

District Court, Mesa County, Colorado 125 N Spruce Street Grand Junction, CO 81502	<div style="text-align: center;"> <input type="checkbox"/> COURT USE ONLY <input type="checkbox"/> </div>
<b>THE PEOPLE OF THE STATE OF COLORADO</b> vs. <b>GRAND JURY 2017,</b>	
Daniel P. Rubinstein Twenty First Judicial District District Attorney, # 27473 P O Box 20000-5031 Grand Junction, CO 81502-5031 Phone Number: 970-244-1730 Fax: 970-244-1729	Case No:  Div:                      Courtroom:
<b>INDICTMENT</b>	

Daniel P. Rubinstein, District Attorney for the Twenty First Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of Mesa:

**COUNT 1- COCCA-PATTERN OF RACKETEERING (F2)**

Christopher Michael Wilson, while employed by or associated with an enterprise, namely: Satan's Disciples, 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 count one and two was a group of individuals, associated in fact although not a legal entity. The individuals in this group included, but were not limited to the following:

Robert White, a.k.a. "Black"  
 Sean McDonough, a.k.a. "Sean Carr," "Basco"  
 William Labreck, a.k.a. "Snook," "Lil Smoke"  
 Jeremy Martinez, a.k.a. "Rango"  
 Van Clyde Peacock, a.k.a. "Ace"  
 Jackie Heard, a.k.a. "Jigga"

Terrance Richardson, a.k.a. "TJ," "Dirty"  
James Mooradian, a.k.a. "Lucky"  
Larry Taylor, a.k.a. "Bandit"  
Jonah Gallagher, a.k.a. "Fiasco"  
Ryan Lange, a.k.a. "Whispers"  
Eric Passero, a.k.a. "Bam-Bam," "Little D"  
Jonas Larson, a.k.a. "White," "Shadow"  
Izak Friar, a.k.a. "Shaggy"

and other persons, known or as yet unknown to the 21st Judicial District Grand Jury, who were involved from time to time in racketeering activity described herein that was related to the conduct of the Enterprise.

The conduct of the Enterprise was to operate as a chapter of the Satan's Disciple's gang, expand their territory, increase their membership, and create fear of the gang through crime. These crimes created revenue for the gang and/or functioned as retaliation to those acting in opposition. These arrangements and formation of the association took place in Mesa County, Colorado, and the crimes were all committed in Mesa County, Colorado. Christopher Wilson, AKA "Kris Fafejta," "Foul," or "Fabel" was the head or "chief" of the Satan's Disciples chapter operating in Mesa County. Wilson directed or authorized the crimes, and appointed other high ranking members of the gang to be in charge of managing or supervising specific criminal acts. Sean McDonough (DOB 5/16/1980), AKA "Sean Carr," or "Basco" was the Chief of Security and would supervise some of the crimes at the assignment or direction of Christopher Wilson. William Labreck (DOB 7/29/1990), AKA "Snook," or "Lil Smoke," was the Chief of Enforcement and would supervise some of the crimes at the assignment or direction of Christopher Wilson. Jeremy Martinez (DOB 4/20/1986), AKA "Rango," was the Secretary of Treasury and would supervise some of the crimes at the assignment or direction of Christopher Wilson. Robert White (DOB 4/27/1969), AKA "Black," was an advisor to Christopher Wilson and would assist him with advice in how to handle certain matters.

Soldiers included the following:

Van Clyde Peacock, a.k.a. "Ace"  
Jackie Heard, a.k.a. "Jigga"  
Terrance Richardson, a.k.a. "TJ," "Dirty"  
James Mooradian, a.k.a. "Lucky"  
Larry Taylor, a.k.a. "Bandit"  
Jonah Gallagher, a.k.a. "Fiasco"  
Ryan Lange, a.k.a. "Whispers"  
Eric Passero, a.k.a. "Bam-Bam," "Little D"  
Jonas Larson, a.k.a. "White," "Shadow"  
Izak Friar, a.k.a. "Shaggy"

Pattern of Racketeering Activity

For purposes of count one, the defendant: Christopher Wilson directly and in concert engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in multiple acts; the following predicate acts, including any lesser included offenses, related to the conduct of the Enterprise, at least one of which took place in the State of Colorado after December 15, 2013:

Aggravated Robbery  
Menacing  
Assault  
Theft  
Tampering with Evidence  
Aggravated Robbery  
Menacing  
Theft  
Attempted Burglary  
Attempted Theft  
Burglary  
1st Degree Arson  
2nd Degree Arson  
Criminal Mischief  
Theft  
Tampering with Evidence  
Theft

**PREDICATE 1-  
AGGRAVATED ROBBERY (F3)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who unlawfully, feloniously, and knowingly took a thing of value, namely: Money, from the person or presence of Maria Cruz-Ruiz, by the use of force, threats, or intimidation, and the defendant, during the robbery or immediate flight therefrom, and by use of force, threats or intimidation with a deadly weapon, namely: handgun, knowingly put the victim or any other person in reasonable fear of death or bodily injury; in violation of section 18-4-302(1)(b), C.R.S.

