

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO, v. TRI TRONG NGUYEN THOMAS CLAIRE DISPANET, (“C.T.”) CUYLER GERBICH KRISTINE CLARETTA ROOT MICHAEL PATRICK GLICK, (“COUNTRY”) AARON MATTHEW ELLERING AUBREY CHARLES KEESLING RYAN JOSEPH FARROW JOSIE PHUONG FARROW (“MUFFIN”) SHEILA THI KIEU LORENZ OANH TRAN (“LIZ”) VEON DELOY HATCH PATRICK JOSEPH CONCANNON TAOSSUNTO, INC. (D.B.A. Herban Development, LLC, Herbanrefugee, LLC) HSUI SHENG, LLC JOSEPH JOHNSON WEST SIDE SKYDIVERS, LLC WEST SIDE SKYDIVERS HOUSTON, LLC NICHOLAS ALAN KUHL DOUGLAS DUNLAP (“DOUG THE SCIENCE GUY”) MICAHA PETERSON ANTONIO DOMENICO ORFEI LINDSAY GEINERT ANDREW JAMES WILEY JOHN RODGER MAGEE JESSICA PETERSON ALICIA RAINEY ANH THI NGUYEN (“LANA”) JASON JOYNER JAMES CHAD AVERETTE TIFFANY GILLE EVERETT GROVE (“RED”) ADAM TILLEY ANTHONY SMITH MATTHEW OLSON JORDAN IOVINELLA E.D.I.S., CORPORATION Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>CYNTHIA COFFMAN, Attorney General MICHAEL W. MELITO* Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 720 508 6702 *Counsel of Record Registration Number: 36059</p>	<p>Grand Jury Case No.: 14CR01 Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2014-2015 term of the Denver District Court in the year 2015; 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:

COUNT ONE:	COCCA-Pattern of Racketeering – Participation in an Enterprise, §18-17-104(3), C.R.S. (F2) 37284
COUNT TWO:	COCCA-Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2) 37285
COUNT THREE:	Cultivation of Marijuana, More than thirty Plants §18-18-406(7.5)(c), C.R.S. (F4) 88033
COUNT FOUR:	Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), C.R.S. §18-2-201 (F5) CON
COUNT FIVE:	Cultivation of Marijuana, More than Thirty Plants, C.R.S. §18-18-406(3)(A)(I) (DF3) 8803A
COUNT SIX:	Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants §18-18-406(3)(A)(I) C.R.S. §18-2-201 (DF4) CON
COUNT SEVEN:	Distribution of Marijuana, More than One Hundred Pounds, §18-18-406(6)(b)(I),(III)(C), C.R.S. (F3) 88024
COUNT EIGHT:	Possession with Intent to Manufacture or Distribute Marijuana - More than One Hundred Pounds, §18-18-406(6)(b)(I),(III)(C), C.R.S., (F3) 88043
COUNT NINE:	Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – More than One Hundred Pounds, §18-18-406(6)(b)(I),(III)(C), C.R.S. (F3) 88053
COUNT TEN:	Distribution Of Marijuana (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) 8802P
COUNT ELEVEN:	Possession with Intent to Manufacture or Distribute Marijuana (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) 8802U
COUNT TWELVE:	Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS), C.R.S. §18-18-406(2)(B)(I),(III)(A) (DF1) 8802Z
COUNT THIRTEEN:	Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, §18-5-309(1)(A)(I), C.R.S. (F3) 12211
COUNT FOURTEEN:	Conspiracy to Commit Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, §18-5-309(1)(A)(I), and §18-2-201, C.R.S. (F4) CON
COUNT FIFTEEN:	Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, §18-5-309(1)(A)(II), C.R.S. (F3) 12212
COUNT SIXTEEN:	Conspiracy to Commit Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, §18-5-309(1)(A)(II), and §18-2-201, C.R.S. (F4) CON
COUNT SEVENTEEN:	Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, C.R.S. §18-5-309(1)(B)(I) (F3) 12213
COUNT EIGHTEEN:	Conspiracy to Commit Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I), and §18-2-201, C.R.S. (F4) CON
COUNT NINETEEN:	Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, §18-5-309(1)(B)(II), C.R.S. (F3) 12214
COUNT TWENTY:	Conspiracy to Commit Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, §18-5-309(1)(B)(II), and §18-2-201, C.R.S. (F4) CON
COUNT TWENTY-ONE:	Money Laundering – Financial Transaction Involving Proceeds, C.R.S. §18-5-309(1)(C) (F3) 12215

COUNT TWENTY-TWO:	Conspiracy to Commit Money Laundering – Financial Transaction Involving Proceeds, C.R.S. §18-5-309(1)(C), and §18-2-201, C.R.S. (F4) CON
COUNT TWENTY-THREE:	Keeping Property for Unlawful Distribution of Controlled Substances, §18-18-411(1), C.R.S. (M1)
COUNT TWENTY-FOUR:	Maintaining Property For Unlawful Manufacturing Of Controlled Substances, C.R.S. 18-18-411(2)(a) (M1) 33512
COUNT TWENTY-FIVE:	Managing or Controlling Property for Manufacture of Controlled Substances, §18-18-411(2)(b), C.R.S. (M1) 33513
COUNT TWENTY-SIX:	Keeping Property for Unlawful Distribution of Controlled Substances, C.R.S. 18-18-411(1) (DM1) 33514
COUNT TWENTY-SEVEN:	Maintaining Property For Unlawful Manufacturing Of Controlled Substances, C.R.S. 18-18-411(2)(a) (DM1) 33515
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COUNT TWENTY-NINE:	Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1), C.R.S. (F5) 40021
COUNT THIRTY:	Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118 (1) and §18-2-201, C.R.S. (F6) CON
COUNT THIRTY-ONE:	Evasion of Taxes Administered by the Colorado Department of Revenue, §39-21-118(1), C.R.S. (F5) 40021
COUNT THIRTY-TWO:	Failure to File Return or Pay Tax, C.R.S. 39-21-118(3) (M) 40023
COUNT THIRTY-THREE:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT THIRTY-FOUR:	Conspiracy to Commit Attempt To Influence A Public Servant, §18-8-306 and §18-2-201, C.R.S. (F5) CON
COUNT THIRTY-FIVE:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT THIRTY-SIX:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT THIRTY-SEVEN:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT THIRTY-EIGHT:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT THIRTY-NINE:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT FORTY:	Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute Marijuana (5-50 LBS) or Marijuana Concentrate (2.5-25 LBS), C.R.S. 18-18-406(2)(B)(I),(III)(B) (DF2) 88A21
COUNT FORTY-ONE:	Possession with Intent to Manufacture or Distribute Marijuana (5-50 LBS) or Marijuana Concentrate (2.5-25 LBS), C.R.S. 18-18-406(2)(B)(I),(III)(B) (DF2) 8802V
COUNT FORTY-TWO:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT FORTY-THREE:	Causing or Contributing to a Hazardous Substance Incident - § 29-22-108, C.R.S. (F4)
COUNT FORTY-FOUR:	Conspiracy to Commit Causing or Contributing to a Hazardous Substance Incident - § 29-22-108, C.R.S. and §18-2-201, C.R.S. (F5) CON
COUNT FORTY-FIVE:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
COUNT FORTY-SIX:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051
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COUNT FORTY-EIGHT:	Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) 24051

COUNT FORTY-NINE:	Special Offender - Source of Income, §18-18-407(1)(a), C.R.S. (SE) 33442
COUNT FIFTY:	Special Offender – Conspiracy – Pattern of Sale, §18-18-407(1)(c) C.R.S. (SE) 33443
COUNT FIFTY-ONE:	Special Offender – 100 Pounds of Marijuana or Marijuana Concentrate, §18-18-407(1)(e), C.R.S. (SE) 3344A
COUNT FIFTY-TWO:	Special Offender – Deadly Weapon, C.R.S. §18-18-407(1)(D)(I) (DF1) 33A45

INDEX OF DEFENDANTS

Defendant	Date of Birth	Counts
TRI TRONG NGUYEN	8/1/1975	1-30,34,40,41,43,44,47,49-51
THOMAS CLAIRE DISPANET (A.K.A. "C.T.")	2/28/1975	1,2,4,6-22,51
CUYLER GERBICH	12/24/1975	1-32,34,35,46,49
KRISTINE CLARETTA ROOT	3/12/1978	1-30,34,47,49,50
TAOSSUNTO, INC. (Trade Name: Herban Development, Herbanrefugee, LLC)	CO Sec. of State I.D. #: 20111588845, 20111592872, 20101221308	1-30
MICHAEL PATRICK GLICK	8/22/1980	1-4,7-12,23-30,33,34,50-51
AARON MATTHEW ELLERING	2/20/1976	1-22,26-30,34,50-51
AUBREY KEESLING	11/6/1975	1-6,10-22,26-30,34,50
ANTONIO DOMENICO ORFEI	12/9/1981	1- 4,7-9,13-22,34,51
RYAN JOSEPH FARROW	8/20/1984	1-4,7-9,13-22,34,50-51,(Predicate Act 1)
JOSIE PHUONG FARROW (A.K.A. "MUFFIN")	10/20/1971	1,2,7-9,13-22,34,48,(Predicate Act 2)
SHEILA THI KIEU LORENZ	9/21/1969	1-32,34,37,40,41,43,44,49-51
OANH TRAN (A.K.A. "LIZ")	9/1/1966	1-30,34,38,40,41,43,44,49-51
VEON DELOY HATCH	6/24/1972	1-32,34,36,49-52
PATRICK JOSEPH CONCANNON	8/6/1977	1-32,34,49-51
HSUI SHENG, LLC	MN Sec of State file # 826605-2	1,2,13,14-22
JOSEPH JOHNSON	3/18/1972	1,2,10-22,26,29,30,45
WEST SIDE SKYDIVERS, LLC	MN Sec of State file # 3796278-2	1,2,10-22,26,29,30
WEST SIDE SKYDIVERS HOUSTON, LLC	TX Sec of State # 0801777002	1,2,10-22,26,29,30
NICHOLAS ALAN KUHL	12/01/1977	1-4,7-12,23-30,34,50
DOUGLAS DUNLAP	10/24/1967	1,2,10-12,26-30,34,40-44,50
MICAH PETERSON	1/18/1982	1-30,34,50-51
LINDSAY GEINERT	8/2/1977	1-6,11,12,26-30,34,50
ANDREW WILEY	3/31/1977	1-6,10-30,34
JOHN RODGER MAGEE	4/13/1977	1-6,10-30,34
JESSICA PETERSON	12/2/1980	1-6,10-30,34
ALICIA RAINEY	8/11/1943	1-6,10-30,34
ANH THI NGUYEN (A.K.A. "LANA")	12/12/1977	1,2,5,6,10-22,26-30,34,39
JASON JOYNER	9/19/1986	1,2,5,6,10-12,26-30,34
JAMES CHAD AVERETTE	11/25/1986	1,2,5,6,10-12,26-30,34
TIFFANY GILLE	5/31/1980	1,2,5,6,10-12,26-30,34
EVERETT GROVE	1/26/1990	1,2,5,6,10-12,26-30,34
ADAM TILLEY	3/23/1987	1,2,5,6,10-12,26-30,34
ANTHONY SMITH	11/12/1987	1-6,10-22,26-30,34
MATTHEW OLSON	3/8/1975	1,2,5,6,10-12,26-30,34
JORDAN IOVINELLA	1/31/1981	1-22,26-30,34,51
E.D.I.S., CORPORATION	CO Sec. of State I.D. #: 20081131944	1-12,25,28-30

COUNT 1

Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering- Participation in Enterprise, §18-17-104(3) and §18-17-105, C.R.S. (F2) **37284**

On or about and between August 1, 2010 and March 12, 2015, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON, ANTONIO DOMENICO ORFEI, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN (A.K.A. “LANA”), JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, EVERETT GROVE, ADAM TILLEY, ANTHONY SMITH, MATTHEW OLSON, JORDAN IOVINELLA, E.D.I.S., CORPORATION** 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 §18-17-104(3) and §18-17-105, C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.

COUNT 2

Violation of the Colorado Organized Crime Control Act – Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2) **37285**

On or about and between August 1, 2010 and March 12, 2015, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON, ANTONIO DOMENICO ORFEI, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN (A.K.A. “LANA”), JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, EVERETT GROVE, ADAM TILLEY, ANTHONY SMITH, MATTHEW OLSON, JORDAN IOVINELLA, E.D.I.S., CORPORATION** and others both known and unknown, did unlawfully, knowingly, and feloniously conspire to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity in violation of C.R.S. §18-17-104(4) and §18-17-104(3), C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.

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

The Enterprise

The enterprise alleged in Counts One and Two consisted of a groups of individuals, associated in fact, and multiple legal entities. The enterprise included, the following associated in fact individuals, a group of individuals, along with legal entities and/or other entities:

TRI TRONG NGUYEN
THOMAS CLAIRE DISPANET (A.K.A. "C.T.")
CUYLER GERBICH
KRISTINE CLARETTA ROOT
MICHAEL PATRICK GLICK
AARON MATTHEW ELLERING
AUBREY CHARLES KEESLING
RYAN JOSEPH FARROW
JOSIE PHUONG FARROW
SHEILA THI KIEU LORENZ
OANH TRAN (A.K.A. "LIZ")
VEON DELOY HATCH
PATRICK JOSEPH CONCANNON
TAOSSUNTO, INC. (A.K.A. Herban Development, LLC and Herbanrefugee, LLC)
HSUI SHENG, LLC
JOSEPH JOHNSON
WEST SIDE SKYDIVERS, LLC
WEST SIDE SKYDIVERS HOUSTON, LLC
NICHOLAS ALAN KUHL
DOUGLAS DUNLAP
MICAHA PETERSON
ANTONIO ORFEI
LINDSAY GEINERT
ANDREW WILEY
JOHN RODGER MAGEE
JESSICA PETERSON
ALICIA RAINEY
ANH THI NGUYEN (A.K.A. "LANA")
JASON JOYNER
JAMES CHAD AVERETTE
TIFFANY GILLE
EVERETT GROVE
ADAM TILLEY
ANTHONY SMITH
MATTHEW OLSON
JORDAN IOVINELLA
E.D.I.S., CORPORATION

and others both known and unknown to the Grand Jury, who were associated from time to time in the racketeering activity related to the conduct of the enterprise.

