

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

THE PEOPLE OF THE STATE OF COLORADO,

v.

AARON BACA
PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS)
LUCAS BELMONT
CONNOR BROOKS
CB SOLUTIONS
SCOTT BROOKS
RYAN CAMPBELL
BRADLEY COLEY
MICHAEL W. CONNER
GREGORY CROSS
NELSON CUELLAR
TIMOTHY DOWDELL
MATTHEW SCOTT EVEN
M SEVEN, LLC
ISRAEL GARCIA
NICHOLAS GYORI
JUSTIN J. HANSON
DANIEL HARTHURN
CAMERON HENAGE
JAMES HIGGINS
HUSTON HULSE
BRIAN HUNT
MATTHEW HVIZDA
JARED JACOBSEN
HIARUI JIANG
ZHEN ZHEN JIANG
CHRISTIAN JONES
CHRISTEN KOZER
JONATHAN CRYSTAL LEE
RICHARD LITTLER
KEVIN MARQUEZ
GREGORY MCBRIDE
LADY OAK MOSKOWITZ
XIAN MEUNSY
JOHN W. ORN

▲ COURT USE
ONLY ▲

JON OTONOGA
SYNOY PHANBANDITH
MANIVONG PHANNUDET
PHOUKHONG PHANNUDET
TRAIRONG PHANNUDET
SIRISACK RAJPHOUMY
SIRIDETH RAJHOUMY
JUSTIN RUIZ
RAYMOND RUIZ
JEREMY RUDNICK
JOHN RUSSO, Jr.
JMJR, LLC (DBA RAVELLO GENERAL CONTRACTING)
JOHN RUSSO, Sr.
SAMAR, INC (AKA SAMOE STYLE, INC., AKA
SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR,
LLC)
ADAM SAMOKISHYN
MARLENE SAMOKISHYN
MELISSA SAMOKISHYN
MICHAEL SAMOKISHYN
SANTINO SANTORI
EDWARD SHU
JERRY SHYONG
JPEX, INC. (D.B.A. "Growfax South")
JUSTIN SHYONG
10787 TUSCON WAY, LLC
JSM, INC
PETER STEEL
THOMAS STOCKTON
MICHAEL SWINYARD
JEFFREY TEIFFEL
JRS, LLC
JOEL VLASIN
JIN TIEN WU (A.K.A. "Tim Wu")
3333 SOUTH MARION, LLC
COLORADO CONSULTING AND PROPERTIES
MANAGEMENT, LLC
SHEN QUIN WU (A.K.A. SHEN QING WU)
1015D WEST EVANS, (A general partnership)
WAN WAN WU
RONA YANG
JEREMY YOUNESS
Defendants.

<p>CYNTHIA COFFMAN, Attorney General</p> <p>MICHAEL W. MELITO Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 (720) 508 6702 Reg. No. 36059</p> <p>ALISON CONNAUGHTY Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 (720) 508-6733 Reg. No. 42548</p> <p>ZOE A. LAIRD Special Assistant Attorney General Deputy District Attorney 4000 Justice Way, Suite 2525-A Castle Rock, CO 80109 (720) 874 8627 Reg. No. 46115</p> <p>PHILIP W. REINERT Special Assistant Attorney General Deputy District Attorney 201 W. Colfax Ave, 9th Floor Denver, CO 80202 (720) 912 9285 Reg. No. 36720</p> <p>TYRA F. WELCH Special Assistant Attorney General Jefferson County District Attorney's Office Deputy District Attorney 500 Jefferson County Parkway Golden, Colorado 80401 (303) 271-6823 Reg. No. 42274</p>	<p>Grand Jury Case No.: 16CR01</p> <p>Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2016-2017 term of the Denver District Court in the year 2016; the 2016-2017 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:** 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**
- COUNT TWO:** Violation of the Colorado Organized Crime Control Act – Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2) **37285**
- COUNT THREE:** Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering – Acquire Interest in Enterprise, §18-17-104(2) C.R.S. (F2) **37283**
- COUNT FOUR:** Cultivation of Marijuana, More than Thirty Plants, C.R.S. §18-18-406(3)(A)(I), C.R.S. (DF3) **8803A**
- COUNT FIVE:** 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**
- COUNT SIX:** Distribution Of Marijuana (50 LBS) or Marijuana Concentrate (25 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802P**
- COUNT SEVEN:** Possession with Intent to Manufacture or Distribute Marijuana (50 LBS) or Marijuana Concentrate (25 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802U**
- COUNT EIGHT:** Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS) or Marijuana Concentrate (25LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802Z**
- COUNT NINE:** Money Laundering – Conduct Financial Transaction with Intent to Promote Crime, §18-5-309(1)(A)(I), C.R.S. (F3) **12211**
- COUNT TEN:** 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 ELEVEN:** Money Laundering –Financial Transaction To Conceal or Disguise Nature or Avoid Reporting, §18-5-309(1)(A)(II), C.R.S. (F3) **12212**
- COUNT TWELVE:** 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 THIRTEEN:** Money Laundering – Transfer Monetary Instrument with Intent to Promote Crime, §18-5-309(1)(B)(I), C.R.S. (F3) **12213**
- COUNT FOURTEEN:** 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 FIFTEEN:** Money Laundering – Transfer Monetary Instrument to Conceal or Disguise or Avoid Reporting, §18-5-309(1)(B)(II), C.R.S. (F3) **12214**

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

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

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

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

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

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

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

COUNT TWENTY-FIVE: Filing a False Tax Return, §39-21-118(4), C.R.S. (F5) **40024**

COUNT TWENTY-SIX Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

COUNT TWENTY-SEVEN: Theft - \$100,000 - \$1,000,000, §18-4-401(1),(2)(i), C.R.S. (F3) **08A16**

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

COUNT TWENTY-NINE: Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

COUNT THIRTY: Theft - \$100,000 - \$1,000,000, §18-4-401(1),(2)(i), C.R.S. (F3) **08A16**

COUNT THIRTY-ONE: Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

COUNT THIRTY-TWO: Theft - \$100,000 - \$1,000,000, §18-4-401(1),(2)(i), C.R.S. (F3) **08A16**

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

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

COUNT THIRTY-FIVE: Securities Fraud – Untrue Statement or Omission, C.R.S. §11-51-501(1)(b) (F3) **50052**

INDEX OF DEFENDANTS

<u>Defendant</u>	<u>Date of Birth</u>	<u>Counts</u>
AARON BACA	05/17/1985	1 – 25, 31, 32, 34
LUCAS BELMONT	05/18/1980	1 – 10, 13, 14, 17 – 24
CONNOR BROOKS	09/13/1986	1 – 24, 29, 30, 35
SCOTT BROOKS	06/24/1954	1, 2, 4 – 23
RYAN CAMPBELL	03/29/1986	1, 2, 4 – 24
BRADLEY COLEY	01/03/1986	1, 2, 4 – 8, 19 – 21
MICHAEL W. CONNER		1, 2, 6 – 8, 15, 16, 19 – 21
GREGORY CROSS	08/26/1983	1, 2, 4 – 8, 19 – 21
NELSON CUELLAR	05/14/1963	1, 2, 4 – 24
TIMOTHY DOWDELL	03/31/1986	1, 2, 4 – 8, 15, 16, 19 – 21
MATTHEW SCOTT EVEN	03/07/1987	1 – 23
ISRAEL GARCIA	02/23/1989	1, 2, 6 – 8, 19 – 21
NICHOLAS GYORI	06/10/1990	1, 2, 4 – 8, 19 – 21
JUSTIN J. HANSON	11/21/1981	1, 2, 6 – 8, 15, 16, 19 – 21
DANIEL HARTHURN	05/21/1981	1, 2, 6 – 10, 13 – 23
CAMERON HENAGE	11/19/1987	1, 2, 4 – 10, 13, 14, 17 – 23
JAMES HIGGINS	05/31/1993	1, 2, 4 – 8, 19 – 21
HUSTON HULSE	12/13/1989	1, 2, 4 – 10, 13, 14, 17 – 23
BRIAN HUNT	09/26/1983	1, 2, 4 – 8, 19 – 21
MATTHEW HVIZDA	11/29/1989	1, 2, 4 – 10, 13, 14, 17 – 23
JARED JACOBSEN	11/18/1988	1, 2, 4 – 8, 19 – 21
HIARUI JIANG	01/02/1965	1, 2, 4 – 23
ZHEN ZHEN JIANG	11/14/1952	1, 2, 4 – 10, 13, 14, 17 – 23
CHRISTIAN JONES	03/16/1990	1, 2, 6 – 8, 15, 16, 19 – 21
CHRISTEN KOZER	11/19/1987	1, 2, 4 – 23
JONATHAN CRYSTAL LEE	01/04/1985	1 – 23
RICHARD LITTLER	11/23/1977	1, 2, 4 – 8, 19 – 21
KEVIN MARQUEZ	09/10/1986	1, 2, 4 – 10, 13, 14, 17 – 23
GREGORY MCBRIDE	07/24/1976	1, 2, 6 – 8, 15, 16
LADY OAK MOSKOWITZ	09/01/1955	1, 2, 4 – 10, 13, 14, 17 – 23
XIAN MEUNSY	10/10/1968	1, 2, 4 – 10, 13, 14, 17 – 23
JOHN W. ORN	08/01/1984	1, 2, 4 – 23
JON OTONOGA	06/28/1970	1, 2, 4 – 10, 13, 14, 17 – 23
SYNOY PHANBANDITH	05/13/1982	1, 2, 4 – 24
MANIVONG PHANNUDET	11/06/1972	1, 2, 4 – 24
PHOUKHONG PHANNUDET	10/26/1975	1, 2, 4 – 24
TRAIRONG PHANNUDET	07/31/1984	1, 2, 4 – 23
SIRISACK RAJPHOUMY	04/10/01970	1, 2, 4 – 23
SIRIDETH RAJHOUMY	04/08/1973	1, 2, 4 – 23
JUSTIN RUIZ	06/18/1984	1 – 23
RAYMOND RUIZ	07/26/1953	1, 2, 4 – 8, 19 – 21
JEREMY RUDNICK	05/23/1985	1, 2, 4 – 8, 19 – 21
JOHN RUSSO JR.	06/24/1985	1 – 24, 28
JOHN RUSSO SR.	06/21/1965	1 – 10, 13, 14, 17 – 23, 26, 27

ADAM SAMOKISHYN	10/03/1990	1 – 23
MARLENE SAMOKISHYN	01/22/1955	1 – 23
MELISSA SAMOKISHYN	07/19/1986	1 – 23
MICHAEL SAMOKISHYN	08/16/1953	1 – 23
SANTINO SANTORI	04/16/1984	1, 2, 4 – 8, 19 – 21
EDWARD SHU	02/09/1941	1, 2, 4 – 23
JERRY SHYONG	04/22/1977	1 – 10, 13, 14, 17 – 24
JUSTIN SHYONG	06/18/1984	1- 23, 31 – 33
PETER STEEL	11/24/1979	1, 2, 4 – 8, 19 – 21
THOMAS STOCKTON	10/11/1986	1, 2, 6 – 8, 15, 16, 19 – 21
MICHAEL SWINYARD		1, 2, 9, 10, 14, 17 – 24
JEFFREY TEIFFEL	04/13/1984	1 – 10, 13, 14, 17 – 23
JOEL VLASIN	11/06/1983	1, 2, 4 – 24
JIN TIEN WU	05/03/1981	1 – 23
WAN WAN WU	06/28/1975	1, 2, 4 – 10, 13, 14, 17 – 23
RONA YANG	06/09/1953	1, 2, 4 – 23
JEREMY YOUNESS	09/09/1976	1, 2, 4 – 24
SHEN QUIN WU	08/01/1948	1 – 10, 13, 14, 17 – 23
1015D WEST EVANS		1 – 10, 13, 14, 17 – 23
COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC		1 – 23
3333 SOUTH MARION LLC		1 – 23
JRS, LLC		1 – 10, 13, 14, 17 – 23
JSM, INC		1 – 23
10787 TUSCON WAY, LLC		1 – 23
JPEX, INC (DBA GROWFAX SOUTH)		1 – 23
SAMAR INC		1 – 23
JMJR, LLC		1 – 24
CB SOLUTIONS		1 – 24
PUT ON DEVELOPMENTS		1 – 25, 31, 32
M SEVEN, LLC		1 – 23

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIKZA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOAGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown to the Grand Jury, 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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIKZA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOAGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr.,**

JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown to the Grand Jury, 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.