This predicate act was committed in the following manner:

The soldiers of the Satan's Disciple's were looking for something to do to earn their stripes (credentials within the organization), improve the reputation of the gang, and to earn money for themselves, the local chapter and the umbrella organization in Chicago. Christopher Wilson surveilled the location of La Mexicana Market, and communicated to William Labreck and Terrance Richardson when to go there to do the job based upon police patrol schedules. On or about November 8, 2016, William Labreck entered the La Mexicana Market, at 2851 North Avenue, in Mesa County, Colorado, with a gun. Labreck pointed the gun at the clerk, Maria Cruz-Ruiz, and racked it so as to load a bullet in the chamber. He hit Cruz-Ruiz in the back of

the head with his fist, grabbed her by the hair, and moved her around the counter. At gunpoint, he ordered her to open the cash register. When she opened the register, Labreck removed about \$150 from it; he then fled the store.

**PREDICATE 2-  
MENACING (F5)**

On or about November 8, 2016, Christopher Michael Wilson, was a complicitor to another who, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place Maria Cruz-Ruiz in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: handgun; in violation of section 18-3-206(1)(a)/(b), C.R.S.

This predicate act was committed in the following manner:

The soldiers of the Satan's Disciple's were looking for something to do to earn their stripes (credentials within the organization), improve the reputation of the gang, and to earn money for themselves, the local chapter and the umbrella organization in Chicago. Christopher Wilson surveilled the location of La Mexicana Market, and communicated to William Labreck and Terrance Richardson when to go there to do the job based upon police patrol schedules. On or about November 8, 2016, William Labreck entered the La Mexicana Market, at 2851 North Avenue, in Mesa County, Colorado, with a gun. Labreck pointed the gun at the clerk, Maria Cruz-Ruiz, and racked it so as to load a bullet in the chamber. He hit Cruz-Ruiz in the back of the head with his fist, grabbed her by the hair, and moved her around the counter. At gunpoint, he ordered her to open the cash register. When she opened the register, Labreck removed about \$150 from it; he then fled the store.

**PREDICATE 3-  
ASSAULT IN THE THIRD DEGREE (M1)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly or recklessly, caused bodily injury to Maria Cruz-Ruiz; in violation of section 18-3-204(1)(a), C.R.S.

This predicate act was committed in the following manner:

The soldiers of the Satan's Disciple's were looking for something to do to earn their stripes (credentials within the organization), improve the reputation of the gang, and to earn money for themselves, the local chapter and the umbrella organization in Chicago. Christopher Wilson surveilled the location of La Mexicana Market, and communicated to William Labreck and Terrance Richardson when to go there to do the job based upon police patrol schedules. On or about November 8, 2016, William Labreck entered the La Mexicana Market, at 2851 North Avenue, in Mesa County, Colorado, with a gun. Labreck pointed the gun at the clerk, Maria Cruz-Ruiz, and racked it so as to load a bullet in the chamber. He hit Cruz-Ruiz in the back of

the head with his fist, grabbed her by the hair, and moved her around the counter. At gunpoint, he ordered her to open the cash register. When she opened the register, Labreck removed about \$150 from it; he then fled the store.

**PREDICATE 4-  
THEFT (M3)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly, took a thing of value, namely: Money, of La Mexicana Market, with the value of fifty dollars or more but less than three hundred dollars intended to deprive La Mexicana Market permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

This predicate act was committed in the following manner:

The soldiers of the Satan's Disciple's were looking for something to do to earn their stripes (credentials within the organization), improve the reputation of the gang, and to earn money for themselves, the local chapter and the umbrella organization in Chicago. Christopher Wilson surveilled the location of La Mexicana Market, and communicated to William Labreck and Terrance Richardson when to go there to do the job based upon police patrol schedules. On or about November 8, 2016, William Labreck entered the La Mexicana Market, at 2851 North Avenue, in Mesa County, Colorado, with a gun. Labreck pointed the gun at the clerk, Maria Cruz-Ruiz, and racked it so as to load a bullet in the chamber. He hit Cruz-Ruiz in the back of the head with his fist, grabbed her by the hair, and moved her around the counter. At gunpoint, he ordered her to open the cash register. When she opened the register, Labreck removed about \$150 from it; he then fled the store.

**PREDICATE 5-  
TAMPERING WITH PHYSICAL EVIDENCE (F6)**

Between and including December 5, 2016 and December 31, 2016, Christopher Michael Wilson, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

This predicate act was committed in the following manner:

On or about December 5, 2016, at the A&W Mobile Home Park in Mesa County, Colorado, Terrance Richardson stabbed Caleb Fettig with a knife, killing him. After the murder, Richardson went to Christopher Wilson's apartment. Richardson was covered in blood when arrived. Wilson directed him to strip out of his clothes, take a shower and put on new clothes that Wilson provided him. Wilson then disposed of the murder weapon and Richardson's bloody clothing.