The above persons and entities that associated with the enterprise, and the enterprise itself, engaged in a scheme including: receiving, buying, possessing, selling, dealing, cultivating and/or distributing marijuana in Colorado and other states including Minnesota, while simultaneously engaging in tax evasion, money laundering, environmental crimes, failing to pay over taxes and attempting to influence public servants through deceit.

The Drug Trafficking Organization (DTO) operated numerous illegal marijuana grows in the City and County of Denver. Members of the enterprise/DTO cultivated most of their marijuana at warehouses located at the following addresses: 5145 Clarkson; 5155 Clarkson; 676-678 Bryant; 1978-1980 Acoma; 3050 East 43rd Avenue; 3835 Paris; 90 South Rio and 153 Vallejo, which simultaneously served as the DTO's headquarters. Certain members of the DTO began building secret marijuana grow warehouses –which enterprise members nicknamed “black-ops” grows– in other parts of the State of Colorado such as Steamboat Springs and Como.

In essence, the enterprise evolved into a distribution ring from Colorado to Minnesota, in part, because many members had established personal, collegiate and business connections with one another throughout the preceding years.

Pattern of Racketeering Activity

For purposes of Counts One and Two, TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN (A.K.A. “LIZ”), VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, LLC, WEST SIDE SKYDIVERS HOUSTON, LLC, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON, ANTONIO DOMENICO ORFEI, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN (A.K.A. “LANA”), JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, EVERETT GROVE, ADAM TILLEY, ANTHONY SMITH, MATTHEW OLSON, JORDAN IOVINELLA, E.D.I.S., CORPORATION and others both known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, and any lesser included offenses as permitted in §18-17-103, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

- Cultivation of Marijuana
- Conspiracy to Commit Cultivation of Marijuana
- Distribution of Marijuana
- Conspiracy to Distribute or Possess with Intent to Manufacture or Distribute Marijuana
- Possession with Intent to Manufacture or Distribute Marijuana
- Possession with Intent to Manufacture or Distribute Marijuana Concentrate
- Conspiracy to Distribute or Possess with Intent to Manufacture or Distribute Marijuana Concentrate
- Money Laundering
- Evasion of Taxes Administered by the Colorado Department of Revenue
- Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue
- Failure to File a Return or Pay Tax
- Attempt To Influence a Public Servant
- Keeping Property for Unlawful Distribution of Controlled Substances
- Maintaining Property for Manufacture of Controlled Substances
- Managing or Controlling Property for Manufacture of Controlled Substances
- Unlawful Use of a Communications Facility

RACKETEERING ACTIVITY

The acts of racketeering activity that the above named persons and/or entities committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses permitted to be used as predicates under this statute:

Counts Three through Forty Two, and Forty Five through Forty Eight and the other identified Predicate Act(s) set forth the essential relevant acts of racketeering and are incorporated in these Counts One and Two by this reference. The relevant acts of racketeering activity include any lesser included offenses of Counts Three through Forty Two, and Forty Five through Forty Eight and the other identified Predicate Acts.

COUNT 3

Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), C.R.S. (F4) **88033**

On or about and between August 1, 2010 and March 16, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, ANTONIO DOMENICO ORFEI, RYAN JOSEPH FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, NICHOLAS ALAN KUHL, ALICIA RAINEY, ANTHONY SMITH, JORDAN IOVINELLA, E.D.I.S., CORPORATION and others known and unknown to the Grand Jury** unlawfully, feloniously, and knowingly cultivated, grew, or produced marijuana plants, or allowed marijuana plants to be cultivated, grown, or produced on land owned, occupied, or controlled by the defendants. Further, the number of marijuana plants was thirty or more; in violation of §18-18-406(7.5)(c), C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 4

Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants
§18-18-406(7.5)(c), and §18-2-201, C.R.S. (F5) **CON**

On or about and between August 1, 2010 and March 16, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, ANTONIO DOMENICO ORFEI, RYAN JOSEPH FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, NICHOLAS ALAN KUHL, ALICIA RAINEY, ANTHONY SMITH, JORDAN IOVINELLA, E.D.I.S., CORPORATION and others known and unknown to the Grand Jury** with the intent to promote or facilitate the commission of the crime of Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), unlawfully and feloniously agreed with one another and persons known 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 §18-18-406(7.5)(c) and §18-2-201, C.R.S. (F5), and against the peace and dignity of the People of the State of Colorado.

PREDICATE ACT 1

Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), C.R.S. (F4) **88033**

On or about August 23, 2011, in and triable in the State of Colorado, **RYAN JOSEPH FARROW**, unlawfully, feloniously, and knowingly cultivated, grew, or produced marijuana plants, or allowed marijuana plants to be cultivated, grown, or produced on land owned, occupied, or controlled by the defendant. Further, the number of marijuana plants was thirty or more; in violation of §18-18-406(7.5)(c), C.R.S. and against the peace and dignity of the People of the State of Colorado.

COUNT 5

Cultivation of Marijuana, More than Thirty Plants, C.R.S. §18-18-406(3)(A)(I), C.R.S. (DF3) **8803A**

On or about and between March 17, 2014 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly cultivated, grew, or produced marijuana plants, or allowed marijuana plants to be cultivated, grown, or produced on land owned, occupied, or controlled by the defendants. Further, the number of marijuana plants was thirty or more; in violation of §18-18-406(3)(A)(I), C.R.S. (DF3), and against the peace and dignity of the People of the State of Colorado.

COUNT 6

Conspiracy to Commit Cultivation of Marijuana, More than Thirty Plants
§18-18-406(3)(A)(I) and §18-2-201, C.R.S. (DF4) **CON**

On or about and between March 17, 2014 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, E.D.I.S., CORPORATION and others known to the Grand Jury** with the intent to promote or facilitate the commission of the crime of Cultivation of Marijuana, More than Thirty Plants §18-18-406(7.5)(c), unlawfully and feloniously agreed with one another and persons known 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 §18-

18-406(7.5)(c) and §18-2-201, C.R.S. (F5), and against the peace and dignity of the People of the State of Colorado.

COUNT 7

Distribution of Marijuana, More than One Hundred Pounds,
§18-18-406(6)(b)(I),(III)(C), C.R.S. (F3) **88024**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, JORDAN IOVINELLA, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly sold or distributed, or attempted to sell or distribute, marijuana. Further, the amount of marijuana was more than one hundred pounds; in violation of §18-18-406(6)(b)(I),(III)(C), C.R.S. (F3), and against the peace and dignity of the People of the State of Colorado.

COUNT 8

Possession with Intent to Manufacture or Distribute Marijuana - More than One Hundred Pounds,
§18-18-406(6)(b)(I),(III)(C), C.R.S., (F3) **88043**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, JORDAN IOVINELLA, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly possessed, or attempted to possess, with intent to manufacture, sell or distribute, marijuana. Further, the amount of marijuana was more than one hundred pounds; in violation of §18-18-406(6)(b)(I),(III)(C), C.R.S. (F3), and against the peace and dignity of the People of the State of Colorado.

COUNT 9

Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – More than One Hundred Pounds, §18-18-406(6)(b)(I),(III)(C), C.R.S. (F3) **88053**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, ANTONIO DOMENICO ORFEL, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, JORDAN IOVINELLA, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly conspired with one another and with persons known and unknown to the Grand Jury, to sell, distribute, or possess with intent to

manufacture, sell or distribute marijuana. Further, the amount of marijuana was more than one hundred pounds; in violation of §18-18-406(6)(b)(I),(III)(C) C.R.S., and against the peace and dignity of the People of the State of Colorado.

PREDICATE ACT 2

Unlawful Use of a Communication Facility, 21 U.S.C. §843

On or about June 17, 2013, in and triable in the State of Colorado, **JOSIE PHUONG FARROW and others known to the Grand Jury** did knowingly or intentionally use a communications facility, namely, a wire, telephone and/or other means of communication, to facilitate the commission of a felony, namely, distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute 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.

COUNT 10

Distribution Of Marijuana (50 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802P**

On or about and between October 1, 2013 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, DOUGLAS DUNLAP, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly sold or distributed, or attempted to sell or distribute marijuana. Further, the amount of marijuana was more than fifty pounds, in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

COUNT 11

Possession with Intent to Manufacture or Distribute Marijuana (50 LBS),
§18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802U**

On or about and between October 1, 2013 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, DOUGLAS DUNLAP, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE,**

ANTHONY SMITH, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury unlawfully, feloniously, and knowingly possessed, or attempted to possess, with intent to manufacture, sell or distribute, marijuana. Further, the amount of marijuana was more than fifty pounds; in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

COUNT 12

Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802Z**

On or about and between October 1, 2013 and October 31, 2014 in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, DOUGLAS DUNLAP, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, NICHOLAS ALAN KUHL, E.D.I.S., CORPORATION and others known to the Grand Jury** unlawfully, feloniously, and knowingly conspired with one another and with a person or persons known and unknown to the Grand Jury, to sell, distribute, or possess with intent to manufacture, sell or distribute marijuana. Further, the amount of marijuana was more than fifty pounds in violation of §18-18-406(2)(b)(I),(III)(A), C.R.S. (DF1), and against the peace and dignity of the People of the State of Colorado.

COUNT 13

Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, §18-5-309(1)(A)(I), C.R.S. (F3) **12211**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH, ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, unlawfully and feloniously, conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendant knew or believed to be the proceeds, in any form, of a criminal offense, with the intent to promote the commission of a criminal offense; in violation of §18-5-309(1)(A)(I), C.R.S. (F3), and against the peace and dignity of the People of the State of Colorado.

COUNT 14

Conspiracy to Commit Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, §18-5-309(1)(A)(I) and §18-2-201, C.R.S. (F4) **CON**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, with the intent to promote or facilitate the commission of the crime of Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(A)(I) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 15

Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, §18-5-309(1)(A)(II), C.R.S. (F3) **12212**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, unlawfully and feloniously conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendant knew or believed to be the proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law; in violation of §18-5-309(1)(A)(II), C.R.S. (F3) and against the peace and dignity of the People of the State of Colorado.

COUNT 16

Conspiracy to Commit Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, §18-5-309(1)(A)(II) and §18-2-201, C.R.S. (F4) **CON**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, with the intent to promote or facilitate the commission of the crime of Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(A)(II) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 17

Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I), C.R.S. (F3) **12213**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, in violation of §18-5-309(1)(B)(I), C.R.S. (F3) and against the peace and dignity of the People of the State of Colorado.

COUNT 18

Conspiracy to Commit Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I) and §18-2-201, C.R.S. (F4) **CON**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON,**

PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury with the intent to promote or facilitate the commission of the crime of Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(B)(I) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 19

Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, §18-5-309(1)(B)(II), C.R.S. (F3) **12214**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with knowledge or a belief that the monetary instrument or moneys represented the proceeds of a criminal offense and that the transportation, transmission, or transfer was designed, in whole or in part, to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense avoid a transaction reporting requirement under federal law; in violation of §18-5-309(1)(b)(II), C.R.S. (F3) and against the peace and dignity of the People of the State of Colorado.

COUNT 20

Conspiracy to Commit Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, §18-5-309(1)(B)(II) and §18-2-201, C.R.S. (F4) **CON**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, with the intent to promote or facilitate the commission of the

crime of Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(B)(II) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 21

Money Laundering – Financial Transaction Involving Proceeds, §18-5-309(1)(C), C.R.S. (F3) **12215**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH, ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, 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 promote the commission of a criminal offense or conceal or disguise the nature, location, source, ownership, or control of property the defendant believed to be the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law; in violation of §18-5-309(1)(C), C.R.S. (F3) and against the peace and dignity of the People of the State of Colorado.

COUNT 22

Conspiracy to Commit Money Laundering – Financial Transaction Involving Proceeds, §18-5-309(1)(C) and §18-2-201, C.R.S. (F4) **CON**

On or about and between August 1, 2011 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH, ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBREY CHARLES KEESLING, ALICIA RAINEY, ANTHONY SMITH and others known to the Grand Jury**, with the intent to promote or facilitate the commission of the crime of Money Laundering – Financial Transaction Involving Proceeds, unlawfully and feloniously agreed with one another 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 §18-5-309(1)(C) and §18-2-201, C.R.S. (F4), and against the peace and dignity of the People of the State of Colorado.

COUNT 23

Keeping Property for Unlawful Distribution of Controlled Substances,
§18-18-411(1), C.R.S. (M1) **33511**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY and others known to the Grand Jury**, knowingly or intentionally kept, maintained, controlled, rented, leased, or made available for use a store, shop, warehouse, dwelling, building, vehicle, vessel, aircraft, room, enclosure, or other structure or place, which the defendants knew were resorted to for the purpose of keeping for distribution, transporting for distribution, or distribution of a controlled substance; in violation of §18-18-411(1), C.R.S. (M1), and against the peace and dignity of the People of the State of Colorado.

COUNT 24

Maintaining Property For Unlawful Manufacturing Of Controlled Substances,
§18-18-411(2)(a), C.R.S. (M1) **33512**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY and others known to the Grand Jury**, knowingly or intentionally opened or maintained a place which the defendant knew was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(a), C.R.S. (M1), and against the peace and dignity of the People of the State of Colorado.

COUNT 25

Managing or Controlling Property for Manufacture of Controlled Substances,
§18-18-411(2)(b), C.R.S. (M1) **33513**

On or about and between August 11, 2010 and September 30, 2013, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, E.D.I.S., CORPORATION and others known to the Grand Jury**, unlawfully managed or controlled a building, room, or enclosure as an owner, lessee, agent, employee, or mortgagee and knowingly or intentionally rented, leased, or made it available for use, and the defendant knew it was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(b), C.R.S. (M1), and against the peace and dignity of the People of the State of Colorado.