COUNT 3

Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering – Acquire Interest in Enterprise, §18-17-104(2) C.R.S. (F2) 37283

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, MATTHEW SCOTT EVEN, M SEVEN, LLC, JONATHAN CRYSTAL LEE, JUSTIN RUIZ, JOHN RUSSO, Jr., MJJR, LLC, JOHN RUSSO, Sr., JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., JEFFREY TEIFFEL, JRS, LLC, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, and others known and unknown to the Grand Jury, did unlawfully, feloniously, and knowingly acquired or maintained, directly or indirectly, an interest in or control of an enterprise, namely: **PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), CB SOLUTIONS, M SEVEN, LLC, Bill Corporation (DBA Lee’s Check Cashing), MJJR, LLC, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), JPEX, INC. (D.B.A. “Growfax South”), 10787 TUSCON WAY, LLC, JSM, INC., JRS, LLC, 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, 1015D WEST EVANS (a general partnership), and or real property, namely: 10787 TUSCON WAY, Commerce City, Colorado; 3333 SOUTH MARION, Denver Colorado; 1015D WEST EVANS, Denver, Colorado; 1675 SOUTH FILMORE, Denver, Colorado; 9825 WEST WESLEY, Lakewood, Colorado** through a pattern of racketeering activity or through the collection of an unlawful debt; in violation of §18-17-104(2), C.R.S. (F2), and against the peace and dignity of the People of the State of Colorado.**

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

The Enterprise

The enterprise alleged in Counts One, Two and Three consisted of a group 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:

AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS 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 across the front range in Colorado and numerous other states including but not limited to Kansas, Texas, Nebraska, Ohio and Oklahoma, while simultaneously engaging in tax evasion, money laundering, filing false tax information and failing to pay over taxes.

This Drug Trafficking Organization (DTO) operated an illegal marijuana grow and drug distribution network that primarily centered its production operations in the City and County of Denver and had several smaller grow locations in Jefferson County and Arapahoe County, Colorado. Many of the members were family but most knew each other from high school friendships and through similar connections. Members of the enterprise/DTO cultivated most of their marijuana at various warehouses and home grow facilities. Certain members of the DTO began their involvement in the enterprise by building and or cultivating a marijuana grow in warehouses and then gradually expanding to multiple house grows to hide their existence. On average, the DTO generally produced and trafficked over 100 pounds of finished marijuana per month during each month of its existence since January of 2012. Several specific instances of the enterprise's criminal behavior will be discussed in greater detail below.

Various members of this DTO created business entities and registered them with the Secretary of State in efforts to maintain a façade of legitimacy. Sometimes these businesses in the enterprise would mask members' ultimate purposes by serving as "marijuana consulting" firms or cooperative leasing groups. Certain members even had a fractional ownership in a Castlerock grow store, which allowed them to have ready access to nutrients, pesticides and other supplies. Still other members of the enterprise used their business fronts for some legal activities and for myriad illicit purposes including opening and or maintaining bank accounts for money laundering.

Lastly, by submitting false documentation to banks, members of the organization obtained loans, interest rates and terms on home loans for which they otherwise would not have qualified. By

fraudulently obtaining mortgages, members of the DTO were able to acquire real estate used for their own personal residences and or illegal cultivation sites which ultimately helped the organization funnel their marijuana to out of state markets.

Pattern of Racketeering Activity

For purposes of Counts One, Two and Three, AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others 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 or Marijuana Concentrate
- Conspiracy to Distribute or Possess with Intent to Manufacture or Distribute Marijuana or Marijuana Concentrate
- Possession with Intent to Manufacture or Distribute Marijuana or 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
- Filing of a False Return
- Keeping Property for Unlawful Distribution of Controlled Substances
- Maintaining Property for Manufacture of Controlled Substances
- Managing or Controlling Property for Manufacture of Controlled Substances
- Securities Fraud
- Forgery
- Theft
- And the Predicate Acts of: Unlawful Use of a Communications Facility.

In general the enterprise members' roles¹ were as follows:

AARON BACA, Owner of Put on Developments (D.B.A. Allied Exteriors located at West Mississippi), who used his business to assist his co-conspirator friends Justin Shyong, Jin "Tim" Wu and others to commit financial crimes including tax evasion, mortgage fraud and money laundering. His participation in the enterprise and his production of forged document allowed co-conspirators to purchase homes through mortgage fraud. Further his business was used on behalf of other members of the enterprise as a laundering mechanism to hide proceeds of the illegal distribution of marijuana. Mr. Baca sub-leased a building located at 5305 West Mississippi in Lakewood, Colorado which – starting in June of 2016- were controlled by co-conspirators Synoy Phanbandith and Manivong Phannudet used for the illegal cultivation and distribution of marijuana for the enterprise.

LUCAS BELMONT, The primary individual responsible for helping and conspiring with the enterprise's cultivators, managers and transporters in the organization to illegally possess and distribute marijuana for sale out of Colorado to states including Kansas, Nebraska, Texas, Ohio and Oklahoma. On the numerous occasions where Belmont distributed marijuana out of state, the weight of the illegally cultivated and distributed marijuana generally fell between 30 and 50 pounds. During a search warrant of Belmont's personal residence and an illegal residential grow house under his control, police seized 127 marijuana plants, along with an active illegal marijuana grow operation, over \$149,000 in cash, over 69 pounds of finished marijuana, 1920 grams of marijuana concentrate, steroids and a personal use quantity of methylone. Moreover, Belmont participated in the money laundering of the organization through divers criminal acts including transporting the proceeds of illegal sales of marijuana in efforts to promote the enterprise's criminal activities and conducting financial transactions to accomplish the same.

CONNOR BROOKS, Owner of CB Solutions, who networked with old friends and family members to open illegal warehouse cultivation sites throughout the Front Range using the façade of his business to legitimize his illegal actions. Connor Brooks engaged in various acts of financial fraud, including securities and mortgage fraud to raise money to expand his own personal wealth, purchase a home and to help fund the over one dozen marijuana production facilities under his management. Connor Brooks even duped his own co-conspirators and swindled them out of money when attempting to acquire a 100,000 square foot warehouse intended for a massive cultivation site using the caregiver laws as a ruse to produce marijuana for out of state distribution. Brooks also used old friends and family members to convey materially false information in order to defraud investors seeking to earn money in legitimate marijuana grows. Those securities fraud victims included close friends, business associates of friends, wealthy business persons and both current and former National Football League players.

SCOTT BROOKS, Father to Connor Brooks, who assisted his son in the overall illegal marijuana production and later helped Connor destroy evidence of an illegal marijuana grow after police caught Connor Brooks in the process of distributing over 50 pounds of other illegally cultivated marijuana. Scott Brooks also maintained a marijuana grow at his own house.

RYAN CAMPBELL, A marijuana cultivator in charge of three illegal house grows located at 1475 S. Fillmore Street, 2747 W. 35th Avenue and 1240 S. Elizabeth Street in Denver that were used to supply finished marijuana intended for out of state distribution to his co-conspirator manager John Russo. Campbell also transported and coordinated movement of the enterprise's illegally cultivated

¹ The descriptions of enterprise members' roles are grouped together in alphabetical order, along with their respective business entities, for the convenience of the reader.

marijuana out of Colorado for Russo. During a search warrant executed at Campbell's 1475 Fillmore residence police located 36 marijuana plants along with 3 grams of cocaine.

BRADLEY COLEY, Occupied the role of a marijuana cultivator and trimmer of a warehouse grow managed by co-conspirator Justin Shyong and located in Denver. Coley was also a marijuana cultivator in charge of an illegal house grow located at 1951 W Ida Avenue in Littleton that was used to supply finished marijuana intended for out of state distribution to his co-conspirator John Russo.

MICHAEL CONNER, A transporter of finished marijuana who conspired with Justin Hanson and Lucas Belmont to distribute marijuana out of Colorado to Ohio. During one such marijuana distribution run the Kansas State Patrol stopped Justin Hanson and Michael Conner with 32 pounds of marijuana.

GREGORY CROSS, A marijuana cultivator in charge of a house grow located at 4065 W. Linvale Place in suburban Denver that was used to supply finished marijuana intended for out of state distribution to his co-conspirator manager Connor Brooks. Cross is also the nephew of a wealthy business executive defrauded by Connor Brooks having been fooled into investing in the grow facilities believing Brooks was operating a lawful marijuana grow.

NELSON CUELLAR, A marijuana cultivator in charge of multiple large over thirty marijuana plant grows at houses and farms in Brighton, Clear Creek County and Bailey, Colorado. Cuellar utilized co-conspirator James Higgins to assist in the cultivation, trimming and distribution activities. Cuellar also used co-conspirator Daniel Harthurn, amongst others, to assist in the logistics of out of state distribution and sale of his illegally cultivated marijuana.

TIMOTHY DOWDELL, A self-admitted manager for trimming crews used at cultivation sites owned and operated by co-conspirator Justin Shyong. Dowdell was a trusted worker participated in the cultivation of over one hundred plants in Shyong's warehouse grows. Dowdell's responsibilities included accountability for the enterprise's twister device and managing other supplies and personnel between illegal grow locations of enterprise co-conspirators.

MATTHEW SCOTT EVEN, Owner of M Seven, LLC, and a marijuana cultivator in charge of a grow located at 1015 W. Evans Avenue, Unit D in Denver that was used to supply finished marijuana intended for out of state distribution to his co-conspirators John Russo, Jeffrey Teiffel, Justin Ruiz, Connor Brooks, Justin Shyong and Jin "Tim" Wu. Matthew Even also transferred cash and proceeds of prior illegal marijuana distributions into financial institutions such as JPM Morgan Chase for the purpose of promoting crime, in part by delivering those funds to Shen Wu as rent for his marijuana grow warehouse.

ISRAEL GARCIA, an individual who conspired primarily with Lucas Belmont to distribute the enterprise's marijuana to his own clientele list. Garcia also produced Butane Hash Oil ("BHO") for further distribution. On January 21, 2016 Denver Police caught Israel Garcia and friend Sara Oves with 5.88 lbs. of finished marijuana and a closed loop BHO extraction system leaving the house of Lucas Belmont.