**PREDICATE 6-  
AGGRAVATED ROBBERY (F3)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly took a thing of value, namely: Money and cigarettes, from the person or presence of Samuel King, by the use of force, threats, or intimidation, and the defendant, during the robbery or immediate flight therefrom, and by use of force, threats or intimidation with a deadly weapon, namely: handgun, knowingly put the victim or any other person in reasonable fear of death or bodily injury; in violation of section 18-4-302(1)(b), C.R.S.

This predicate act was committed in the following manner:

Terrance Richardson and/or William Labreck had the idea to commit a robbery of the C&F Food Store. They presented the idea to Christopher Wilson, who authorized the mission and conducted surveillance of the store by going there and testing out the emergency exit to see if the alarm went off. He then advised them on how to commit the robbery and authorized them to do so. On or about December 7, 2016, Terrence Richardson entered the C&F Food Store at 2847 North Avenue in Mesa County, Colorado. He was armed with a gun. He forced the clerk, Samuel King, at gunpoint, to open the cash register. He then stole about \$300 and cigarettes. The money was split between Wilson and the umbrella organization in Chicago.

**PREDICATE 7-  
MENACING (F5)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson, was a complicitor to another who, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place Samuel King in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: handgun; in violation of section 18-3-206(1)(a)/(b), C.R.S.

This predicate act was committed in the following manner:

Terrance Richardson and/or William Labreck had the idea to commit a robbery of the C&F Food Store. They presented the idea to Christopher Wilson, who authorized the mission and conducted surveillance of the store by going there and testing out the emergency exit to see if the alarm went off. He then advised them on how to commit the robbery and authorized them to do so. On or about December 7, 2016, Terrence Richardson entered the C&F Food Store at 2847 North Avenue in Mesa County, Colorado. He was armed with a gun. He forced the clerk, Samuel King, at gunpoint, to open the cash register. He then stole about \$300 and cigarettes. The money was split between Wilson and the umbrella organization in Chicago.

**PREDICATE 8-  
THEFT (M3)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly, took a thing of value, namely: Money and cigarettes, of C&F foods, with the value of fifty dollars or more but less than three hundred dollars intended to deprive C & F Foods permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

This predicate act was committed in the following manner:

Terrance Richardson and/or William Labreck had the idea to commit a robbery of the C&F Food Store. They presented the idea to Christopher Wilson, who authorized the mission and conducted surveillance of the store by going there and testing out the emergency exit to see if the alarm went off. He then advised them on how to commit the robbery and authorized them to do so. On or about December 7, 2016, Terrence Richardson entered the C&F Food Store at 2847 North Avenue in Mesa County, Colorado. He was armed with a gun. He forced the clerk, Samuel King, at gunpoint, to open the cash register. He then stole about \$300 and cigarettes. The money was split between Wilson and the umbrella organization in Chicago.

**PREDICATE 9-  
CRIMINAL ATTEMPT TO COMMIT SECOND DEGREE BURGLARY (F5)**

On or about April 12, 2017, by engaging in conduct constituting a substantial step toward the commission of second degree burglary, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly attempted to break an entrance into, enter, or remain unlawfully after a lawful or unlawful entry in the building or occupied structure of First National Pawn, located at 2892 North Avenue with the intent to commit therein the crime of Theft; in violation of sections 18-4-203(1) and 18-2-101, C.R.S.

This predicate act was committed in the following manner:

On or about April 12, 2017, Van Clyde Peacock and Jeremy Martinez decided to burglarize First National Pawn. They called Christopher Wilson at his house and proposed the idea. Wilson authorized this to occur, and directed Sean McDonough to be in charge of the operation. Sean McDonough then directed Peacock and Martinez to attempt to shoot through the doors and steal guns for the Satan's Disciples gang. McDonough agreed to create a distraction for law enforcement across town while this occurred. Peacock and Martinez attempted to burglarize First National Pawn at 2892 North Ave, Unit B, Grand Junction, Mesa County, Colorado. Peacock shot at the front door of the business multiple times, then hammered on the door with the gun, trying to gain entry. At the same time, Sean McDonough was attempting to create a distraction for law enforcement by firing a gun through the windows of the Dominos at 9th and North. The attempt to burglarize the Pawnshop failed. Wilson ordered Martinez, as punishment to Peacock, to take the gun that Peacock used away from him, which Martinez did.

**PREDICATE 10-  
CRIMINAL ATTEMPT TO COMMIT THEFT (M3)**

On or about April 12, 2017, by engaging in conduct constituting a substantial step toward the commission of theft, Christopher Michael Wilson was a complicitor to another who, unlawfully and knowingly attempted to take a thing of value, namely: Guns, of First National Pawn, with a value of fifty dollars or more but less than three hundred dollars and intended to deprive the owner, First National Pawn, permanently of the use or benefit of the items; in violation of sections 18-4-401(1),(2)(c),(6) and 18-2-101, C.R.S.