COUNT 26

Keeping Property for Unlawful Distribution of Controlled Substances,
§18-18-411(1), C.R.S. (DM1) **33514**

On or about and between October 1, 2013 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON and others known to the Grand Jury** knowingly or intentionally kept, maintained, controlled, rented, leased, or made available for use a store, shop, warehouse, dwelling, building, vehicle, vessel, aircraft, room, enclosure, or other structure or place, which the defendant knew was resorted to for the purpose of keeping for distribution, transporting for distribution, or distribution of a controlled substance; in violation of §18-18-411(1), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

COUNT 27

Maintaining Property For Unlawful Manufacturing Of Controlled Substances,
§18-18-411(2)(a), C.R.S. (DM1) **33515**

On or about and between October 1, 2013 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH and others known to the Grand Jury** knowingly or intentionally opened or maintained a place which the defendant knew was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(a), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

COUNT 28

Managing or Controlling Property for Manufacture of Controlled Substances,
§18-18-411(2)(B), C.R.S. (DM1) **35516**

On or about and between October 1, 2013 and October 31, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER**

MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, E.D.I.S., CORPORATION and others known to the Grand Jury unlawfully managed or controlled a building, room, or enclosure as an owner, lessee, agent, employee, or mortgagee and knowingly or intentionally rented, leased, or made it available for use, and the defendant knew it was resorted to for the purpose of unlawfully manufacturing a controlled substance; in violation of §18-18-411(2)(B), C.R.S. (DM1), and against the peace and dignity of the People of the State of Colorado.

COUNT 29

Evasion of Taxes Administered by the Colorado Department of Revenue,
§39-21-118(1), C.R.S. (F5) **40021**

On or about and between January 1, 2014 and November 30, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, E.D.I.S., CORPORATION and others known to the Grand Jury** did unlawfully, feloniously and willfully attempt to evade and defeat a tax administered by the Colorado Department of Revenue, or a payment thereof namely, state marijuana excise tax, in violation of §39-21-118(1), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado.

COUNT 30

Conspiracy to Commit Evasion of Taxes Administered by the Colorado Department of Revenue,
§39-21-118(1) and §18-2-201, C.R.S. (F6) **CON**

On or about and between January 1, 2014 and November 30, 2014, in and triable in the State of Colorado, **TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, E.D.I.S., CORPORATION and others known to the Grand Jury** with the intent to promote or facilitate the commission of the crime of Evasion of Taxes Administered by the Colorado Department of Revenue, unlawfully and feloniously agreed with one another 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 §39-21-118(1) and §18-2-201, C.R.S. (F6), and against the peace and dignity of the People of the State of Colorado.

COUNT 31

Evasion of Taxes Administered by the Colorado Department of Revenue,
§39-21-118(1), C.R.S. (F5) **40021**

On or about and between January 1, 2012 and April 15, 2014, in and triable in the State of Colorado, **CUYLER GERBICH, PATRICK JOSEPH CONCANNON, VEON DELOY HATCH AND SHEILA THI KIEU LORENZ and others known to the Grand Jury** did unlawfully, feloniously and willfully attempt to evade and defeat a tax administered by the Colorado Department of Revenue, or a payment thereof namely, state income tax, in violation of §39-21-118(1), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado

COUNT 32

Failure to File Return or Pay Tax, §39-21-118(3), C.R.S. (M) **40023**

On or about and between April 15, 2013 and April 15, 2014, in and triable in the State of Colorado, **CUYLER GERBICH, PATRICK JOSEPH CONCANNON, VEON DELOY HATCH AND SHEILA THI KIEU LORENZ and others known to the Grand Jury** unlawfully and willfully failed to pay a tax or estimated tax, make a return, keep tax records, or supply tax information as required; in violation of §39-21-118(3), C.R.S. (M), and against the peace and dignity of the People of the State of Colorado.

COUNT 33

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about and between January 20, 2014 and February 1, 2014, in and triable in the State of Colorado, **MICHAEL PATRICK GLICK** unlawfully and feloniously attempted to influence Denver Fire Department Fire Inspectors Jason Cole, David Schlote of the Denver Fire Department and Detective Chris Shotts of the Denver Police Department, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 34

Conspiracy to Commit Attempt To Influence A Public Servant,
§18-8-306 and §18-2-201, C.R.S. (F5) **CON**

On or about and between August 1, 2010 and February 1, 2015, in and triable in the State of Colorado, **TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON, ANTONIO ORFEI, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN (A.K.A. "LANA"), JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY**

GILLE, EVERETT GROVE, ADAM TILLEY, ANTHONY SMITH, MATTHEW OLSON, JORDAN IOVINELLA and others known to the Grand Jury with the intent to promote or facilitate the commission of the crime of Attempt To Influence A Public Servant, unlawfully and feloniously agreed with one another 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 §18-8-306 and §18-2-201, C.R.S. (F5), and against the peace and dignity of the People of the State of Colorado.

COUNT 35

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about October 28, 2014, in and triable in the State of Colorado, **CUYLER GERBICH**, unlawfully and feloniously attempted to influence United States Drug Enforcement Administration Special Agent Randolph S. Ladd and Special Agent William Cronin, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 36

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about October 28, 2014, in and triable in the State of Colorado, **VEON DELOY HATCH** , unlawfully and feloniously attempted to influence Colorado Department of Revenue Criminal Tax Enforcement Special Agent Charlie Schlaufman, United States Drug Enforcement Administration Analyst/Contract Employee Maryann Harmon and United States Drug Enforcement Administration Analyst/Contract Employee Tiffany Brubaker, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 37

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about October 28, 2014, in and triable in the State of Colorado, **SHEILA THI KIEU LORENZ**, unlawfully and feloniously attempted to influence Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Charlie Schlaufman, United States Drug Enforcement Administration Analyst/Contract Employee Maryann Harmon and United States Drug Enforcement Administration Analyst/Contract Employee Tiffany Brubaker, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 38

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about October 28, 2014, in and triable in the State of Colorado, **OANH TRAN**, unlawfully and feloniously attempted to influence Colorado Department of Revenue Criminal Tax Enforcement Special Agent Peter McParlane, United States Alcohol Tobacco and Firearms Contract Employee A.J. Gehring, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 39

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about October 28, 2014, in and triable in the State of Colorado, **ANH THI NGUYEN**, unlawfully and feloniously attempted to influence United States Drug Enforcement Administration, Special Agent Mike Tonozzi, who is a public servant, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 40

Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute Marijuana (5-50 LBS) or Marijuana Concentrate (2.5-25 LBS), §18-18-406(2)(B)(I),(III)(B), C.R.S. (DF2) **88A21**

On or about and between September 1, 2014 and October 31, 2014, in and triable in the State of Colorado, **DOUGLAS DUNLAP, TRI TRONG NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN** unlawfully, feloniously, and knowingly conspired with one another and a person or persons to the Attorney General unknown, to sell or distribute, or possess with intent to manufacture, or sell or distribute, or marijuana concentrate. Further, the amount of marijuana was more than five pounds but not more than fifty pounds or the amount of marijuana concentrate was more than two and one-half pounds but not more than twenty-five pounds, in violation of, in violation of §18-18-406(2)(b)(I),(III)(B), C.R.S. (DF2) and against the peace and dignity of the People of the State of Colorado.

COUNT 41

Possession With Intent to Manufacture or Distribute Marijuana (5-50 LBS) or Marijuana Concentrate (2.5-25 LBS), §18-18-406(2)(B)(I),(III)(B), C.R.S. (DF2) **8802V**

On or about and between September 1, 2014 and October 31, 2014, in and triable in the State of Colorado, **DOUGLAS DUNLAP, TRI TRONG NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN** unlawfully, feloniously, and knowingly possessed, or attempted to possess, with intent to manufacture, sell or distribute marijuana concentrate. Further, the amount of marijuana was more than five pounds but not more than fifty pounds or the amount of marijuana concentrate was more than two and one-half pounds but not more than twenty-five pounds, in violation of, in violation

of §18-18-406(2)(b)(I),(III)(B), C.R.S. (DF2) and against the peace and dignity of the People of the State of Colorado.

COUNT 42

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about and between October 29, 2014 and October 31, 2014, in and triable in the State of Colorado, **DOUGLAS DUNLAP**, unlawfully and feloniously attempted to influence Colorado Department of Revenue Criminal Tax Enforcement Special Agent Stephen Bratten and or Special Agent Sondra Pennington who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servants or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 43

Causing or Contributing to a Hazardous Substance Incident,
§ 29-22-108(1), C.R.S. (F4)

On or about and between January 1, 2014 and November 1, 2014, in and triable in the State of Colorado, **DOUGLAS DUNLAP, TRI TRONG NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN and others known or unknown to the Grand Jury**, in the State of Colorado did unlawfully and intentionally cause or substantially contribute to the occurrence of a hazardous substance incident in violation of §29-22-108(1), C.R.S. (F4) and against the peace and dignity of the People of the State of Colorado.

COUNT 44

Conspiracy to Commit Causing or Contributing to a Hazardous Substance Incident,
§29-22-108(1) and §18-2-201, C.R.S. (F5) **CON**

On or about and between January 1, 2014 and November 1, 2014, in and triable in the State of Colorado, **DOUGLAS DUNLAP, TRI TRONG NGUYEN, SHEILA THI KIEU LORENZ and OANH TRAN, and others known or unknown to the Grand Jury** with the intent to promote or facilitate the commission of the crime of Causing or Contributing to a Hazardous Substance Incident, unlawfully and feloniously agreed with one another 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 §29-22-108(1) and §18-2-201, C.R.S. (F6), and against the peace and dignity of the People of the State of Colorado.

COUNT 45

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about and between July 20, 2014 and July 31, 2014, in and triable in the State of Colorado, **JOSEPH JOHNSON**, unlawfully and feloniously attempted to influence Special Agent Aaron Tucker of the Drug Enforcement Administration, Detective Christopher Shotts of the Denver Police

Department, and or Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Stephen Bratten are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 46

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about December 18, 2014, in and triable in the State of Colorado, **CUYLER GERBICH**, unlawfully and feloniously attempted to influence United States Drug Enforcement Administration Special Agent Randolph S. Ladd, Denver Police Department Detective Christopher Shotts and Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Stephen Bratten, who are a public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 47

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about and between January 1, 2015 and March 12, 2015, in and triable in the State of Colorado, in the State of Colorado **TRI TRONG NGUYEN and KRISTINE CLARETTA ROOT**, unlawfully and feloniously attempted to influence members of the United States Attorney's Office, Chief of the Civil Division and their subordinates and or staff and the Drug Enforcement Administration Asset Forfeiture Section and its Counsel, including but not limited to: Tonya Andrews, Pamela Jebens, James Gothe and or Terrence J. King who are public servants, by means of deceit, with the intent thereby to alter or affect those public servants' decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servants were a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

COUNT 48

Attempt To Influence A Public Servant, §18-8-306, C.R.S. (F4) **24051**

On or about and between June 17, 2013 and July 31, 2013, in and triable in the State of Colorado, **JOSIE FARROW**, unlawfully and feloniously attempted to influence United States Homeland Security Investigations Special Agent Andrew Vincik, who is a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of §18-8-306, C.R.S. (F-4), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Counts 1 through 48 and Predicate Acts 1 and 2 incorporate any and all above asserted facts and dates and the essential facts of the crimes were committed in the following manner and occurred either entirely or partly in the State of Colorado:

Starting in January of 2014 the State of Colorado enacted a marijuana excise tax. Retail marijuana became subject to a 15% excise tax based on the average market price of retail marijuana. The tax is calculated on the basis of the category of the retail marijuana product¹ being sold or transferred.

In January of 2014 the Denver Police Department Narcotics Bureau (DPD) responded to a citizen complaint raising concerns about large portable generators on a nearby warehouse.² Ultimately, the warehouse in question turned out to be an illegal and unlicensed marijuana cultivation operation located on 3850 E. 43rd Avenue in Denver.

As DPD detectives arrived on scene in response to their citizen's complaint, they noticed Denver environmental inspectors, a city building inspector, a city electrical inspector, a business license inspector from Denver Excise and Licenses, and two lieutenants from the Denver Fire Department. Inside the warehouse, DPD detectives watched inspectors as they conversed with an individual named Michael Glick standing amidst a large scale sophisticated marijuana cultivation.³ The detectives learned from a fire inspector that the 3850 E. 43rd Avenue marijuana grow operation routinely tripped transformers. Further, the warehouse's interior electrical work failed to meet city code standards and presented a fire hazard. Lastly, the fire inspector added that the large nearby generators were illegal and likewise presented a fire hazard. Once Glick finished his conversations with the city's inspectors and the DPD detectives finished talking with the fire inspectors, Glick turned to talk with the detectives.

Glick claimed the "co-op" cultivation inside the warehouse merely consisted of several different caregiver growers, with each possessing their own individual Colorado patients. Growing increasingly nervous during his conversation with DPD detectives, Glick conveyed he grew the 500 to 600 plants inside his rooms for five patients and went on to state the other rooms belonged to other caregivers and likewise grown for Colorado patients. As Glick showed DPD Detectives around the warehouse, they observed a marijuana drying room containing processed⁴ marijuana. Glick relayed the dried marijuana belonged to the people for whom he worked. Sensing a ruse, DPD Detective Chris Shotts continued to press Glick on his story. Glick later broke down and confessed to attempting to deceive Detective Shotts with a false caregiver/co-op story.⁵

In general, Glick explained he and other members of the enterprise worked for an individual named Tri Nguyen who headed up several marijuana warehouse grows in the Denver area. This enterprise transported nearly all of the marijuana grown in their five⁶ Denver, Colorado warehouses⁷ to the State of Minnesota. Glick then went on to describe the nature of the enterprise, the out of state distribution scheme, roles of certain members of the organization and how members fraudulently held themselves

¹ i.e., Flower, Trim, or Immature Plant.

² According to the citizen, the generators caused outages of local electrical transformers.

³ The Colorado Department of Revenue Medical Marijuana Enforcement Department informed the DPD Detectives that the warehouse lacked any dispensary or off-premise cultivation licensure or even pending applications.

⁴ The detectives ultimately recovered this dried high grade marijuana weighing 27.8 pounds and confirmed its status as marijuana through lab tests.

⁵ In order to hide the illicit marijuana warehouse grows and the illegal out of state distributions of the enterprise, Glick and his co-conspirators concocted the false caregiver/co-op grow cover story to use if any member of the enterprise were questioned by law enforcement. Effectively, this cover story segment of the scheme allowed the enterprise to "hide in plain sight."

⁶ The number of warehouses fluctuated throughout the course of the conspiracy.

