

District Court, City and County of Denver, Colorado
City and County Building, Room 424
1437 Bannock Street
Denver, CO 80202

**Plaintiff: THE PEOPLE OF THE STATE OF
COLORADO**

Defendants:

**ERNEST HILL
DAVON PHILLIPS
KEVIN BOSWELL
TYRELL HOMES
KEVIN GLADNEY
VINCENT HOOD
TAJSHAWNNE TATE
KAITLIN HOLT
MYKECIA HAQQ-ANDERSON
LEDEZHANE TYLER
DEIANA LOLLIS
ALAWN SMITH
JALIL JACKSON
ELIZABETH BROUGHTON
KIANA MASCARENAS
GREGORY ASHLEY
AALYAH AUSTIN
ADONTAE THOMPSON
GHAISSA HOOD
ORIANA CLIFFORD-JOHNSON
MORRAIL BELL
XAVIER SMITH
TRAVIS DRAPER
DORIAN PHILLIPS
ONJANIQUE WILLIAMS
KANESHA ROLAND
JAYLON JONES**

COURT USE ONLY

Case Number:

Grand Jury No. 19CR2B

Div.: Criminal Ctrm: 424 / ____

INDICTMENT

**VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3),
(F2) <37284> 1 (1 count)**

**CONSPIRACY TO COMMIT THEFT, 18-4-401(1),(2)(h);18-2-201 C.R.S. (F5) <08A15C> 2 (1
count)**

**FORGERY, 18-5-102(1)(e) C.R.S. (F5) <1001C> 3, 5, 6, 7, 8, 9, 11, 12, 14, 15, 17, 19, 22, 23,
26, 27, 28, 29, 30, 32, 33, 35, 36, 37, 38, 40, 41, 44, 45, 46, 48, 49, 50, 51, 53 (35 counts)**

THEFT, 18-4-401(1),(2)(g) C.R.S. (F5) <08A14> 4, 10, 13, 20, 24, 34 (6 counts)

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13> 16, 39, 42 (3 counts)

IDENTITY THEFT, 18-5-902(1)(c) C.R.S. (F4) <1307J> 18, 21, 25, 43, 52 (5 counts)

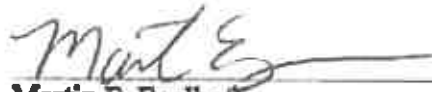
CRIMINAL IMPERSONATION, 18-5-113(1)(b)(II) C.R.S. (F6) <1011F> 31, 47 (2 counts)

THEFT - AT-RISK PERSON, 18-6.5-103(5);18-4-401(1) C.R.S. (F3) <18548> 54, 55 (2 counts)

THEFT - AT-RISK PERSON, 18-6.5-103(5);18-4-401(1) C.R.S. (F5) <18547> 56 (1 count)

The Grand Jury presents the within Indictment and the same is ordered filed.

Dated this 18 day of September, 2019.



**Martin F. Egelhoff
Presiding Judge
Denver District Court**

COUNT ONE
**VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, C.R.S. 18-17-104(3),
(F2) <37284>**

Between and including August 7, 2017, and June 26, 2019, at or triable in the City and County of Denver, State of Colorado, ERNEST HILL and DAVON PHILLIPS, while employed by or associated with an enterprise, namely: a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

The Enterprise

The enterprise alleged in this count was a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: ERNEST HILL, DAVON PHILLIPS, KEVIN BOSWELL, TYRELL HOMES, KEVIN GLADNEY, VINCENT HOOD, TAJSHAWNE TATE, KAITLIN HOLT, MYKECIA HAQQ-ANDERSON, LADEZHANE TYLER, DEIANA LOLLIS, ALAWN SMITH, JALIL JACKSON, ELIZABETH BROUGHTON, KIANA MASCARENAS, GREGORY ASHLEY, AALYAH AUSTIN, ADONTAE THOMPSON, GHAISHA HOOD, ORIANA CLIFFORD-JOHNSON, MORRAIL BELL, XAVIER SMITH, TRAVIS DRAPER, DORIAN PHILLIPS, ONJANIQUE WILLIAMS, KANESHA ROLAND, JAYLON JONES, and other persons known or unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

Pattern of Racketeering Activity

For purposes of this count, the defendants engaged in acts related to the conduct of the enterprise, including:

As to ERNEST HILL, the acts described in counts 2, 3, 5, 6, 7, 8, 9, 11, 12, 14, 15, 17, 18, 19, 25, 26, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 40, 41, 43, 44, 45, 46, 48, 49, 50, 51, 52, and 53 including any lesser included offenses of these counts.

As to DAVON PHILLIPS, the acts described in counts 2, 3, and 47, including any lesser included offenses of these counts.

COUNT TWO
CONSPIRACY TO COMMIT THEFT, 18-4-401(1),(2)(h);18-2-201 C.R.S. (F5) <08A15C>

Between and including August 7, 2017, and August 21, 2019, at and triable in the City and County of Denver, State of Colorado, **ERNEST HILL, DAVON PHILLIPS, KEVIN BOSWELL, TYRELL HOMES, KEVIN GLADNEY, VINCENT HOOD, TAJSHAWNNE TATE, KAITLIN HOLT, MYKECIA HAQQ-ANDERSON, LADEZHANE TYLER, DEIANA LOLLIS, ALAWN SMITH, JALIL JACKSON, ELIZABETH BROUGHTON, KIANA MASCARENAS, GREGORY ASHLEY, AALYAH AUSTIN, ADONTAE THOMPSON, GHAISHA HOOD, ORIANA CLIFFORD-JOHNSON, MORRAIL BELL, XAVIER SMITH, TRAVIS DRAPER, DORIAN PHILLIPS, ONJANIQUE WILLIAMS, KANESHA ROLAND, and JAYLON JONES**, with the intent to promote or facilitate the commission of the crime of theft, unlawfully and feloniously agreed with EACH OTHER and a person or persons to the Grand Jury unknown 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, and the value of the thing or things of value was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of sections 18-4-401(1),(2)(h) and 18-2-201, C.R.S.

1. The facts supporting Counts 1 and 2 are as follows:
2. The facts supporting all other counts in this Indictment are incorporated herein by reference.
3. From at least August 7, 2017 to June 26, 2019, with various members joining at various times, Ernest Hill, Davon Phillips, Kevin Boswell, Tyrell Homes, Kevin Gladney, Vincent Hood, Tajshawne Tate, Kaitlin Holt, Mykecia Haqq-Anderson, Ladezhane Tyler, Deiana Lollis, Alawn Smith, Jalil Jackson, Elizabeth Broughton, Kiana Mascarenas, Gregory Ashley, Aalyah Austin, Adontae Thompson, Ghaisha Hood, Oriana Clifford-Johnson, Morrail Bell, Xavier Smith, Travis Draper, Dorian Phillips, Onjanique Williams, Kanisha Roland, Jaylon Jones, a group of individuals associated in fact, though not a legal entity, with common goals. The common goal of the members of the enterprise was theft of money. The way that these thefts were accomplished involved the following stages:
 4. Enterprise members opened bank accounts at various banks and credit unions throughout the Denver metropolitan area.
 5. The bank accounts opened by enterprise members were funded with nominal sums and almost immediately enterprise members forged or deposited fraudulent checks into the accounts to artificially inflate the account balances.
 6. Members of the enterprise then either cashed the checks immediately or rapidly withdrew money from ATM machines in the Denver metropolitan area causing losses to the victims.

7. To facilitate the enterprise, conspirator and enterprise member Davon Phillips set up a business with the Colorado Secretary of State and opened accounts in his personal name and the name of his business, Davon Phillips HeadlightsRUS. This business never traded and was merely a vehicle for the commission of crimes and other acts to further the aims of the enterprise.

8. The business account for HeadlightsRUS was funded at opening with a forged check. The account provided a source of multiple checks. These checks were fraudulently completed. Many of the checks were written by Ernest Hill. They were made payable to other members of the enterprise, who then negotiated them to obtain money. The business account was never funded and the business itself rapidly went into delinquency.

9. Enterprise members would often visit several different branches of the banks or credit unions on the same day with the specific purpose of quickly cashing different checks.

