

County Court, City and County of Denver, Colorado Lindsey-Flanigan Courthouse, Room 160 520 W. Colfax Ave. Denver, CO 80204	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Plaintiff: The People of the State of Colorado Defendant: Dean Anthony Morgan 06/08/1991	
	Case Number: 2024-216383 Date of Offense: 04/17/24- 04/22/24 Location of Offense: 853 Saint Paul St
SUPPORTING AFFIDAVIT FOR ARREST WARRANT	

I, David A Dawson of lawful age do swear upon my oath to the facts set forth below and on 8 continuation page(s):

Your affiant, David A Dawson, an Investigator for the Denver District Attorney’s Office, Economic Crime Unit was assigned to investigate allegations of VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, in violation of 18-17-104(3); THEFT - AT-RISK VICTIM, in violation of 18-6.5-103(5);18-4-401(1); CRIMINAL EXPLOITATION - AT-RISK PERSON, in violation of 18-6.5-103(7.5)(a),(b); by **Dean Anthony Morgan** against [REDACTED], in DA Case Number **2024-216383**.

This investigation was initiated on April 24, 2024, when Sergeant Timothy Blair, of the Denver Police Department, referred a mandatory report to Denver DA’s Office relating to two at-risk victims of a roof repair company. On April 24, 2024, I received an email from Detective Dalton Montgomery of the Denver Police Department’s Major Crimes Division requesting a call in reference to the at-risk adult victims.

[REDACTED] Officers had responded to a call from the victim, [REDACTED], an At-Risk Adult at his residence [REDACTED], a location within the City and County of Denver and the State of Colorado. [REDACTED] had had contact with a group of individuals claiming to be representing a roofing company, and at their request he had provided them with three separate checks payable to individuals for \$6000, \$6000 and \$17,400. He now believed that he was the victim of a roofing scam; two checks had been cashed and the last one denied.

On April 26, 2024, I met with [REDACTED] at his residence. [REDACTED] was asked how he came into contact with individuals claiming to be Mary Jim’s Roofing & Masonry. [REDACTED] said that they

had knocked on his door on Thursday and that is when he first had contact with them. [REDACTED] was asked if when he said Thursday if he was referring to Wednesday April 18, 2024 and [REDACTED] said yes.

[REDACTED] was asked if the roofing company had given him a copy of an advertising flyer for their company Mary Jim's Roofing & Masonry and he said yes.

[REDACTED] said that two of the individuals gave their names as "Tom" and "David". [REDACTED] was asked what Tom or David said when they first came to his house on Thursday and [REDACTED] said Tom said that they were working in the area and had noticed damage to his roof. [REDACTED] said that they went up onto his roof and then told him that the wood was wet and deteriorated and had insects and that there were squirrels and raccoons were in the roof and he needed to repair the roof and get new shingles.

[REDACTED] was asked how many were at his house on Thursday and on Friday he said four or five at least at different times. [REDACTED] was asked if any of the four or five had introduced themselves to him and [REDACTED] said only the two who said they were Tom and David.

[REDACTED] was asked if he had gotten a contract from Mary Jim's showing what work was to be completed and how much it was going to cost and [REDACTED] said yes. I asked [REDACTED] if he still had the contract had he provided me with two original contracts from Mary Jims Roofing & Masonry and an advertising flyer. The contacts listed the business address as the Upper Colfax Business Center located at 1245 East Colfax Avenue, Denver, Colorado. The telephone number listed on the contract was 720.241.9413. [REDACTED] said that was a fictitious address.

The first contract, a one-page contract was dated April 17, 2024, and was in the amount of \$29,000.00. I noticed that none of the printed boxes describing what work was to be completed were checked. New Shingle Replacement and New ISO sheet, sister rafter. The deposit was listed as \$17,400.00. "Tom" signed the contract on April 18, 2024 and [REDACTED] signed the contract on April 19, 2024.

[REDACTED] was asked if Tom and Dave had been at his house on April 17th as the contract was dated April 17th and [REDACTED] said no they were only at his house on Thursday and Friday (April 18th and 19th).