⁷ Tri Nguyen is also co-owner and high managerial agent of Taossunto, Inc. (D.B.A. Herban Development, LLC, Herbanrefugee, LLC) and Hsui Sheng, LLC, which were front companies used to launder proceeds of the illegally distributed marijuana through financial institutions and other entities during the majority of the duration of the enterprise.

out as caregivers in order to hide their illegal activity. In general the enterprise members' roles⁸ were as follows:

Aubrey Charles Keesling – a grower for the DTO who worked at both the E. 43th Avenue warehouse marijuana grow and another marijuana warehouse grow on Bryant Street. Keesling conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

Aaron Matthew Ellering – a grower for the DTO and Tri Nguyen's enforcer, handling any problems that may arise needing muscle. Ellering admitted his involvement in packaging on behalf of the enterprise and conspiring to ship marijuana from the Denver warehouse grows to other members of the organization based in Minnesota.

Josie Phuong Farrow – sister of Tri Nguyen who is involved in the organization as a grower and partner level manager.

Ryan Farrow – husband of Josie Farrow, grower (in both home and warehouse grows) and transporter of marijuana and proceeds of illegal marijuana distributions between Colorado and Minnesota. Farrow simultaneously managed a grow operation located at 90 Rio Grande while operating a grow in the basement of his home. In mid June 2013, law enforcement in Omaha, Nebraska stopped Farrow in possession of proceeds of the enterprise's illegal grows and out of state distributions totaling approximately \$150,000. After attempting to deceive public officials in Nebraska, Farrow confessed to his role in the illegal distribution and the laundering of money.

Antonio Orfei – a grower and transporter of marijuana and proceeds of illegal marijuana distribution between Colorado and Minnesota. In mid June 2013, law enforcement in Omaha, Nebraska stopped Orfei in possession of proceeds of the enterprise's illegal grows and out of state distributions. Orfei had assisted Farrow in the transportation of Colorado grown marijuana out of state and confessed to his role in the illegal distribution and the laundering of money.

Sheila Thi Kieu Lorenz – sister of Tri Nguyen, Oanh Tran and Anh Nguyen. Sheila is involved in the organization as both a grower for the DTO and partner who assists in laundering proceeds of illegally distributed marijuana.

Veon Deloy Hatch – a higher level employee of the DTO and the fiancé of Sheila Lorenz. Hatch's role included grower and the head of security in charge of setting up and maintaining video surveillance equipment and security alarm equipment at the marijuana grow sites. Mr. Hatch is owner and high managerial agent of E.D.I.S. Corporation, a security company responsible for installing the above mentioned surveillance and security systems that allowed the DTO to conduct its illegal operations and keep track of workers and security issues. Indeed, once Veon Hatch started cooperating with law enforcement officials he stated he witnessed Nicholas Kuhl stealing marijuana and money from the DTO via video cameras within hours of the theft occurring.

Nicholas Kuhl – occupied a higher level managerial role and set up transportation of the marijuana from Denver, Colorado to Minnesota. He oversaw at least one warehouse grow on behalf of the DTO, but tensions with Tri Nguyen and a theft of marijuana and cash proceeds by Kuhl led to the two men parting ways and Nicholas leaving the DTO. Kuhl practiced a method of marijuana transport employing mostly women drivers as he believed law enforcement was less likely to stop women during drug interdiction operations.

Kristine Clarette Root – the common law wife of Tri Nguyen who occupies a role laundering proceeds of illegally distributed marijuana, acts as a high managerial agent of several "front" companies and pays workers, bills and collect debts in order for the illegal distributions to continue.

⁸ The description of enterprise members' roles, including Tri Nguyen's, incorporates information obtained after the Glick interview and includes information on members he may not have known. The members' roles are grouped together for convenience of the reader.

Along with her common law husband, Ms. Root is co-owner and high managerial agent of Taosunto, Inc. (D.B.A. Herban Development, LLC and Herbanrefugee, LLC) and Hsui Sheng, LLC, which were front companies used to launder proceeds of the illegally distributed marijuana through financial institutions and other entities during the majority of the duration of the enterprise.

Justin J. Walker – occupied the role of a grower and transporter of marijuana and proceeds of illegal marijuana distributions between Colorado and Minnesota. Nebraska authorities pulled over Walker during the existence of the distribution conspiracy with \$135,378.00 of the enterprise’s marijuana proceeds from Colorado.

Douglas Dunlap – a self-styled “hash oil scientist” who produced marijuana derivatives using a variety of butane extraction techniques without regard to the dangers or environmental impact. Following the direction of Tri Nguyen, Dunlap was one of several hash oil producers who received their supply source of raw marijuana from individual members of the DTO including siblings Sheila Lorenz, Tri Nguyen and Oanh Tran.

Patrick Concannon – a higher to mid-level member of the enterprise who moved from Minnesota to Colorado and started working for the DTO as a grower in February of 2013. Concannon met Tri Nguyen through his long-time friend Thomas “C.T.” Dispanet. Concannon participated in the cultivation of hundreds of plants and responsible for packaging hundreds of pounds destined for illegal out of state distribution by the DTO.

Culyer Gerbich– a high level member of the DTO, formerly from Minnesota, who moved to Colorado in 2009 and –along with others- started setting up grows and growing marijuana on behalf of the enterprise since August of 2010. Gerbich served as the primary coordinator of trafficking the DTO’s marijuana via airplane. After starting out partnered with Tri Nguyen, Gerbich eventually leased a warehouse his father, Michael Gerbich⁹ (a resident of Arizona), purchased in Denver so that his son could have a location to run his marijuana grow operation. Gerbich employs Lindsay Geinert and others to cultivate hundreds of pounds of marijuana and then traffic that same marijuana to Minnesota where it is sold to end users. Gerbich also assists in laundering cash proceeds on behalf of the organization, as did almost all members of the enterprise.

Lindsay Geinert–a grower of the DTO’s marijuana crops and primary underling of Culyer Gerbich with cultivation and packaging duties mainly at the 5145 Clarkson warehouse. She conspired with other members of the DTO/enterprise by allowing the marijuana she was cultivating to be packaged and shipped for destinations including Minnesota. Geinert confessed to participation in the cultivation activities of the DTO and being aware of the fraudulent methods the enterprise as a whole employed to make it appear as if the DTO’s drug cultivation and trafficking activities were that of legitimate caregivers.

Joseph Johnson– owner and high managerial agent of West Side Skydivers, LLC and Westside Skydivers Houston, LLC. Johnson began his involvement with the DTO through a skydiver client who introduced him to Culyer Gerbich. Gerbich then introduced Johnson to Tri Nguyen at a restaurant in Denver. Tri Nguyen and Culyer Gerbich agreed to pay Johnson \$250.00 for every pound of marijuana that he transported from Colorado to Minnesota. Johnson informed Gerbich and Nguyen that at \$250 a pound he needed to transport at least 100 pounds per trip to make the trips profitable. Ultimately realizing the potential of having access to airplanes to transport marijuana, Gerbich and Tri Nguyen conspired with Johnson to transport hundreds of pounds of marijuana virtually undetected from the Denver warehouse grows to Thomas “C.T.” Dispanet in Minnesota. Johnson admitted to investigators he had used his skydiving businesses to traffic the DTO’s illegally cultivated marijuana to Minnesota via airplane. In an effort to expand their customer base the DTO

⁹In addition to attempting to influence public servants through deceit, Gerbich likewise deceived his own father into believing the younger Gerbich’s warehouse marijuana grow in Denver ran under a lawful caregiver model.

trafficked over 100 pounds to Houston, Texas. Johnson witnessed the prospective Houston customers refuse more than 60 pounds of the total marijuana load rejecting it on the basis of its poor quality. Johnson received instructions from the DTO to return the remaining marijuana to Colorado. In order to save on the cost of airplane fuel, Johnson rented a car and drove back to Colorado to deliver cash proceeds and the remaining sixty or so pounds of marijuana to the DTO's leadership. However, in June of 2014, Kansas authorities intercepted Johnson and caught him transporting the DTO's marijuana and \$330,000.00 of cash proceeds. In attempts to mitigate future punishment, Johnson began working with DEA agents and made a variety of surreptitious recordings of his co-conspirators' discussions of drug trafficking and money laundering activities. The recordings about the DTO's illegal activities included conversations with Dispanet, Concannon and Gerbich.

Thomas "C.T." Dispanet— a high level member of the DTO who lives in Minnesota and serves as the primary importer of marijuana shipments from the enterprise's Denver based warehouse grows. Dispanet was one of only a few trusted individuals on the receiving end of hundreds of pounds of the DTO's Colorado grown marijuana. Whether transported by car, truck or airplane, Dispanet received the shipments and sent the DTO's marijuana down to lower level dealers in Minnesota. Typically, Dispanet would receive up to 400 pounds of the DTO's Denver grown marijuana on a monthly basis. C.T. then collected cash proceeds from prior illegal distributions in Minnesota and transferred millions of dollars in proceeds back to Colorado based co-conspirators. Historically, the DTO conservatively generated up to \$500,000 per month in proceeds from the illegally distributed marijuana. In turn, his co-conspirators in the DTO utilized those proceeds to promote further illegal marijuana production and trafficking.

Micah Peterson— occupied the role of a mid-level employee and long-time grower for the DTO. Peterson worked at the 5155 Clarkson and the 153 Vallejo marijuana grow warehouses and had been a member of the conspiracy to cultivate and distribute marijuana out of the state of Colorado since nearly its inception of the enterprise. He conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

Andrew Wiley— a grower for the DTO who worked at the 5155 Clarkson and 153 Vallejo marijuana grow warehouses. He conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

John Rodger Magee— a grower for the DTO who worked at the 153 Vallejo marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

Jessica Peterson— a grower for the DTO who worked at the 153 Vallejo and 1978/1980 Acoma marijuana grow warehouses. She conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

Oanh Tran ("Liz") — sister of Tri Nguyen, Sheila Thi Kieu Lorenz and Anh Nguyen and a former practicing nurse in the State of Minnesota. Liz is involved in the organization as both a grower for the DTO and partner who assists in laundering proceeds of illegally distributed marijuana.

Anh Thi Nguyen ("Lana") — a sibling of Tri Nguyen, Oanh Tran and Sheila Lorenz and the last to join the conspiracy to traffic marijuana on behalf of the DTO. Having moved out from Minnesota to Colorado in recent months, Lana participated in the enterprise starting roughly in the late spring or early summer of 2014 as a grower. She also helped her siblings launder money of the DTO to disguise the illicit nature of the cash proceeds.

Jason Joyner— a grower for the DTO who worked at the 5155 Clarkson marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO's marijuana to Minnesota.

James Chad Averette– a grower for the DTO who worked at the 5155 Clarkson marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Tiffany Gille– a grower for the DTO who worked at the 676/678 Bryant marijuana grow warehouse. She conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Everett Grove– a grower for the DTO who worked at the 5155 Clarkson marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Adam Tilley– a grower for the DTO who worked at 5145 Clarkson and 1978/1980 South Acoma warehouse marijuana grow. He conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Anthony Smith– a grower for the DTO who worked at the 5155 Clarkson marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Matthew Olson– a grower for the DTO who worked at the 153 Vallejo marijuana grow warehouse. He conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota.

Alicia Raney– Mother of Jordan Iovanella and a former practicing nurse. Ms. Raney’s role was that of a grower for the DTO who worked at the 153 Vallejo marijuana grow warehouse. She conspired with other members of the enterprise and helped the DTO prepare the marijuana for shipment to Minnesota.

Jordan Iovinella– a grower for the DTO who worked at the 153 Vallejo marijuana grow warehouse. Iovanella conspired with other members of the enterprise and helped ship the DTO’s marijuana to Minnesota. Jordan became embroiled in conflict with fellow DTO members when it became known he conducted his own basement marijuana grow and risked exposing his fellow members of the enterprise to detection. Tri Nguyen later transferred Iovanella to a smaller grow as he felt Jordan’s performance level became insufficient.

CULTIVATION LOCATIONS AND DISTRIBUTION METHODS

The investigation also revealed that, in addition to the location at 3850 East 43rd Ave., Tri Nguyen and the DTO maintained other grow operations including locations at 5155 Clarkson St., 688 Bryant St., 1978/1980 S. Acoma Street and 153 Vallejo Street. Members of the DTO refer to 153 Vallejo St. as the “office” because the partners and growers meet at this location every Monday at 10:00 am to discuss business and production. Furthermore, the investigation revealed that between August of 2010 and October of 2014, the DTO utilized approximately thirteen different warehouse spaces in the Denver metro area and one residential/farm property in the Como, Colorado area. These properties were collectively used to cultivate thousands of marijuana plants illegally, resulting in thousands of pounds of high grade marijuana harvested, packaged and distributed illegally.

After receiving a tip on an illegal marijuana grow inside an Elbert County residence, Agents Ross and Hanagan from the South Metro Drug Task Force went to the home of Josie and Ryan Farrow on August 23, 2011. Mr. Ryan Farrow granted consent to search the residence. The law enforcement officers walked down to the basement and observed three grow rooms, designated A, B and C.

Officers observed the following:

- Room A contained 10 - plants, 8 - lights, 5 - fans, 1 - air conditioner and 1 - charcoal filter.

- Room B contained 10 - plants, 8 - lights, 5 - fans, 1 - air conditioner and 1 - charcoal filter.
- Room C contained 132 - plants, 115 - clones, 5 - lights, 4 - fans, 2 - charcoal filters, 1 - electrical panel and 5 – ballasts.
- A fourth room contained 8 - ballasts, 1 – 8 ballast flip controllers, 1 – electrical panel, 8 – outlets and 1 – fan.

Ryan Farrow provided caregiver/patient paperwork to the officers that at “first glance” made his grow appear legitimate. Farrow also explained he sought out his five patients offering to pay for their state registration fee and doctors’ visits while supplying them with free marijuana, in exchange for making him their caregiver. According to the then unemployed Mr. Farrow, the build out¹⁰ for the basement marijuana grow cost around \$30,000. Farrow described using the money he made from the marijuana sales to pay his rent and all the bills associated to his residence. Sensing deceit, the responding police officer -Detective Hanagan- questioned Mr. Farrow on the inconsistencies in the story. Ultimately, Farrow admitted his caregiver story was a ruse and the paperwork for the five patients was likewise not legitimate. Officers seized numerous tangible items from Mr. Farrow’s illicit grow including over \$26,000 in cash proceeds derived from the illegal sale of marijuana, silver bars¹¹ weighing approximately 40 ounces.