10. Members of the Enterprise, including but not limited to Ernest Hill and Davon Phillips, also opened new accounts ostensibly for an elderly female, [REDACTED] (DOB [REDACTED]/[REDACTED]/1940). [REDACTED] was originally from the Las Vegas area but came to Denver with Ernest Hill and Davon Phillips in the fall of 2017.

11. Ernest Hill and Davon Phillips lived with this senior, who they referred to as "Grandma [REDACTED]". After moving to Denver new accounts were opened for her. Multiple checks were negotiated from her accounts by members of the enterprise. During the time [REDACTED] checks were negotiated, her accounts were either not funded or had been closed or frozen by the banking institutions the checks were drawn on.

12. [REDACTED] health declined and her care needs increased. In July of 2019 Ernest Hill and Davon Phillips made arrangements for [REDACTED] to go into respite care. She had suffered several strokes, had impaired vision, and was barely able to sign her name when she arrived in Denver. Despite this, numerous checks were written on her accounts and cashed by members of the enterprise.

13. The goal of the enterprise was for the members to extract the maximum amount of money from the bank or credit union before checks were returned not honored and accounts were closed.

14. The common goals of the enterprise also included the obtaining, using, and sharing of personal identifying information, financial identifying information, and financial devices by theft or by other means.

15. During all times relevant to this Indictment members of the enterprise falsely completed and/or uttered multiple checks and shared these fraudulent financial transaction devices to further the aims of the enterprise.

16. During all times relevant to this Indictment members of the enterprise obtained an aggregate amount of more than \$40,696.66.

COUNT THREE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 1, 2017, and August 12, 2017, at or triable in the City and County of Denver, State of Colorado, DAVON PHILLIPS and ERNEST HILL, with the intent to defraud TCF BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 3 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about August 12, 2017, hand written check number [REDACTED] purporting to be from a MoneyNetwork account, written for \$3500.00, and made payable to Davon Phillips, was deposited into Davon Phillips and [REDACTED] joint TCF Bank account number [REDACTED] via ATM at 2090 S. University Blvd., Denver County, Colorado.**
- 3. This check was not honored, and was subsequently returned unpaid to TCF Bank on August 15, 2017. Money Network confirmed that this check was fraudulently written under that account number, hence, the return of the check.**
- 4. The check was deposited into the account owned by Davon Phillips but was previously completed by Ernest Hill.**

COUNT FOUR

THEFT, 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

Between and including August 28, 2017, and September 5, 2017, at or triable in the City and County of Denver, State of Colorado, TYRELL HOMES unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; a thing of value, namely: US CURRENCY of ACADEMY BANK AND TCF BANK, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive ACADEMY BANK AND TCF BANK permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT FIVE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 24, 2017 and September 5, 2017 at and triable in the City and County of Denver, State of Colorado, TYRELL HOMES and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 4 and 5 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about August 28, 2017, Tyrell Homes opened Academy Bank checking account number [REDACTED] at an Academy Branch Bank located at 5990 Dahlia Street, Adams County, Colorado.**
- 3. On or about August 30, 2017, Tyrell Homes cashed check number [REDACTED], written for \$897.65 and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 7155 Sheridan Boulevard, Jefferson County, Colorado.**
- 4. On or about August 31, 2017, Tyrell Homes cashed check number [REDACTED], written for \$969.43, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 7455 West Colfax Avenue, Jefferson County, Colorado.**
- 5. On or about August 31, 2017, Tyrell Homes cashed check number [REDACTED], written for \$984.25, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 601 Englewood Parkway, Arapahoe County, Colorado.**

6. On or about August 31, 2017, Tyrell Homes cashed check number [REDACTED] written for \$600.00 and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 5990 Dahlia Street, Adams County, Colorado.

7. On or about August 31, 2017, Tyrell Homes cashed check number [REDACTED] written for \$897.85, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 60 W. Bromley Lane, Adams County, Colorado.

8. On or about September 1, 2017, Tyrell Homes cashed check number [REDACTED] written for \$998.68, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 5990 Dahlia Street, Adams County, Colorado.

9. On or about September 5, 2017, Tyrell Homes cashed check number [REDACTED] written for \$990.65, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 10900 E. Briarwood Avenue, Arapahoe County, Colorado.

10. On or about September 5, 2017, Tyrell Homes cashed check number [REDACTED], written for \$899.75, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 9901 Grant Street, Adams County, Colorado.

11. On or about September 5, 2017, Tyrell Homes cashed check number [REDACTED] written for \$1395.68, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 60 W. Bromley Lane, Adams County, Colorado.

12. On or about September 5, 2017, Tyrell Homes cashed check number [REDACTED], written for \$998.65, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at an Academy Branch Bank located at 5990 Dahlia Street, Adams County, Colorado.

13. Between and including September 5, 2017 and September 8, 2017, all checks negotiated by Tyrell Homes were returned unpaid to Academy Bank by TCF Bank.

14. On or about September 13, 2017, Academy Bank closed Tyrell Homes' account.

15. Between and including August 30, 2017, and September 5, 2019, Tyrell Homes obtained \$10,530.44 in cash from Academy Bank and TCF Bank.

16. These checks were negotiated by Tyrell Homes, but had previously been completed by Ernest Hill.

COUNT SIX

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about August 28, 2017, at or triable in the City and County of Denver, State of Colorado, **GHAISHA HOOD** and **ERNEST HILL** with the intent to defraud **SECURITY SERVICES FEDERAL CREDIT UNION**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT SEVEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about September 1, 2017, at or triable in the City and County of Denver, State of Colorado, **GHAISHA HOOD**, and **ERNEST HILL** with the intent to defraud **US BANK**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 6 and 7 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 28, 2017, Ghaisha Hood, opened Security Services Federal Credit Union Account number [REDACTED] at a Security Services Credit Union Account branch.
3. On or about August 28, 2017, Ghaisha Hood deposited check number [REDACTED] written for \$982.65 and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, and written for \$982.65, into Security Services Federal Credit Union account number [REDACTED] at the Security Services Federal Credit Union located at 7800 West Quincy Avenue, Denver County, Colorado.
4. On or about August 31, 2017, check number [REDACTED], drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, was returned unpaid by TFC Bank to Security Services Federal Credit Union.
5. On or about September 1, 2017, Ghaisha Hood, opened US Bank account number [REDACTED] at a US Bank branch.
6. On or about September 1, 2017, Ghaisha Hood deposited number check number [REDACTED] drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, and written for \$525.85, into US Bank account number [REDACTED] at the US Bank branch located at 2701 Walton Street, Denver County, Colorado.
7. Between September 1, 2017, and October 20, 2017, Check number [REDACTED], drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, was returned

unpaid by TFC Bank to US Bank and Ghaisha Hood's account was closed by US Bank on or about October 20, 2017.

8. These checks were negotiated by Ghaisha Hood, but had previously been completed by Ernest Hill.

COUNT EIGHT

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 23, 2017 and September 1, 2017 at and triable in the City and County of Denver, State of Colorado, KEVIN BOSWELL and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT NINE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 30, 2017 and September 22, 2017 at and triable in the City and County of Denver, State of Colorado, KEVIN BOSWELL and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 8 and 9 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 16, 2017, Kevin Boswell opened up Academy Bank account number [REDACTED] at an Academy Bank Branch located at 3301 North Tower Road, Denver County, Colorado.
3. On or about August 24, 2017, Kevin Boswell deposited check number [REDACTED] written for \$953.69 and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, into Academy Bank account number [REDACTED] at the Academy Bank branch located at 5990 Dahlia Street, Adams County, Colorado. Kevin Boswell deposited \$153.69 into the account and kept \$800.00 in cash.
4. On or about August 29, 2017, number [REDACTED] drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, was returned unpaid by TFC Bank to Academy Bank.
5. On or about August 31, 2017, Academy Bank closed Kevin Boswell's account, number [REDACTED].
6. On or about September 1, 2017, Kevin Boswell deposited check number [REDACTED] written for \$975.82 and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, into US Bank account number [REDACTED], at the US Bank Branch located

at 2701 Welton Street, Denver County, Colorado. Kevin Boswell deposited \$475.82 into the account and kept \$500.00 in cash.

