gonzalez stored a supply of cocaine, a schedule II controlled substance, for sale and distribution around the Front Range area.

Patrick Lorenzo and Enrique Campos received methamphetamine from Juan Carlos Gonzalez for redistribution around the Front Range area.

Jennifer Seipp and Juan Carlos Gonzalez worked together to transfer financial proceeds that were proceeds from the Gonzalez Drug Trafficking Organization pattern of racketeering. The financial transactions were made to facilitate other criminal activity and/or conceal the criminal connection to the proceeds. Additionally, Jennifer Seipp attempted to evade paying taxes to the State of Colorado on the proceeds from the Gonzalez Drug Trafficking Organization pattern of racketeering.

Monica Gonzalez was also a member of the Gonzalez Drug Trafficking Organization. She received methamphetamine from Juan Carlos Gonzalez. Monica Gonzalez also received methamphetamine from alternative sources of supply when necessary, including but not limited to Maria Arellano a/k/a Nena.

Monica Gonzalez distributed methamphetamine to other distributors, including but not limited to Joe Baier, Tina Leblanc, Frank Hardy, Matthew Skipp a/k/a Mateo, James Loeffler, Jennifer Ganje, Jason Jacquez, Danielle Ulibarri and Hugo Arevalo. Additionally, Monica Gonzalez attempted to evade paying taxes to the State of Colorado on the proceeds from the Gonzalez Drug Trafficking Organization pattern of racketeering.

Oscar Ruvalcaba was a “load car” driver, who delivered a large quantity of methamphetamine to Juan Carlos Gonzalez in Colorado.

Luz Gonzalez assisted Monica Gonzalez with day to day operations of the Gonzalez Drug Trafficking Organization, including participating with the distribution of methamphetamine to other distributors.

Maria Arellano a/k/a Nena acted as an alternative source of supply to Monica Gonzalez. Upon request, Maria Arellano supplied methamphetamine to Monica Gonzalez that Monica Gonzalez redistributed to others, including but not limited to Joe Baier and Frank Hardy.

Members of the criminal enterprise relied on cellular telephones to arrange and execute the importation and distribution of methamphetamine in Colorado, and they often used coded terminology when speaking to each other in order to conceal their criminal activity.

Pattern of Racketeering Activity

Members of the criminal enterprise, including but not limited to Juan Carlos Gonzalez, Monica Gonzalez, Oscar Ruvalcaba, Luz Gonzalez, Maria Arellano a/k/a Nena, Patrick Lorenzo, Enrique Campos, Jennifer Seipp, Joe Baier, Tina Leblanc, Frank Hardy, Matthew Skipp a/k/a Mateo, James Loeffler, Jennifer Ganje, Jason Jacquez, Danielle Ulibarri and/or Hugo Arevalo engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in two or more of the following predicate acts related to the conduct of the criminal enterprise, at least one of which took place in the State of Colorado after July 1, 1981:

- Possession with Intent to Distribute a Controlled Substance – Methamphetamine
- Possession with Intent to Distribute a Controlled Substance – Schedule II
- Conspiracy to Distribute Methamphetamine
- Distribution of Methamphetamine
- Money Laundering
- Tax Evasion
- Filing a False Tax Return

- Unlawful Use of a Telecommunications Facility

The last of the acts of racketeering activity occurred within ten years after a prior act of racketeering activity.

Predicate Acts

The predicate acts that set forth the relevant acts of racketeering activity and support the above-stated Colorado Organized Crime Control Act charges are set forth in Counts Three through Sixteen, Counts Eighteen through Twenty-Two, Counts Twenty-Four through Thirty-Eight, Counts Forty through Forty-Five, Counts Forty-Seven through Sixty-Four. Those counts are incorporated by reference as if fully set forth herein.