Generally, the DTO would load up a car and drive the marijuana from Denver to the Minneapolis, Minnesota area. Once the marijuana arrived in Minnesota from Denver, it was then distributed and sold in Minnesota.

In mid June 2013, Ryan Farrow and Antonio Orfei drove the DTO’s Colorado warehouse grown marijuana to Minnesota for distribution. While in Minnesota, Farrow and Orfei picked up cash proceeds of previous illegal distributions from another DTO member. During the course of their trip to and from Minnesota, Josie “Muffin” Farrow communicated via phone and text message with her husband Ryan Farrow to facilitate the distribution of marijuana and the overall conspiracy to distribute marijuana. Josie sent the below text messages at the listed date and times to help accomplish her, her husband’s, and the DTO’s overall goals of marijuana distribution.

From: +19525941390 Muffin Farrow	6/17/2013 12:30:13 AM(UTC-5)	+12063130025	Read	Hey where are you?
From: +19525941390 Muffin Farrow	6/17/2013 12:39:42 AM(UTC-5)	+14044550010	Read	You need to call me
From: +19525941390 Muffin Farrow	6/17/2013 12:42:49 AM(UTC-5)	+14044550010	Read	What the fuck, I know you are not asleep
From: +19525941390 Muffin Farrow	6/17/2013 1:17:29 AM(UTC-5)	+12063130028	Read	You need to call me and let me know what's up..you guys have a lot at stake

Coincidentally, on June 17, 2013, on Ryan Farrow’s and Antonio Orfei’s return trip, law enforcement officers in Omaha, Nebraska stopped both Farrow and Orfei in possession of over \$150,000 in cash proceeds of the enterprise. Both men were interviewed by Nebraska-based Homeland Security agents. After attempting to deceive the law enforcement officials with Homeland Security Investigations with a concocted story, Farrow eventually confessed to his role in the illegal distribution and the laundering of money.

In contrast, Orfei explained that he had been working for a “medial marijuana” facility located at 153 Vallejo for approximately one year. During the interviews investigators learned Tri Nguyen, through Taosunto, Inc., owned several marijuana warehouses and employed Orfei, in part, to transport the

¹⁰ A later investigation revealed Tri Nguyen not only provided the money to pay for the patients’ red cards and doctor visits, but also the build out of the basement marijuana grow as it was part of the overall enterprise’s production.

¹¹ Mrs. Josie Farrow claimed ownership of the bars.

marijuana from the Colorado “medical marijuana” facilities to people in Minnesota. Orfei also conveyed he had transported money for Tri Nguyen from marijuana proceeds from Minnesota to Colorado for the preceding five months. Each trip he transported between \$50,000.00 and \$100,000 for which Orfei was paid \$3,000 to \$4,000.

After the interviews, Farrow and Orfei were released by the law enforcement officials and travelled back to Colorado. Apparently, upon his return home, Ryan Farrow failed to tell his wife Josie of his above mentioned confession to Homeland Security Special Agent Andrew Vincik. Shortly after Mr. Farrow’s stop in Omaha, Nebraska, Mrs. Farrow called Agent Vincik on her phone in attempts to retrieve the seized proceeds of the illegal marijuana distribution. She questioned the agent as to why he had seized and refused to release the over \$150,000 in cash. Mrs. Farrow deceitfully stated that Mr. Farrow’s source of the money in question was not illicit, but rather derived from jewelry sales or an insurance payout (for his father’s death).

Soon after Mr. Farrow’s Nebraska traffic stop, he and Mrs. Farrow were effectively banished from the enterprise. DEA and DEA Task Force Officers from the Parker Police Department and Douglas County Sheriff’s Office learned that Mr. Farrow continued to cultivate marijuana in his home until October of 2014.

In October of 2013, the DTO started using airplanes to deliver marijuana and cash proceeds from illegal cultivation between Colorado and Minnesota. Likewise, once the marijuana arrived in Minnesota from Colorado it was then distributed and sold in Minnesota. Joe Johnson conducted his first of nearly ten trips using his skydiving companies sometime around late October or early November of 2013. First, he flew to the Boulder, Colorado municipal airport and rented a car. Johnson then drove the car to meet Gerbich at the 5155 Clarkson Street cultivation facility. At that time, Gerbich gave Johnson 100 pounds of marijuana split amongst four duffle bags, and instructed Johnson to fly the marijuana to Winsted, Minnesota. Johnson landed with the marijuana and met Dispanet.

After receiving the illegally distributed Colorado marijuana, Dispanet handed Johnson a duffle bag containing vacuum-sealed U.S. currency totaling approximately \$460,000. Dispanet instructed Johnson to fly the money back to Tri Nguyen and Cuyler Gerbich in Denver. Later, Johnson flew back to Boulder with the \$460,000 and met Gerbich and Tri Nguyen at the Rack House Restaurant.¹² Tri Nguyen arrived in his white Audi and Johnson placed the duffle bag full of money into the car on the floor behind the driver’s seat. Gerbich then gave Johnson a separate package that contained \$25,000 in U.S. currency as payment for transporting the marijuana. Despite having access to air transportation the organization never stopped transporting marijuana by car.

In fact, on February 5, 2014, detectives learned the DTO completed a marijuana harvest at the 3850 E. 48th Avenue warehouse and twenty-five pounds of marijuana had been packaged for distribution. Shortly thereafter, detectives observed a car driven by Aubrey Keesling with Aaron Ellering in the passenger seat arrive at the warehouse. Ellering entered the warehouse and exited a short time later with a large cardboard box he then placed inside of a truck. Detectives followed Ellering as he drove to 688 Bryant St. Ellering exited the truck, removed the box and carried it into the warehouse located at 688 Bryant Street Warehouse. Detectives learned the box contained twenty-five pounds of marijuana from the E. 48th Avenue warehouse. Later, Nicholas Kuhl drove up to 688 Bryant Street warehouse and dropped off a male passenger. This man carried a large, full trash bag into 688 Bryant Street. Detectives discovered that the DTO intended to collect a large enough load of marijuana from their warehouses for a delivery to Minnesota.

¹² At each subsequent delivery, Johnson transferred the proceeds of illegal marijuana distributions at Gerbich’s home. Johnson would meet Tri Nguyen at Gerbich’s house to transfer the money to Nguyen.

On February 8, 2014, a Lancaster County (Nebraska) Sheriff's Deputy apprehended Justin Walker driving from Minnesota to Colorado. Walker was transporting approximately \$135,000 cash, vacuum-sealed, in the trunk of the vehicle. The cash emitted a strong odor of marijuana. Detectives later confirmed that the money Walker was transporting was in fact proceeds from the DTO's sale of illegally cultivated marijuana. Deliveries continued undetected until June of 2014.

As described above, in June of 2014, Kansas State Patrol apprehended Joe Johnson driving from Houston to Colorado. Johnson then began cooperating with law enforcement.

On June 24, 2014, Joe Johnson had a face-to-face meeting at a restaurant with Dispanet in the Minneapolis area to talk about Kansas law enforcement's seizure of the DTO's marijuana and cash proceeds. Photos of Dispanet and Johnson were taken during this meeting. During this meeting Dispanet acknowledged that the marijuana and money had been seized by Kansas law enforcement and told Johnson words to the effect of: "That was seventy pounds of shit" and "my fingerprints are on that currency." After the undercover operation involving Dispanet, Johnson continued to provide information to investigators.

During the latter half of July of 2014, law enforcement officials approached Johnson to further interview him about the DTO's illegal ongoing cultivation, distribution and money laundering behaviors and to explore additional possible avenues of investigation. During this consensual interview, Johnson discussed quantities of money he had received as payment from the DTO for his airplane based illegal drug running go-fer services. When questioned about the location of the nearly \$100,000 cash Johnson had received from the DTO, Johnson became evasive with interviewing agents Special Agent Aaron Tucker of the Drug Enforcement Administration, Detective Christopher Shotts of the Denver Police Department, and Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Stephen Bratten. Moreover, Johnson attempted to deceive the three investigators and described burying the \$100,000 in a particular location Mr. Johnson later confessed that he had never buried the money but instead spent it to pay bills and prop up his skydiving business.

THE DTO'S MONEY LAUNDERING

During the DTO's existence, Tri Nguyen controlled the overall illegal cultivation and distribution of marijuana. Moreover, with the assistance and complicity of his wife, Kristine Root, sisters and other members and entities involved in the DTO, Tri Nguyen controlled the associated flow of money/proceeds from out of state sales of illegal marijuana. Tri Nguyen and others involved in the organization took substantial steps to hide the source and nature of the illegal marijuana proceeds.

Joseph Johnson, owner and high managerial agent of West Side Skydivers, LLC and West Side Skydivers, Houston, LLC utilized airplanes from his two skydiving businesses to deliver marijuana and proceeds of illegal marijuana distributions on behalf of the drug trafficking organization. Johnson and his two skydiving businesses transported over 1500 pounds of marijuana and over \$2,000,000 in cash proceeds between Minnesota and Colorado from October 2013 through June 2014.

Through the use of his two companies' aircraft (and on occasion: automobiles owned or rented by Johnson), he was able to discreetly deliver marijuana to Minnesota¹³ and return proceeds of previous marijuana sales in Minnesota to Colorado. Both the outbound marijuana and inbound cash proceeds

¹³ Unless otherwise specified, all of Johnson's shipments of the DTO's Colorado grown marijuana were made via his skydiving businesses, in his capacity as owner and high managerial agent, and delivered to Thomas "C.T." Dispanet as part of the enterprise's distribution scheme. Furthermore, all deliveries of the DTO's marijuana made by Johnson were never less than 90 pounds and not more than 500 pounds.

were sealed and packaged to avoid law enforcement detection. Johnson personally delivered cash proceeds from illegal marijuana distributions to members of the DTO including Tri Nguyen, Cuyler Gerbich and Pat Concannon during the course of the enterprise. A sizeable portion of the proceeds from the illegal marijuana sales ended up in the hands of Nguyen regardless of whether Johnson first gave the laundered funds to Gerbich or Concannon.

On June 20, 2014, law enforcement authorities from Kansas stopped Johnson and seized sixty-six pounds of the DTO's Colorado grown marijuana and \$330,000¹⁴ of cash proceed that the organization intended on returning to Colorado. The Kansas state law enforcement members turned their segment of the investigation over to a DEA unit based in Kansas. Members of the DEA then obtained a confession from Joe Johnson about his personal participation in activities of the enterprise including but not limited to, drug trafficking and money laundering. Investigators interviewing Johnson learned that on this particular delivery route, Johnson had possessed over sixty six pounds of marijuana (grown by the DTO) and used his skydiving business to distribute over thirty three of the total one hundred pounds of this marijuana in Houston, Texas. During Johnson's confession, investigators also learned that Johnson's trip to Houston had been a plan formulated by both Tri Nguyen and other members of the enterprise with the intent to expand the DTO's reach into new markets. According to Johnson, the DTO's potential new customers in Houston, Texas found the marijuana produced by Nguyen and his organization to be of such poor quality that they accepted approximately 1/3 of the over 100 pounds and rejected future deals.

Utility records revealed the DTO began cultivating marijuana as early as August 2010 with illegal distribution operations happening shortly thereafter. Averaging between 100 and 400 pounds a month per month in production, the DTO grew thousands of pounds over its evolution and distributed the majority of its warehouse cultivated marijuana to Minnesota. Typically, it was sold for an average of \$2,600.00 per pound. The DTO conservatively¹⁵ brought in over \$12,000,000.00 during the course of the conspiracy.

Bank records of Root, Tri Nguyen and other DTO members, indicate the DTO has collectively deposited approximately \$1,200,000 into known and traceable bank accounts between September 2011 and August 2014. During the same time frame over \$350,000 of proceeds from prior illegal marijuana distributions were used cyclically to pay rent, electrical and water bills on the various warehouses run by the DTO. The illegal cultivating and distributing of marijuana sustained the DTO's illegal marijuana operation run by Tri Nguyen, Root, Gerbich, Concannon, Veon Hatch, Sheila Lorenz, Oanh Tran and other members. Subsequent production and proceeds analysis revealed the DTO members took in an additional \$10,000,000.00 from the money deposited into bank accounts since August 2010, none of which was placed into known or traceable bank accounts.

Nguyen and Root conspired with other members of the DTO to devise a ruse whereby Taossunto, Inc., Herbanrefugee, LLC, Herban Development, LLC and other entities posed as property management companies catering exclusively to Colorado medical marijuana caregivers. Part of Nguyen and Root's scheme involved using Taossunto, Inc. -their front company- to lease commercial warehouse spaces in the Denver Metro area. These same warehouses were then utilized to cultivate marijuana illegally. In order to maintain the DTO's publically outward fiction of a cooperative caregiver marijuana grow existing in each warehouse, Tri Nguyen and his co-conspirators drafted fake subleases.

¹⁴ These illegal marijuana proceeds seized from Johnson represent part of the earlier mentioned \$2,000,000.00 figure.

¹⁵ Assumes the conservative number of 100 pounds per month, multiplied by the number of months the DTO harvested marijuana (November 2010 through October 2014 (48 months)), multiplied by \$2,600.00 per pound. The DTO's income is \$12,480,000 during the course of the conspiracy.

Records and interviews with cooperating witnesses indicate since 2011 that Tri Nguyen and Root utilized various members of this DTO to convert cash obtained from the illegal sale of marijuana in Minnesota into money orders. The DTO members patronized Denver Metro area money service businesses such as the US Postal Service, Western Union and Money Gram outlets such as Safeway, King Soopers, 7-Elevens and Loaf-N-Jugs. Once converted to money orders, Kristine Root and other members of the DTO worked together to avoid federal reporting requirements and to deposit the proceeds of the illegal marijuana distributions into a FirstBank account in the name of Taossunto, Inc., ending in xxxxxx4549. The co-conspirators did so under the false pretense that the money being paid was for “rent” destined for Tri Nguyen and Taossunto, Inc. in their capacity as a mere landlord and management company. In summary, Tri and Kristine owned and manipulated Tassounto, Inc. and the associated bank account to hold and transfer marijuana proceeds and to oversee the marijuana cultivation and distribution network.