NICHOLAS GYORI, A marijuana cultivator in charge of house grows located in the suburbs of Denver and Arapahoe County, Colorado that were used to supply finished marijuana intended for out of state distribution to his co-conspirator -and half-brother- John Russo, Jr. Police seized 58 marijuana plants at one such grow located at 3173 West Radcliff Drive in Englewood. Based on financial analysis appears to have just commenced as an illegal cultivation grow house. Further, financial, money order and electrical records indicate Gyori and John Russo, Jr. also used proceeds of

illegal marijuana distributions to pay for 3000 South Bellaire Street, in Denver which served as yet another illegal cultivation grow house supplying the enterprise.

JUSTIN HANSON, A transporter of finished marijuana who conspired with Michael Conner and Lucas Belmont to distribute marijuana out of Colorado to Ohio. During one such marijuana distribution run the Kansas State Patrol stopped Justin Hanson and Michael Conner with 32 pounds of marijuana.

DANIEL HARTHURN, An individual responsible for helping the enterprise's cultivators and managers in the organization illegally transport marijuana out of Colorado for sale. Harthurn worked with producers including Justin Shyong, Joel Vlasin and Jeremy Rudnick to ship the enterprise's illegally cultivated marijuana to Texas, using himself and Thomas Stockton as transporters who delivered finished marijuana to Greg McBride in Corpus Cristi, Texas for further distribution. On the numerous occasions where Harthurn distributed marijuana out of state the weight of the marijuana generally fell between 30 and 50 pounds.

CAMERON HENAGE, A marijuana cultivator in charge of two house grows located at 7856 Cud Drive and 5906 Scenic Avenue in Firestone, Colorado that were used to supply finished marijuana intended for out of state distribution to his co-conspirator Connor Brooks. Indeed, during a search warrant of his house police located 18 illegally cultivated marijuana plants and learned Scenic Drive had nearly \$150,000 of money transferred as rent and or utility in order to promote the illegal cultivation at this residence. Given Henage's position in the respective grow locations, he stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

JAMES HIGGINS, A marijuana cultivator who assisted Nelson Cuellar in managing multiple large marijuana grows at houses and farms in Brighton, Clear Creek County and Bailey, Colorado. Cuellar utilized co-conspirator James Higgins to assist in the cultivation, trimming and distribution activities. Cuellar and Higgins also used co-conspirator Daniel Harthurn, amongst others, to assist in the logistics of out of state distribution and sale of his illegally cultivated marijuana.

HUSTON HULSE, A marijuana cultivator in charge of two illegal house grows located at 4422 S. Yank Street and 7796 N Tejon Street in Denver that were used to supply finished marijuana intended for out of state distribution to his co-conspirator Connor Brooks. Hulse also transported and coordinated movement of the enterprise's illegally cultivated marijuana out of Colorado for Connor Brooks. Given Hulse's position in the respective grow locations, he stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

BRIAN HUNT, A marijuana cultivator identified as a trimmer for John Russo at his facility located at 1275 S. Cherokee Street. Mr. Hunt largely performed tasks which served to ready the marijuana for packaging and distribution.

MATTHEW HVIZDA, A marijuana cultivator in charge of an illegal house grow located at 6918 W 70th Avenue in Denver that was used to supply finished marijuana intended for out of state distribution to his co-conspirator Connor Brooks. Hvizda also transported and coordinated movement of the enterprise's illegally cultivated marijuana out of Colorado for Connor Brooks. Given Hvizda's position in the respective grow location, he stood complicit in the transfers of money and proceeds-

from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

JARED JACOBSEN, A marijuana cultivator in charge of an illegal house grow located at 4131 E. 16th Avenue in Denver that was used to supply finished marijuana intended for out of state distribution to his co-conspirator Connor Brooks. Jacobsen also transported and coordinated movement of the enterprise's illegally cultivated marijuana out of Colorado for Connor Brooks. During a search warrant of his house police located 69 illegally cultivated marijuana plants and 9 lbs. of prepackaged marijuana along with an active illegal marijuana grow operation. On the night police stopped Connor Brooks with over 50 pounds of illegally cultivated marijuana destined for distribution, he had stopped at Jacobson's house to pick up 8 pounds of marijuana (located in a suitcase) that was to be combined with other marijuana for future illegal sales.

HIARUI JIANG, A marijuana cultivator in charge of an illegal house grow located at 5229 S. Parfet Street in Denver that was used to supply finished marijuana to co-conspirators – including Jin “Tim” Wu- that was ultimately intended for out of state distribution. Indeed, during a search warrant of his house police located 27 illegally cultivated marijuana plants and 130 lbs. of prepackaged marijuana along with an active illegal marijuana grow operation.

ZHEN ZHEN JIANG, A marijuana cultivator, who shared marijuana production responsibilities with her husband Shen Qing Wu, of an illegal house grow located at 9173 W. Capri Avenue in Littleton. During a search warrant of this house police located signs of a prior marijuana grow along with Twister, digital scale and over 5 lbs. of marijuana concentrate. Mrs. Jiang is also the mother of Jin “Tim” Wu and Wan Wan Wu. Mrs. Jiang owned a dwelling located at 9839 S. Field Way in Littleton, Colorado which –starting in June of 2016- she rented to co-conspirator Synoy Phanbandith for the purposes of promoting the illegal cultivation and distribution of marijuana. Mrs. Jiang and her husband also owned a dwelling located at 8365 S. Estes Street in Littleton, Colorado which –starting in October of 2013- they rented to co-conspirator Triarong Phannudet for the purposes of promoting the illegal cultivation and distribution of marijuana.

CHRISTIAN JONES, A transporter of finished marijuana who conspired with Joel Vlasin to distribute marijuana out of Colorado to Nebraska. During one such marijuana distribution run law enforcement officers in Nebraska stopped Mr. Jones and Joel Vlasin with 36 pounds of marijuana illegally cultivated in Colorado by other members of the enterprise.

CHRISTEN KOZER, A marijuana cultivator, who shared marijuana production responsibilities with her live in boyfriend Justin Ruiz, at an illegal house grow located at 1365 South Vine Street in Denver. Further, Ms. Kozler used the proceeds of the illegal marijuana distribution by transferring cash and money orders to pay utility and other bills, including rents, to promote further criminal activity. During a search warrant of her house police located 61 marijuana plants along with an active illegal marijuana grow operation, over \$23,000 in cash and a personal use quantity of cocaine. Kozler also helped her boyfriend Justin Ruiz with illegal marijuana cultivation activities and distribution preparation at the warehouses he shared with other members of the enterprise.

JONATHAN LEE, managed Bill Corporation DBA Lee's Check Cashing, owned by Jonathan Lee's family (located at 630 E. 58th Ave., Denver, CO 80216) and used this business as a front to repeatedly launder money for Connor Brooks, Justin Shyong, Jin Wu and other members of the drug trafficking network. Jonathan Lee converted large sums (in excess of \$50,000 at a single time) of small dollar bills into large dollar bills in attempts to disguise the source and nature of the funds. Jonathan Lee occasionally charged members of this drug trafficking network for his money laundering services. Jonathan Lee also rented a room from Connor Brooks at 4765 Oakland St. where he illegally

cultivated marijuana. Additionally, Jonathan Lee partnered with Matthew S. Even at illegal marijuana cultivation site which was financed by Jonathan Lee. Jonathan Lee had a marijuana buyer who purchased approximately twenty pounds of marijuana from him on a weekly basis. When Jonathan Lee couldn't provide his buyer with marijuana from the illegal cultivation facilities he managed. Jonathan Lee contacted Justin Shyong, John Russo and Connor Brooks to purchase marijuana on behalf of his buyer.

RICHARD LITTLER, A marijuana cultivator identified also as a trimmer for Justin Shyong at his multiple warehouse facilities located throughout Denver. Mr. Littler largely performed cultivation type tasks and those which served as a precursor for packaging and distribution.

KEVIN MARQUEZ, A marijuana cultivator in charge of an illegal house grow located at 433 South Newcombe Street used to supply finished marijuana to co-conspirators including his boss Connor Brooks. Marquez stood complicit and or conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring cash and or checks to pay rents and utility expenses. During a search warrant of his house on Newcombe, police located 28 marijuana plants along with an active illegal marijuana grow operation and over 73 pounds of finished marijuana readied for illegal distribution. Given Marquez's position in the respective grow location, he stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

GREGORY MCBRIDE, An individual responsible for the final segment of the enterprise's distribution to the state of Texas. Cultivators and managers in the organization illegally transported marijuana out of Colorado through middlemen distributors like Daniel Harthurn and Thomas Stockton. Members of the conspiracy distributed finished marijuana to Greg McBride in Corpus Cristi, Texas for further distribution. On the numerous occasions where Harthurn distributed marijuana out of state to McBride, the weight of the marijuana generally fell between 30 and 50 pounds.

XIAN MEUNSY, A marijuana cultivator in charge of an illegal house grow located at 7503 Red Fox Court in Littleton, Colorado 4524 Thompson Court and 4520 Thompson Court in Denver that was used to supply finished marijuana to co-conspirators – including Jin “Tim” Wu, Shen Qing Wu and Zhen Zhen Jiang- that was ultimately intended for out of state distribution. Meunsy rented this dwelling for the purposes of promoting the enterprise via illegal cultivation and distribution of marijuana. Further, Mr. Meunsy used the proceeds of the illegal marijuana distribution transferring money and paying utility bills- averaging nearly \$1,700 per month- to promote further criminal activity. During a search warrant of his grow at 4520, police located over 17 lbs. of Mr. Meunsy's and his co-conspirator's finished marijuana destined for illegal distribution. Given Xian Meunsy's position in the respective grow location, he stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

LADY OAK MOSKOWITZ, The mother-in-law of Jerry Shyong who participated in the enterprise by serving as a cultivator who grew illegal marijuana at the 160 North Vallejo warehouse for the DTO's out of state distribution activity. During a search warrant of her warehouse, police seized 76 pounds of finished marijuana. Further, Moskowitz conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring over \$52,000 in cash and or checks to pay warehouse rents and utility expenses in 2015 and 2016.

JOHN W. ORN, Tim Wu employed John Orn to work at the 3333 South Marion illegal residential marijuana cultivation site and to participate in the cultivation of illegal marijuana and other activities which served as a precursor for the DTO's out of state distribution. During a search warrant of this location police seized 514 marijuana plants and approximately 10 pounds of finished marijuana. Lastly, Orn conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring multiple money orders to pay rents and utility expenses for illegal residential marijuana grows like 7690 Rampart Way and 3333 South Marion Street.

JON OTONOGA, Served in a capacity of a grower for the DTO with numerous production responsibilities including managing an illegal warehouse grow at 1120 N Yuma Court. During a search warrant of this warehouse police seized 115 marijuana plants. He also used his 34733 Upper Bear Creek Road residence as a sizeable marijuana home grow for the enterprise. During a search warrant of his personal residence, police seized 56 marijuana plants, 7 pounds of finished marijuana and 294 grams of marijuana concentrate. Given Otonaga's position in the respective grow location, he stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to promote crime in ways including growing the next crop of illegally cultivated marijuana.

SYNOY PHANBANDITH, A marijuana cultivator in charge of an illegal house grow located at 9839 S. Field Way in Littleton, Colorado that was used to supply finished marijuana to co-conspirators – including Jin “Tim” Wu, Shen Qing Wu and Zhen Zhen Jiang- that was ultimately intended for out of state distribution. Synoy Phanbandith rented this dwelling for the purposes of promoting the enterprise through the illegal cultivation and distribution of marijuana. Further, Mr. Phanbandith used the proceeds of the illegal marijuana distribution transferring money and paying utility and other bills- including rents to Shen Qing Wu and Zhen Zhen Jiang- to promote further criminal activity. During a search warrant of his house, police located over 25 lbs. of finished marijuana destined for illegal distribution.