7. On or about September 22, 2017, the check was returned unpaid by TCF Bank to US Bank.

8. On or about September 22, 2017, US Bank closed Kevin Boswell's account.

9. These checks were negotiated by Kevin Boswell, but had previously been completed by Ernest Hill.

COUNT TEN

THEFT 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

Between and including September 5, 2017 and September 7, 2017 at or triable in the City and County of Denver, State of Colorado, KEVIN GLADNEY unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; a thing of value, namely: US CURRENCY of [REDACTED] CHASE, ACADEMY BANK, TCF BANK, and CREDIT UNION OF COLORADO with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive [REDACTED], CHASE, ACADEMY BANK, TCF BANK and CREDIT UNION OF COLORADO permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT ELEVEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 20, 2017 and September 5, 2017 at or triable in the City and County of Denver, State of Colorado, KEVIN GLADNEY and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT TWELVE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including August 30, 2017 and September 5, 2017 at or triable in the City and County of Denver, State of Colorado, KEVIN GLADNEY and ERNEST HILL with the intent to defraud CREDIT UNION OF COLORADO, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 10, 11, and 12 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 5, 2017, Kevin Gladney opened checking account number [REDACTED] at the Credit Union of Colorado branch located at 13732 East Quincy Avenue, Arapahoe County, Colorado.
3. On or about September 6, 2017, Kevin Gladney deposited check number [REDACTED], written for \$1200.00, and drawn on Chase Bank account number [REDACTED], owned by [REDACTED], into his Credit Union of Colorado account, number [REDACTED] at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado. Kevin Gladney deposited \$300.00 into the account and kept \$900.00.

4. On or about September 6, 2017, Kevin Gladney deposited check number [REDACTED] written for \$1850.00, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, into Gladney's Credit Union of Colorado account, number [REDACTED] at the Credit Union of Colorado branch located at 8770 Wadsworth Blvd, Jefferson County, Colorado. Kevin Gladney deposited \$300.00 into the account and kept \$1550.00 in cash.
5. On or about September 6, 2017, Kevin Gladney cashed check number [REDACTED] written for \$1790.00, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado. He deposited \$300.00 and kept \$1490.00 in cash.
6. On or about September 6, 2017, Kevin Gladney conducted a point of sale purchase for \$300.00 at 7325 West 88th Avenue, Jefferson County Colorado. The funds came out of his Credit Union of Colorado account number [REDACTED].
7. On or about September 6, 2017, Kevin Gladney withdrew \$500.00 from the ATM located at Credit Union of Colorado, 1390 Logan Street, Denver County, Colorado. The funds came out of his Credit Union of Colorado account number [REDACTED].
8. On or about September 7, 2017, Kevin Gladney cashed check number [REDACTED] written for \$1800.00, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.
9. Between and including September 11, 2017 and September 14, 2017, all checks deposited by Kevin Gladney into Credit Union of Colorado account number [REDACTED] were returned unpaid by TCF Bank to Credit Union of Colorado.
10. On or about September 2, 2017, Kevin Gladney opened Academy Bank account number [REDACTED].
11. On or about September 5, 2017, Kevin Gladney deposited check number [REDACTED] written for \$996.38, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, into Academy Bank account number [REDACTED], at the Academy Bank branch located at 5990 Dahlia St, Adams County, Colorado. Kevin Gladney deposited \$96.38 and kept \$900.00 in cash.
12. On or about September 5, 2017, Kevin Gladney deposited check number [REDACTED], written for \$960.22, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS, into Academy Bank account number [REDACTED], at the Academy Bank branch located at 5990 Dahlia St, Adams County, Colorado. Kevin Gladney deposited \$160.00 and kept \$800.22 in cash.

13. Between and including September 8, 2017, and September 13, 2017, all checks deposited by Kevin Gladney into Academy Bank account number [REDACTED] were returned unpaid by TCF Bank to Academy Bank.
14. Between and including September 5, 2017, and September 7, 2017, Kevin Gladney obtained \$5640.22 from [REDACTED] Chase, Academy Bank TCF Bank and Credit Union of Colorado.
15. On or about September 6, 2017, at about 1:04 PM, Oriana Clifford-Johnson, Kevin Gladney, and Ernest Hill were all captured on video surveillance at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado.
16. On or about September 6, 2017, at about 4:15 PM, Kevin Gladney, and Ernest Hill were captured on video surveillance withdrawing money via the ATM located at the Credit Union of Colorado branch located at 1309 Logan Street, Denver County, Colorado.
17. At times relevant to this indictment, Kevin Gladney and Oriana Clifford-Jones are captured on video surveillance at the same time at various branches of Credit Union of Colorado throughout the Denver metropolitan area.
18. These checks were negotiated by Kevin Gladney but had previously been completed by Ernest Hill.

COUNT THIRTEEN

THEFT 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

Between and including September 5, 2017, and September 7, 2017, at or triable in the City and County of Denver, State of Colorado, **ORIANA CLIFFORD-JOHNSON** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; a thing of value, namely: **US CURRENCY**, of [REDACTED], **TCF BANK, ANB BANK, CHASE, NAVY FEDERAL CREDIT UNION, and CREDIT UNION OF COLORADO** with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive [REDACTED], **TCF BANK, ANB BANK, CHASE, NAVY FEDERAL CREDIT UNION, and CREDIT UNION OF COLORADO** permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT FOURTEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including September 3, 2017, and September 7, 2017, at or triable in the City and County of Denver, State of Colorado, **ORIANA CLIFFORD-JOHNSON and ERNEST HILL** with the intent to defraud **CREDIT UNION OF COLORADO**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 13 and 14 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 5, 2017, Oriana Clifford-Johnson deposited check number [REDACTED], written for \$4500.00, and drawn against TFC BANK, account number [REDACTED], owned by Davon Phillips HeadlightsRUS, into her existing Credit Union of Colorado Account, number [REDACTED] at the Credit Union of Colorado branch located at 7541 E. Iliff Avenue, Arapahoe County, CO.
3. On or about September 5, 2017, Oriana Clifford-Johnson deposited check number [REDACTED], written for \$2250.00, and drawn against ANB Bank account number [REDACTED], owned by Davon Phillips, into her Credit Union of Colorado account, number [REDACTED], at the Credit Union of Colorado branch located at 13732 E. Quincy Avenue, Arapahoe County, Colorado.
4. On or about September 6, 2017, Oriana Clifford-Johnson cashed check number [REDACTED], written for \$1750.00, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado.
5. On or about September 6, 2017, Oriana Clifford-Johnson cashed check number [REDACTED], written for \$1550.00, and drawn on Chase Bank account number [REDACTED], owned by [REDACTED]

██████████, into her Credit Union of Colorado account, number ██████████ at the Credit Union of Colorado branch located at 8770 Wadsworth Blvd, Jefferson County, Colorado.

6. On or about September 6, 2017, Oriana Clifford-Johnson cashed check number ██████████ written for \$1900.00, and drawn on Chase Bank account number ██████████, owned by ██████████, at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.

7. On or about September 7, 2017, Oriana Clifford-Johnson deposited check number ██████████, written for \$2300.00 and drawn against Navy Federal Credit Union account number ██████████, owned by Carlos A. Belmont, into Credit Union of Colorado account number ██████████ at the Credit Union of Colorado branch located at 13732 E. Quincy Avenue, Arapahoe County, Colorado.

8. Between and including September 8, 2017, and September 22, 2017, all checks negotiated by Oriana Clifford-Johnson were returned unpaid to Credit Union of Colorado.

9. Between and including September 5, 2017, and September 7, 2017, Oriana Clifford-Johnson obtained a total of \$5200.00 from ██████████, TCF Bank, ANB Bank, Chase, Navy Federal Credit Union, and Credit Union of Colorado.

10. On or about September 6, 2017, at about 1:04 PM, Oriana Clifford-Johnson, Kevin Gladney, and Ernest Hill were all captured on video surveillance at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado.

11. At times relevant to this indictment, Kevin Gladney and Oriana Clifford-Jones are also captured on video surveillance present at the same time at other branches of Credit Union of Colorado throughout the Denver metropolitan area.