FirstBank records indicate account xxxxxx4549, in the name of Tasossunto, Inc., listed Tri Nguyen and Kristine Root as the only authorized signors. Bank records show account xxxxxx4549 was opened on September 28, 2011 with a \$12,000 check from Moonlit Wellness, DBA Salida Green Cross, a marijuana related business. Records show \$409,261.56 in deposits between September 2011 and August 2014. Furthermore, records indicate approximately \$389,465.00 of these are deposits are proceeds of Nguyen and Root’s illegal marijuana operation. FirstBank account xxxxxx4549 shows 388 separate money orders deposited between April 2012 and August 2014 and totaling \$263,660. The deposited money orders were in \$500 and/or \$1000 denominations. Bank records show that DTO members purchased multiple money orders at multiple money service businesses in the same day and within short periods of time in order to avoid federal reporting requirements. In general, these money orders were almost exclusively purchased in increments that were \$3,000 or less per transaction per store/money service business even though the total amount of money used to purchase money orders throughout the same day was far greater.

For example, Sheila Lorenz, the sister of Tri Nguyen, appears to have signed money orders dated July 16, 2014, totaling \$9,000 and deposited into the Taossunto, Inc. FirstBank account on July 18, 2014. The \$9,000 in money orders was purchased in the following manner on July 16, 2014:

- \$2,500 (2 -\$1,000 and 1-\$500) at King Soopers store #60 at 10:07AM
- \$1,000 (2 -\$500) at Safeway store #1587 at 10:33AM
- \$2,500 (2 -\$1,000 and 1-\$500) at King Soopers store #90
- \$2,500 (2 -\$1,000 and 1-\$500) in MoneyGram money orders
- \$500 (1-\$500) at Safeway store #1248 at 6:23PM.

Some of these money orders contained the handwritten word “Rent”, and were consistent with the known scheme allowing the DTO to hide in plain sight. Other money orders apparently signed by Lorenz and deposited into FirstBank account xxxxxx4549 stated ‘rent’, ‘unit #107’ or ‘#107’. These numbers referenced one of the leased Taossunto, Inc. spaces at the 153 Vallejo warehouse and helped further the fraudulent caregiver cover story of the organization.

Additionally, Oanh Tran, appeared to have signed money orders totaling \$5,000 and later deposited them into FirstBank account xxxxxx4549 on August 6, 2014. The \$5,000 in money orders were purchased in the following manner on August 1, 2014:

- \$3,000 (3-\$1,000) at King Soopers store #7 at 12:02/12:03PM
- \$2,000 (2-\$1,000) at King Soopers store #124 at 1:34PM

Each of these money orders contained the handwritten word "Rent". On August 1, 2014 at approximately 12:18PM, surveillance video from 7-11 store # 27429 show both OANH Tran and Ahn Nguyen purchasing money orders consecutively and within minutes of each other in two different transactions. Eventually two of these money orders found their way into FirstBank account xxxxxx4549 and contained the signature of yet another member of the DTO, Patrick Concannon. They too stated the word "Rent". Oanh Tran appeared to have signed other money orders deposited into account xxxxxx4549 stating 'rent' and 'unit #108' or '#108'. These numbers referenced one of the leased Taossunto, Inc. spaces at the 153 Vallejo warehouse and helped further the fraudulent caregiver cover story of the organization.

The vast majority of the \$263,660 deposited from money orders into FirstBank account xxxxxx4549 were purchased in a similar fashion and included multiple money order purchases by Sheila Lorenz, Oanh Tran and other members of the DTO such as Andrew Wiley, Aubrey Keesling, John Magee, Kristine Root, Patrick Concannon and Veon Hatch. Bank records show these money orders contained the signatures of the members of the DTO and referenced a different unit number or stated the word 'Rent'. The endorsement on the money orders deposited into FirstBank account xxxxxx4549, usually stated Taossunto, Taossunto Inc. or Kristine Root. Frequently, the deposits of proceeds from prior illegal drug distributions made into Taossunto's FirstBank account paid for expenses associated with this DTO's ongoing marijuana operation such as rent, electrical usage and water. On occasion, marijuana proceeds deposited into the Taossunto FirstBank account xxxxxx4549 were transferred to other US Bank and Bank of the West accounts controlled by Tri Nguyen or Kristine Root.

Bank records indicate account number xxxxxx4549 shows 48 separate cash deposits between March 2012 and August 2014, totaling approximately \$104,905. All were \$3,000 or under to avoid reporting requirements and to disguise the nature of the proceeds. Indeed, the DTO made cash deposits of \$3,000 on March 4, 2013, March 11, 2013, March 18, 2013, April 1, 2013, April 8, 2013, April 22, 2013, May 1, 2013 and May 15, 2013 to pay for items such as utilities, rent and other marijuana expenses. Moreover, some of the illegal marijuana proceeds were transferred to Nguyen and Root's bank accounts with US Bank.

Kristine Root possesses a bank account in the name of H-Services with Bank of the West ending in xxxxx8018. H-Services is an entity controlled by Root and she is the sole signor on the bank account. Kristine Root stated on business documentation that H Services is an electrical facilities company. Financially, H-Services appeared to do nothing more than serve as a depository for some of the DTO's marijuana proceeds. Bank records show Root opened the Bank of the West xxxxx8018 account with a \$3,500 cash deposit. Bank of the West surveillance photo records show Root depositing a \$12,000 check into Bank of the West Account number xxxxx8018 at an ATM on Steele Street in Denver. The \$12,000 check's source, written from Taosunto's FirstBank account xxxxxx4549, consisted of illegal marijuana proceeds.

Kristine Root owns other bank accounts at US Bank. Account number xxxxxxxx6595 lists Kristine Root as owner and the only signor. US Bank account number xxxxxxxx7672, registered to Hsui Sheng, LLC (a purported massage therapy business)¹⁶ lists Kristine Root as the only signor. Hsui Sheng, LLC is an entity owned and controlled by Kristine Root.

Records indicate a balance of \$3,547.05 in US Bank account xxxxxxxx6595 on December 15, 2011. However, between January 2012 and July 2014 US Bank account xxxxxxxx6595 activity indicates \$267,635.54 in deposits. \$206,994.03 is derived from marijuana proceeds and consists of both cash

¹⁶The Department of Regulatory Agencies (DORA) does not possess records indicating Kristine Root or Hsui Sheng, LLC are registered or licensed in the massage therapy field. DORA would otherwise be required to possess such records.

deposits and deposits from non-cash sources including bank accounts controlled by Kristine Root or Tri Nguyen.

US bank records state that between March 2012 and July 2014 account number xxxxxxxx6595 received deposits totaling approximately \$72,879.72 from the Taossunto FirstBank xxxxxx4549 account. Except for the first deposit, which was a check, FirstBank and US Bank records indicate the electronic transfers state the word "Payroll". These "Payroll" deposits into US Bank account number xxxxxxxx6595 from FirstBank account xxxxxx4549 occurred monthly and in similar amounts in consecutive months.

Records on March 7, 2012 show a check for \$1,800 written to Tri Nguyen was deposited into US Bank account number xxxxxxxx6595. This \$1,800 check came from the Taossunto FirstBank xxxxxx4549 account and states it was a "payroll" check. US Bank records show between March 2012 and December 2012, an additional 10 monthly electronic deposits for \$1,800 each, were then deposited into US Bank account number xxxxxxxx6595 from the FirstBank xxxxxx4549 account likewise stating "payroll".

During January through July of 2014, deposits into US Bank account xxxxxxxx6595 from "payroll" each month regularly occurred in the amounts of \$1,208.42 and \$3,642.80. The moneys transferred from the Taossunto FirstBank xxxxxx4549 account to the US Bank xxxxxxxx6595 account were marijuana proceeds from the DTO's illegal distributions.

Between January 2012 and July 2014, US Bank account xxxxxxxx6595 had over \$114,000 in cash deposits made at various US Bank ATM machines in the Denver Metro area. The DTO made sixty three separate cash deposits with each deposit being \$2,500 or less. Fifty three of the sixty three cash deposits ranged from \$1,850 to \$2,000. The deposits into xxxxxxxx6595 occurred on a consistent basis. For example, US Bank records show the DTO deposited \$1,980 on April 8, 2013, April 15, 2013, April 23, 2013, May 1, 2013 and May 6, 2013. These small cash deposits into banks allowed the DTO to avoid federal reporting requirements and eschew red flags that might arise out of such structured deposits.

Between January 2012 and July 2014, Kristine Root made \$21,029.83 in deposits into US Bank account number xxxxxxxx7672. Indeed, on April 15, 2014, April 23, 2014, May 1, 2014 and May 20, 2014, US Bank ATM surveillance photos show Kristine Root making four \$2,000 cash deposits into US Bank account xxxxxxxx7672. On April 5, 2012, Root then made a \$23,000 transfer and later a \$15,000 transfer on March 28, 2014 to US Bank account number xxxxxxxx6595. All of these deposits to ATMs were at or less than \$2,000 per deposit and appear to be illegal marijuana proceeds.

The investigation also revealed that Kristine Root and Tri Nguyen also possessed a Wells Fargo account xxxxxx9262 registered to Taossunto, Inc., where Root and Nguyen were the only signors. Tri Nguyen and Kristine Root opened this account with a \$100 cash deposit on December 16, 2013. Between December 2013 and July 2014, account xxxxxx9262 had approximately \$320,585.92 in deposits from illegal marijuana proceeds made in cash, money orders and other non-cash sources.

Cash deposits into the Taossunto, Inc. Wells Fargo account totaled \$94,180. Specifically, on January 17, 2014, there were four separate cash deposits made into Wells Fargo Bank account xxxxxx9262, in the amounts of \$9,000, \$6,980, \$4,960 and \$4,040 and were deposited at different times and at different Wells Fargo bank locations. Further, on February 14, 2014, there were two separate cash deposits made in the amounts of \$9,000 each and were deposited at different times at different Wells Fargo bank locations. This behavior allowed the DTO to hide the illegal marijuana sales from taxation and avoid federal bank reporting requirements.

Over three hundred separate \$500 or \$1000 money order deposits into the Taossunto Wells Fargo account took place between January 2014 and June 2014. Bank records show that these \$500 and \$1000 money orders totaled \$226,385 and were almost uniformly purchased in increments of \$3,000 or less per transaction per money service business,¹⁷ thus avoiding federal reporting requirements.

Specifically, Wells Fargo records show that Sheila Lorenz, a DTO member and sister of Tri Nguyen, signed money orders dated May 30, 2014, that were purchased totaling \$5,000. The \$5,000 in money orders was purchased as follows on May 30, 2014:

\$2,500 (2 -\$1,000 and 1-\$500) at King Soopers store #90 at 12:13 PM,
\$2,500 (2 -\$1,000 and 1-\$500) at King Soopers store #127 at 12:39 PM.

These money orders stated “Rent” and #107” on them and appeared to reference a particular space at 153 Vallejo, a marijuana cultivation warehouse controlled by the DTO. Ultimately, this money was deposited into Wells Fargo Bank account number xxxxxx9262 on or about June 2, 2014.

Furthermore, Wells Fargo Bank records show Oanh Tran appeared to have signed money orders totaling \$6,000 and purchased on April 29, 2014. These money orders were eventually deposited into Wells Fargo Bank account number xxxxxx9262 on May 5, 2014.

Bank surveillance shows Kristine Root making two different deposits into Wells Fargo account xxxxxx9262 from marijuana proceeds on June 2, 2014. The first derived from money orders signed by Pat Concannon with handwriting on the money orders stating ‘rent’. These money orders signed by Concannon were purchased at a Post Office, Safeway, King Soopers and MoneyGram outlet in transactions that were \$3,000 or less, thus avoiding federal reporting requirements. The other deposit to Wells Fargo xxxxxx9262, consisted of money orders signed by Sheila Lorenz and Veon Hatch with handwriting on the money orders stating ‘rent’ to Taossunto, Inc. These same money orders with the Lorenz and Hatch signatures were purchased at two different King Soopers locations at different times in \$3,000 increments and purchased in ways consistent with other DTO money order transactions made to avoid federal reporting requirements.

OCTOBER SEARCH WARRANTS

Search warrants executed on October 28, 2014 and October 29, 2014 resulted in the seizure of over 1,900 marijuana plants that were growing at the time, over 4,600 pounds of marijuana trim, over 160 pounds of flowered marijuana, over 600 grams of marijuana concentrate and over 1 pound of hash oil, all of which was grown, processed and produced illegally.

On October 28, 2014 members of the Denver Police Department, the Colorado Attorney General’s Office, the United States Drug Enforcement Administration, the Colorado Department of Revenue Criminal Tax Enforcement Section and other agencies participated or assisted in the simultaneous execution of eighteen search warrants and subsequent interviews.

On the morning of October 28, 2014 in Denver, Colorado law enforcement officers executed a search warrant on the home of Cuyler Gerbich. In a subsequent consensual interview Gerbich attempted to deceive DEA Agents Randolph S. Ladd and William Cronin by making deceitful statements including but not limited to: denying his involvement in trafficking marijuana to Minnesota; and

¹⁷ The money orders were almost exclusively purchased at 7-11, King Soopers, Safeway, US Post Offices and MoneyGram outlets.

claiming he only ran a lawful caregiver grow. The agents questioned Mr. Gerbich about his deceitful story and Mr. Gerbich confessed to attempting to deceive the interviewing agents.

On the morning of October 28, 2014 in Golden, Colorado law enforcement performed a search warrant on the home of Veon Hatch and his fiancé Sheila Lorenz. In a subsequent consensual interview, Veon Hatch attempted to deceive Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Charlie Schlaufman, United States Drug Enforcement Administration Analyst/Contract Employee Maryann Harmon and United States Drug Enforcement Administration Analyst/Contract Employee Tiffany Brubaker by making deceitful statements including but not limited to: denying his involvement in trafficking marijuana to Minnesota; denying knowing that Tri Nguyen trafficked marijuana; deceitfully claiming that the enterprise's warehouse on Clarkson in Denver was merely a caregiver facility; claiming he lacked knowledge as to whether Sheila Lorenz's family is in the marijuana business; and claiming his security business (E.D.I.S. Corporation) provided his only source of income. After agents finished their interview with Mr. Hatch they then spoke to Ms. Lorenz later that same morning in her home.