MANIVONG PHANNUDET, A marijuana cultivator/manager participating in several illegal grows located at 5305 West Mississippi in Lakewood, 10787 Tucson Way and 4520 Thompson Court in Denver. The illegal grows at the above addresses were used to supply the enterprise with finished marijuana intended for out of state distribution. Mr. Phannudet used the proceeds of the illegal marijuana distribution and transferred money and paid utility and other bills- including rents to Shen Qing Wu and Zhen Zhen Jiang- to promote further criminal activity. During a search warrant of his grow at 4520, police located over 17 lbs. of Mr. Manivong Phannudet's and the enterprise's finished marijuana destined for illegal distribution. Indeed, Mr. Phannudet, Jin Wu's brother-in-law, delivered marijuana to 1260 S. Santa Fe Drive at least three times for likely further distribution. Lastly, Mr. Phannudet admitted to having a marijuana grow at 4520 Thompson Court, paying rent and utilities for the illegal cultivation at 10787 Tucson Way and was observed making deposits at Wells Fargo into 10787 Tucson, LLC's bank account.

NORRAHONG PHANNUDET, wife of Jin “Tim” Wu, Mrs. Phannudet conspired with him to illegally cultivate marijuana and assisted her husband in money laundering. Mrs. Phannudet accomplished this by duping unwitting employees of her family's restaurant, “Asian Chef”, into exchanging cash proceeds from the illegal sale of marijuana for money orders which in effect disguised the nature, location, source, ownership, or control of the proceeds of her husband's criminal offenses while also avoiding transaction reporting requirements under federal law.

PHOUKHONG PHANNUDET, A marijuana cultivator who conspired with Wan Wan Wu and others to assist in the cultivation of marijuana at an illegal house grow located at 7503 Red Fox Court in Douglas County, Colorado that was used to supply finished marijuana to co-conspirators – including Jin “Tim” Wu, Shen Qing Wu and Zhen Zhen Jiang- that was ultimately intended for out of state distribution. Early contacts with Douglas County Sheriffs revealed Mr. Phannudet illegally cultivated 60 or more marijuana plants. Like many other members of the enterprise, Mr. Phoukhong Phannudet engaged in a ruse using the cover of caregiver laws to produce and ship black market marijuana to other states. Law enforcement officials interviewed many of Mr. Phannudet’s patients who only served to confirm the ruse citing Mr. Phannudet was never a caregiver at all or served in that capacity for a minimal time period. A later search of the 7503 Red Fox Court residence revealed a disassembled illegal house grow with sixty five specialized grow lights and over seventy ballast.

TRAIRONG PHANNUDET, A marijuana cultivator who conspired with his Phannudet family members and others to assist in the cultivation of marijuana at an illegal house grow located at 3865 S. Estes in Douglas County, Colorado that was used to supply finished marijuana to co-conspirators – including Jin “Tim” Wu, Shen Qing Wu and Zhen Zhen Jiang- that was ultimately intended for out of state distribution. Family members interviewed by police reported Trairong Phannudet operated an illegal marijuana cultivation at 8365 S. Estes Street and further stated Mr. Phannudet did not use the Marijuana he grew-but did not know what he did with it when it disappeared. Like many other members of the enterprise, Mr. Trairong Phannudet engaged in a ruse using the cover of caregiver laws to produce and ship black market marijuana to other states. Law enforcement officials interviewed many of Mr. Phannudet’s patients who only served to confirm the ruse citing Mr. Phannudet was never a caregiver at all or served in that capacity for a minimal time period.

SIRISACK RAJPHOUMY, A marijuana cultivator/manager participating in several illegal grows located at 4524 and 4520 Thompson Court in Denver. The illegal grows at the above addresses were used to supply the enterprise with finished marijuana intended for out of state distribution. Mr. Rajphoumy used the proceeds of the illegal marijuana distribution and transferred money and paid utility and other bills- including rents to Jin “Tim” Wu - to promote further criminal activity. During a search warrant of his grow at 4520, police located over 17 lbs. of the enterprise’s finished marijuana destined for illegal distribution.

SIRIDETH RAJHOUMY, A marijuana cultivator/manager participating in several illegal grows located at 10237 Telluride Way in Commerce City along with 4524 and 4520 Thompson Court in Denver. The illegal grows at the above addresses were used to supply the enterprise with finished marijuana intended for out of state distribution. Mr. Rajhoumy used the proceeds of the illegal marijuana distribution and transferred money and paid utility and other bills- including rents to Shen Qing Wu and Zhen Zhen Jiang - to promote further criminal activity. During a search warrant of his grow at 4520, police located over 17 lbs. of the enterprise’s finished marijuana destined for illegal distribution. A search of the Telluride Way address by police yielded nearly 41 lbs. of finished marijuana destined for out of state distribution by members of the enterprise.

JUSTIN RUIZ, A marijuana cultivator, who shared marijuana production responsibilities with his live in girlfriend, Christen Kozer at an illegal house grow located at 1365 South Vine Street in Denver. During a search warrant of his house police located 61 marijuana plants along with an active illegal marijuana grow operation, over \$23,000 in cash and a personal use quantity of cocaine.

RAYMOND RUIZ, Assisted his son, Justin Ruiz, by working as a marijuana cultivator performing cultivation type tasks that served as a precursor for packaging and distribution of the enterprise’s marijuana destined for out of state distribution.

JEREMY RUDNICK, A marijuana cultivator identified also as a trimmer for Justin Shyong at his multiple warehouse facilities, but mainly 1260 South Santa Fe, located in Denver. Mr. Rudnick largely performed cultivation type tasks and those which served as a precursor for packaging and distribution of the marijuana destined for out of state distribution.

JOHN RUSSO, Jr., owner of JMJR, LLC, who used his bogus general contracting company as a front to money launder and to hide his true involvement in the enterprise's illegal marijuana cultivation and distribution conspiracy. John Russo, Jr., also acted as a marijuana cultivator in charge of multiple large illegal marijuana grows at warehouses in the City and County of Denver along with a comparatively smaller 44 marijuana plant grow (weighing over 51 pounds) at his residence in Littleton, Colorado. Further, Mr. John Russo, Jr. used cash and the proceeds of the illegal marijuana distribution transferring money and paying utility and other bills –including mortgages and warehouse rents- to promote further criminal activity. During a search warrant of the grow at his residence, police located over \$46,000 in cash, a handgun, currency counters, a digital scale and over 5 lbs. of finished marijuana destined for illegal distribution. Russo and Teiffel co-leased the illegal warehouse marijuana grow at 1822 South Bannock Street, where during a search warrant, police seized 36 marijuana plants and approximately 29 pounds of finished marijuana.

JOHN RUSSO, Sr., Fraudulently purchased a home for his daughter-in-law and son, John Russo, Jr., and committed mortgage fraud by uttering forged documents to obtain a home loan under terms more favorable than he or his son and daughter-in-law could otherwise obtain. This fraud upon lending institutions allowed his son to maintain a professional façade of a general contractor when in fact John Russo, Jr.'s true employment was that of a high ranking member of an enterprise dedicated to the illegal cultivation and distribution of marijuana. Co-conspirators claim that John Russo, Sr., knowing of his son's illegal activities, laundered John Russo, Jr.'s illegal marijuana distribution proceeds by artificially placing his son on the payroll of his company, Terracina Homes, LLC.

ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, a family that collectively owned and operated a purse manufacturing company operating under several business names including, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC). Each member of this family was complicit in the use of their family owned and operated business as an illegal marijuana cultivation and distribution front which ultimately allowed Joel Vlasin to launder nearly \$4,000 per month of marijuana proceeds and hide Vlasin's true source of income from federal and state authorities. While the Samokishyn family members participated in the enterprise by assisting Mr. Vlasin in money laundering, they also illegally cultivated marijuana and used Joel Vlasin as a willing conduit to distribute the marijuana for out of state distribution and sales.

SANTINO SANTORI, A marijuana cultivator identified also as a trimmer for Justin Shyong at his warehouse at 1260 South Santa Fe in Denver. Mr. Santori largely performed cultivation type tasks and those which served as a precursor for packaging and distribution of the marijuana destined for out of state distribution.

EDWARD SHU, The step-father of Justin and Jerry Shyong who participated in the enterprise by serving as a cultivator who grew illegal marijuana at the 1260 South Santa Fe Drive and 1273 – 1275 South Cherokee Street warehouses for the DTO's out of state distribution activity. During a search warrant of the three warehouses where Shu worked, police seized an aggregate of 74 plants (weighing nearly 365 pounds), and over 112 pounds of finished marijuana. Further, Shu stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to: promote crime in ways including growing the next crop of

illegally cultivated marijuana; and disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law.

JERRY SHYONG, Co-owner and manager of JPEX, INC., (D.B.A. “Growfax South”), the cultivation supply store that laundered proceeds and funds of enterprise members in order to promote future illegal out of state distributions of marijuana while simultaneously providing logistical support for co-conspirators. Indeed, supplies from the store were used by enterprise co-conspirators for the illegal marijuana grow operations. Coincidentally, Mr. Jerry Shyong employed Peter Steel in the GroFAX store who also trimmed marijuana plants at the 160 Vallejo Street and 1256 S Bannock Street warehouses. Jerry Shyong assisted and stood complicit in the cultivation and distribution crimes of both his brother Justin and his mother-in-law Lady Oak Moskowitz in their respective warehouses grows. Lastly, he conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring cash and or checks to pay warehouse rents and utility expenses in 2015 and 2016.

JUSTIN SHYONG, Owner of 10787 TUSCON WAY, LLC, JSM, INC., and manager and cultivator for numerous illegal marijuana cultivation warehouses and residential illegal house grows including but not limited to 1260 South Santa Fe Drive and 1273 – 1273 South Cherokee Street. Shyong’s cultivation facilities also served as a central hub where numerous co-conspirators gathered finished marijuana for out of state distribution. He, along with Jin Wu, co-owned the illegal residential marijuana grow 3333 South Marion Street, managed by John Orn, where during a search warrant, police seized 514 marijuana plants and approximately 10 pounds of finished marijuana. Lastly, Justin conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring cash and or checks to pay grow house mortgages, his own mortgage, warehouse rents and utility expenses throughout the existence of the DTO.

PETER STEEL, An employee of the GroFAX store who also trimmed marijuana plants in preparation of out of state distribution while working at the 160 Vallejo Street and 1256 S Bannock Street illegal cultivation warehouses.

THOMAS STOCKTON, An individual responsible for helping the enterprise’s cultivators and managers in the organization illegally transport marijuana out of Colorado for sale. Stockton worked with middlemen like Harthurn and producers including Justin Shyong, Joel Vlasin and Jeremy Rudnick to ship the enterprise’s illegally cultivated marijuana to Texas, transporting finished marijuana to Greg McBride in Corpus Cristi, Texas for further distribution. On the numerous occasions where Stockton distributed marijuana out of state the weight of the marijuana generally fell between 30 and 50 pounds.