12. These checks were negotiated by Oriana Clifford-Johnson, but had previously been completed by Ernest Hill.

COUNT FIFTEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including September 3, 2017, and September 6, 2017 at and triable in the City and County of Denver, State of Colorado, VINCENT HOOD and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 15 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about September 5, 2017, Vincent Hood opened Academy Bank account number [REDACTED]**
- 3. On or about September 6, 2017, Vincent Hood deposited check number [REDACTED], written for \$975.00, and drawn on US Bank account number [REDACTED], purported to belong to [REDACTED] into Academy Bank account number [REDACTED], at the Academy Bank located at 5990 Dahlia Street, Adams County, Colorado.**
- 5. On or about September 8, 2017, the check deposited by Vincent Hood was returned unpaid to Academy Bank.**
- 6. This check was negotiated by Vincent Hood, but had previously been completed by Ernest Hill.**

COUNT SIXTEEN

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13>

On or about September 22, 2017, at or triable in the City and County of Denver, State of Colorado, TAJSHAWNNE TATE unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of ACADEMY BANK and TCF BANK, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive ACADEMY BANK and TCF BANK permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT SEVENTEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including September 20, 2017, and September 22, 2017 at or triable in the City and County of Denver, State of Colorado, TAJSHAWNNE TATE and ERNEST HILL with the intent to and defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 16 and 17 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 5, 2017, Tajshawnne Tate opened Academy Bank account number [REDACTED]
3. On or about September 7, 2017, Tajshawnne Tate deposited Check number [REDACTED] purporting to be drawn from US Bank account [REDACTED] supposedly belonging to David Francis, Esquire, Attorney, written in the amount of \$1829.72, into Academy Bank account number [REDACTED] at the Academy Bank branch located at 5990 Dahlia Street, Adams County, Colorado. Tajshawnne Tate deposited \$200.72 and kept \$1629.00 in cash.
4. On or about September 22, 2017, Tajshawnne Tate cashed check number [REDACTED], written for \$1628.68, and drawn against TCF Bank account number [REDACTED], owned by Davon Phillips HeadlightsRUS into her into Academy Bank account number [REDACTED] at the Academy Bank branch located at 2545 Rimrock Avenue, Mesa County, Colorado. Tajshawnne Tate deposited \$128.68 and kept \$1500.00 in cash.
5. Between and including September 26, 2017, and September 27, 2017, all checks negotiated by Tajshawnne Tate were returned unpaid to Academy Bank.

6. Between and including September 7, 2017, and September 22, 2017, Tajshawnne Tate obtained \$3129.00 from Academy Bank and TCF Bank.

7. These checks were negotiated by Tajshawnne Tate, but had previously been completed by Ernest Hill.

COUNT EIGHTEEN

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307J>

On or about September 25, 2017, at or triable in the City and County of Denver, State of Colorado, MORRAIL BELL and ERNEST HILL unlawfully, feloniously, and knowingly, used the personal identifying information, financial identifying information or financial device of [REDACTED] without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

COUNT NINETEEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about September 25, 2017 at and triable in the City and County of Denver, State of Colorado, MORRAIL BELL and ERNEST HILL with the intent to defraud CREDIT UNION OF COLORADO, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 18 and 19 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 25, 2017, Morrail Bell opened checking account number [REDACTED] at the Credit Union of Colorado branch located at 13732 East Quincy Avenue, Arapahoe County, Colorado.
3. On or about September 26, 2017, Morrail Bell deposited check number [REDACTED], written for \$2300.00 and drawn against Navy Federal Credit Union account number [REDACTED], owned by [REDACTED] into Credit Union of Colorado account number [REDACTED], at the Credit Union of Colorado branch located at 13732 E. Quincy Avenue, Arapahoe County, Colorado.
4. On or about September 26, 2017, Morrail Bell deposited check number [REDACTED], written for \$1965.32 and drawn on Bank of America Bank account number [REDACTED], owned by [REDACTED] into Credit Union of Colorado account number [REDACTED] at the Credit Union of Colorado branch located at 13732 E. Quincy Avenue, Arapahoe County, Colorado. [REDACTED] formerly lived in Las Vegas, Nevada, and confirmed she was a victim of fraud on this account. She also confirmed she did not write nor authorize any check or payment to Morrail Bell.
5. On or about September 29, 2017, all checks negotiated by Morrail Bell were returned as unpaid to Credit Union of Colorado.

6. These checks were negotiated by Morrall Bell, but had previously been completed by Ernest Hill.

COUNT TWENTY

THEFT 18-4-401(1),(2)(g) C.R.S. (F5) <08A14>

On or about September 28, 2017, at or triable in the City and County of Denver, State of Colorado, XAVIER SMITH unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of MID-CENTURY COMPANY INC. and CREDIT UNION OF COLORADO, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive MID-CENTURY COMPANY INC. and CREDIT UNION OF COLORADO permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT TWENTY-ONE

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307>

On or about September 28, 2017, at or triable in the City and County of Denver, State of Colorado, XAVIER SMITH unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information or financial device of MID-CENTURY COMPANY INC.; without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY-TWO

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about September 28, 2017 at or triable in the City and County of Denver, State of Colorado, XAVIER SMITH with the intent to defraud CREDIT UNION OF COLORADO 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 20, 21, and 22 are as follows

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about September 26, 2017, Xavier Smith opened account number [REDACTED], at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.
3. On or about September 28, 2017, Xavier Smith deposited check number [REDACTED] written for \$1977.26, and drawn against Citibank account number [REDACTED] purported to be owned by Mid-Century Company, Inc., into account number [REDACTED], at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado. Xavier deposited \$277.86 and kept \$1700.00 in cash.
4. On or about September 28, 2017, Xavier Smith deposited check number [REDACTED], written

for \$1756.08, and drawn against Citibank account number [REDACTED], purported to be owned by Mid-Century Company, Inc., into account number [REDACTED] at the Credit Union of Colorado branch located at 8770 Wadsworth Blvd, Jefferson County, Colorado. Xavier Smith deposited \$256.08 and kept \$1500.00 in cash.

5. On or about September 28, 2017, Xavier Smith deposited check number [REDACTED], written for \$1953.83, and drawn against Citibank account number [REDACTED], purported to be owned by Mid-Century Company, Inc., into account number [REDACTED], at the Credit Union of Colorado branch located at 9140 W. 6th Avenue, Jefferson County, Colorado. Xavier Smith deposited \$283.83 and kept \$1700.00 in cash.

6. On or about September 28, 2017, Xavier Smith withdrew \$500.00 from Credit Union of Colorado account number [REDACTED] from the ATM at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.

7. On October 3, 2017, all checks negotiated by Xavier Smith were returned to Credit Union of Colorado with the reason stated as "Altered/Fictitious."

8. On or about September 28, 2017, Xavier Smith, Xavier Smith obtained a total of \$5400.00 from Mid-Century Company, Inc., and Credit Union of Colorado.

9. On or about November 22, 2017, at about 11:35 AM, Ernest Hill and Xavier Smith were both captured present on video surveillance at the Credit Union of Colorado Branch located at 3907 E. 120th Avenue, Adams County, Colorado.

COUNT TWENTY-THREE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about October 7, 2017, at or triable in the City and County of Denver, State of Colorado, TRAVIS DRAPER with the intent to defraud CREDIT UNION OF COLORADO, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 23 are as follows

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about October 6, 2017, Travis Draper opened account number [REDACTED], at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.**
- 3. On or about October 10, 2017, Travis Draper deposited check number [REDACTED], written for \$1950.00 purported to be written from US Bank account [REDACTED] owned by David Francis, Esquire, into his Credit Union of Colorado account, number [REDACTED] at the Credit Union of Colorado branch located at 3907 E. 120th Avenue, Adams County, Colorado.**
- 4. On or about October 25, 2017, the check was returned unpaid to Credit Union of Colorado.**

COUNT TWENTY-FOUR

THEFT 18-4-401(1),(2)(f) C.R.S. (F6) <08A14>

Between and including January 8, 2018, and January 11, 2018, at or triable in the City and County of Denver, State of Colorado, JALIL JACKSON unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of US BANK, GO BANK, ██████████, CHASE, CREDIT UNION OF COLORADO and LEGACY INSURANCE SERVICES with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive US BANK, GO BANK, ██████████, CHASE, CREDIT UNION OF COLORADO and LEGACY INSURANCE SERVICES permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT TWENTY-FIVE

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307J>

On or about January 11, 2018, at and triable in the City and County of Denver, State of Colorado, JALIL JACKSON and ERNEST HILL unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information or financial device of LEGACY INSURANCE SERVICES, INC.; without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment; in violation of section 18-5-902(1)(a), C.R.S.