During a consensual interview, Sheila Lorenz attempted to deceive Colorado Department of Revenue, Criminal Tax Enforcement Special Agent Charlie Schlaufman, United States Drug Enforcement Administration Analyst/Contract Employee Maryann Harmon and United States Drug Enforcement Administration Analyst/Contract Employee Tiffany Brubaker by making deceitful statements including but not limited to: she only received income from being paid by EDIS (Hatch's security company) and from her child support; that she was unaware whether her brother Tri Nguyen was in the marijuana business; stating she rented space from her brother Tri Nguyen to grow marijuana; claiming neither she nor Veon Hatch get any money from marijuana; stating her brother Tri Nguyen owns a lighting company that is active in both Minnesota and Colorado; and that her sister Oanh Tran is a provider/caregiver of marijuana but her brother Tri Nguyen is not because she did not think he grows marijuana.

On the morning of October 28, 2014 in Lakewood, Colorado law enforcement officials performed a search warrant on the home of Oanh Tran and her sister Anh Nguyen. In a subsequent consensual interview Tran attempted to deceive Colorado Department of Revenue Special Agent Peter McParlane, United States Alcohol Tobacco and Firearms Contract Employee A.J. Gehring by making deceitful statements including but not limited to: stating she was a provider/caregiver and leased space to grow for her patients; rented space at 153 Vallejo to grow marijuana for her patients; claiming she grows for her patients and was not compensated; claiming the marijuana she grew is only for her own use and that of her patients; claiming she applied for an OPC license; claiming that names (Tri Nguyen and Aaron Ellering) and figures on a financial ledger were not related to the warehouse grow nor referenced money associated with marijuana distribution; falsely claiming the money listed on that same ledger was a proposed investment; and falsely recounting the origin of the over \$500,000 cash found at her house. After agents finished their interview with Ms. Tran they then spoke to Ms. Anh "Lana" Nguyen later that same morning in the home she shared with her sister Oanh.

In a subsequent consensual interview Anh Nguyen attempted to deceive United States Drug Enforcement Administration, Special Agent Mike Tonozzi by making deceitful statements including but not limited to: stating she lacked a job at the present time; and falsely claiming the nearly \$8,000 cash found in her bedroom was from her work as a waitress.

One day after law enforcement executed the above mentioned search warrants on the warehouses and homes of DTO members throughout the Denver Metro area, Kristine Root entered the US Bank branch at 200 University Boulevard. Unaware that law enforcement seized the safe deposit box

contents and bank accounts through search warrants, Kristine Root attempted to access her safe deposit box and bank accounts. Kristine Root contacted managers at this US Bank branch and stated someone else had her key and alluded to the fact that her key had been stolen even though law enforcement had obtained her key during the previous day's search warrant. Root told the US Bank managers she could not wait and had to take the money out of her safe deposit box immediately and needed access to her bank accounts immediately. In response to Root's "story" and her allusion to the safe deposit key being stolen, the bank manager provided the business card of a DEA agent and Kristine Root left US Bank without being able to access her safe deposit box¹⁸ or bank accounts.

On the morning of October 29, 2014 law enforcement officials performed a search warrant on the DTO's hash oil production facility located at 3050/3020 East 43rd Avenue in Denver. They seized over five pounds of marijuana along with over one pound of hash oil and over 600 grams of marijuana concentrate that Mr. Dunlap produced for the DTO. To produce the hash oil Dunlap employed two different methods: closed butane extraction and open butane extraction. In a subsequent consensual interview, Douglas Dunlap attempted to deceive Colorado Department of Revenue Criminal Tax Enforcement Special Agent Stephen Bratten and or Special Agent Sondra Pennington by making deceitful statements including but not limited to: claiming he was performing research; claiming he owned the hash oil extraction equipment present in the warehouse; claiming he did not work for anyone; and claiming he did not know where or who the marijuana in his warehouse/hash oil extraction facility was from. The law enforcement agents participating in the search of the warehouse found boxes of marijuana labeled with phrases and names including: "Sheila's leaves – Top and bottom", "Liz" and "auto parts - old."

Investigation performed after the 3050/3020 East 43rd Avenue search revealed that between January 1, 2014 and November 1, 2014, Douglas Dunlap, Tri Nguyen, Sheila Lorenz and Oanh Tran conspired with one another to produce hash oil. During actual production of the hash oil the four named conspirators caused or substantially contributed to the occurrence of a hazardous substance incident.

Subsequent interviews and investigation revealed that Tri Nguyen, Sheila Lorenz and Oanh Tran provided marijuana from the DTO's warehouse marijuana cultivation operations to Douglas Dunlap for the purposes of extracting hash oil. Tri Nguyen, on behalf of the DTO, purchased the hash oil extraction equipment for Mr. Dunlap and also contracted for a lease with the warehouse's owner. As mentioned above, the "facility" in which Mr. Dunlap produced hash oil utilized both open and closed butane extraction techniques. Butane is a highly flammable substance which is heavier than air and without proper safety protocols, as was the case here, extracting hash oil poses a risk of explosions from sparks as its flashpoint is only negative 76 degrees Fahrenheit. Accordingly, when Douglas Dunlap, Tri Nguyen, Sheila Lorenz and Oanh Tran conspired with one another to produce hash oil and Mr. Dunlap used a butane extraction technique, their collective behavior of hash oil production threatened an immediate and irreparable harm to the environment or the health and safety of nearby individuals.¹⁹

After the search warrants were executed on October 28, 2014 several of the DTO members met with investigators in attempts to minimize future punishments or simply tell their sides of the story. Cuyler Gerbich was one such individual who attempted this tactic. On December 18, 2014 Mr. Gerbich submitted to a consensual interview with United States Drug Enforcement Administration Special Agent Randolph Ladd, Denver Police Department Detective Christopher Shotts and Colorado

¹⁸ A narcotics dog had a positive indication on the \$70,000 in illegal marijuana proceeds in the safe deposit box.

¹⁹ The butane extraction technique posed a risk of harm to fellow 3050/3020 43rd Avenue tenants including but not limited to a nearby recording studio.

Department of Revenue, Criminal Tax Enforcement Special Agent Stephen Bratten to discuss the various criminal behaviors by members of the DTO. Gerbich attempted to deceive Special Agent Ladd, Detective Shotts, and Special Agent Bratten by making deceitful statements including but not limited to: stating his father had a heart condition and suffered a heart attack after Cuyler informed him of the search warrants executed on October 28, 2014; and by minimizing his own role and the role of Lindsay Geinert in the DTO; while deceitfully describing the true role and involvement of Joseph Johnson in the overall DTO; and deceitfully describing his interactions with Joseph Johnson during the illegal distribution of marijuana by the DTO.

As mentioned above, law enforcement officers executed a search warrant on the home and marijuana warehouse grows run by Tri Nguyen at the end of October 2014. From the home of Mr. Nguyen and Ms. Root the officers and agents seized approximately \$750,000 in cash proceeds from illegally grown and distributed marijuana. A search of other co-conspirators homes yielded nearly \$740,000 in laundered money from the organization as a whole and in total over \$1,400,000 was found in the residences of DTO members. Law enforcement agents also seized automobiles that Tri Nguyen had purchase with the aforementioned illicit marijuana cash proceeds. Between January 1, 2015 and March 12, 2015 and in response to the seizure of the cash and subsequent civil asset forfeiture action, Tri Nguyen and Kristine Root submitted multiple legal filings/paperwork, via their attorney Ariel Z. Benjamin, Esq., in an effort to reacquire their seized assets. However, in two of these filings both Tri Nguyen and his common law wife Kristine Root made deceitful and fraudulent representations to the United States Attorney's Office and the Drug Enforcement Administration Asset Forfeiture Section. The deceitful assertions by Root and Tri Nguyen included but were not limited to: claiming Mr. Nguyen had obtained all of his seized assets through lawful activity; claiming Mr. Nguyen activities were in compliance with all law; claiming that Tri Nguyen was not engaged in the activity of growing marijuana but was merely a land lord [to the DTO's warehouse marijuana grows situated throughout Denver]. These assertions were made deceitfully and in attempts to hide the existence of the DTO and in order to obtain seized proceeds of illegal marijuana distributions from law enforcement.

Other members were more candid about the existence and evolution of the DTO in post search warrant interviews with law enforcement officers. Indeed, DTO members stated that at the beginning of the conspiracy in 2010, Tri Nguyen and his organization intended on starting their marijuana cultivation and distribution operation in California. However at that time, the DTO decided to illegally cultivate and distribute marijuana in Colorado due to their perceived lack of regulatory enforcement actions and oversight in the marijuana industry. DTO members subjectively felt Colorado's weak regulatory enforcement structure afforded them the easiest opportunity to conduct illegal marijuana and distribution activity with little to no consequences from law enforcement and civil regulators.

The investigation revealed that Tri Nguyen and the DTO routinely contacted at least one state licensed dispensary, in an effort to obtain cultivation licenses for the illegally operating marijuana warehouses. These efforts proved unsuccessful. During spring of 2014 a representative from a state licensed dispensary, exploring a possible merger, met with and explained to Mr. Nguyen the illegal nature of the enterprises' warehouse grows. The representative elaborated and conveyed to Tri Nguyen that any shot at legitimacy –and thus subsequent licensure– involved cutting down the DTO's marijuana plants and cleaning out the warehouses prior to any inspection by city and state officials. Tri Nguyen flatly rejected the suggestion of losing a crop. Instead he stated words to the effect, "I am making too much money doing what I'm doing." On the precipice of a possible merger with a state licensed dispensary, Tri Nguyen, leader of the DTO, decided it would be more profitable to not destroy the crop and forgo the process of obtaining proper state licensure.

During the conspiracy investigators interviewed multiple DTO members and learned Tri Nguyen instructed them to falsely hold themselves out as “caregivers” if questioned by law enforcement or civil regulators. In furtherance of the conspiracy, the DTO members executed leases deceitfully designed to show the DTO members were mere lawful caregivers renting cultivation rooms at the marijuana warehouses. These fraudulent leases also gave the outward appearance that Tri Nguyen occupied the role of landlord to the various marijuana grower tenants (his DTO members listed above). Instead, the rent paid under the auspices of the leases was yet another plan of the DTO to launder proceeds of its illegally cultivated and distributed marijuana. This so called “rent” was simply money Tri Nguyen had given to them from Colorado grown marijuana sold in Minnesota to complete the ruse and hide the illegal nature of the DTO’s activity.

THE DTO’S TAX EVASION

Certain members of the DTO intentionally evaded taxes and failed to file their individual state income taxes with the Colorado Department of Revenue. They did so to avoid revealing their involvement in the enterprise’s overall illegal distribution scheme. These tax evading members who failed to file their taxes include Veon Hatch, Patrick Concanon, Sheila Lorenz and Cuyler Gerbich.

Analysis by Colorado Department of Revenue Criminal Tax Enforcement Special Agent Steve Bratten indicates that between January 1, 2014 and October 28, 2014 Tri Nugyen, Cuyler Gerbich and various other DTO members failed to pay the required marijuana excise tax for cultivating marijuana to be sold at retail/wholesale and failed to file any marijuana excise tax returns with the Colorado Department of Revenue. Likewise, they also failed to obtain proper retail marijuana cultivation licensing. Conservative estimates demonstrate that Tri Nguyen, Cuyler Gerbich and other members of the DTO were subject to over \$700,000 in marijuana excise tax that should have been paid in association with their marijuana cultivation operation. Instead, the DTO’s illegal activity remained hidden via their fictitious “caregiver” scheme and thus afforded the enterprise the ability to evade the excise taxes administered by the Colorado Department of Revenue.

COUNT 49

Special Offender - Source of Income, §18-18-407(1)(a), C.R.S. (SE) **33442**

On or about and between September 1, 2011 and October 31, 2014, in and triable in the State of Colorado,

TRI TRONG NGUYEN, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

KRISTINE CLARETTA ROOT, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

CUYLER GERBICH, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

SHEILA THI KIEU LORENZ, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

OANH TRAN, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

VEON DELOY HATCH, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

PATRICK JOSEPH CONCANNON, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve; as part of a pattern of manufacturing, sale, or distributing controlled substances, which constituted a substantial source of the defendant's income

and in which the defendant manifested special skill or expertise; in violation of §18-18-407(1)(a), C.R.S. (SE), and against the peace and dignity of the People of the State of Colorado.

COUNT 50

Special Offender – Conspiracy – Pattern of Sale, §18-18-407(1)(c) C.R.S. (SE) **33443**

On or about and between August 11, 2010 and October 31, 2014, in and triable in the State of Colorado,

TRI TRONG NGUYEN, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

KRISTINE CLARETTA ROOT committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

CUYLER GERBICH, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

MICHAEL PATRICK GLICK committed the felony offenses charged in counts Three Four, Seven, Eight, Nine, Ten, Eleven and Twelve;

AARON MATTHEW ELLERING committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

AUBREY CHARLES KEESLING committed the felony offenses charged in counts Three Four, Five, Six, Ten, Eleven and Twelve;

RYAN JOSEPH FARROW committed the felony offenses charged in counts Three Four, Seven, Eight and Nine;

SHEILA THI KIEU LORENZ committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

OANH TRAN committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

VEON DELOY HATCH committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

PATRICK JOSEPH CONCANNON committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

NICHOLAS ALAN KUHLMANN committed the felony offenses charged in counts Three Four, Seven, Eight, Nine, Ten, Eleven and Twelve;

DOUGLAS DUNLAP committed the felony offenses charged in counts Ten, Eleven and Twelve;

MICAH PETERSON committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve;

LINDSAY GEINERT, committed the felony offenses charged in counts Three Four, Five, Six, Seven, Eight, Nine, Ten, Eleven and Twelve; which was, or was in furtherance of, a conspiracy with one or more persons to engage in a pattern of manufacturing, sale, or distributing a controlled substance, and the defendant did, or agreed that defendant would initiate, organize, plan, finance, direct, manage, or supervise part or all of the conspiracy or manufacture, sale, or distributing, in violation of §18-18-407(1)(c), C.R.S. (SE), and against the peace and dignity of the People of the State of Colorado.