MICHAEL SWINYARD, Served in a capacity of a grower for the DTO with production responsibilities including renting an illegal warehouse grow at 1120 N Yuma Court. In a consensual interview with DPDMT Detective Shana Michael, Swinyard admitted personally growing marijuana in excess of the 36 plant limit at 1120 N. Yuma Court and owning the grow equipment –ballasts and light- in that same warehouse. After the interaction with Detective Michael, Swinyard claimed he began “subletting” 1120 N. Yuma to John Otonaga. Swinyard then altered his activities within the DTO and partnered with John Otonaga, paying close to \$1,800 per month from the proceeds of illegal marijuana distribution for electrical bills (attributable to Otonaga’s growing marijuana and using a large amount of electricity) and roughly \$2,600 in rent per month for the 1120 N. Yuma Court warehouse, despite his claims that he was merely a lessor to Otonaga who no longer grew his own marijuana at that location. During a search warrant of this 1120 N. Yuma Court warehouse police seized 115 marijuana plants.

JEFFREY TEIFFEL, Owner of the front company JRS, LLC, and a grower/manager for the DTO who co-leased 1822 S. Bannock St with John Russo, Jr. Police seized 36 marijuana plants and approximately 29 pounds of finished marijuana at this co-leased illegal warehouse marijuana grow. Law enforcement officials also identified Teiffel as a signor on an account for and used by Justin Shyong for illicit activity. During a search warrant of his personal residence, police located 60 marijuana plants along with an active illegal marijuana grow operation, over \$113,000 in cash and a personal use quantity of cocaine.

JOEL VLASIN, A marijuana cultivator in charge of an illegal house grow located at 3001 Zenobia Street in Denver, Colorado that was used to supply finished marijuana to co-conspirators. An individual responsible for helping the enterprise's cultivators and managers in the organization illegally transport marijuana out of Colorado for sale. Vlasin conspired with middlemen and out of state transporters like Harthurn and Stockton and illegal producers including Justin Shyong John Russo, Jr., Justin Ruiz and Jeremy Rudnick to ship the enterprise's illegally cultivated marijuana to Nebraska and Texas, transporting that finished marijuana to Greg McBride in Corpus Cristi, Texas for further distribution. Further, Mr. Vlasin used the proceeds of the illegal marijuana distribution by transferring cash and money orders to pay utility and other bills, including rents, to promote further criminal activity. The investigation revealed that Vlasin acted as a manager for a purse manufacturing site operating under the several business names including Samar, Inc. Vlasin laundered the proceeds of the enterprise's illegal marijuana cultivation and sales with the assistance of the family members who owned or helped operate Samar, Inc. Those individuals who engaged in this money laundering -Adam Samokishyn, Marlene Samokishyn, Melissa Samokishyn and Michael Samokishyn- ultimately allowed Vlasin to launder nearly \$4,000 per month of marijuana proceeds and hide Vlasin's true source of income from federal and state authorities. While the Samokishyn family members participated in the enterprise by assisting Mr. Vlasin in money laundering, they also illegally cultivated marijuana and used Joel Vlasin as a willing conduit to distribute the marijuana for out of state distribution and sales.

JIN TIEN WU (A.K.A. "Tim Wu"), The owner of the business entities 3333 SOUTH MARION, LLC, and COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, and manager and cultivator for numerous illegal marijuana cultivation warehouses and residential illegal house grows. Mr. Wu is also an individual responsible for helping his family members and other enterprise's cultivators and managers in the organization illegally transport marijuana out of Colorado for sale. Wu and Justin Shyong co-owned the illegal residential marijuana grow 3333 South Marion Street, where during a search warrant, police seized 514 marijuana plants and approximately 10 pounds of finished marijuana. Tim Wu employed John Orn to work at 3333 South Marion and participate in the cultivation of illegal marijuana and other activities which served as a precursor for the DTO's out of state distribution. Lastly, Tim Wu conspired with other members of the enterprise to use the proceeds of the illegal marijuana distribution to promote further illegal marijuana cultivation and distribution by transferring cash and or checks to pay grow house mortgages, warehouse rents and utility expenses throughout the existence of the DTO. During a search warrant of his house police located just over three pounds of finished marijuana, 3.8 grams of marijuana concentrate, evidence of a prior marijuana grow operation, over \$139,000 in cash, and a personal use quantity of psilocybin mushrooms.

SHEN QUIN WU (A.K.A. SHEN QING WU), A marijuana cultivator, who shared marijuana production responsibilities with his wife Zhen Zhen Jiang, in an illegal house grow located at 9173 W. Capri Avenue in Littleton. During a search warrant of this house police located signs of a prior marijuana grow along with Twister, digital scale and over 5 lbs. of marijuana concentrate. Mr. Wu along with his wife and daughter, Wan Wan Wu, owned a 4200 square foot facility located at 1015

W. Evans Avenue Unit D, in Denver Colorado held in a general partnership called 1015D West Evans. Throughout the conspiracy Shen Wu rented the facility to co-conspirator Matthew S. Even and his front company M Seven, LLC for the purposes of promoting the illegal cultivation and distribution of marijuana.

WAN WAN WU, A marijuana cultivator who conspired with Xian Meunsi, Phoukhong Phannudet and others to operate an illegal house grow at 7503 Red Fox Court in Littleton containing approximately 60 marijuana plants. Wan Wu used her grow to supply finished marijuana to co-conspirators – including her brother Jin “Tim” Wu- that was ultimately intended for out of state distribution.

RONA YANG, The mother of Justin and Jerry Shyong who participated in the enterprise by serving as a cultivator who grew illegal marijuana at the 1260 South Santa Fe Drive and 1273 – 1275 South Cherokee Street warehouses for the DTO’s out of state distribution activity. During a search warrant of the three warehouses where Rona Yang worked, police seized an aggregate of 74 plants (weighing nearly 365 pounds), and over 112 pounds of finished marijuana. Lastly, she stood complicit in the transfers of money and proceeds- from the illegal distribution of marijuana- and financial transactions which allowed fellow members to: promote crime in ways including growing the next crop of illegally cultivated marijuana; and disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense or avoid a transaction reporting requirement under federal law.

JEREMY YOUNESS, A grower, manger and distributor for the DTO who is connected to the 1260 Santa Fe illegal cultivation warehouse. Police seized nearly 89 pounds of finished marijuana at this illegal warehouse marijuana grow during the execution of a search warrant. Law enforcement officials also identified Youness as a signor on an account for and used by Justin Shyong for illicit activity. During a search warrant executed at Youness’ residence at 7211 E. 6th Avenue Parkway police located 71 marijuana plants along with an active illegal marijuana grow operation, over \$113,000 in cash and a personal use quantity of cocaine.

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

COUNT 4

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, NICHOLAS GYORI, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED**

JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, JONATHAN CRYSTAL LEE, RICHARD LITTLER, CHRISTEN KOZER, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS 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(3)(A)(I), C.R.S. (DF3), and against the peace and dignity of the People of the State of Colorado.

COUNT 5

**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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, NICHOLAS GYORI, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIKZA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, JONATHAN CRYSTAL LEE, RICHARD LITTLER, CHRISTEN KOZER, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS 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.

COUNT 6

Distribution Of Marijuana (50 LBS) or Marijuana Concentrate (25 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802P**

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly sold or distributed, or attempted to sell or distribute marijuana or marijuana concentrate. Further, the amount of marijuana was more than fifty pounds or the marijuana concentrate was more than twenty five 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 7

Possession with Intent to Manufacture or Distribute Marijuana (50 LBS) or Marijuana Concentrate (25 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) **8802U**

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON**

OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly possessed, or attempted to possess, with intent to manufacture, sell or distribute, marijuana or marijuana concentrate. Further, the amount of marijuana was more than fifty pounds or the amount of marijuana concentrate was more than twenty five 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 8

Conspiracy to Distribute, or Possess with Intent to Manufacture or Distribute, Marijuana – (50 LBS) or Marijuana Concentrate (25 LBS), §18-18-406(2)(B)(I),(III)(A), C.R.S. (DF1) 8802Z

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW Hvizda, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, GREGORY MCBRIDE, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 or marijuana concentrate. Further, the amount of marijuana was more than fifty pounds or the amount of marijuana concentrate was more than twenty five 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 9

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW Hvizda, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 10

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW Hvizda, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA**

YANG, JEREMY YOUNESS and others known and unknown to the Grand Jury, and others known and unknown 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 11

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, HIARUI JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, JOHN W. ORN, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, RONA YANG, JEREMY YOUNESS and others known and unknown 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 12

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, HIARUI JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, JOHN W. ORN, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JUSTIN SHYONG, 10787**

TUSCON WAY, LLC, JSM, INC., JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, RONA YANG, JEREMY YOUNESS and others known and unknown 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 13

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 14

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY**

PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 15

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, HIARUI JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, JOHN W. ORN, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, RONA YANG, JEREMY YOUNESS, MICHAEL CONNER, , JUSTIN HANSON, DANIEL HARTHURN, CHRISTIAN JONES, GREGORY MCBRIDE, THOMAS STOCKTON and others known and unknown 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 or to 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 16

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, HIARUI JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, JOHN W. ORN, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, RONA YANG, JEREMY YOUNESS, MICHAEL CONNER, , JUSTIN HANSON, DANIEL HARTHURN, CHRISTIAN JONES, GREGORY MCBRIDE, THOMAS STOCKTON and others known and unknown 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 17

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

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 18

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 January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. “Growfax South”), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. “Tim Wu”), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 19

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

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN**

KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 20

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

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 21

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

On or about and between January 1, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, BRADLEY COLEY, MICHAEL CONNER, GREGORY CROSS, NELSON CUELLAR, TIMOTHY DOWDELL, MATTHEW SCOTT EVEN, M SEVEN, LLC, ISRAEL GARCIA, NICHOLAS GYORI, JUSTIN HANSON, DANIEL HARTHURN, CAMERON HENAGE, JAMES HIGGINS, HUSTON HULSE, BRIAN HUNT, MATTHEW HVIZDA, JARED JACOBSEN, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTIAN JONES, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, RICHARD LITTLER, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, RAYMOND RUIZ, JEREMY RUDNICK, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, SANTINO SANTORI, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., PETER STEEL, THOMAS STOCKTON, MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 22

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 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN,**

EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 and or 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 23

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, 2012 and April 30, 2017, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, SCOTT BROOKS, RYAN CAMPBELL, NELSON CUELLAR, MATTHEW SCOTT EVEN, M SEVEN, LLC, DANIEL HARTHURN, CAMERON HENAGE, HUSTON HULSE, MATTHEW HVIZDA, HIARUI JIANG, ZHEN ZHEN JIANG, CHRISTEN KOZER, JONATHAN CRYSTAL LEE, KEVIN MARQUEZ, XIAN MEUNSY, LADY OAK MOSKOWITZ, JOHN W. ORN, JON OTONOGA, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, TRAIRONG PHANNUDET, SIRISACK RAJPHOUMY, SIRIDETH RAJHOUMY, JUSTIN RUIZ, JOHN RUSSO, Jr., JMJR, LLC, JOHN RUSSO, Sr., SAMAR, INC (AKA SAMOE STYLE, INC., AKA SAMOESTYLE, AKA AM CREATIONS, AKA SAMAR, LLC), ADAM SAMOKISHYN, MARLENE SAMOKISHYN, MELISSA SAMOKISHYN, MICHAEL SAMOKISHYN, EDWARD SHU, JERRY SHYONG, JPEX, INC. (D.B.A. "Growfax South"), JUSTIN SHYONG, 10787 TUSCON WAY, LLC, JSM, INC., MICHAEL SWINYARD, JEFFREY TEIFFEL, JRS, LLC, JOEL VLASIN, JIN TIEN WU (A.K.A. "Tim Wu"), 3333 SOUTH MARION, LLC, COLORADO CONSULTING AND PROPERTIES MANAGEMENT, LLC, SHEN QUIN WU (A.K.A. SHEN QING WU), 1015D WEST EVANS, WAN WAN WU, RONA YANG, JEREMY YOUNESS and others known and unknown 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 24

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

On or about and between January 1, 2016 and October 16, 2016, in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS), LUCAS BELMONT, CONNOR BROOKS, CB SOLUTIONS, RYAN CAMPBELL, NELSON CUELLAR, SYNOY PHANBANDITH, MANIVONG PHANNUDET, PHOUKHONG PHANNUDET, JOHN RUSSO, Jr., JMJR, LLC, JERRY SHYONG, MICHAEL SWINYARD,**

JOEL VLASIN, JEREMY YOUNESS and others known and unknown 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 25

Filing a False Tax Return, §39-21-118(4), C.R.S. (F5) **40024**

On or about October 15, 2015 in and triable in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (DBA ALLIED EXTERIORS)**, unlawfully, feloniously, and willfully made and subscribed returns, statements, or other documents, which contained or were verified by a written declaration that they were made under the penalties of perjury, and which the defendant did not believe to be true and correct as to every material matter; in violation of §39-21-118(4), C.R.S. (F5), and against the peace and dignity of the People of the State of Colorado.