COUNT TWENTY-SIX

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including January 6, 2018 and January 8, 2018 at or triable in the City and County of Denver, State of Colorado, JALIL JACKSON and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT TWENTY-SEVEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about January 10, 2018, at or triable in the City and County of Denver, State of Colorado, JALIL JACKSON and ERNEST HILL with the intent to defraud CREDIT UNION OF COLORADO, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT TWENTY-EIGHT

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about January 11, 2018 at or triable in the City and County of Denver, State of Colorado, **JALIL JACKSON** and **ERNEST HILL** with the intent to defraud **CREDIT UNION OF COLORADO**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 24, 25, 26, 27, and 28 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 1, 2018, Jalil Jackson opened checking account number [REDACTED] at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.
3. On or about January 10, 2018, Jalil Jackson deposited check number [REDACTED], written for \$1285.00 and drawn against GO Bank account number [REDACTED], belonging to [REDACTED], at the Credit Union of Colorado branch located at 3907 E 120th Avenue, Adams County, Colorado. He deposited \$300.00 and kept \$985.00 in cash.
4. On or about January 11, 2018, Jalil Jackson deposited check number [REDACTED], written for \$1450.00, and purported to be from US Bank account [REDACTED] belonging to Legacy Insurance Services, Inc., into his Credit Union of Colorado checking account number [REDACTED] at the Credit Union of Colorado branch located at 3100 S. Sheridan Blvd, Denver County, Colorado. Jalil Jackson deposited \$320.00 and retained \$1130.00 in cash.
5. On or about January 8, 2018, Jalil Jackson opened US BANK checking account number [REDACTED] at the US Bank branch located at 2810 Quebec Street, Denver County, Colorado.
6. On or about January 8, 2018, Jalil Jackson deposited check number [REDACTED], drawn against Chase account [REDACTED] belonging to [REDACTED], and written for \$550.00, into US Bank account [REDACTED] located at a US Bank branch at 730 Colorado Blvd, Denver County, Colorado. He deposited \$50.00 and kept \$500.00 in cash.
7. On or about January 8, 2018, Jalil Jackson deposited check number [REDACTED], drawn against Chase account [REDACTED] belonging to [REDACTED], and written for \$600.00, into US Bank account [REDACTED] located at a US Bank branch at 771 Thornton Pkwy, Adams County, Colorado.
8. All checks negotiated by Jalil Jackson were returned unpaid by GO Bank and US Bank to Credit Union of Colorado, and from Chase to US Bank.

9. Legacy Insurance Services, Inc. reported their check to US Bank as having been forged and therefore the check was not honored by US Bank.

10. Jalil Jackson obtained a total of \$2615.00 in cash from [REDACTED], Credit Union of Colorado, GO Bank, and US Bank.

11. These checks were negotiated by Jalil Jackson, but had previously been completed by Ernest Hill.

COUNT TWENTY-NINE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including January 4, 2018, and January 8, 2018, at or triable in the City and County of Denver, State of Colorado, **DORIAN PHILLIPS** and **ERNEST HILL** with the intent to defraud **US BANK** 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT THIRTY

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including January 14, 2018, and January 16, 2018, at or triable in the City and County of Denver, State of Colorado, **DORIAN PHILLIPS** and **ERNEST HILL**, with the intent to defraud **CREDIT UNION OF COLORADO** 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 29 and 30 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about January 08, 2018, Phillips opened checking account number [REDACTED] with Credit Union of Colorado through an online application. She then went into the branch located at 1390 Logan Street, Denver County, Colorado on January 12, 2018, to complete the application process.
3. On or about January 16, 2018, Dorian Phillips deposited check number [REDACTED] purporting to be a check from Money Network in the sum of \$1450.00, into her Credit Union of Colorado account, at the Credit Union of Colorado branch located at 3907 E 120th Avenue, Adams County, Colorado.
4. On or about January 16, 2018, check number [REDACTED] purporting to be a check from Money Network, was not processed at the Credit Union of Colorado as it was determined to be a fraudulent check prior to payment submission.
5. On or about January 16, 2018, at about 11:37 AM, Ernest Hill and Dorian Phillips were both captured on video surveillance at the Credit Union of Colorado branch located at 3907 E 120th Avenue, Adams County, Colorado.
6. This check was negotiated by Dorian Phillips, but had previously been completed by Ernest Hill.

COUNT THIRTY-ONE

CRIMINAL IMPERSONATION, 18-5-113(1)(b)(II) C.R.S. (F6) <1011F>

On or about January 17, 2018, at or triable in the City and County of Denver, State of Colorado, ERNEST HILL unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Marcelino de la Cruz, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The facts supporting Count 31 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On January 17, 2018, Ernest Hill, purporting to be Marcelino De La Cruz, and the grandson of [REDACTED], wrote to Ms. [REDACTED] of Sierra Fiduciary Services, LLC who was the VA Fiduciary responsible for the administration and disbursement of [REDACTED]'s benefits. He claimed that he and Davon Phillips were the grandsons of [REDACTED] and would pay her utility accounts. Based on this representation, Ms. [REDACTED] confirmed that she authorized rent payments to Ms. [REDACTED] for a particular property in Denver.**

COUNT THIRTY-TWO

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including January 16, 2018, and January 22, 2018, at or triable in the City and County of Denver, State of Colorado, KAITLIN HOLT and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT THIRTY-THREE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including February 1, 2018 and February 5, 2018 at or triable in the City and County of Denver, State of Colorado, KAITLIN HOLT and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 32 and 33 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about January 22, 2018, Kaitlin Holt deposited check number [REDACTED] written for \$825.00, and against BBVA Compass Bank account, number [REDACTED], owned by [REDACTED] into her US Bank account, number [REDACTED], at the US Bank branch located at [REDACTED] Broadway, Denver County, Colorado. She deposited \$625.00 into the account and kept \$200.00 in cash.**
- 3. On or about January 24, 2018, the check was returned unpaid to US Bank by BVVA Compass Bank.**
- 4. On or about February 3, 2018, Kaitlin Holt opened account number [REDACTED] at an Academy Bank branch.**
- 5. On or about February 5, 2018, Kaitlin Holt deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED], and written for \$1350.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 601 Englewood Parkway, Arapahoe County, Colorado. She deposited \$800.00 and kept \$550.00 in cash.**
- 6. On or about February 7, 2018, the check was returned unpaid to Academy Bank by Chase Bank.**
- 7. These checks were negotiated by Kaitlin Holt, but had previously been completed by Ernest Hill.**

COUNT THIRTY-FOUR

THEFT 18-4-401(1),(2)(f) C.R.S. (F6) <08A14>

Between and including February 3, 2018, and February 5, 2018, at or triable in the City and County of Denver, State of Colorado, KIANA MASCARENAS unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of [REDACTED], US BANK, BBVA COMPASS, and ROCKY MOUNTAIN LAW ENFORCEMENT FEDERAL CREDIT UNION, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive [REDACTED], US BANK, BBVA COMPASS and ROCKY MOUNTAIN LAW ENFORCEMENT FEDERAL CREDIT UNION permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT THIRTY-FIVE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including January 27, 2018, and February 3, 2018, at or triable in the City and County of Denver, State of Colorado, KIANA MASCARENAS and ERNEST HILL with the intent to defraud ROCKY MOUNTAIN LAW ENFORCEMENT FEDERAL CREDIT UNION, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT THIRTY-SIX

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including February 1, 2018, and February 5, 2018, at or triable in the City and County of Denver, State of Colorado, KIANA MASCARENAS and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 34, 35, and 36, are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. Kiana Mascarenas had an existing account at the Rocky Mountain Law Enforcement Federal Credit Union, Account Number [REDACTED], and she also opened a new account, number [REDACTED], on or about December 4, 2017.
3. On or about February 3, 2018, Kiana Mascarenas deposited check number [REDACTED], written for \$1750.00, and drawn on BBVA Compass account number [REDACTED], owned by [REDACTED] into her existing account number [REDACTED] at the Rocky Mountain Law Enforcement Federal Credit Union branch located at 992 Potomac Circle, Arapahoe County, Colorado.