Unlawful Use of a Communication Facility

Additionally, between and including March 12, 2014 and August 22, 2014, in the State of Colorado, Juan Carlos Gonzalez, Monica Gonzalez, Oscar Ruvalcaba, Luz Gonzalez and/or Maria Arellano a/k/a Nena did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

The facts supporting Count Number Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THREE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE
METHAMPHETAMINE – MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)
Mini Cooper

Between and including August 18, 2014 and August 19, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Oscar Ruvalcaba** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound,

mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FOUR

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE

METHAMPHETAMINE – MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Vine Court

Between and including August 18, 2014 and August 19, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Four are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIVE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE

METHAMPHETAMINE – MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Public Storage Unit #1811

On approximately August 18, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Five are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIX

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE – SCHEDULE I OR II
MORE THAN 225 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(A) (DF1)
Public Storage Unit – Cocaine

On approximately August 18, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute cocaine, a schedule I or II controlled substance. Further, the violation involved a material, compound, mixture or preparation that weighed more than two hundred twenty-five grams, in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The facts supporting Count Number Six are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SEVEN

CONSPIRACY – CONTROLLED SUBSTANCES
METHAMPHETAMINE - MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

On approximately August 18, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Oscar Ruvalcaba** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Seven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER EIGHT

CONSPIRACY – CONTROLLED SUBSTANCES METHAMPHETAMINE - MORE THAN 112 GRAMS C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including March 12, 2014 to August 18, 2014, in the State of Colorado, **Juan Carlos Gonzalez, Monica Gonzalez and/or Luz Gonzalez** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Eight are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER NINE

DISTRIBUTION OF CONTROLLED SUBSTANCE C.R.S. 18-18-405(1),(2)(C)(II) (DF3) Supplying Monica Gonzalez

On approximately July 17, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Nine are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TEN

DISTRIBUTION OF CONTROLLED SUBSTANCE C.R.S. 18-18-405(1),(2)(C)(II) (DF3) Supplying Monica Gonzalez

On approximately July 23, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Ten are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER ELEVEN

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Patrick Lorenzo

On approximately July 25, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Eleven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWELVE

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Patrick Lorenzo

On approximately August 2, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Twelve are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTEEN

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Patrick Lorenzo

On approximately August 6, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FOURTEEN

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Patrick Lorenzo

On approximately August 11, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fourteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTEEN

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Patrick Lorenzo

On approximately August 17, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTEEN

CONSPIRACY – CONTROLLED SUBSTANCES
METHAMPHETAMINE - MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including July 17, 2014 to August 19, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Patrick Lorenzo** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury

unknown, to sell or distribute Methamphetamine. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Sixteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SEVENTEEN

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE
METHAMPHETAMINE – MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including July 17, 2014 and August 19, 2014, in the State of Colorado, **Patrick Lorenzo** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Seventeen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER EIGHTEEN

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Enrique Campos

On approximately July 31, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Eighteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER NINETEEN

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Enrique Campos

On approximately August 4, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Nineteen are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Enrique Campos

On approximately August 11, 2014, in the State of Colorado, **Juan Carlos Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Twenty are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-ONE

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including July 31, 2014 and August 11, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Enrique Campos** unlawfully, feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Twenty-One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-TWO

MONEY LAUNDERING
C.R.S. 18-5-309(1)(C) (F3)

Between and including November 20, 2013 and August 19, 2014, in the State of Colorado, **Juan Carlos Gonzalez and Jennifer Seipp** unlawfully, feloniously, and intentionally conducted a financial transaction involving property that was represented to be the proceeds of a criminal offense, or involving property that the defendant knew or believed to have been used to conduct or facilitate a criminal offense to conceal or disguise the nature, location, source, ownership, or control of property the defendant believed to be the proceeds of a criminal offense and/or to avoid a transaction reporting requirement under federal law; in violation of section 18-5-309(1)(c), C.R.S.

The facts supporting Count Number Twenty-Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-THREE

TAX EVASION
C.R.S. 39-21-118(1) (F5)

Between and including January 1, 2012 and April 15, 2014, in the State of Colorado, **Jennifer Seipp** unlawfully, feloniously, and willfully attempted to evade or defeat a tax administered by the Colorado Department of Revenue, or the payment thereof, namely Colorado Income Tax; in violation of section 39-21-118(1), C.R.S.