The offense alleged in the immediately above two counts 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:

During tax year 2015 the gross income for Aaron Baca, Allied Exteriors, Lucas Belmont, Connor Brooks, CB Solutions, Ryan Campbell, Nelson Cuellar, Synoy Phanbandith, Manivong Phannudet, Phoukhong Phannudet, John Russo, Jr. JMJR, LLC, Jerry Shyong, Michael Swinyard, Joel Vlasin and Jeremy Youness exceeded an amount such that they would have been required to file a return in 2016. All willfully failed to do so. For tax year 2014 Aaron Baca owner of Allied Exteriors, via his company, filed a materially false return with the Colorado Department of Revenue in that it included false documentation including but not limited to that which pertains to: deductions, 1040s and W-2s.

COUNT 26

Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

On or about and between October 1, 2012 and October 31, 2012, in the State of Colorado, **JOHN RUSSO, Sr.**, with the intent to defraud FirstBank, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a uniform loan application; in violation of §18-5-102(1)(c), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado.

COUNT 27

Theft - \$20,000 or more, §18-4-401(1)(a),(2)(d), C.R.S. (F3) **0801V**

On or about and between October 1, 2012 and October 31, 2012, and discovered July 17, 2016, in the State of Colorado, **JOHN RUSSO, Sr.**, unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of FirstBank, with the value of one hundred thousand dollars or more but less than one million dollars; in violation of §18-4-401(1),(2)(d), without authorization, or by threat or deception, and intended to deprive FirstBank, permanently of its use or

benefit; in violation of §18-4-401(1),(2)(d),(6), C.R.S. (F-3), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in the above two counts 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:

According to records obtained from FirstBank, a uniform loan application was signed on October 20, 2012 by John Russo, Sr. for the property located at 5077 S. Allison Way in Littleton, Colorado. On this loan application uttered to FirstBank by John Russo, Sr., he fraudulently checked a box indicating this address was his primary residence. However, John Russo, Sr. has never lived at, nor intended to occupy 5077 S. Allison Way as his primary residence. John Russo, Sr. actually resides two doors down the road from 5077 S Allison Way and committed the above acts of mortgage fraud in efforts to help buy a home for his son John Russo, Jr. and his son's wife at an interest rate for which John Russo, Sr. would not have otherwise qualified.

Furthermore, during the execution of search warrants on March 15, 2016 at 5077 S. Allison Way investigators found multiple mortgage statements for the property at that same address. These statements were addressed to John Russo, Sr. at 3103 W. Hampden Ave., Sheridan, CO 80110 and attached to these statements were multiple money order receipts.

In fact, on February 23, 2017 investigators interviewed John Russo, Jr. who stated his father, John Russo Sr., has never lived at 5077 S. Allison Way. John Russo, Jr. also stated he and not his father has directly paid for the mortgage on this property. Indeed, according to records obtained from First Bank between June 6, 2014 and February 8, 2016, John Russo, Jr. and his wife have made payments in money orders and checks totaling \$79,380 on the mortgage for the property located at 5077 S. Allison Way.

COUNT 28

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

On or about March 15, 2016, in and triable in the State of Colorado **JOHN RUSSO, Jr.**, unlawfully and feloniously attempted to influence Denver Police Department Detectives including but not limited to John Bauer and Donnie Brannon who are public servants, by means of deceit, with the intent thereby to alter or affect the public servants' decisions, 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 members; 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 the immediately above count incorporates 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:

On March 15, 2016, DPDMT detectives interviewed John Russo, Jr. during the execution of multiple search warrants at or near 5077 S. Allison Way, in Littleton, Colorado. When asked about his occupation by Denver Police Department Detective John Bauer and Detective Donnie Brannon, John Russo, Jr. said he was the owner of Ravello, a general contractor construction business. In order to hide his involvement in the illegal marijuana cultivation and distribution conspiracy, John Russo, Jr. mixed fact with falsity claiming he owned Ravello for approximately four years and then deceitfully added that Ravello was his only source of income.

COUNT 29

Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

On or about and between June 1, 2015 and June 30, 2015 in the State of Colorado, **CONNOR BROOKS** with the intent to defraud Universal Lending Corporation, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: mortgage documents including a HUD-1 or settlement statement; in violation of §18-5-102(1)(c), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado.

COUNT 30

Theft - \$100,000 - \$1,000,000, §18-4-401(1),(2)(i), C.R.S. (F3) **08A16**

On or about and between June 1, 2015 and June 30, 2015, in the State of Colorado, **CONNOR BROOKS** unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of Universal Lending Corporation with the value of one hundred thousand dollars or more but less than one million dollars; in violation of section 18-4-401(1),(2)(i),(6), without authorization, or by threat or deception, and intended to deprive Universal Lending Corporation, permanently of its use or benefit; in violation of §18-4-401(1),(2)(i),(6), C.R.S. (F-3), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in the above two counts 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:

Connor Brooks purchased his house at 9825 West Wesley in Lakewood with proceeds from his illegal marijuana and cultivation distribution. As Mr. Brooks lacked sufficient traceable legitimate income to qualify for a home loan, he decided to commit mortgage fraud and use proceeds from his drug crimes to acquire it. Mr. Brooks then submitted fraudulent information in his mortgage documents including a HUD-1 or settlement statement for the purposes of fraudulently obtaining a mortgage from Universal Lending Corporation.

COUNT 31

Forgery, § 18-5-102(1)(C), C.R.S. (F5) **1001C**

On or about and between June 15, 2015 and July 31, 2015 in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (D.B.A. ALLIED EXTERIORS) AND JUSTIN SHYONG** with the intent to defraud JP Morgan Chase Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a salary statement about Justin Shyong from Allied Exteriors, a request for verification of employment for Justin Shyong, mortgage documents including a HUD-1 or settlement statement; in

violation of §18-5-102(1)(c), C.R.S. (F-5), and against the peace and dignity of the People of the State of Colorado.

COUNT 32

Theft - \$100,000 - \$1,000,000, §18-4-401(1),(2)(i), C.R.S. (F3) **08A16**

On or about and between June 15, 2015 and July 31, 2015, in the State of Colorado, **AARON BACA, PUT ON DEVELOPMENTS (D.B.A. ALLIED EXTERIORS) AND JUSTIN SHYONG** unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: money of JP Morgan Chase Bank, N.A. with the value of one hundred thousand dollars or more but less than one million dollars; in violation of §18-4-401(1),(2)(i),(6), without authorization, or by threat or deception, and intended to deprive JP Morgan Chase, permanently of its use or benefit; in violation of §18-4-401(1),(2)(i),(6), C.R.S. (F-3), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in the above two counts 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:

Aaron Baca used his business to assist his co-conspirator and friend Justin Shyong, to commit mortgage fraud and money laundering. His participation in the enterprise and his production of forged document allowed co-conspirators to purchase homes through mortgage fraud. Justin Shyong and Aaron Baca, acting as owner and high managerial agent of Allied Exteriors, used various forged documents including: a salary statement about Justin Shyong from Allied Exteriors, a request for verification of employment for Justin Shyong, mortgage documents including a HUD-1 or settlement statement; for the purposes of fraudulently obtaining a mortgage from JP Morgan Chase.

COUNT 33

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

On or about March 12, 2015, in and triable in the State of Colorado, **JUSTIN SHYONG** unlawfully and feloniously attempted to influence Denver Police Department Detectives Phillip Henkle, Brett Starnes and Shanna Michael who are public servants, by means of deceit, with the intent thereby to alter or affect the public servants' decisions, 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 members; 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 the immediately above count incorporates 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:

On March 12, 2015, Denver Police Department Marijuana Team ("DPDMT") Detectives ("DPDMT") Brett Starnes, Shanna Michael and Sergeant Phillip "Brett" Hinkle responded to a warehouse at 1273 S. Cherokee Street in Denver to follow up on the zoning violation information supplied by a City and County of Denver inspector. Sergeant Hinkle obtained a phone number for Justin Shyong and spoke with him concerning the marijuana grow inside of 1273 S. Cherokee Street. Shyong then engaged in deceitful statements in attempts to influence the investigation being conducted by the three detectives. In fact Justin Shyong relayed that his mother Rona Yang and step

father Edward Shu were the actual licensed growers and he assists them in their caregiver cultivation at the warehouse. Justin gave Sergeant Hinkle verbal consent to enter 1273 S. Cherokee Street to conduct a plant count and review any licensure. At that time, detectives observed approximately 12 live flowering marijuana plants and another 12 freshly harvested. Detectives also observed State of Colorado Medical Marijuana licenses and doctor's recommendations for both Edward Shu and Rona Yang. Justin made a final deceitful comment to Sergeant Hinkle that his parents had begun the moving out process as the landlord of 1273 S. Cherokee Street leased the building to someone else. DPDMT members later learned that Shyong, Yang and Shu were participating in a larger enterprise whose aim was to employ a ruse using the caregiver laws to illegally cultivate and distribute marijuana to various other states.

COUNT 34

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

On or about and between June 3, 2016 and June 6, 2016, in and triable in the State of Colorado, **AARON BACA** unlawfully and feloniously attempted to influence Colorado Department of Revenue Special Agent Sondra Pennington, Denver Police Department Detective Kenneth Berube, Drug Enforcement Administration Special Agent Randolph Ladd who are public servants, by means of deceit, with the intent thereby to alter or affect the public servants' decisions, 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 members; 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 the immediately above count incorporates 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:

Between June 3, 2016 and June 6, 2016 Colorado Department of Revenue Special Agent Sondra Pennington, Denver Police Department Detective Kenneth Berube and Drug Enforcement Administration Special Agent Randolph Ladd conducted an interview with Aaron Baca regarding their cooperative investigation into the illegal marijuana cultivation and distribution ring consisting of John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz and other enterprise members. During the course of this interview, Mr. Baca engaged in numerous deceitful statements for the purposes of hiding his friends' involvement in the drug trafficking organization and the existence of the organization in addition to his own culpability and involvement. These deceitful statements included but were not limited to Mr. Baca's assertions about the nature of and employment relationships between he and his co-conspirators Justin Shyong and Jin Wu, his lack of involvement in the conspiracy to and actual distribution of the enterprise's illegally cultivated marijuana to other states.