This predicate act was committed in the following manner:

On or about April 12, 2017, Van Clyde Peacock and Jeremy Martinez decided to burglarize First National Pawn. They called Christopher Wilson at his house and proposed the idea. Wilson authorized this to occur, and directed Sean McDonough to be in charge of the operation. Sean McDonough then directed Peacock and Martinez to attempt to shoot through the doors and steal guns for the Satan's Disciples gang. McDonough agreed to create a distraction for law enforcement across town while this occurred. Peacock and Martinez attempted to burglarize First National Pawn at 2892 North Ave, Unit B, Grand Junction, Mesa County, Colorado. Peacock shot at the front door of the business multiple times, then hammered on the door with the gun, trying to gain entry. At the same time, Sean McDonough was attempting to create a distraction for law enforcement by firing a gun through the windows of the Dominos at 9th and North. The attempt to burglarize the Pawnshop failed. Wilson ordered Martinez, as punishment to Peacock, to take the gun that Peacock used away from him, which Martinez did.

**PREDICATE 11-  
SECOND DEGREE BURGLARY (F3)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Larry and Betty Kempton, located at 2805 Mesa Ave, Grand Junction, CO with the intent to commit therein the crime of Criminal Mischief and Arson; in violation of section 18-4-203(1),(2)(a), C.R.S.

This predicate act was committed in the following manner:

In retaliation for charging rent that he thought was unfair, Christopher Wilson told Jeremy Martinez and others to burglarize his landlord's house, across the street. He told them to damage property, steal jewelry and guns. Wilson used his position to imply that they did not have a choice, and put Martinez in charge of this mission. On or about June 2, 2017, Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange broke into a residence at 2805 Mesa Avenue, Grand Junction, Mesa County, Colorado. The four forced open the back door. They damaged the



home, stole jewelry, firearms, and alcohol. They then loaded the property into trash bags they got from Christopher Wilson's house across the street. Once they stashed the property, they returned to try to burn the home with Molotov cocktails, at Wilson's direction. As they left the house, they broke out the window of a classic car in driveway and threw a flare inside. The car and the trailer parked next to it burned. All individuals involved were adults except for Eric Passero who was a juvenile.

**PREDICATE 12-  
FIRST DEGREE ARSON (F3)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly set fire to, burned, or caused to be burned a building or occupied structure of Larry and Betty Kempton, located at 2805 Mesa Ave, Grand Junction, CO, without the consent of the victim; in violation of section 18-4-102(1), C.R.S.

This predicate act was committed in the following manner:

On or about June 2, 2017, Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange broke into a residence at 2805 Mesa Avenue, Grand Junction, Mesa County, Colorado. The four forced open the back door. They damaged the home, stole jewelry, firearms, and alcohol. They then loaded the property into trash bags they got from Christopher Wilson's house across the street. Once they stashed the property, they returned to try to burn the home with Molotov cocktails, at Wilson's direction. As they left the house, they broke out the window of a classic car in driveway and threw a flare inside. It and the trailer parked next to it burned. All individuals involved were adults except for Eric Passero who was a juvenile.

**PREDICATE 13-  
SECOND DEGREE ARSON (F4)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly set fire to, burned, or caused to be burned the property of Larry and Betty Kempton, without the consent of the victim, the damage being one hundred dollars or more; in violation of section 18-4-103(1), C.R.S.

This predicate act was committed in the following manner:

On or about June 2, 2017, Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange broke into a residence at 2805 Mesa Avenue, Grand Junction, Mesa County, Colorado. The four forced open the back door. They damaged the home, stole jewelry, firearms, and alcohol. They then loaded the property into trash bags they got from Christopher Wilson's house across the street. Once they stashed the property, they returned to try to burn the home with Molotov cocktails, at Wilson's direction. As they left the house, they broke out the window of a classic

car in driveway and threw a flare inside. It and the trailer parked next to it burned. All individuals involved were adults except for Eric Passero who was a juvenile.

**PREDICATE 14-  
CRIMINAL MISCHIEF (F4)**

On or about June 2, 2017, Christopher Michael Wilson, was a complicitor to another who, in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of Larry and Betty Kempton, the aggregate damage being twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-501(1),(4)(f), C.R.S.

This predicate act was committed in the following manner:

In retaliation for charging rent that he thought was unfair, Christopher Wilson told Jeremy Martinez and others to burglarize his landlord's house, across the street. He told them to damage property, steal jewelry and guns. Wilson used his position to imply that they did not have a choice, and put Martinez in charge of this mission. On or about June 2, 2017, Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange broke into a residence at 2805 Mesa Avenue, Grand Junction, Mesa County, Colorado. The four forced open the back door. They damaged the home, stole jewelry, firearms, and alcohol. They then loaded the property into trash bags they got from Christopher Wilson's house across the street. Once they stashed the property, they returned to try to burn the home with Molotov cocktails, at Wilson's direction. As they left the house, they broke out the window of a classic car in driveway and threw a flare inside. It and the trailer parked next to it burned. All individuals involved were adults except for Eric Passero who was a juvenile.