The facts supporting Count Number Twenty-Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-FOUR

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE

METHAMPHETAMINE – MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

1201 W. Thornton Parkway, #54

On approximately August 18, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Four are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-FIVE

DISTRIBUTION OF CONTROLLED SUBSTANCE

METHAMPHETAMINE – 7 – 112 GRAMS

C.R.S. 18-18-405(1),(2)(B)(I)(B) (DF2)

Supplying Undercover Agent

On approximately March 12, 2014, in the State of Colorado, **Monica Gonzalez and Luz Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Five are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-SIX

DISTRIBUTION OF CONTROLLED SUBSTANCE
METHAMPHETAMINE – 7 – 112 GRAMS
C.R.S. 18-18-405(1),(2)(B)(I)(B) (DF2)
Supplying Undercover Agent

On approximately March 28, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Six are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-SEVEN

DISTRIBUTION OF CONTROLLED SUBSTANCE
METHAMPHETAMINE – 7 – 112 GRAMS
C.R.S. 18-18-405(1),(2)(B)(I)(B) (DF2)
Supplying Undercover Agent

On approximately April 23, 2014, in the State of Colorado, **Monica Gonzalez and Luz Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Seven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-EIGHT

DISTRIBUTION OF CONTROLLED SUBSTANCE

METHAMPHETAMINE – 7 – 112 GRAMS

C.R.S. 18-18-405(1),(2)(B)(I)(B) (DF2)

Supplying Undercover Agent

On approximately May 20, 2014, in the State of Colorado, **Monica Gonzalez and Luz Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than seven but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Eight are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER TWENTY-NINE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE

METHAMPHETAMINE – MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Supplying Undercover

On approximately June 11, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Twenty-Nine are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY

DISTRIBUTION OF CONTROLLED SUBSTANCE
METHAMPHETAMINE - MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)
Supplying Undercover Agent

On approximately June 11, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Thirty are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-ONE

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Joe Baier

On approximately June 19, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-TWO

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Joe Baier

On approximately June 30, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-THREE

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Joe Baier

On approximately July 16, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-FOUR

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Joe Baier

On approximately July 18, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Four are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-FIVE

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Joe Baier and Tina Leblanc

On approximately July 19, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Five are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-SIX

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Joe Baier

On approximately July 26, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Six are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-SEVEN

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Joe Baier and Tina Leblanc

On approximately August 4, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Thirty-Seven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-EIGHT

CONSPIRACY – CONTROLLED SUBSTANCES
METHAMPHETAMINE - MORE THAN 112 GRAMS

C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including June 19, 2014 to August 19, 2014, in the State of Colorado, **Monica Gonzalez, Joe Baier and Tina Leblanc** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine. Further, the violation involved a

material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Thirty-Eight are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER THIRTY-NINE

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE
METHAMPHETAMINE – MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including June 19, 2014 and August 19, 2014, in the State of Colorado, **Joe Baier** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Thirty-Nine are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Frank Hardy

On approximately June 11, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-ONE

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Frank Hardy

On approximately July 11, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-TWO

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Frank Hardy

On approximately July 16, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-THREE

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Frank Hardy

On approximately July 19, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-FOUR

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Frank Hardy

On approximately July 25, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Four are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-FIVE

CONSPIRACY – CONTROLLED SUBSTANCES
METHAMPHETAMINE - MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including June 11, 2014 to August 19, 2014, in the State of Colorado, **Monica Gonzalez and Frank Hardy** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Forty-Five are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-SIX

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE
METHAMPHETAMINE – MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including June 11, 2014 and August 19, 2014, in the State of Colorado, **Frank Hardy** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more

than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Forty-Six are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-SEVEN

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Matthew Skipp

On approximately July 19, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Seven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-EIGHT

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Matthew Skipp

On approximately July 28, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Eight are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FORTY-NINE