COUNT 35

Securities Fraud – Untrue Statement or Omission, C.R.S. §11-51-501(1)(b) (F3) **50052**

On or about and between August 1, 2012 and November 30, 2014, in the State of Colorado, **CONNOR BROOKS** in connection with the offer, sale, or purchase of a security, directly or indirectly, unlawfully, feloniously, and willfully made an untrue statement of a material fact or omitted to state a material fact necessary in order to make the statements made, in the light of the

circumstances under which they were made, not misleading; in violation of §11-51-501(1)(b) and §11-51-603(1), C.R.S. (F3), and against the peace and dignity of the People of the State of Colorado.

The offenses alleged in the immediately above count incorporates 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:

Between June 1, 2012, and November 30, 2014, Connor Brooks solicited investments from Ron Lanzilotta, Devin Pavel, Erik Pears, Joel Dreessen, Terence Fitch and others. Connor Brooks told these people that the funds would be used for a legal, legitimate marijuana grow operation that Connor Brooks was overseeing and operating. Connor Brooks accepted the first investment in August of 2012 for this allegedly legal marijuana grow operation, and he continued to accept investments for that operation through November of 2014. The individuals understood that they would be passive investors in Connor Brooks' operation, and Connor Brooks promised these individuals a return on their investment from profits derived from the sale of marijuana in exchange for their investment in his business. Connor Brooks promised that the business would be profitable. Connor Brooks did not disclose that the funds would be used to fund an illegal marijuana cultivation and distribution operation or that he had engaged in mortgage fraud to purchase his house. These individuals each provided tens of thousands of dollars to Connor Brooks to fund an allegedly legal grow operation and they did not receive any of their invested funds back from Connor Brooks as promised. These individuals did not discover that Connor Brooks was using their funds for an illegitimate, illegal grow operation until shortly after the conclusion of 2014.

PREDICATE ACT 1

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

On or about August 2, 2015 at 2:32:39 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

PREDICATE ACT 2

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

On or about August 2, 2015 at 2:35:06 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

PREDICATE ACT 3

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

On or about August 2, 2015 at 2:39:37 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

PREDICATE ACT 4

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

On or about August 2, 2015 at 3:12:21 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

PREDICATE ACT 5

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

August 3, 2015 at 2:10:26 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

PREDICATE ACT 6

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

August 3, 2015 at 2:12:02 p.m. (UTC-6) in and triable in the State of Colorado, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, and Justin Ruiz** 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.

Between on or about August 2, 2015 and August 3, 2015 at the times listed below, **John Russo, Jr., Justin Shyong, Jeffrey Tieffel, Justin Ruiz** took part in the below text message conversation with one another in order to facilitate the felony distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance.

August 2, 2015 at 2:32:39 p.m. (UTC-6):

Text #1: Just went to front and swept the whole top out. Bonus lights are in front side room. Ru and teff you want to grab your two? Russo and I will get ours

August 2, 2015 at 2:39:28 p.m. (UTC-6)

Text #2: I'll move them

August 2, 2015 at 3:01:44 p.m. (UTC-6)

Text #3: Thx ru

August 2, 2015 at 3:11:28 p.m. (UTC-6)

Text #4: No prob

August 3, 2015 at 2:10:26 p.m. (UTC-6)

Text #5: Who used the machine last

August 3, 2015 at 2:12:02 p.m. (UTC-6)

Text #6: Never mind I found it

PREDICATE ACT 7

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

On or about October 9, 2015 at 5:24:10 p.m. (UC-6) in and triable in the State of Colorado, **John Russo, Jr., and a person or persons unknown 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.

On or about October 9, 2015 at 5:24:10 p.m. at the time listed below, **John Russo, Jr.** took part in the below text message conversation with another in order to facilitate the felony distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance.

Text Message: Trailer is at Brad's house. I told him to keep an ion it so if anyone needs to take the trailer for anything please let me or Brad know so we know that nobody stole it. This is his address 1951 w. Ida Ave

PREDICATE ACT 8

Possession of Marijuana with Intent to Distribute, Level 2/Drug/Felony, Felony Penalty Section:
K.S.A. 21-6804

That on or about and between the 1st and 2nd day of December, 2015, in Colby in Thomas County, state of Kansas, one Michael Connor and one Justin Hanson, did then and there unlawfully,

intentionally, knowingly and feloniously have in his/her possession with intent to distribute any hallucinogenic drug, to wit: Marijuana, as designated in K.S.A. 65- 4105(d)(16), and the quantity of the material was at least 450 grams but less than 30 kilograms, all in violation of K.S.A. 21-5705(a)(4)(d)(2)(C). (Possession of Marijuana with Intent to Distribute, Level 2/Drug/Felony), Felony Penalty Section: K.S.A. 21-6804

The offenses alleged in the immediately above predicate act incorporates any and all above asserted facts and dates and the essential facts of the crimes were committed in the following manner and occurred in the state of Kansas:

On December 1, 2015 at approximately 1450 hours, DPDMT detectives watched Lucas Belmont's 2011 black BMW 550 drive east bound on I-70. The detectives ultimately found Belmont parked on the west side of the Quality Inn located at 3300 Ouray Street, Aurora. The Quality Inn hotel camera system allowed the detectives to observe or deduce that Belmont had just delivered a load of marijuana to Michael W. Conner and James J. Hanson. At approximately 2235 hours, Conner and Hanson exited the hotel's west door and walk over to a 2007 grey GMC pickup bearing Ohio plate GHS5192. Both Conner and Hanson got into the truck and began smoking a marijuana cigarette. At approximately 2250 hours, Conner and Hanson left the hotel and drove the GMC truck to the Flying J gas station located at 16751 East 32nd Avenue to refuel. After fueling up the GMC, Hanson and Conner headed east bound on I-70. During the early morning hours of December 2, 2015 Kansas State Highway Patrol Interdiction Unit Lieutenant Brent Hogelin conducted a traffic stop on the GMC truck at exit #53 in Colby, Kansas. Lieutenant Hogelin located 16 individually packaged heat sealed two pound bags of marijuana concealed in a tool box from the bed of the truck.

PREDICATE ACT 7

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

On or about March 16, 2016, at 6:02:31 (GMT-6), in and triable in the State of Colorado, **NELSON CUELLAR AND JAMES HIGGINS** 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.

PREDICATE ACT 8

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

On or about March 16, 2016, at 6:20:43 (GMT-6), in and triable in the State of Colorado, **NELSON CUELLAR AND JAMES HIGGINS** 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.

PREDICATE ACT 9

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

On or about March 16, 2016, at 6:22:18 (GMT-6), in and triable in the State of Colorado, **NELSON CUELLAR AND JAMES HIGGINS** 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.

PREDICATE ACT 10

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

On or about March 16, 2016, at 6:23:11 (GMT-6), in and triable in the State of Colorado, **NELSON CUELLAR AND JAMES HIGGINS** 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.

On March 16, 2016 at the times listed below, Nelson Cuellar and James Higgins took part in the below text message conversation in order to facilitate the felony distribution of a controlled substance, possession with the intent to distribute a controlled substance and/or conspiracy to distribute a controlled substance.

Text #1 at 6:02:31 (GMT-6): Remember to bring buckets up

Text #2 at 6:20:43 (GMT-6):Dont water till i get there

Text #3 at 6:22:18 (GMT-6):What if I already started

Text #4 at 6:23:11 (GMT-6):I just did the upstairs. I wont do any more though

The offenses alleged in Counts 1 through 35 and all Predicate Acts 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 product² being sold or transferred. None of the enterprise's co-conspirators paid this excise tax (despite the excise tax being due and owing) or filed any returns associated with the excise tax. Further, the members of this enterprise sought to hide their illegal cultivation and distribution activity. In particular, they sought to hide or disguise their income from illegal marijuana distributions and sales, and thus the enterprise members conspired and sought to willfully attempt to evade and defeat the state income tax administered by the Colorado Department of Revenue.

² i.e., Flower, Trim, or Immature Plant.

Between January 1, 2012 and April 30, 2017, members of the DTO, including but not limited to Aaron Baca, Put on Developments (DBA Allied Exteriors), Lucas Belmont, Connor Brooks, CB Solutions, Scott Brooks, Ryan Campbell, Bradley Coley, Gregory Cross, Nelson Cuellar, Timothy Dowdell, Matthew Scott Even, M Seven, LLC, Nicholas Gyori, Cameron Henage, James Higgins, Huston Hulse, Brian Hunt, Mathew Hvizda, Jared Jacobsen, Hiarui Jiang, Zhen Zhen Jiang, Jonathan Lee, Richard Littler, Christen Kozer, Kevin Marquez, Xian Meunsy, Lady Oak Moskowitz, John W. Orn, Jon Otonaga, Synoy Phanbandith Phanbandith, Manivong Phannudet, Phoukhong Phannudet, Trairong Phannudet, Sirisack Rajphoumy, Sirideth Rajhoumy, Justin Ruiz, Raymond Ruiz, Jeremy Rudnick, John Russo, Jr., JMJR, LLC, John Russo, Sr., Samar, Inc. (a.k.a. Samoe Style, Inc., Samoestyle, AM Creations, Samar, LLC), Adam Samokishyn, Marlene Samokishyn, Melissa Samokishyn, Michael Samokishyn, Santino Santori, Edward Shu, Jerry Shyong, JPEX, Inc. (D.B.A. "Growfax South"), Justin Shyong, 10787 Tucson Way, LLC, JSM, INC., Peter Steel, Michael Swinyard, Jeffrey Teiffel, JRS, LLC, Joel Vlasin, Jin Tien Wu, 3333 South Marion, LLC, Colorado Consulting and Properties Management, Shen Quin Wu, 1015D West Evans, Wan Wan Wu, Rona Yang, Jeremy Youness and others unlawfully, cultivated and/or conspired to cultivate marijuana, along with the above mentioned members of the DTO at over 65 different marijuana growing operations throughout the state of Colorado. During the execution of the three phases of search warrants at numerous residential and warehouse cultivation facilities, investigators seized slightly over 2600 marijuana plants from members of the DTO in March and May of 2016 and January of 2017.

In general, between January 1, 2012 and April 30, 2017, members of the DTO, including but not limited to Aaron Baca, Put on Developments (DBA Allied Exteriors), Lucas Belmont, Connor Brooks, CB Solutions, Scott Brooks, Ryan Campbell, Bradley Coley, Michael Conner, Gregory Cross, Nelson Cuellar, Timothy Dowdell, Matthew Scott Even, M Seven, LLC, Israel Garcia, Nicholas Gyori, Justin Hanson, Daniel Harthurn, Cameron Henage, James Higgins, Huston Hulse, Brian Hunt, Mathew Hvizda, Jared Jacobsen, Hiarui Jiang, Zhen Zhen Jiang, Christian Jones, Christen Kozer, Jonathan Lee, Richard Littler, Kevin Marquez, Gregory McBride, Xian Meunsy, Lady Oak Moskowitz, John W. Orn, Jon Otonaga, Synoy Phanbandith, Manivong Phannudet, Phoukhong Phannudet, Trairong Phannudet, Sirisack Rajphoumy, Sirideth Rajhoumy, Justin Ruiz, Raymond Ruiz, Jeremy Rudnick, John Russo, Jr., JMJR, LLC, John Russo, Sr., Samar, Inc. (a.k.a. Samoe Style, Inc., Samoestyle, AM Creations, Samar, LLC), Adam Samokishyn, Marlene Samokishyn, Melissa Samokishyn, Michael Samokishyn, Santino Santori, Edward Shu, Jerry Shyong, JPEX, Inc. (D.B.A. "Growfax South"), Justin Shyong, 10787 Tucson Way, LLC, JSM, INC., Peter Steel, Thomas Stockton, Jeffrey Teiffel, JRS, LLC, Joel Vlasin, Jin Tien Wu, 3333 South Marion, LLC, Colorado Consulting and Properties Management, Shen Quin Wu, 1015D West Evans, Wan Wan Wu, Rona Yang, Jeremy Youness and others known to the Grand Jury possessed with intent to distribute, distributed and/or conspired to distribute their illegally cultivated marijuana with the above mentioned members of the DTO and others known and unknown. During the execution of the three phases of search warrants on vehicles and at numerous residential and warehouse cultivation facilities, investigators seized well over 1100 pounds of finished marijuana destined for out of state distribution by the members of the DTO in March and May of 2016 and January of 2017.