COUNT 51

Special Offender – 100 Pounds of Marijuana or Marijuana Concentrate, §18-18-407(1)(e), C.R.S. (SE) **3344A**

On or about and between August 1, 2010 and September 30, 2013, in and triable in the State of Colorado,

TRI TRONG NGUYEN, committed the felony offenses charged in counts Seven, Eight and Nine;
THOMAS CLAIRE DISPANET (A.K.A. “C.T.”) committed the felony offenses charged in counts Seven, Eight and Nine;

CUYLER GERBICH committed the felony offenses charged in counts Seven, Eight and Nine;
MICHAEL PATRICK GLICK committed the felony offenses charged in counts Seven, Eight and Nine;

AARON MATTHEW ELLERING committed the felony offenses charged in counts Seven, Eight and Nine;

RYAN JOSEPH FARROW committed the felony offenses charged in counts Seven, Eight and Nine;

JOSIE PHUONG FARROW committed the felony offenses charged in counts Seven, Eight and Nine;

ANTONIO DOMENICO ORFEI, committed the felony offenses charged in counts Seven, Eight and Nine;

SHEILA THI KIEU LORENZ committed the felony offenses charged in counts Seven, Eight and Nine;

OANH TRAN committed the felony offenses charged in counts Seven, Eight and Nine;

VEON DELOY HATCH committed the felony offenses charged in counts Seven, Eight and Nine;

PATRICK JOSEPH CONCANNON committed the felony offenses charged in counts Seven, Eight and Nine;

MICAH PETERSON committed the felony offenses charged in counts Seven, Eight and Nine;

JORDAN IOVINELLA committed the felony offenses charged in counts Seven, Eight and Nine; and possessed, dispensed, sold, distributed, or imported into the State of Colorado a quantity in excess of one hundred pounds of marijuana or marijuana concentrate; in violation of §18-18-407(1)(e), C.R.S. (SE), and against the peace and dignity of the People of the State of Colorado.

COUNT 52

Special Offender – Deadly Weapon, C.R.S. §18-18-407(1)(D)(I) (DF1) **33A45**

On or about September 26, 2014, in and triable in the State of Colorado, **VEON DELOY HATCH** committed the felony offenses charged in Counts committed the felony offenses charged in counts Five, Six, Ten, Eleven and Twelve and used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, namely: a handgun, at the time of the commission of the offense; in violation of §18-18-407(1)(d)(I), C.R.S., and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in Counts 49 through 52 incorporate all above asserted essential facts and were committed in the above described manner and occurred either entirely or partly in the State of Colorado.

AS TO COUNT ONE:
A TRUE BILL

Foreperson

AS TO COUNT TWO:
A TRUE BILL

Foreperson

AS TO COUNT THREE:
A TRUE BILL

Foreperson

AS TO COUNT FOUR:
A TRUE BILL

Foreperson

AS TO COUNT FIVE:
A TRUE BILL

Foreperson

AS TO COUNT SIX:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT SEVEN:
A TRUE BILL

AS TO COUNT EIGHT:
A TRUE BILL

Foreperson

AS TO COUNT NINE:
A TRUE BILL

Foreperson

AS TO COUNT TEN:
A TRUE BILL

Foreperson

AS TO COUNT ELEVEN:
A TRUE BILL

Foreperson

AS TO COUNT TWELVE:
A TRUE BILL

Foreperson

AS TO COUNT THIRTEEN:
A TRUE BILL

Foreperson

A NO TRUE BILL

A NO TRUE BILL

Foreperson

AS TO COUNT FOURTEEN:
A TRUE BILL

Foreperson

AS TO COUNT FIFTEEN:
A TRUE BILL

Foreperson

AS TO COUNT SIXTEEN:
A TRUE BILL

Foreperson

AS TO COUNT SEVENTEEN:
A TRUE BILL

Foreperson

AS TO COUNT EIGHTEEN:
A TRUE BILL

Foreperson

AS TO COUNT NINETEEN:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT TWENTY ONE:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY TWO:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY THREE:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY FOUR:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY FIVE:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY SIX:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY SEVEN:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT TWENTY EIGHT:
A TRUE BILL

Foreperson

AS TO COUNT TWENTY NINE:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY ONE:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY TWO:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY THREE:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY FOUR:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT THIRTY FIVE:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY SIX:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY SEVEN:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY EIGHT:
A TRUE BILL

Foreperson

AS TO COUNT THIRTY NINE:
A TRUE BILL

Foreperson

TO COUNT FORTY:
A TRUE BILL

Foreperson

TO COUNT FORTY ONE:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

TO COUNT FORTY TWO:
A TRUE BILL

Foreperson

AS TO COUNT FORTY THREE:
A TRUE BILL

Foreperson

AS TO COUNT FORTY FOUR:
A TRUE BILL

Foreperson

AS TO COUNT FORTY FIVE:
A TRUE BILL

Foreperson

AS TO COUNT FORTY SIX:
A TRUE BILL

Foreperson

AS TO COUNT FORTY SEVEN:
A TRUE BILL

Foreperson

AS TO COUNT FORTY EIGHT:
A TRUE BILL

Foreperson

A NO TRUE BILL

Foreperson

AS TO COUNT FORTY NINE:
A TRUE BILL

Foreperson

AS TO COUNT FIFTY:
A TRUE BILL

Foreperson

AS TO COUNT FIFTY ONE:
A TRUE BILL

Foreperson

AS TO COUNT FIFTY TWO:
A TRUE BILL

Foreperson

A NO TRUE BILL

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.

Foreperson

Subscribed to before me in the City and County of Denver, State of Colorado, this 19th day of March, 2015.

Notary Public

My commission expires:_____

CYNTHIA H. COFFMAN
ATTORNEY GENERAL
STATE OF COLORADO

MICHAEL W. MELITO
Senior Assistant Attorney General
Criminal Justice Section
Special Prosecution Unit

The 2014-2015 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 20th day of March, 2015.

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

WARRANTS TO ISSUE:

BOND FOR TRI TRONG NGUYEN, SET AT \$250,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants (except his common law wife Kristine Root)
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR THOMAS CLAIRE DISPANET (A.K.A. "C.T."), SET AT \$200,000.00 CASH ONLY

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR CUYLER GERBICH, SET AT \$75,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR KRISTINE CLARETTA ROOT, SET AT \$100,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants (except her common law husband Tri Nguyen)
Obey all state and federal laws
Turn in her passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR MICHAEL PATRICK GLICK, SET AT \$25,000.00 Personal Recognizance Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR AARON MATTHEW ELLERING, SET AT \$50,000.00 Personal Recognizance Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR AUBREY CHARLES KEESLING, SET AT \$100,000.00 Personal Recognizance Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR NICHOLAS ALAN KUHL, SET AT \$100,000 Cash Only
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR RYAN JOSEPH FARROW, SET AT \$75,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants (except his wife Josie Farrow)
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JOSIE PHUONG FARROW, SET AT \$75,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants (except her husband Ryan Farrow)
Obey all state and federal laws
Turn in her passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR SHEILA THI KIEU LORENZ, SET AT 200,000 CASH.

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in her passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR OANH TRAN, SET AT 200,000 CASH.

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in her passport

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR VEON DELOY HATCH, SET AT \$175,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR PATRICK JOSEPH CONCANNON, SET AT \$25,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR DOUGLAS DUNLAP, SET AT \$50,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR LINDSAY GEINERT, SET AT \$25,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ANDREW WILEY, SET AT \$25,000.00 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JOHN RODGER MAGEE, SET AT \$25,000.00 Cash Bond

Conditions of bond include:

No contact with any codefendants

Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JESSICA PETERSON, SET AT \$25,000.00 Cash Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ALICIA RAINEY, SET AT \$25,000.00 Cash Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ANH THI NGUYEN (A.K.A. LANA), SET AT 200,000 Cash Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ANTONIO DOMENICO ORFEI, SET AT \$75,000 Personal Recognizance Bond
Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JASON JOYNER, SET AT \$75,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JAMES CHAD AVERETTE SET AT \$75,000 Cash Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR TIFFANY GILLE SET AT \$75,000 Cash Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR EVERETT GROVE SET AT \$75,000 Cash Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ADAM TILLEY SET AT \$75,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR ANTHONY SMITH SET AT \$75,000 Cash Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR MATTHEW OLSON SET AT \$75,000 Personal Recognizance Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

BOND FOR JORDAN IOVINELLA SET AT \$75,000 Cash Bond

Conditions of bond include:

No contact with any codefendants
Obey all state and federal laws
Turn in his passport
GPS Monitoring

That the defendant shall refrain from harassing, molesting, intimidating, retaliating against, or tampering with any witnesses to the acts charged.

Dated this 20th day of March, 2015.

Chief Judge Michael Martinez
Presiding Judge, State Grand Jury

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COUNT SIXTEEN: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT SEVENTEEN: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT EIGHTEEN: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. “C.T.”), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH

COUNT NINETEEN: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT TWENTY: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT TWENTY-ONE: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT TWENTY-TWO: 08/01/2011 – 10/31/2014	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, KRISTINE CLARETTA ROOT, TAOSSUNTO, INC., HSUI SHENG, LLC, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, PATRICK JOSEPH CONCANNON, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, ANTONIO DOMENICO ORFEI, VEON DELOY HATCH , ANDREW WILEY, JOHN RODGER MAGEE, JORDAN IOVINELLA, MICAH PETERSON, OANH TRAN, ANH THI NGUYEN, SHEILA THI KIEU LORENZ, JESSICA PETERSON, AUBRY KEESLING, ALICIA RAINEY, ANTHONY SMITH
COUNT TWENTY-THREE: 08/11/2010 – 09/30/2013	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY
COUNT TWENTY-FOUR: 08/11/2010 – 09/30/2013	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY
COUNT TWENTY-FIVE: 08/11/2010 – 09/30/2013	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, E.D.I.S., CORPORATION
COUNT TWENTY-SIX: 10/01/2013 –	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS

10/31/2014	DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON
COUNT TWENTY-SEVEN: 10/01/2013 – 10/31/2014	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH
COUNT TWENTY-EIGHT: 10/01/2013 – 10/31/2014	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, E.D.I.S., CORPORATION
COUNT TWENTY-NINE: 01/01/2014 – 11/30/2014	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, E.D.I.S., CORPORATION
COUNT THIRTY: 01/01/2014 – 11/30/2014	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, TAOSSUNTO, INC., AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, NICHOLAS ALAN KUHL, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, DOUGLAS DUNLAP, MICAH PETERSON, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN, JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, JORDAN IOVINELLA, MATTHEW OLSON, ADAM TILLEY, EVERETT GROVE, ANTHONY SMITH, JOSEPH JOHNSON, WEST SIDE SKYDIVERS, WEST SIDE SKYDIVERS HOUSTON, E.D.I.S., CORPORATION
COUNT THIRTY-ONE: 01/01/2014 – 04/15/2014	CUYLER GERBICH, PATRICK JOSEPH CONCANNON, VEON DELOY HATCH AND SHEILA
COUNT THIRTY-TWO: 04/15/2013 –	CUYLER GERBICH, PATRICK JOSEPH CONCANNON, VEON DELOY HATCH AND SHEILA THI KIEU LORENZ

04/15/2014	
COUNT THIRTY-THREE: 01/20/2014 – 02/01/2014	MICHAEL PATRICK GLICK
COUNT THIRTY FOUR: 08/04/2010 – 02/01/2015	TRI TRONG NGUYEN, CUYLER GERBICH, KRISTINE CLARETTA ROOT, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, JOSIE PHUONG FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON, ANTONIO ORFEI, LINDSAY GEINERT, ANDREW WILEY, JOHN RODGER MAGEE, JESSICA PETERSON, ALICIA RAINEY, ANH THI NGUYEN (A.K.A. “LANA”), JASON JOYNER, JAMES CHAD AVERETTE, TIFFANY GILLE, EVERETT GROVE, ADAM TILLEY, ANTHONY SMITH, MATTHEW OLSON, JORDAN IOVINELLA
COUNT THIRTY-FIVE: 10/28/2014	CUYLER GERBICH
COUNT THIRTY-SIX: 10/28/2014	VEON DELOY HATCH
COUNT THIRTY-SEVEN: 10/28/2014	SHEILA THI KIEU LORENZ
COUNT THIRTY-EIGHT: 10/28/2014	OANH TRAN
COUNT THIRTY-NINE: 10/28/2014	ANH THI NGUYEN
COUNT FORTY: 09/01/2014 – 10/31/2014	DOUGLAS DUNLAP, TRI NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN
COUNT FORTY-ONE: 09/01/2014 – 10/31/2014	DOUGLAS DUNLAP, TRI NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN
COUNT FORTY-TWO: 10/29/2014 – 10/31/2014	DOUGLAS DUNLAP
COUNT	DOUGLAS DUNLAP, TRI NGUYEN, SHEILA THI KIEU LORENZ, OANH TRAN

FORTY-THREE: 01/01/2014 – 11/01/2014	
COUNT FORTY-FOUR: 01/01/2014 – 11/01/2014	DOUGLAS DUNLAP, TRI NGUYEN, SHEILA THI KIEU LORENZ and OANH TRAN
COUNT FORTY-FIVE: 07/20/2014 – 07/31/2014	JOSEPH JOHNSON
COUNT FORTY-SIX: 12/18/2014	CUYLER GERBICH
COUNT FORTY-SEVEN: 01/01/2015 – 03/12/2015	TRI NGUYEN and KRISTINE ROOT
COUNT FORTY-EIGHT: 07/17/2013 – 07/31/2013	JOSIE FARROW
COUNT FORTY-NINE: 09/01/2011 – 10/31/2014	TRI TRONG NGUYEN, KRISTINE CLARETTA ROOT, CUYLER GERBICH, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON
COUNT FIFTY: 08/11/2010 – 10/31/2014	TRI TRONG NGUYEN, KRISTINE CLARETTA ROOT, CUYLER GERBICH, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, AUBREY CHARLES KEESLING, RYAN JOSEPH FARROW, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, NICHOLAS ALAN KUHL, DOUGLAS DUNLAP, MICAH PETERSON and LINDSAY GEINERT
COUNT FIFTY-ONE: 08/11/2010 – 09/30/2013	TRI TRONG NGUYEN, THOMAS CLAIRE DISPANET (A.K.A. "C.T."), CUYLER GERBICH, MICHAEL PATRICK GLICK, AARON MATTHEW ELLERING, RYAN JOSEPH FARROW, ANTONIO DOMENICO ORFEI, SHEILA THI KIEU LORENZ, OANH TRAN, VEON DELOY HATCH, PATRICK JOSEPH CONCANNON, MICAH PETERSON, JORDAN IOVINELLA
COUNT FIFTY-TWO: 09/26/2014	VEON DELOY HATCH