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including July 19, 2014 and July 28, 2014, in the State of Colorado, **Monica Gonzalez and Matthew Skipp** unlawfully, feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to

sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Forty-Nine are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying James Loeffler

On approximately June 27, 2014, in the State of Colorado, **Monica Gonzalez and Luz Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-ONE

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying James Loeffler

On approximately August 12, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-TWO

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including June 27, 2014 and August 12, 2014, in the State of Colorado, **Monica Gonzalez, Luz Gonzalez and James Loeffler** unlawfully,

feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-THREE

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Jennifer Ganje and Jason Jacquez

On approximately August 11, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-FOUR

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including July 20, 2014 and August 11, 2014, in the State of Colorado, **Monica Gonzalez, Jennifer Ganje and/or Jason Jacquez** unlawfully, feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Four are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-FIVE

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Danielle Ulibarri

On approximately August 3, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Five are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-SIX

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including August 1, 2014 and August 18, 2014, in the State of Colorado, **Monica Gonzalez and Danielle Ulibarri** unlawfully, feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Six are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-SEVEN

DISTRIBUTION OF CONTROLLED SUBSTANCE

C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Supplying Hugo Arevalo

On approximately July 25, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Seven are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-EIGHT

CONSPIRACY – CONTROLLED SUBSTANCES – METHAMPHETAMINE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)

Between and including July 25, 2014 and August 7, 2014, in the State of Colorado, **Monica Gonzalez and Hugo Arevalo** unlawfully, feloniously, and knowingly conspired with each other and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Eight are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER FIFTY-NINE

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Monica Gonzalez

On approximately July 16, 2014, in the State of Colorado, **Maria Arellano a/k/a Nena** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Fifty-Nine are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTY

DISTRIBUTION OF CONTROLLED SUBSTANCE
C.R.S. 18-18-405(1),(2)(C)(II) (DF3)
Supplying Monica Gonzalez

On approximately August 7, 2014, in the State of Colorado, **Maria Arellano a/k/a Nena** unlawfully, feloniously, and knowingly sold or distributed Methamphetamine, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II). C.R.S.

The facts supporting Count Number Sixty are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTY-ONE

CONSPIRACY – CONTROLLED SUBSTANCES
METHAMPHETAMINE - MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including July 16, 2014 to August 19, 2014, in the State of Colorado, **Maria Arellano a/k/a Nena and Monica Gonzalez** unlawfully, feloniously, and knowingly conspired with each other, and a person or persons to the Grand Jury unknown, to sell or distribute Methamphetamine. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Sixty-One are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTY-TWO

POSSESSION WITH INTENT TO MANUFACTURE OR DISTRIBUTE A
CONTROLLED SUBSTANCE
METHAMPHETAMINE – MORE THAN 112 GRAMS
C.R.S. 18-18-405(1),(2)(A)(I)(B) (DF1)

Between and including July 16, 2014 and August 7, 2014, in the State of Colorado, **Maria Arellano a/k/a Nena and Monica Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Methamphetamine, a controlled substance. Further, the violation involved a material compound, mixture or preparation that weighed more than one hundred and twelve grams, in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The facts supporting Count Number Sixty-Two are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTY-THREE

TAX EVASION C.R.S. 39-21-118(1) (F5)

Between and including January 1, 2012 and April 15, 2014, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and willfully attempted to evade or defeat a tax administered by the Colorado Department of Revenue, or the payment thereof, namely Colorado Income Tax; in violation of section 39-21-118(1), C.R.S.

The facts supporting Count Number Sixty-Three are set forth after Count Number Sixty-Four, and are incorporated as if fully set forth herein.

COUNT NUMBER SIXTY-FOUR

FILING A FALSE TAX RETURN C.R.S. 39-21-118(4) (F5)

On approximately April 16, 2013, in the State of Colorado, **Monica Gonzalez** unlawfully, feloniously, and willfully made and subscribed a return, statement, or other document, which contained or was verified by a written declaration that it was made under the penalties of perjury, and which the defendant did not believe to be true and correct as to every material matter; in violation of section 39-21-118(4), C.R.S.