The second contract, also a one-page contract was dated April 19, 2024, and was in the amount of \$20,000.00 and the word Estimate was printed. On this contract none of the printed boxes describing what work was to be completed were checked. [REDACTED] said that he had written the information on the contract "Infestation – removal replace insulation" and on the line below this he had written "Insulation Removal Rebuild Two chimneys."



██████████ was asked if any work had done any work on his house and he said yes, they had taken out insulation on both Thursday and Friday and carried off 15 big black plastic bags and put them in their truck. ██████████ was asked what kind of truck they were driving and he said it was a white truck that didn't have a license plate but had a bunch of ladders. ██████████ said that they had parked the truck on the east side of the street and north of his house down by the corner of

██████████ ██████████ said that April 18th, at Tom's direction he wrote two checks for \$6,000.00 each for the work and supplies. ██████████ said he was told to write one check to Dean Morgan and one to John McNamara. ██████████ was asked if he remembered the check numbers and ██████████ said yes and then checked his checkbook and provided the following information on the two checks. Check number 8287 was in the amount of \$6,000.00 and was made payable to Dean Anthony Morgan

Check number 8279, was in the amount of \$6,000.00 and was made payable to John McNamara ██████████ said that he gave both checks to Tom. I asked if he knew Tom's last name and he said no. ██████████ was asked if all of the five Irish guys were present when he gave Tom the checks and ██████████ said he didn't think so David and maybe one other one was there.

██████████ said that he remembers that the bank called him the day he gave the two checks to Tom because he didn't realize when he wrote the checks that he had dated them April 19th and the bank called because it was the 18th. ██████████ said that he told the bank that he had written the checks and that they could cash them. ██████████ was asked if Tom and the other Irish guys were at his home on Thursday morning or afternoon and he said that it was in the morning.

██████████ was asked if there was any work done on Friday and he said yes, and that Tom had told him that there was some damage done to the roof and they had put a tarp on the roof and that it was still there. ██████████ said that they had pulled out more insulation and put it in 15 big black bags and hauled it off.

██████████ said on April 19, Tom came back and asked him for three checks and directed him to make one of the checks payable to Dean Anthony Morgan for \$17,400.00 one to John McNamara for \$8,700.00 and the third check payable to Cash in the amount of \$8,700.00.

██████████ was asked if these checks were written Friday morning or Friday afternoon and he said

he thought it was Friday morning. [REDACTED] was asked if all five of the guys were there and he said no.

[REDACTED] said that his bank [REDACTED] had called him on the 19th and told him that they didn't have that amount of cash and wouldn't cash the three checks.

[REDACTED] said that Tom came back on Friday and gave him back all three checks that he had given to Tom earlier and wanted him to write a check for \$17,400.00. [REDACTED] said he told Tom that he wanted one of the principals from the company to come and get the check and Tom came back with Morgan to pick up the check.

[REDACTED] said that he told Morgan he would not give him the check until he saw his passport.

[REDACTED] said that Morgan did show produce his passport and prior to giving Morgan the check he took a picture of Morgan's passport. [REDACTED] said that he still had the picture of Morgan's passport on his cellphone and I was able to take a picture of Morgans passport.

Morgan then produced his passport from Ireland and [REDACTED] took a photograph of Moran's