Investigators learned that between January 1, 2012 and April 30, 2017, members of the DTO, including but not limited to Aaron Baca, Put on Developments (DBA Allied Exteriors), Lucas Belmont, Connor Brooks, CB Solutions, Scott Brooks, Ryan Campbell, Bradley Coley, Michael Connor, Gregory Cross, Nelson Cuellar, Timothy Dowdell, Matthew Scott Even, M Seven, LLC, Israel Garcia, Nicholas Gyori, Justin Hanson, Daniel Harthurn, Cameron Henage, James Higgins, Huston Hulse, Brian Hunt, Mathew Hvizda, Jared Jacobsen, Hiarui Jiang, Zhen Zhen Jiang, Christina Jones, Christen Kozer, Jonathan Lee, Richard Littler, Kevin Marquez, Xian Meunsy, Lady Oak Moskowitz, John W. Orn, Jon Otonaga, Synoy Phanbandith, Manivong Phannudet, Phoukhong

Phannudet, Trairong Phannudet, Sirisack Rajphoumy, Sirideth Rajhoumy, Justin Ruiz, Raymond Ruiz, Jeremy Rudnick, John Russo, Jr., JMJR, LLC, John Russo, Sr., Samar, Inc. (a.k.a. Samoe Style, Inc., Samoestyle, AM Creations, Samar, LLC), Adam Samokishyn, Marlene Samokishyn, Melissa Samokishyn, Michael Samokishyn, Santino Santori, Edward Shu, Jerry Shyong, JPEX, Inc. (D.B.A. “Growfax South”), Justin Shyong, 10787 Tucson Way, LLC, JSM, INC., Peter Steel, Thomas Stockton, Michael Swinyard, Jeffrey Teiffel, JRS, LLC, Joel Vlasin, Jin Tien Wu, 3333 South Marion, LLC, Colorado Consulting and Properties Management, Shen Quin Wu, 1015D West Evans, Wan Wan Wu, Rona Yang, Jeremy Youness, and others known to the Grand Jury, knowingly or intentionally kept, maintained, controlled, rented, leased, or made available for use a warehouse, dwelling, building, vehicle, room, enclosure, or other structure or place, in the state of Colorado which they knew was resorted to for the purpose of keeping for distribution, transporting for distribution, or distribution of marijuana. The above individuals also knowingly or intentionally opened or maintained a place which they knew was resorted to for the purpose of unlawfully manufacturing marijuana. Further, they unlawfully managed or controlled a building, room, or enclosure as an owner, lessee, agent, employee, or mortgagee and rented, leased, or made it available for use, and they knew it was resorted to for the purpose of unlawfully manufacturing marijuana. These locations include the following addresses, cultivation equipment and seized marijuana quantities:

Street Address	Building Type	Location	Lights	Ballasts	Plants	Plant Weight (lbs.)	Finished Product (lbs.)
1260 S SANTA FE DR	WAREHOUSE	DENVER	27	21	0	0.000	88.093
1273 S CHEROKEE ST	WAREHOUSE	DENVER	20	20	36	260.730	0.000
1275 S CHEROKEE ST	WAREHOUSE	DENVER	44	24	38	104.297	24.45
1193 S BANNOCK ST	WAREHOUSE	DENVER	20	24	41	45.490	54.554
1256 S BANNOCK ST	WAREHOUSE	DENVER	18	9	36	27.640	6.746
1822 S BANNOCK ST	WAREHOUSE	DENVER	46	50	36	200.000	29.034
160 N VALLEJO ST	WAREHOUSE	DENVER	41	32	0	0.000	76.074
621 S JASON ST	WAREHOUSE	DENVER	73	53	38	288.000	23.727
2795 S SHOSHONE ST #D	WAREHOUSE	ENGLEWOOD	65	47	98	350.228	4.338
2899 S SHOSHONE ST	WAREHOUSE	ENGLEWOOD	0	0	0	0.000	0.000
1120 N YUMA CT	WAREHOUSE	DENVER	43	43	115	150.000	0.000
1675 S FILLMORE ST	RESIDENCE	DENVER	6	6	0	0.000	0.000
16482 E PHILLIPS DR	RESIDENCE	LITTLETON	0	0	0	0.000	0.000
4957 PALMER RIDGE DR	RESIDENCE	PARKER	0	0	0	0.000	0.000
10303 E PEAK VIEW #G-262	RESIDENCE	ENGLEWOOD	0	0	0	0.000	0.000
5077 S ALLISON WAY	RESIDENCE	LAKEWOOD	12	12	44	51.550	5.442
5069 S ALLISON WAY	RESIDENCE	LAKEWOOD	0	0	0	0.000	0.250
3001 N ZENOBIA ST	RESIDENCE	DENVER	17	14	11	10.426	0.012
5470 N XENIA ST	RESIDENCE	DENVER	5	5	0	0.000	62.919
2675 S GAYLORD ST	RESIDENCE	DENVER	19	19	127	12.267	6.355
3333 S MARION ST	RESIDENCE	ENGLEWOOD	110	98	514	267.400	10.000
7211 E 6TH AVE PKWY	RESIDENCE	DENVER	13	13	71	86.330	1.521
1365 S VINE ST	RESIDENCE	DENVER	19	27	61	62.990	0.412
6026 S SYCAMORE ST	RESIDENCE	LITTLETON	0	0	0	0.000	0.000
3200 BRIGHTON BLVD #158	RESIDENCE	DENVER	0	0	0	0.000	0.000
3173 W RADCLIFF DR	RESIDENCE	SHERIDAN	27	24	58	320.200	0.000
3067 S PEARL ST	RESIDENCE	ENGLEWOOD	28	20	60	67.680	0.000
1451 24TH ST #408	RESIDENCE	DENVER	0	0	0	0.000	0.000
115 WILCOX ST	GROW SUPPLY STORE	CASTLE ROCK	0	0	0	0.000	0.000
34733 UPPER BEAR CREEED RD	RESIDENCE	EVERGREEN	29	16	56	111.380	7.743
15550 E 144TH AVE	RESIDENCE	BRIGHTON	50	37	395	140.109	14.980
192 CHICKADEE LANE	RESIDENCE	BAILEY	19	11	171	42.662	0.087
650 OLD SQUAW PASS RD	RESIDENCE	EVERGREEN	24	13	101	35.415	0.000
9839 S FIELD WY	RESIDENCE	LITTLETON	76	38	0	0.000	25.026
7503 RED FOX CT	RESIDENCE	LITTLETON	65	72	0	0.000	0.000
1015 W EVANS AVE UNIT D	WAREHOUSE	DENVER	52	34	0	0.000	0.060
8394 S ESTES ST	RESIDENCE	LITTLETON	15	2	0	0.000	3.224
8365 S ESTES ST	RESIDENCE	LITTLETON	43	44	0	0.000	2.000

Street Address	Building Type	Location	Lights	Ballasts	Plants	Plant Weight (lbs.)	Finished Product (lbs.)
5229 S PARFET WY	RESIDENCE	LITTLETON	26	26	27	62.842	130.950
7690 RAMPART WY	RESIDENCE	DOUGLAS COUNTY	68	49	0	0.000	0.000
9173 W CAPRI AVE	RESIDENCE	LITTLETON	30	30	0	0.000	0.000
10787 TUCSON WAY	RESIDENCE	COMMERCE CITY	74	45	0	0.000	0.000
10237 TELLURIDE WAY	RESIDENCE	COMMERCE CITY	50	50	0	0.000	41.640
5395 E 39TH AVE	WAREHOUSE	DENVER	0	0	0	0.000	6.919
482 LAREDO ST	WAREHOUSE	AURORA	0	0	0	0.000	220.124
6909 S HOLLY CIR #302	WAREHOUSE	CENTENNIAL	0	0	0	0.000	0.000
5305 W MISSISSIPPI AVE	WAREHOUSE	LAKEWOOD	124	104	29	0.570	0.000
2349 S ORCHARD ST	RESIDENCE	GREENWOOD VILLAGE	0	0	0	0.000	0.000
4131 E 16TH AVE	RESIDENCE	DENVER	25	25	69		9.000
1475 S FILLMORE ST	RESIDENCE	DENVER			36		
4065 W LINVALE PL	RESIDENCE	DENVER	19	19	42		10.000
2129 N DOWNING ST (1ST FLOOR)	RESIDENCE	DENVER			116		
9825 W WESLEY CT	RESIDENCE	LAKEWOOD	0	0	0		
8073 S CARR CT	RESIDENCE	LITTLETON	15	15	0		8.000
4422 S YANK ST	RESIDENCE	LITTLETON	3	4	0		
6918 W 70TH AVE	RESIDENCE	ARVADA	29	21	26		
5154 ZINNIA CT	RESIDENCE	ARVADA	0	0	0		
433 S NEWCOMBE ST	RESIDENCE	LAKEWOOD	17	15	28		35.000
10270 W HAMPDEN AVE UNIT # 4102	STORAGE UNIT	LAKEWOOD	0	0	0		
10270 W HAMPDEN AVE UNIT # 4176	STORAGE UNIT	LAKEWOOD	0	0	0		
6301 W MISSISSIPPI AVE UNIT # 2013	STORAGE UNIT	LAKEWOOD	118	121	0		
7796 N TEJON ST	RESIDENCE	ADAMS COUNTY	34	35	43		0.125
7856 CYD DR	RESIDENCE	ADAMS COUNTY	30	27	18		
5906 SCENIC AVE	RESIDENCE	FIRESTONE	36	24	18		
17 NIBLICK LANE	RESIDENCE	LITTLETON			0		80.000
3600 E 45TH AVE	WAREHOUSE	DENVER	2	2			
8436 W CAPRI AVE	RESIDENCE	LITTLETON			16		50.000
8748 FLOWER ST	RESIDENCE	WESTMINSTER			21		5.000

CYNTHIA H. COFFMAN
ATTORNEY GENERAL
STATE OF COLORADO



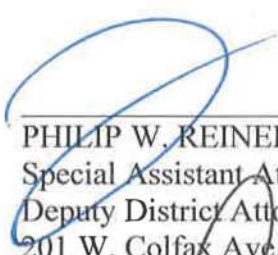
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The 2016-2017 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 9th day of June, 2017.

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.

A handwritten signature in blue ink, appearing to read "Michael Martinez", written over a horizontal line.

Chief Judge Michael Martinez
Presiding Judge, State Grand Jury