The facts supporting Counts One through Sixty-Four are as follow:

Juan Carlos Gonzalez Possessed Methamphetamine and Cocaine

Juan Carlos was associated with a residence located at Vine Court in Adams County, Colorado. A search of the residence on August 19, 2014 resulted in the seizure of just under one pound of methamphetamine.

Juan Carlos was also associated with Public Storage Unit #1811 located in Adams County, Colorado. A search of the storage unit on August 18, 2014 resulted in the seizure of approximately twelve pounds of methamphetamine and just under one pound of cocaine, as well as a scale.

Juan Carlos Gonzalez Supplied Monica Gonzalez

On approximately July 17, 2014, after coded phone calls between Juan Carlos Gonzalez and Monica Gonzalez, Juan Carlos Gonzalez supplied Monica Gonzalez with an unknown quantity of methamphetamine for her to re-distribute to third-parties. Juan Carlos Gonzalez delivered the methamphetamine to Monica Gonzalez at her home in Adams County, Colorado.

On July 22, 2014, Juan Carlos Gonzalez attempted to contact Monica Gonzalez by phone, but Monica Gonzalez had misplaced her phone and was unable to answer. Juan Carlos Gonzalez went to Monica Gonzalez's home in Adams County, Colorado, and then went to a Public Storage Unit that Juan Carlos Gonzalez rented. On July 23, 2014, Juan Carlos Gonzalez went to Luz Gonzalez's home in Adams County, Colorado, and then went to Monica Gonzalez's home. Juan Carlos Gonzalez then drove to a Motel 6 before returning to Monica Gonzalez's home to deliver an unknown quantity of methamphetamine for Monica Gonzalez to re-distribute to third-parties.

Maria Arellano a/k/a Nena Supplied Monica Gonzalez

On July 16, 2014, Monica Gonzalez and Maria Arellano communicated by cell phone, and Maria Arellano agreed to supply Monica Gonzalez with methamphetamine. The communication was in code; however, Monica Gonzalez did meet Maria Arellano at her taco trailer located at 8th and Federal in Denver, Colorado. Following that meeting, Monica Gonzalez used her cell phone to arrange drug deals with some of her re-distributors, including but not limited to Frank Hardy and Joe Baier.

On approximately August 4, 2014, Monica Gonzalez and Maria Arellano communicated by cell phone to arrange another drug deal. "Double" was requested, and Maria Arellano advised "only four available." On August 7, 2014, Monica Gonzalez met Maria Arellano at her home in Lakewood, Colorado, where Monica Gonzalez was supplied with methamphetamine. Following the drug deal on August 7, 2014, Monica Gonzalez contacted Maria Arellano and complained about the poor quality of the methamphetamine using coded language.

Monica Gonzalez Possessed Methamphetamine

Monica Gonzalez conducted a number of drug deals with an undercover agent, during which times she supplied the agent with methamphetamine. Monica Gonzalez would leave from her home in Adams County, Colorado to meet with the undercover agent without stopping to pick up supply. Additionally, a search at Monica Gonzalez's home on August 18, 2014 resulted in the seizure of approximately 440 grams of methamphetamine.

Juan Carlos Gonzalez Supplied Patrick Lorenzo

On July 25, 2014, surveillance agents observed Juan Carlos Gonzalez meet Patrick Lorenzo in Westminster, Colorado. Patrick Lorenzo got into Juan Carlos Gonzalez's BMW for a short period of time, which was consistent with a hand-to-hand drug deal. Patrick Lorenzo was later observed at his work carrying a white plastic bag. Based on all of the evidence, Juan Carlos Gonzalez supplied Patrick Lorenzo with an unknown quantity of methamphetamine on July 25, 2014.