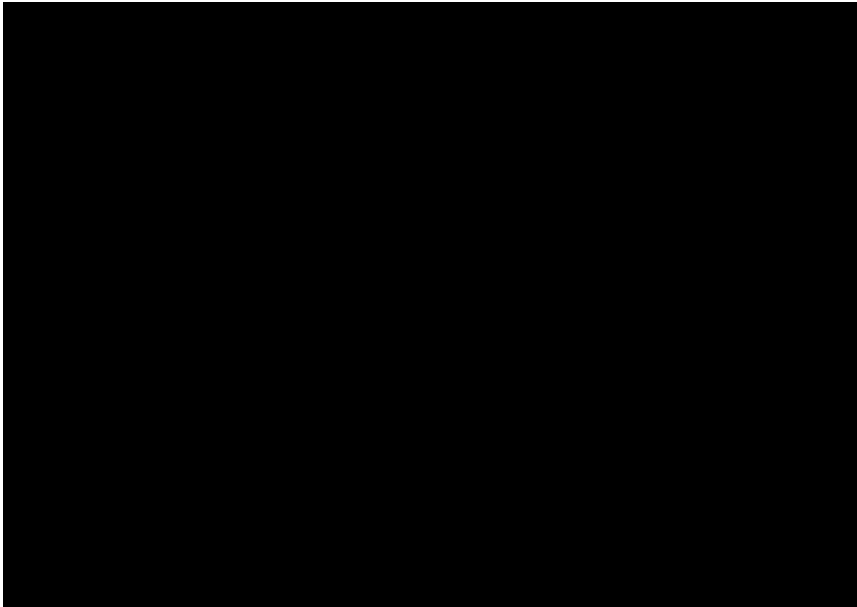
[REDACTED]



[REDACTED] said that when Morgan came and picked up the check for \$17,400.00 he remembers Morgan told him that he (Morgan) had an account at Wells Fargo Bank.

On April 29, 2024 I met with [REDACTED]

[REDACTED] in Cherry Creek a location within the City and County of Denver and the State of Colorado. [REDACTED] was the account holder for [REDACTED] checking account number ending in [REDACTED] and authorized [REDACTED] to release information on his account pertinent to check numbers 8278 and 8279. Romer confirmed that both checks had been negotiated at the [REDACTED] located at [REDACTED] subsequently provided your affiant with security pictures of John McNamara and Dean Anthony Morgan when they negotiated these two checks on April 18, 2024.



1:11:50 PM
4/18/2024



1:12:02 PM
4/18/2024

As a direct result of Dean Anthony Morgan and John McNamara negotiating the above checks, [REDACTED] sustained a loss of \$12,000.

On April 29, 2024, I queried the State of Colorado Secretary of State's on-line web site for a business called Mary Jim's Roofing and Masonry. There was no registration for a company called Mary Jim's Roofing and Masonry LLC, or Mary Mim's Roofing and Masonry Inc. or Mary Jim's Roofing & Masonry LTD.

On April 29, 2024, I queried the City and County of Denver, Contractor Licensing on-line site for a contractor license in the name of Mary Jim's Roofing and Masonry LLC, or Mary Jim's Roofing and Masonry Inc. or Mary Jim's Roofing & Masonry LTD. There was no record of a City and County of Denver contractor license for any of these business names.



On May 2, 2024 I called [REDACTED] who resides at [REDACTED] a location within the City and County of Denver and the State of Colorado. [REDACTED] is also an at-risk adult, DOB 12/22/1943, and she had also had an issue with roofers at her property.

[REDACTED] was asked how these men first contacted her and she said that she and her partner [REDACTED] were walking down the street and they were kind of behind them.

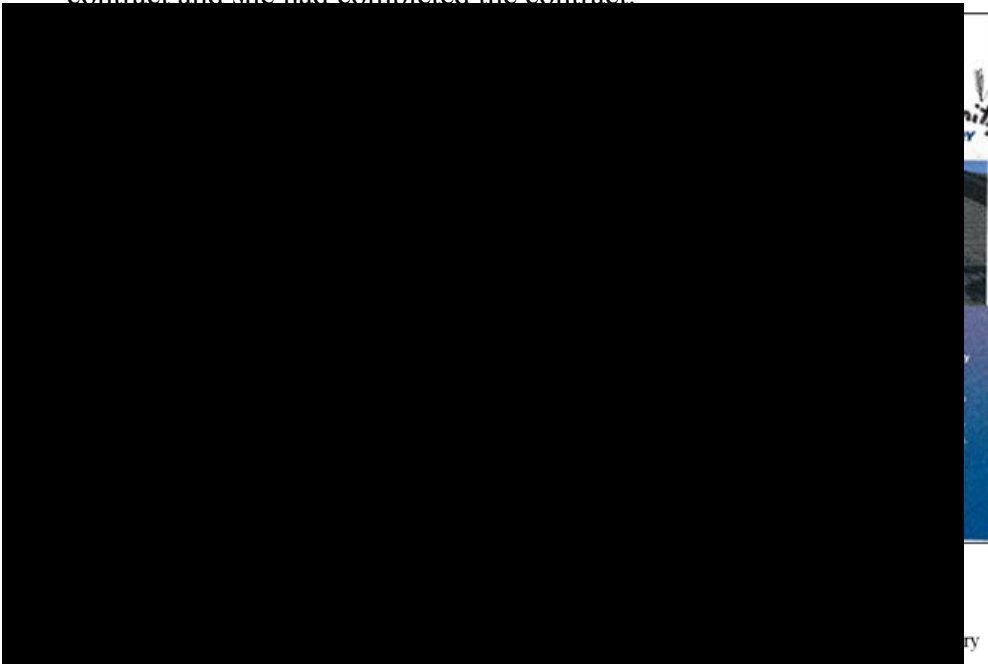
[REDACTED] said she was contacted by a group of 5 men who said they were working on a neighbor's house behind hers and could see her roof and that it needed immediate repair. [REDACTED] said all the