**PREDICATE 15-  
THEFT (F4)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly, took a thing of value, namely: guns, jewelry, documents, of Larry and Betty Kempton, with the value of twenty thousand dollars or more but less than one hundred thousand dollars intended to deprive Larry and Betty Kempton permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

This predicate act was committed in the following manner:

In retaliation for charging rent that he thought was unfair, Christopher Wilson told Jeremy Martinez and others to burglarize his landlord's house, across the street. He told them to damage property, steal jewelry and guns. Wilson used his position to imply that they did not have a choice, and put Martinez in charge of this mission. On or about June 2, 2017, Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange broke into a residence at 2805 Mesa Avenue, Grand Junction, Mesa County, Colorado. The four forced open the back door. They damaged the

home, stole jewelry, firearms, and alcohol. They then loaded the property into trash bags they got from Christopher Wilson's house across the street. Once they stashed the property, they returned to try to burn the home with Molotov cocktails, at Wilson's direction. As they left the house, they broke out the window of a classic car in driveway and threw a flare inside. It and the trailer parked next to it burned. All individuals involved were adults except for Eric Passero who was a juvenile.

**PREDICATE 16-  
TAMPERING WITH PHYSICAL EVIDENCE (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson, was a complicitor to another who, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

This predicate act was committed in the following manner:

Between and including June 2, 2017 and June 23, 2017, Christopher Wilson directed Jeremy Martinez, Jonah Gallagher, Eric Passero and Ryan Lange to take property stolen from the residence at 2805 Mesa Avenue, Grand Junction, Colorado, transport it in trash bags and conceal it at another location.

**PREDICATE 17-  
THEFT (F4)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly, commit the crime of theft by acting without authorization or by threat or deception, to obtain, retain, or exercise control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: guns, jewelry and other personal property, of Larry and Betty Kempton, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and to knowingly use, conceal, or abandon the thing of value in such manner as to permanently deprive Larry and Betty Kempton of its use or benefit; in violation of section 18-4-401(1)(b),(2)(h), 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 18-4-101(1), C.R.S.

This predicate act was committed in the following manner:

Between and including June 2, 2017 and June 23, 2017, Christopher Wilson directed Jackie Heard, Isaac Fryar, Sean McDonough, Jonah Gallagher, Eric Passero, Ryan Lange and Jeremy Martinez to remove stolen property from his house and to conceal it or otherwise dispose of it.

**PREDICATE 18-  
CONSPIRACY TO COMMIT POSSESSION OF A DANGEROUS WEAPON-SHORT  
SHOTGUN (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson with the intent to promote or facilitate the commission of the crime of possession of a dangerous weapon, unlawfully and feloniously agreed with Jeremy Martinez, and, a person or persons to the District Attorney 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; in violation of sections 18-12-102(3) and 18-2-201, C.R.S.

This predicate act was committed in the following manner:

Between and including June 2, 2017 and June 23, 2017, Christopher Wilson directed Jeremy Martinez saw off the barrels of the shotgun to make it easier to conceal.

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

**COUNT 2-AGGRAVATED ROBBERY (F3)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly took a thing of value, namely: Money, from the person or presence of Maria Cruz-Ruiz, by the use of force, threats, or intimidation, and the defendant, during the robbery or immediate flight therefrom, and by use of force, threats or intimidation with a deadly weapon, namely: handgun, knowingly put the victim or any other person in reasonable fear of death or bodily injury; in violation of section 18-4-302(1)(b), C.R.S.

**COUNT 3-MENACING (F5)**

On or about November 8, 2016, Christopher Michael Wilson, was a complicitor to another who, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place Maria Cruz-Ruiz in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: handgun; in violation of section 18-3-206(1)(a)/(b), C.R.S.

**COUNT 4-ASSAULT IN THE THIRD DEGREE (M1)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly or recklessly, caused bodily injury to Maria Cruz-Ruiz; in violation of section 18-3-204(1)(a), C.R.S.

**COUNT 5-THEFT (M3)**

On or about November 8, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly, took a thing of value, namely: Money, of La Mexicana Market, with the value of fifty dollars or more but less than three hundred dollars intended to deprive La Mexicana Market permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

**COUNT 6-TAMPERING WITH PHYSICAL EVIDENCE (F6)**

Between and including December 5, 2016 and December 31, 2016, Christopher Michael Wilson, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

**COUNT 7-AGGRAVATED ROBBERY (F3)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly took a thing of value, namely: Money and cigarettes, from the person or presence of Samuel King, by the use of force, threats, or intimidation, and the defendant, during the robbery or immediate flight therefrom, and by use of force, threats or intimidation with a deadly weapon, namely: handgun, knowingly put the victim or any other person in reasonable fear of death or bodily injury; in violation of section 18-4-302(1)(b), C.R.S.