4. On or about February 3, 2018, [REDACTED] withdrew \$200 from her Rocky Mountain Law Enforcement Federal Credit Union account number [REDACTED], at 700 West 39th Avenue, Denver County, Colorado.
5. On or about February 3, 2018, Kiana Mascarenas withdrew \$300.00 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], at the US Bank branch located at 2456 S Parker Rd, Arapahoe County, Colorado.
6. On or about February 3, 2018, Kiana Mascarenas deposited check number [REDACTED], written for \$775.00, and drawn on drawn on BBVA Compass account number [REDACTED], owned by [REDACTED], into her existing account number [REDACTED], at 700 West 39th Avenue, Denver County, Colorado.
7. On or about February 4, 2018, Kiana Mascarenas withdrew \$200 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], at 700 West 39th Avenue, Denver County, Colorado.
8. On or about February 5, 2018, Kiana Mascarenas withdrew \$20 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED] at, 4600 Leetsdale Dr., Arapahoe County, Colorado.
9. On or about February 5, 2018, Kiana Mascarenas withdrew \$1000.00 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], Rocky Mountain Law Enforcement Federal Credit Union branch located at 992 Potomac Circle, Arapahoe County, Colorado.
10. On or about February 5, 2018, Kiana Mascarenas deposited check number [REDACTED], written for \$2300.00 and purported to be from David Francis, Esquire, from US Bank account [REDACTED], into her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], Rocky Mountain Law Enforcement Federal Credit Union branch located at 992 Potomac Circle, Arapahoe County, Colorado.
11. On or about February 5, 2018, Kiana Mascarenas withdrew \$1300.00 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], Rocky Mountain Law Enforcement Federal Credit Union branch located at 992 Potomac Circle, Arapahoe County, Colorado.
12. On or about February 5, 2018, Kiana Mascarenas deposited check number [REDACTED], written for \$3800.00, and drawn on BBVA Compass account number [REDACTED], owned by [REDACTED] into her existing Rocky Mountain Law Enforcement Federal Credit Union account number [REDACTED], at 700 West 39th Avenue, Denver County, Colorado.

13. On or about February 5, 2018, Kiana Mascarenas withdrew \$400.00 from her Rocky Mountain Law Enforcement Federal Credit Union account, number [REDACTED], at the branch at 1301 W 38 Avenue, County of Denver, Colorado.
14. Between February 7, 2018, and February 8, 2018, all checks negotiated by Kiana Mascarenas were returned to Rocky Mountain Law Enforcement Federal Credit Union by BBVA Compass, and US Bank.
15. On or about February 3, 2018, Kiana Mascarenas opened account number [REDACTED] at a US Bank branch.
16. On or about February 4, 2018, Kiana Mascarenas deposited a check number [REDACTED], written for \$950.00, and drawn on Chase account number [REDACTED], owned by [REDACTED] at the US Bank branch located at 19711 E Smokey Hill Rd, Arapahoe County, Colorado. She deposited \$750.00 and kept \$200.00 in cash.
17. On or about February 7, 2018, the check was returned unpaid by Chase to US Bank.
18. Between February 3, 2018, and February 5, 2018, Kiana Mascarenas obtained \$4395.00 from [REDACTED], BBVA Compass Bank, Rocky Mountain Federal Credit Union, US Bank and Chase Bank.

COUNT THIRTY-SEVEN

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including February 17, 2018, and February 21, 2018, at or triable in the City and County of Denver, State of Colorado, ALAWN SMITH AND ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 37 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about January 19, 2018, Alawn Smith opened account number [REDACTED] at a US Bank branch at 1415 Carr Street, Jefferson County, Colorado.**
- 3. On or about February 21, 2018, Alawn Smith deposited check number [REDACTED], written for \$1350.00, and drawn on Chase account number [REDACTED], owned by [REDACTED] at the US Bank branch located at 4600 Leetsdale Drive, Arapahoe County, Colorado. He deposited \$1150.00 and kept \$200.00 in cash.**
- 4. On or about February 22, 2018, the check was returned unpaid by Chase to US Bank.**
- 5. This check was negotiated by Alawn Smith, but had previously been completed by Ernest Hill.**

COUNT THIRTY-EIGHT

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including February 19, 2018 and February 22, 2018 at or triable in the City and County of Denver, State of Colorado, AALYAH AUSTIN and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 38 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about February 22, 2018, Aalyah Austin opened account number [REDACTED] at a US Bank branch at 2701 Walton Street, Denver County, Colorado.**
- 3. On or about February 22, 2018, Aalyah Austin deposited check number [REDACTED] written for \$1325.00, and drawn on Chase account number [REDACTED] owned by [REDACTED] at the US Bank branch located in King Sooper, 4600 Lectsdale Drive, Arapahoe County, Colorado. She deposited \$1000.00 and kept \$325.00 in cash.**
- 4. On or about February 22, 2018, Aalyah Austin deposited check number [REDACTED] written for \$695.00, and drawn on Chase account number [REDACTED] owned by [REDACTED] at the US Bank branch located in King Sooper, 4930 Colorado Blvd, Denver County, Colorado. She deposited \$495.00 and kept \$200.00 in cash.**
- 5. On or about February 26, 2018, the checks were returned unpaid by Chase to US Bank.**
- 6. These checks were negotiated by Aalyah Austin, but had previously been completed by Ernest Hill.**

COUNT THIRTY-NINE

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13>

Between and including March 12, 2018, and March 14, 2018, at or triable in the City and County of Denver, State of Colorado, LADEZHANE TYLER unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of ACADEMY BANK, BBVA COMPASS, CHASE, and [REDACTED], with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive ACADEMY BANK, BBVA COMPASS, CHASE, and [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT FORTY

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including March 8, 2018, and March 14, 2018, at or triable in the City and County of Denver, State of Colorado, LADEZHANE TYLER and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S

The facts supporting Count 39 and 40 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about March 9, 2018, Ladezhane Tyler opened account number [REDACTED] at an Academy Bank branch located at 740 17th Street, Denver County, Colorado.
3. On or about March 12, 2018, Ladezhane Tyler deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED], and written for \$900.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 601 Englewood Parkway, Arapahoe County, Colorado. She deposited \$500.00 and kept \$400.00.
4. On or about March 12, 2018, Ladezhane Tyler deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$1750.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 601 Englewood Parkway, Arapahoe County, Colorado. She deposited \$900.00 and kept \$850.00.
5. On or about March 12, 2018, Ladezhane Tyler deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$950.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 601 Englewood Parkway, Arapahoe County, Colorado. She deposited \$500.00 and kept \$450.00.
6. On or about March 12, 2018, Ladezhane Tyler withdrew \$80.00 from her Academy Bank account, number [REDACTED], at 9901 Grant Street, Adams County, Colorado.

7. On or about March 12, 2018, Ladezhane Tyler withdrew \$380.00 from her Academy Bank account, number [REDACTED], at 7800 Smith Rd, Denver County, Colorado.
8. On or about March 12, 2018, Ladezhane Tyler withdrew \$400.00 from her Academy Bank account, number [REDACTED], at 9901 Grant Street, Adams County, Colorado.
9. On or about March 12, 2018, Ladezhane Tyler withdrew \$500.00 from her Academy Bank account, number [REDACTED] at 7800 Smith Rd, Denver County, Colorado.
10. On or about February 7, 2018, the check was returned unpaid to Academy Bank by Chase Bank.
11. On and including March 12, 2018 through March 14, 2018, Ladezhane Tyler obtained \$3060.00 from [REDACTED], Chase Bank and Academy Bank.
12. These checks were negotiated by Ladezhane Tyler, but had previously been completed by Ernest Hill.