men had accents which sounded Scottish to her.

█ said that one of them said that they had been working on one of her neighbor's roofs and they had seen raccoons and squirrels going in and out of her roof and that there were some bent shingles on her roof and there were two openings in her roof. Beale said that they assured her that they could fix everything. █ said that they could clean out all the droppings and put what they called an ice and water barrier on it and fix it for her, and that they could do it immediately.

█ was asked if any of the individuals had identified themselves and she said one said that his name was Robert but didn't give her his last name and told her they were with Mary Jims Roofing & Masonry and had handed her a flyer from the company.

█ said she believed what they told her and on April 17, 2024, they came to her house and she completed a contract which was provided to her. █ said she was told what to write on the contract and she had completed the contract.



█ said that she had written four checks and Robert told her who to make the checks payable to.

Check # 4180 dated April 17, 2024, for \$10,000 John McNamara

Check # 4181 dated April 18, 2024, for \$17,000 John McNamara

Check # 4182 dated April 18, 2024, for \$16,400 to Dean Anthony Morgan

Check # 4183 dated April 18, 2024, for \$16,400 to John McNamara

█ said that she had placed a stop payment on all four checks so she had not lost any money.

█ said she received a call on April 19, 2024, from ANB Bank of Cherry Creek advising her that they refused to cash all four checks and later changed her account information. █ was also told that attempts to cash the checks were made at several other financial institutions.

I asked █ if any work had been completed at her property. She told me that they had removed the shingles from her roof on April 17 leaving the roof exposed to the elements. She

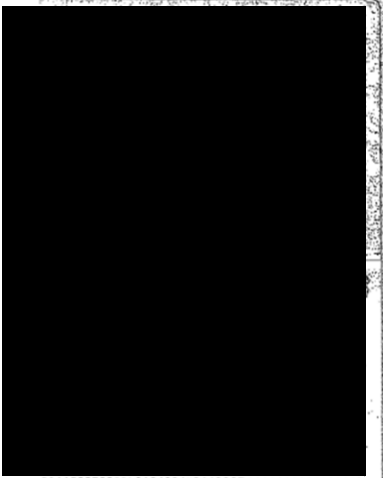
never saw them again after that date. She tried to call the phone number for the business but got no reply.

On May 1, 2024, I called [REDACTED] [REDACTED] in reference to a Wells Fargo Bank account in the name of Dean Anthony Morgan date of birth June 8, 1991.

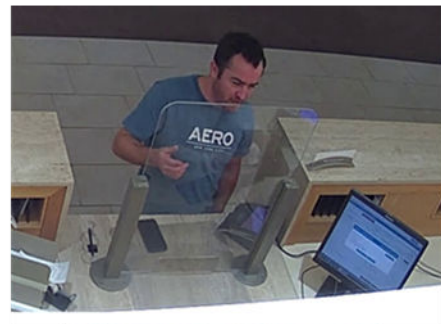
[REDACTED] was advised that Morgan appeared to be possibly involved in a criminal enterprise that was taking advantage of at-risk adults via a roofing scam. [REDACTED] said that she would check with her supervisors and then get back with me.