**COUNT 8-MENACING (F5)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson, was a complicitor to another who, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place Samuel King in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: handgun; in violation of section 18-3-206(1)(a)/(b), C.R.S.

**COUNT 9-THEFT (M3)**

Between and including December 6, 2016 and December 7, 2016, Christopher Michael Wilson was a complicitor to another who, unlawfully, and knowingly, took a thing of value, namely: Money and cigarettes, of C&F foods, with the value of fifty dollars or more but less than three hundred dollars intended to deprive C & F Foods permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(c), C.R.S.

**COUNT 10-CRIMINAL ATTEMPT TO COMMIT SECOND DEGREE BURGLARY (F5)**

On or about April 12, 2017, by engaging in conduct constituting a substantial step toward the commission of second degree burglary, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly directed another to attempt to break an entrance into, enter, or remain unlawfully after a lawful or unlawful entry in the building or occupied structure of First National Pawn, located at 2892 North Avenue with the intent to commit therein the crime of Theft; in violation of sections 18-4-203(1) and 18-2-101, C.R.S.

**COUNT 11-CRIMINAL ATTEMPT TO COMMIT THEFT (M3)**

On or about April 12, 2017, by engaging in conduct constituting a substantial step toward the commission of theft, Christopher Michael Wilson was a complicitor to another who, unlawfully and knowingly attempted to take a thing of value, namely: Guns, of First National Pan, with a value of fifty dollars or more but less than three hundred dollars and intended to deprive the owner, First National Pawn, permanently of the use or benefit of the items; in violation of sections 18-4-401(1),(2)(c),(6) and 18-2-101, C.R.S.

**COUNT 12-POSSESSION OF A WEAPON BY PREVIOUS OFFENDER (F6)**

On or between April 12 and April 19, 2017, Christopher Michael Wilson was a complicitor to another, Jeremy Martinez, who, unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: handgun, and Jeremy Martinez was previously convicted of a felony, namely: Escape, as defined by Colorado Revised Statute, 18-8-208.1, on January 10, 2013; in violation of section 18-12-108(1), C.R.S.

**COUNT 13-SECOND DEGREE BURGLARY (F3)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly broke an entrance into, entered, or remained unlawfully after a lawful or unlawful entry in the dwelling of Larry and Betty Kempton, located at 2805 Mesa Ave, Grand Junction, CO with the intent to commit therein the crime of Criminal Mischief and Arson; in violation of section 18-4-203(1),(2)(a), C.R.S.

**COUNT 14-FIRST DEGREE ARSON (F3)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly set fire to, burned, or caused to be burned a building or occupied structure of Larry and Betty Kempton, located at 2805 Mesa Ave, Grand Junction, CO, without the consent of the victim; in violation of section 18-4-102(1), C.R.S.

**COUNT 15-SECOND DEGREE ARSON (F4)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly set fire to, burned, or caused to be burned the property of Larry and Betty Kempton, without the consent of the victim, the damage being one hundred dollars or more; in violation of section 18-4-103(1), C.R.S.

**COUNT 16-CRIMINAL MISCHIEF (F4)**

On or about June 2, 2017, Christopher Michael Wilson, was a complicitor to another who, in the course of a single criminal episode, unlawfully, feloniously, and knowingly damaged the real or personal property of Larry and Betty Kempton, the aggregate damage being twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-501(1),(4)(f), C.R.S.

**COUNT 17-THEFT (F4)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully, feloniously, and knowingly, took a thing of value, namely: guns, jewelry, documents, of Larry and Betty Kempton, with the value of twenty thousand dollars or more but less than one hundred thousand dollars intended to deprive Larry and Betty Kempton permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

**COUNT 18-CONTRIBUTING TO THE DELINQUENCY OF A MINOR (F4)**

On or about June 2, 2017, Christopher Michael Wilson was a complicitor to another who, unlawfully and feloniously induced, aided, or encouraged Eric Passero, a child, to violate any state law namely: Arson, C.R.S. 18-4-102, and Criminal Mischief, C.R.S. 18-4-501; in violation of section 18-6-701, C.R.S.

**COUNT 19-TAMPERING WITH PHYSICAL EVIDENCE (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson, was a complicitor to another who, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

**COUNT 20-POSSESSION OF A WEAPON BY PREVIOUS OFFENDER (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another, Sean McDonough who, unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: handgun, and Sean McDonough was previously convicted of a felony, namely: Eluding a Traffic Officer, as defined by Wisconsin Statute, 346.04(3), on September 2, 2005 and Attempted Aggravated Sexual Abuse as defined by Illinois law, on or between November 28, 2005 and October 13, 2006; in violation of section 18-12-108(1), C.R.S.