COUNT FORTY-ONE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about March 13, 2018, at or triable in the City and County of Denver, State of Colorado, GREGORY ASHLEY and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 41 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about March 13, 2018, Gregory Ashley opened US Bank account [REDACTED] at a US Bank branch location.**
- 3. On or about March 13, 2018, Gregory Ashley deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$950.00, into US Bank account [REDACTED] at 4930 Colorado Boulevard, Denver County, Colorado. Gregory Ashley deposited \$450.00 and kept \$550.00 in cash.**
- 4. The check was negotiated by Gregory Ashley, but had previously been completed by Ernest Hill.**
- 5. On or about April 5, 2018, US Bank closed Gregory Ashley's account.**

COUNT FORTY-TWO

THEFT, 18-4-401(1),(2)(f) C.R.S. (F6) <08A13>

Between and including March 12, 2018, and March 15, 2018, at or triable in the City and County of Denver, State of Colorado, **KANESHA ROLAND** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over thing of value, namely: **US CURRENCY** of **BBVA COMPASS**, [REDACTED], **CREDIT UNION OF COLORADO**, **LEGACY INSURANCE SERVICES INC**, and **US BANK** with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive **BBVA COMPASS**, [REDACTED], **CREDIT UNION OF COLORADO**, **LEGACY INSURANCE SERVICES INC**, and **US BANK** permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(f), C.R.S.

COUNT FORTY-THREE

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307J>

On or about March 15, 2018, at or triable in the City and County of Denver, State of Colorado, **KANESHA ROLAND** and **ERNEST HILL** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information or financial device of **LEGACY INSURANCE SERVICES INC.**; without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

COUNT FORTY-FOUR

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about March 14, 2018, at or triable in the City and County of Denver, State of Colorado, **KANESHA ROLAND** and **ERNEST HILL**, with the intent to defraud **CREDIT UNION OF COLORADO**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT FORTY-FIVE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about March 15, 2018, at or triable in the City and County of Denver, State of Colorado, **KANESHA ROLAND** and **ERNEST HILL** with the intent to defraud **US BANK**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 42, 43, 44, and 45 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.

2. On or about March 14, 2018, Kanesha Roland opened checking account number [REDACTED] at a US Bank branch.
3. On or about March 13, 2017, Kanesha Roland deposited check number [REDACTED], written for the amount of \$1150.00 and drawn against BBVA Compass Bank account, number [REDACTED], owned by [REDACTED], into her US Bank account, number [REDACTED] at the US Bank branch located at 2810 Quebec Street, Denver County, Colorado. She deposited \$950.00 into the account and kept \$200.00 in cash.
4. On or about March 14, 2017, Kanesha Roland deposited check number [REDACTED], written for the amount of \$990.00 and drawn against BBVA Compass Bank account, number [REDACTED] owned by [REDACTED] into her US Bank account, number [REDACTED] at the US Bank branch located at 4600 Lectsdale Drive, Arapahoe County, Colorado.
5. On or about March 14, 2017, Kanesha Roland opened Credit Union of Colorado account number [REDACTED] at the Credit Union of Colorado branch located at 1390 Logan Street, Denver County, Colorado.
6. On or about March 15, 2017, Kanesha Roland deposited Legacy Insurance Services, Inc. check number [REDACTED], written for \$1829.75, against US Bank account number [REDACTED], at the Credit Union of Colorado branch located at 3100 S. Sheridan Blvd, Denver County, Colorado. She deposited \$529.75 and retained \$1300.00 in cash.
7. On or about March 15, 2017, Kanesha Roland deposited Legacy Insurance Services, Inc. check number [REDACTED] written for \$1959.30, against US Bank account number [REDACTED], at the Credit Union of Colorado branch located at 1800 Jackson Street, Jefferson County, Colorado. She deposited \$459.30 and retained \$1500.00 in cash.
8. All checks negotiated by Kanesha Roland were returned unpaid to Credit Union of Colorado and to US Bank.
9. Legacy Insurance Services Inc. reported their checks to US Bank as having been forged and therefore the check was not honored by US Bank.
10. Between and including March 13, 2018, and March 15, 2018, Kanesha Roland obtained \$3000.00 from BBVA COMPASS, [REDACTED], Credit Union Of Colorado Legacy Insurance Services, Inc., and Us Bank.
11. All check negotiated by Kanesha Roland were returned unpaid to US Bank and Credit Union of Colorado.
12. These checks were negotiated by Kanesha Roland, but had previously been completed by Ernest Hill.

COUNT FORTY-SIX

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

Between and including March 19, 2018, and March 21, 2018, at or triable in the City and County of Denver, State of Colorado, ONJANIQUE WILLIAMS and ERNEST HILL with the intent to defraud CREDIT UNION OF COLORADO 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 46 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about March 21, 2017, Onjanique Williams opened Credit Union of Colorado check account number [REDACTED] at the Credit Union of Colorado branch located at 3100 S. Sheridan Boulevard, Denver County, Colorado.**
- 3. On or about March 21, 2017, Onjanique Williams, deposited check number [REDACTED] written for \$1960.00, and against BBVA Compass Bank account, number [REDACTED], owned by [REDACTED] into her Credit Union of Colorado account, number [REDACTED] at the Credit Union of Colorado branch located at 3100 S Sheridan Boulevard, Denver County, Colorado.**
- 4. On or about March 26, 2017, the check was returned unpaid from BBVA Compass to Credit Union of Colorado.**
- 5. The check was negotiated by Onjanique Williams, but had previously been completed by Ernest Hill.**

COUNT FORTY-SEVEN

CRIMINAL IMPERSONATION, 18-5-113(1)(b)(II) C.R.S. (F6) <1011F>

On or about March 16, 2018, at or triable in the City and County of Denver, State of Colorado, **DAVON PHILLIPS** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: **GRANDSON OF [REDACTED]**, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The facts supporting Count 47 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.

2. On or about March 16, 2018, Davon Phillips, Ernest Hill and [REDACTED] went to a branch of Vectra Bank, located at 3600 Quebec Street, Denver County, Colorado. They met with banker [REDACTED]. Davon Phillips represented himself to Ms. [REDACTED] as [REDACTED]'s grandson, and in that capacity, attempted to become a joint account holder with [REDACTED] on a Vectra Bank Senior Advantage checking account, number [REDACTED], which was opened on that day. He was not added, but Ms. [REDACTED] also executed a Power of Attorney document naming him as agent which gave him complete control over [REDACTED]'s finances.

COUNT FORTY-EIGHT

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about March 19, 2018, at or triable in the City and County of Denver, State of Colorado, DEIANA LOLLIS and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 48 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about March 16, 2018, Deiana Lollis opened Academy Bank account number [REDACTED] at an Academy Bank branch.**
- 3. On or about March 19, 2018, Deiana Lollis deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$1450.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 60 Bromley Lane, Adams County, Colorado. She deposited \$550.00 and kept \$900.00 in cash.**
- 4. On or about March 20, 2018, Deiana Lollis deposited check number [REDACTED], written for \$1985.26, and drawn against TCF Bank account number [REDACTED] owned by Davon Phillips HeadlightsRUS, into her Academy Bank Account, number [REDACTED] located at 60 Bromley Lane, Adams County, Colorado. Deiana Lollis deposited \$1085.26 into the account and kept \$900.00 in cash.**
- 5. On or about March 21, 2018, all checks negotiated by Deiana Lollis were returned unpaid to Academy Bank, by Chase, and TCF Bank.**
- 6. The checks were negotiated by Deiana Lollis, but had previously been completed by Ernest Hill.**
- 7. On or about March 28, 2018, Academy Bank closed Deiana Lollis' account.**

COUNT FORTY-NINE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about April 19, 2018, at or triable in the City and County of Denver, State of Colorado, ELIZABETH BROUGHTON and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 49 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about April 17, 2018, Elizabeth Broughton opened US Bank account [REDACTED] at a US Bank branch location.**
- 3. On or about April 19, 2018, Elizabeth Broughton deposited check number [REDACTED], drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$1050.00, into US Bank account number [REDACTED] at an US Bank branch located at 2456 S Parker Rd, Denver, Arapahoe County, Colorado. She deposited \$850.00 and kept \$200.00 in cash.**
- 4. On or about April 19, 2018, Elizabeth Broughton deposited check number [REDACTED] drawn against USAA Bank account number [REDACTED] owned by Kanasha Roland, and written for \$1850.00, at the US Bank branch located at 4600 Leetsdale Drive, Arapahoe County, Colorado.**
- 5. On or about April 23, 2018, the checks deposited by Elizabeth Broughton were returned to US Bank as unpaid by Chase Bank and USAA Bank.**
- 6. On or about May 10, 2018, US Bank closed Elizabeth Broughton's account.**
- 7. The checks were negotiated by Elizabeth Broughton, but had previously been completed by Ernest Hill.**