On August 1, 2014, Patrick Lorenzo phoned Juan Carlos Gonzalez and ordered "two." On August 2, 2014, Juan Carlos Gonzalez and Patrick Lorenzo communicated by cell phone in code to confirm "two." Juan Carlos Gonzalez drove his BMW to Public Storage Unit #1811, and then switched from his BMW to a F350 truck before meeting with Patrick Lorenzo. Juan Carlos Gonzalez supplied Patrick Lorenzo with an unknown quantity of methamphetamine.

On August 6, 2014, Patrick Lorenzo phoned Juan Carlos Gonzalez and ordered a "six pack." Juan Carlos and Patrick Lorenzo met near 104th and I-25th where Juan Carlos Gonzalez supplied Patrick Lorenzo with an unknown quantity of methamphetamine.

On August 11, 2014, Patrick Lorenzo phoned Juan Carlos Gonzalez and ordered "two yellow cups." Juan Carlos Gonzalez went to Public Storage Unit #1811 and got a package. Juan Carlos Gonzalez and Patrick Lorenzo met in Westminster, Colorado, where Juan Carlos Gonzalez supplied Patrick Lorenzo with an unknown quantity of methamphetamine.

On August 17, 2014, Patrick Lorenzo phoned Juan Carlos Gonzalez and asked if he could "get two." Juan Carlos Gonzalez responded that he needed to "go to the

store.” Juan Carlos Gonzalez drove his BMW to Public Storage Unit #1811 and left holding a disposable cup. Juan Carlos Gonzalez and Patrick Lorenzo met at a Shell gas station on Wadsworth Boulevard in Colorado. Juan Carlos Gonzalez gave Patrick Lorenzo the cup that contained an unknown quantity of methamphetamine.

Based on the number of times Juan Carlos Gonzalez supplied Patrick Lorenzo with methamphetamine between July 17, 2014 and August 17, 2014, coupled with frequent phone calls referencing quantity, Juan Carlos Gonzalez supplied Patrick Lorenzo with more than 112 grams of methamphetamine. Additionally, Patrick Lorenzo possessed more than 112 grams of methamphetamine with the intent to re-distribute the methamphetamine to third-parties.

Juan Carlos Gonzalez Supplied Enrique Campos

On July 31, 2014, Enrique Campos phoned Juan Carlos Gonzalez and talked about “workers” and “notebooks.” Juan Carlos Gonzalez drove his BMW and met Enrique Campos and an unknown female at a Rent a Center on 84th in Colorado, where Juan Carlos Gonzalez supplied Enrique Campos with an unknown quantity of methamphetamine. After the transaction, Juan Carlos Gonzalez drove his BMW to Public Storage Unit #1811.

On August 4, 2014, Enrique Campos phoned Juan Carlos Gonzalez and asked for “just one.” Juan Carlos Gonzalez drove his BMW to a Safeway on Thornton Parkway in Colorado. Enrique Campos drove his blue Chevy Cavalier to the same Safeway. Enrique Campos got into the BMW for a short period of time, which was consistent with a hand-to-hand drug deal. Based on all of the evidence, Juan Carlos Gonzalez supplied Enrique Campos with an unknown quantity of methamphetamine on August 4, 2014.

On August 11, 2014, Enrique Campos phoned Juan Carlos Gonzalez and talked about meeting and “bringing tools.” Juan Carlos Gonzalez drove his BMW to a Safeway on Thornton Parkway in Colorado. Enrique Campos drove his blue Chevy Cavalier to the same Safeway and parked next to the BMW. Enrique Campos got into the BMW for a short period of time, which was consistent with a hand-to-hand drug deal. Based on all of the evidence, Juan Carlos Gonzalez

supplied Enrique Campos with an unknown quantity of methamphetamine on August 11, 2014.

Juan Carlos Gonzalez and Oscar Ruvalcaba Coordinate Delivery

On August 18, 2014, Juan Carlos Gonzalez and Oscar Ruvalcaba used their cell phones to coordinate the delivery of a load of methamphetamine that would be re-distributed for sale in Colorado. Oscar Ruvalcaba arrived in Colorado driving a red Mini Cooper, which he eventually drove to a residence associated with Juan Carlos Gonzalez on Vine Court in Adams County, Colorado. A subsequent search of the Mini Cooper revealed approximately 40 pounds of methamphetamine hidden under the floor of the vehicle.