**COUNT 21-THEFT AT-RISK PERSON (F3)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another, Jackie Heard, who, unlawfully, feloniously, and knowingly, committed the crime of theft by acting without authorization or by threat or deception, to obtain, retain, or exercise control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: guns, jewelry and other personal property, of Larry and Betty Kempton, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and to knowingly use, conceal, or abandon the thing of value in such manner as to permanently deprive Larry and Betty Kempton of its use or benefit; in violation of section 18-4-401(1)(b),(2)(h), 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 18-4-101(1), C.R.S.



**COUNT 22-POSSESSION OF A WEAPON BY PREVIOUS OFFENDER (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another, Jeremy Martinez, who unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: handgun, and Jeremy Martinez was previously convicted of a felony, namely: Escape, as defined by Colorado Revised Statute, 18-8-208.1, on January 10, 2013; in violation of section 18-12-108(1), C.R.S.

**COUNT 23-POSSESSION OF A WEAPON BY PREVIOUS OFFENDER (F6)**

Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson was a complicitor to another Sean McDonough, who unlawfully, feloniously, and knowingly possessed, used, or carried upon his person a firearm or other weapon, namely: handgun, and Sean McDonough was previously convicted of a felony, namely: Eluding a Traffic Officer, as defined by Wisconsin Statute, 346.04(3), on September 2, 2005 and Attempted Aggravated Sexual Abuse as defined by Illinois law, on or between November 28, 2005 and October 13, 2006; in violation of section 18-12-108(1), C.R.S.

**COUNTY 24- CONSPIRACY TO COMMIT POSSESSION OF A DANGEROUS WEAPON-SHORT SHOTGUN (F6)**

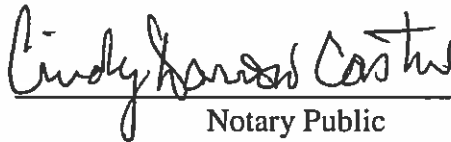
Between and including June 2, 2017 and June 23, 2017, Christopher Michael Wilson with the intent to promote or facilitate the commission of the crime of possession of a dangerous weapon, unlawfully and feloniously agreed with Jeremy Martinez, and, a person or persons to the District Attorney unknown 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; in violation of sections 18-12-102(3) and 18-2-201, C.R.S.

DANIEL P. RUBINSTEIN  
District Attorney  
Twenty-first Judicial District

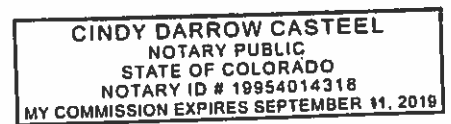


Daniel P. Rubinstein, Reg. No. 27473  
District Attorney

Subscribed to before me in the County of Mesa, State of Colorado, this 29<sup>th</sup> day of  
November, 2017.

  
Notary Public

My commission expires: 09-11-19



**ENDORSED WITNESS LIST**

Evan Curtis  
Grand Junction Police Department  
555 Ute Avenue  
Grand Junction, CO 81501

Michael D Struwe  
Grand Junction Police Department  
555 Ute Avenue  
Grand Junction, CO 81501

Robert White  
505 29 Road  
Grand Junction, CO 81504

Brianna Compton  
673 Gemstone Court, Unit B  
Grand Junction, CO 81505

Kayla Marks-Fafejta  
2854 Belford Avenue, No. 3  
Grand Junction, CO 81503

Tonya Abrams  
1456 Bunting Avenue, No. 4  
Grand Junction, CO 81501

Sean Mcdonough  
803 S. 7<sup>th</sup> Street  
Grand Junction, CO 81501

William Labreck  
Colorado Department of Corrections

Jeremy Martinez  
C/o Mesa County Detention Facility  
215 Rice Street  
Grand Junction, CO 81505

Van Clyde Peacock  
9722 E 16th Avenue  
Aurora, CO 80010

Ruth Thayer  
address unknown at this time

Jackie Heard  
1600 North Avenue, No. 207  
Grand Junction, CO 81501

Terrance Richardson  
C/o Mesa County Detention Facility  
215 Rice Street  
Grand Junction, CO 81505

James Mooradian  
Address Unknown At This Time

Larry Taylor  
Address Unknown At This Time

Jonah Gallagher  
2806 Mesa Avenue  
Grand Junction, CO 81501

Ryan Lange  
1250 Bookcliff Avenue No. 7  
Grand Junction, CO 81501

Eric Passero  
C/o Parent/guardian  
280 28 1/2 Road  
Grand Junction, CO 81503

People v. Christopher Michael Wilson

Case No.:

Jonas Larson  
2408 Elm Avenue  
Grand Junction, CO 81501

Angel Chacon  
Homeless

Izak Friar  
C/o Parent/guardian  
Address Unknown At This Time

The 2017 Mesa County Grand Jury presents the within Indictment, and the same is hereby  
ORDERED FILED this 30th day of November, 2017.