COUNT FIFTY

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about May 23, 2018, at or triable in the City and County of Denver, State of Colorado, MYKECIA HAQQ-ANDERSON and ERNEST HILL with the intent to defraud ACADEMY BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 50 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about March 2, 2018, Mykecia Haqq-Anderson opened Academy Bank account number [REDACTED] at an Academy Bank branch.**
- 3. On or about May 23, 2019, Mykecia Haqq-Anderson deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$750.00, into Academy Bank account number [REDACTED] at an Academy Bank branch located at 7455 West Colfax Avenue, Jefferson County, Colorado. She deposited \$250.00 and kept \$500.00 in cash.**
- 4. The checks were negotiated by Mykecia Haqq-Anderson, but had previously been completed by Ernest Hill.**
- 5. On or about May 29, 2018, the check was returned unpaid by Chase Bank to Academy Bank.**
- 6. On or about June 6, 2018, US Academy Bank closed Mykecia Haqq-Anderson's account.**

COUNT FIFTY-ONE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about May 23, 2018, at or triable in the City and County of Denver, State of Colorado, ADONTAE THOMPSON and ERNEST HILL with the intent to defraud US BANK, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Count 51 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about May 22, 2018, Adontae Thompson, opened US Bank account number [REDACTED] at a US Bank branch.**
- 3. On or about May 23, 2018, Adontae Thompson, deposited check number [REDACTED] drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$900.00, into US Bank account [REDACTED], at 10685 Green Valley Ranch Drive, Denver County, Colorado. He deposited \$600.00 and kept \$300.00 in cash.**
- 4. On or about May 23, 2018, Adontae Thompson, deposited check number [REDACTED], drawn against Chase Bank account [REDACTED] belonging to [REDACTED] and written for \$450.00, into US Bank account [REDACTED], at a US Bank branch located at 2810 E 29 Avenue, Denver County, Colorado. He deposited \$150.00 and kept \$300.00 in cash.**
- 5. On or about May 24, 2018, all checks negotiated by Adontae Thompson were returned unpaid by Chase Bank to US Bank.**
- 6. The checks were negotiated by Adontae Thompson, but had previously been completed by Ernest Hill.**

COUNT FIFTY-TWO

IDENTITY THEFT, 18-5-902(1)(a) C.R.S. (F4) <1307J>

On or about June 26, 2018, at or triable in the City and County of Denver, State of Colorado, **JAYLON JONES** and **ERNEST HILL** unlawfully, feloniously, and knowingly used the personal identifying information, financial identifying information, or financial device of [REDACTED] and **COMPASS BANK** without permission or lawful authority with the intent to obtain cash, credit, property, services, or any other thing of value or to make a financial payment, in violation of section 18-5-902(1)(a), C.R.S.

COUNT FIFTY-THREE

FORGERY, 18-5-102(1)(c) C.R.S. (F5) <1001C>

On or about June 26, 2018, at or triable in the City and County of Denver, State of Colorado, **JAYLON JONES** and **ERNEST HILL** with the intent to defraud **BBVA COMPASS BANK**, 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 check; in violation of section 18-5-102(1)(c), C.R.S.

The facts supporting Counts 52 and 53 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. In June 2019, [REDACTED] had Compass Bank credit card courtesy checks stolen from the United States Postal Service mail delivery system. On or about June 26, 2019, enterprise member Jaylon Jones, in association with the enterprise, deposited one forged check drawn on the Compass Bank Credit card account, into his own account at the Arapahoe County Credit Union. The check was made payable to Jaylon Jones. The check was completed in handwriting consistent with that of Ernest Hill, and was deposited at the Arapahoe Credit Union branch located at 3999 E. Arapahoe Rd, Arapahoe County, Colorado.
3. On or about June 26, 2019, Jaylon Jones opened account number [REDACTED] at an Arapahoe Credit Union branch location.
4. On or about June 26, 2019, Jaylon Jones deposited check number [REDACTED] drawn from BBVA Compass Bank account [REDACTED], in the name of [REDACTED], in the amount of \$4500.00 into Arapahoe Credit Union branch location 3999 E Arapahoe Rd, Arapahoe County, Colorado. He deposited \$4310.00 and withdrew \$190.00.
5. On or about July 1, 2019, the check was returned to Arapahoe Credit Union unpaid by BBVA Compass Bank, with a notation that it was altered or fictitious.

6. The check was negotiated by Jaylon Jones, but had previously been completed by Ernest Hill.

7. On or about August 27, 2019, Arapahoe Credit Union closed Jaylon Jones' account.

COUNT FIFTY-FOUR

**THEFT - \$500 OR MORE - AT-RISK PERSON, 18-6.5-103(5);18-4-401(1) C.R.S. (F3)
<18548>**

On or about August 14, 2019, at or triable in the City and County of Denver, State of Colorado, DAVON PHILLIPS unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of [REDACTED], with the value of five hundred dollars or more, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

Further, the victim was an at-risk person and the Defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

The facts supporting Count 54 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about August, 14, 2019, at the Moneytree located at 10305 East Colfax Avenue, in Arapahoe County, Colorado, Davon Phillips cashed check number [REDACTED], written in the amount of \$500.00, and drawn against UMB Account Number [REDACTED], made payable to [REDACTED]. This was a payment for the benefit of [REDACTED] made by Fuller's Fiduciary Services LLC., in connection with [REDACTED]'s VA Benefits. At this time, [REDACTED] had been admitted to a facility for full time respite care. None of the proceeds were remitted to the facility or to [REDACTED] for her care and support by Davon Phillips. Davon Phillips and Ernest Hill had declined to the facility to have [REDACTED] to return home on August 9.**

COUNT FIFTY-FIVE

**THEFT - \$500 OR MORE - AT-RISK PERSON, 18-6.5-103(5);18-4-401(1) C.R.S. (F3)
<18548>**

On or about August 21, 2019, at or triable in the City and County of Denver, State of Colorado, ERNEST HILL unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of [REDACTED], with the value of five hundred dollars or more, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

Further, the victim was an at-risk person and Defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

The facts supporting Count 55 are as follows:

1. The facts supporting all other counts in this Indictment are incorporated herein by reference.
2. On or about August 21, 2019, Ernest Hill withdrew \$600.00 from an ATM machine located at 2222 S Buckley Road, in Arapahoe County, Colorado. This sum was withdrawn from a Comerica Account in the sole name of [REDACTED] Account number [REDACTED]. At this time, [REDACTED] had been admitted to a facility for full time respite care. None of the proceeds withdrawn were remitted to the facility or to [REDACTED] for her care and support by Ernest Hill. The only source of funding for this account is Social Security Benefits paid to [REDACTED]. On August 11, Ernest Hill had told the facility that he had "washed his hands" of Ms. [REDACTED].

COUNT FIFTY-SIX

THEFT – UNDER \$500 - AT-RISK PERSON, 18-6.5-103(5);18-4-401(1) C.R.S. (F5) <18547>

Between and including November 27, 2018, and March 06, 2019, at or triable in the City and County of Denver, State of Colorado, DAVON PHILLIPS unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: US CURRENCY of [REDACTED] with the value of less than five hundred dollars, and intended to deprive [REDACTED] permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

Further, the victim was an at-risk person and Defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

The facts supporting Count 56 are as follows:

- 1. The facts supporting all other counts in this Indictment are incorporated herein by reference.**
- 2. On or about March 16, 2018, Davon Phillips, Ernest Hill and [REDACTED] went to a branch of Vectra Bank at 3600 Quebec Street, in Denver County. There, they met with banker [REDACTED]**
- 3. Ms. [REDACTED] notarized a Durable Power of Attorney document appointing Davon Phillips as Agent for [REDACTED] thus giving him full control of her finances, and appointing him as her fiduciary to manage these for her benefit. During the period that Davon Phillips was her fiduciary, large amounts of cash were regularly withdrawn from her account. Davon Phillips had no income reported in the state of Colorado between these dates.**
- 4. Also, certain charges were incurred between November 27, 2018, and March 6, 2019, on her Comerica account ending in [REDACTED] for purchases from Safecart.com Infotrace, Playstation Network, Charge For Stubs, and Landlordstation.com. [REDACTED] was in declining health with poor eyesight. These charges were clearly not for her benefit or care.**