[REDACTED] subsequently advised me that Morgan had opened an account with Wells Fargo Bank on April 16, 2024 at the Wells Fargo Bank branch located at 3155 East 1st Avenue a location within the City and County of Denver and the State of Colorado with an initial deposit of \$100.00.

[REDACTED] said that when Morgan opened the account he produced as identification a passport [REDACTED] and a drivers learners permit from Ireland.



[REDACTED] said that on April 19, 2024 Morgan deposited check number 4182, drawn on the account of [REDACTED] in the amount of \$16,400.



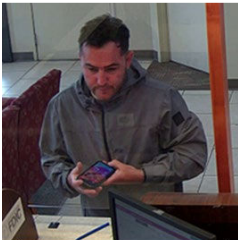
[REDACTED] said that on April 22, 2024, Morgan deposited check number 8283, drawn on the account of [REDACTED] in the amount of \$17,400.



██████████ said that on April 19, 2024, Dean Morgan withdrew \$4,000.00 from his ██████████ Bank account number 3282737190.



██████████ said that on April 20, 2024, Dean Morgan withdrew \$4,000.00 from his ██████████ Bank account number 3282737190.



██████████ said that check 4182 drawn on the account of ██████████ at ██████████ and check number 8283 drawn on the account of ██████████ at ██████████ were returned to ██████████ Bank because the account holders had placed stop payments on the two checks resulting in ██████████ sustaining a loss of \$8,000.00 for the two withdrawals.

On May 8, 2024, I received an email from ██████████
██████████
██████████

██████████ organ and McNamara were scheduled to leave New York City from JFK International Airport on Norse Atlantic Airways at 1:30 a.m., on May 9, 2024.

Based on the foregoing, Dean Anthony Morgan, John McNamara and other individuals representing themselves as employees of a company called Mary Jim's Roofing and Masonry acted in concert to facilitate the commission of the crimes of theft and exploitation of at-risk elders, feloniously with each other and a person or persons unknown that one or more of them

would engage in conduct which constituted these crimes or an attempt to commit these crimes, or agreed to aid the other person or persons in the planning or commission or attempted commission of these crimes.

The modus operandi involved in these crimes was that the group would contact older adults, purporting to be canvassing or working in the area on behalf of a supposedly legitimate business. Two of the group would act as the main contacts, and the senior would be told that their roof required immediate repairs. They would be required to write out a contract, and immediate payment by check was demanded. The checks were requested to be written out to individuals and not to the company. The address on the flyer and contracts was not associated with any such corporate entity, or LLC. The members of the group then immediately proceeded to cash or deposit the checks and make withdrawals. After receiving substantial funds from the seniors, the victims had no further work carried out by the men and were left with homes which had roof damage caused by this process and were open to the elements.


Based on the foregoing, your affiant respectfully requests that a Warrant be issued for the arrest of Dean Anthony Morgan, DOB: 06/08/1991 for: VIOLATION OF COLORADO ORGANIZED CRIME CONTROL ACT, in violation of 18-17-104(3) THEFT - AT-RISK VICTIM, in violation of 18-6.5-103(5);18-4-401(1) CRIMINAL EXPLOITATION - AT-RISK PERSON, in violation of 18-6.5-103(7.5)(a),(b)

I swear and affirm under oath, by administration of the oath over the telephone by the undersigned judge, that the below electronic signature is my own and that the contents of this Affidavit are true and accurate.

Affiant: _____/s/s David A. Dawson ____
INVESTIGATOR

Dated this 8th day of May, 2024, at 7:20 AM PM

In accordance with § 16-1-106 and § 16-3-108, the above-named Affiant swore and affirmed under oath over the telephone to the undersigned judge that the electronic signature is that of the named Affiant and that the contents of this Affidavit are true and accurate.



Signature of Judge

Isabel Pallares

Printed name of Judge