Monica Gonzalez and Luz Gonzalez Supplied an Undercover Agent

On March 12, 2014, an undercover agent working for the DEA was introduced to Monica Gonzalez. On that date, Monica Gonzalez and Luz Gonzalez met the undercover agent in Lakewood, Colorado, and sold him two ounces of methamphetamine.

On March 28, 2014, Monica Gonzalez met the undercover agent at 72nd and Pecos in Colorado, and sold him three ounces of methamphetamine.

On April 23, 2014, Monica Gonzalez and Luz Gonzalez met the undercover agent in Westminster, Colorado, and sold him two ounces of methamphetamine.

On May 20, 2014, Monica Gonzalez and Luz Gonzalez met the undercover agent in Westminster, Colorado, and sold him two ounces of methamphetamine.

On July 11, 2014, Monica Gonzalez met the undercover agent at 72nd and Pecos in Colorado, and sold him ½ pound of methamphetamine.

Monica Gonzalez and the undercover agent used cell phones and coded language to coordinate meetings and drug deals. Monica Gonzalez also consulted with Luz Gonzalez concerning the price of the methamphetamine.

Monica Gonzalez and Luz Gonzalez Supplied Redistributors

Monica Gonzalez supplied Joe Baier with unknown quantities of methamphetamine on June 19, 2014, June 30, 2014, July 16, 2014, July 18, 2014,

July 19, 2014, July 26, 2014, and August 4, 2014. Tina Leblanc participated in the drug deals that occurred on July 19, 2014 and August 4, 2014. All of the drug deals between Monica Gonzalez, Joe Baier and/or Tina Leblanc occurred at Joe Baier's residence in Denver, Colorado. Additionally, the drug deals were arranged by Joe Baier communicating with Monica Gonzalez by cell phone; the majority of contacts were made by text message. Based on the number of drug deals between Joe Baier and Monica Gonzalez, coupled with other evidence, more than 112 grams of methamphetamine was distributed from Monica Gonzalez to Joe Baier.

Monica Gonzalez supplied Frank Hardy with unknown quantities of methamphetamine on June 11, 2014, July 11, 2014, July 16, 2014, July 19, 2014, and July 25, 2014. All of the drug deals between Monica Gonzalez and Frank Hardy occurred at Frank Hardy's residence in Denver, Colorado. Additionally, the drug deals were arranged by Frank Hardy communicating with Monica Gonzalez by cell phone. Based on the number of drug deals between Frank Hardy and Monica Gonzalez, coupled with other evidence, more than 112 grams of methamphetamine was distributed from Monica Gonzalez to Frank Hardy.

Monica Gonzalez supplied Matthew Skipp with unknown quantities of methamphetamine on July 19, 2014 and July 28, 2014. Those drug deals were arranged by cell phone communication between Monica Gonzalez and Matthew Skipp, and the transactions took place around 80th and Sheridan in Adams/Jefferson Counties, Colorado.

Monica Gonzalez and Luz Gonzalez supplied James Loeffler with an unknown quantity of methamphetamine on June 27, 2014. That drug deal occurred at a Laundromat in Colorado. James Loeffler was seen reaching into Monica Gonzalez's white Ford Escape in a way that was consistent with a hand-to-hand drug transaction. On August 12, 2014, Monica Gonzalez supplied James Loeffler with an unknown quantity of methamphetamine in Thornton, Colorado. That drug deal was arranged by cell phone communication between Monica Gonzalez and James Loeffler. After the transaction took place, Monica Gonzalez communicated with Luz Gonzalez in coded language and confirmed the drug deal.

On August 11, 2014, Monica Gonzalez supplied Jennifer Ganje and Jason Jacquez with an unknown quantity of methamphetamine. The drug deal took place at a Gas

Mart in Denver, Colorado. Jennifer Ganje contacted Monica Gonzalez by phone numerous times between July 20, 2014 and August 11, 2014 to arrange the drug deal.