Richard T. Gurley

Richard Gurley, Judge  
21<sup>st</sup> Judicial District  
Mesa County  
Colorado

Warrant to issue for Christopher Wilson DOB: 08/06/86

Bond Amount: No Bond

AS TO COUNT ONE: VIOLATION OF COLORADO ORGANIZED CRIME CONTROL  
ACT

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT TWO: AGGRAVATED ROBBERY

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT THREE: MENACING

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT FOUR: ASSAULT IN THE THIRD DEGREE

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT FIVE: THEFT

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT SIX: TAMPERING WITH PHYSICAL EVIDENCE

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

AS TO COUNT SEVEN: AGGRAVATED ROBBERY

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT EIGHT: MENACING

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT NINE: THEFT

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TEN: CRIMINAL ATTEMPT TO COMMIT SECOND  
DEGREE BURGLARY

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT ELEVEN: CRIMINAL ATTEMPT TO COMMIT THEFT

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWELVE: POSSESSION OF A WEAPON BY A PREVIOUS  
OFFENDER

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT THIRTEEN: SECOND DEGREE BURGLARY

A TRUE BILL

NOT A TRUE BILL

FOREPERSON

AS TO COUNT FOURTEEN: FIRST DEGREE ARSON

A TRUE BILL

NOT A TRUE BILL

FOREPERSON

AS TO COUNT FIFTEEN: SECOND DEGREE ARSON

A TRUE BILL

NOT A TRUE BILL

FOREPERSON

AS TO COUNT SIXTEEN: CRIMINAL MISCHIEF

A TRUE BILL

NOT A TRUE BILL

FOREPERSON

AS TO COUNT SEVENTEEN: THEFT

A TRUE BILL

NOT A TRUE BILL

FOREPERSON

AS TO COUNT EIGHTEEN: CONTRIBUTING TO THE DELINQUENCY OF  
A MINOR

A TRUE BILL

NOT A TRUE BILL

FOREPERSON



AS TO COUNT NINETEEN: TAMPERING WITH PHYSICAL EVIDENCE

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWENTY: POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWENTY-ONE: THEFT

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWENTY-TWO: POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWENTY-THREE: POSSESSION OF A WEAPON BY A PREVIOUS OFFENDER

A TRUE BILL

[REDACTED]

FOREPERSON

NOT A TRUE BILL

\_\_\_\_\_

AS TO COUNT TWENTY-FOUR: CONSPIRACYH TO COMMIT  
POSSESSION OF A DANGEROUS WEAPON SHORT SHOTGUN

A TRUE BILL

FOREPERSON

NOT A TRUE BILL

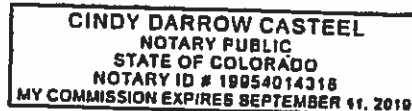
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I [REDACTED], the Foreperson of the 2017 Mesa County Grand Jury, do hereby swear and affirm that each and every True bill returned in this indictment by the 2017 Mesa County Grand Jury was arrived at after deliberation and with the assent and agreement to the existence of probable cause by at least nine members of the 2017 Mesa County Grand Jury. The 2017 Mesa County Grand Jury further authorizes and instructs the District Attorney for the 21<sup>st</sup> Judicial District to return this indictment to open court with or without the presence of the foreperson.

29<sup>th</sup> Subscribed to before me in the County of Mesa, State of Colorado, this day of November, 2017.

Cindy Darrow Casteel  
Notary Public

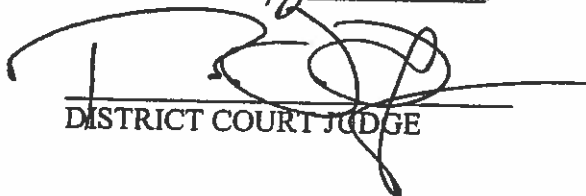
My commission expires: 09-11-19



District Court Mesa County, State of Colorado Court Address: 125 N. Spruce Street, Grand Junction, CO 81505	↑ COURT USE ONLY ↑  <hr/> Case Number: 17CR100  Div.: FLYNN
<b>Plaintiff: People of the State of Colorado,</b>  <b>GRAND JURY 2017</b>	
Attorney or Party Without Attorney: Mark Hand, #24894 Twenty-First Judicial District of Colorado P.O. Box 20,000 Grand Junction, CO 81502-5031 Phone Number: (970) 244-1730 Fax Number: (970) 244-1729 E-mail: mark.hand@mesacounty.us	
<b>ORDER</b>	

Pursuant to the Colorado Revised Statutes §13-72-103, the court hereby ORDERS that in order to preserve the confidentiality of all the information that might identify grand jurors, the jury commissioner shall hold all information related to the grand jurors identity secret.

IT IS SO ORDERED this 25<sup>th</sup> day of April, 2017.

  
 \_\_\_\_\_  
 DISTRICT COURT JUDGE