On August 3, 2014, Monica Gonzalez supplied Danielle Ulibarri with an unknown quantity of methamphetamine. Monica Gonzalez left the methamphetamine under Luz Gonzalez's door mat, and directed Danielle Ulibarri to retrieve the drugs from that location. Arrangements for the August 3, 2014 drug deal, and future drug deals were made by cell phone communication between Monica Gonzalez and Danielle Ulibarri between August 1, 2014 and August 18, 2014.

On July 25, 2014, Monica Gonzalez supplied Hugo Arevalo with an unknown quantity of methamphetamine. The drug deal was arranged by coded phone conversations between Monica Gonzalez and Hugo Arevalo. Monica Gonzalez left the methamphetamine under the passenger side floor mat of her white Ford Escape, which was parked at Monica Gonzalez's residence in Adams County, Colorado. On August 7, 2014, Monica Gonzalez and Luz Gonzalez had a coded cell phone communication about Hugo Arevalo being slow to pay for his drugs, and that he might exchange services in lieu of payment.

Money Laundering and Tax Evasion

Jennifer Seipp had no known source of income between January 1, 2012 and August 19, 2014, but cash deposits were made into her US Bank account. Between November 20, 2013 and August 19, 2014, Jennifer Seipp and Juan Carlos Gonzalez used accounts at US Bank and the Bank of America to move proceeds from drug deals. Proceeds from drug distribution were deposited into Jennifer Seipp's accounts, and then withdrawn at other locations by Juan Carlos Gonzalez. The purpose of transferring the funds was an effort to conceal the nature, location, source, ownership, or control of the money that Juan Carlos Gonzalez was paid for drug deals, and was also done to avoid reporting and paying income tax. Jennifer Seipp did not file Colorado or Federal tax returns for 2012 or 2013.

Monica Gonzalez earned \$4,393.82 from Commercial Cleaning Systems based on her 2012 W2. On April 16, 2013, Monica Gonzalez filed her 2012 Colorado Tax Return. She claimed \$10,172 in gross income; however, analysis of her JP Morgan Chase bank accounts revealed \$38,941.09 in taxable income for 2012. Monica

Gonzalez did not file a Colorado or Federal tax return for 2013; however, analysis of her JP Morgan Chase bank accounts revealed \$35,370.59 in taxable income.

AS TO COUNT ONE:
A TRUE BILL

Foreperson

AS TO COUNT TWO:
A TRUE BILL

Foreperson

AS TO COUNT THREE:
A TRUE BILL

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AS TO COUNT FOUR:
A TRUE BILL

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AS TO COUNT FIVE:
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AS TO COUNT SIX:
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AS TO COUNT SEVEN:
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AS TO COUNT SIXTY-THREE:
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A NO TRUE BILL

Foreperson

AS TO COUNT SIXTY-FOUR:
A TRUE BILL

A NO TRUE BILL

Foreperson

Foreperson

I, _____, the Foreperson of the 2014-2015 Colorado State Grand Jury, do hereby swear and affirm that each and every True Bill returned in this indictment by the 2014-2015 Colorado State Grand Jury was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the Colorado State Grand Jury. The Colorado State Grand Jury further authorizes and instructs the Colorado Attorney General to return this indictment to open court with or without the presence of the foreperson.

Subscribed to before me in the City and County of Denver, State of Colorado, this _____ day of September 2014.

Notary Public

My commission expires:_____

Dated this _____ day of September 2014.

JOHN W. SUTHERS
ATTORNEY GENERAL STATE OF COLORADO

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

The 2014-2015 Colorado Statewide Grand Jury presents this Indictment, and the same is hereby ORDERED FILED this _____ day of September 2014.

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

Dated this _____ day of September 2014.

Michael A. Martinez
Chief Judge, Denver District Court
Presiding Judge, State Grand Jury