

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

12091 E. ARIZONA AVENUE, AURORA, CO;
17994 E. UTAH PLACE, AURORA, CO;

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by and through Acting United States Attorney Robert C. Troyer and Assistant United States Attorney Tonya S. Andrews, pursuant to Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions G(2), states:

JURISDICTION AND VENUE

1. The United States of America (the United States) has commenced this action pursuant to the civil forfeiture provisions of 21 U.S.C. § 881, seeking forfeiture of defendant property based on violations of the narcotics provisions of 21 U.S.C. §§ 801 et seq. This Court has jurisdiction under 28 U.S.C. §§ 1345 and 1355.

2. Venue is proper under 21 U.S.C. § 881(j) and 28 U.S.C. § 1395, as defendant property is located, and some of the acts described herein occurred, in the District of Colorado.

DEFENDANT PROPERTY

3. Defendant property is more fully described as:

- a. 12091 E. Arizona Avenue, Aurora, Colorado 80012 (“defendant Arizona Avenue”), which is more fully described as:

LOT 15, BLOCK 5, VILLAGE EAST-UNIT 1, COUNTY OF ARAPAHOE,
STATE OF COLORADO.

Upon information and belief, defendant Arizona Avenue is titled in the name of Jose Tapia Rubio, and is encumbered by a Deeds of Trust in the principal amount of \$160,000.00 and \$20,000.00, for the benefit of Bank of the West and Ruben Bachayev, respectively.

- b. 17994 E. Utah Place, Aurora, Colorado 80017 (“defendant Utah Place”), which is more fully described as:

LOT 1, BLOCK 9, AURORA HIGHLANDS SUBDIVISION FILING NO. 4,
COUNTY OF ARAPAHOE, STATE OF COLORADO.

Upon information and belief, defendant Utah Place is titled in the name of Rodrigo Mora Sanchez, and is encumbered by a Deed of Trust in the principal amount of \$232,000.00 for the benefit of Citywide Home Loans.

FACTUAL BASIS FOR FORFEITURE

4. Except as otherwise noted, all of the following facts and information have been discovered through my own investigation, and the observations and investigations of fellow law enforcement officers as reported to me.

I. OVERVIEW OF CRIMINAL ACTIVITY

5. In February 2016, the Drug Enforcement Administration - Strike Force Group of Denver, Colorado, initiated an investigation into the illegal drug trafficking activities of the Jose Tapia-Rubio Drug Trafficking Organization (Tapia-Rubio DTO) in the Denver,

Colorado area.

6. The investigation included, but was not limited to, the use of confidential sources (CS), Sources of Information (SOI's), surveillance, covert cameras, court-authorized intercepts of wire communications, court-authorized GPS tracking devices, and public and private custodian of records. It revealed that Jose Tapia-Rubio was operating a multi-kilogram cocaine and methamphetamine distribution network in Arapahoe County, Colorado with sources of supply in the Republic of Mexico. The investigation also revealed that Jose Tapia-Rubio works with, and is assisted in the cocaine and methamphetamine business by Rodrigo Mora-Sanchez, Juan Carlos Medina-Soberanis, Heberto Mora-Sanchez, Selestino Hernando-Mayo, Erik Parra, Lara Zamora Cruz, Claudia Lisseth Lara, Vilma Zamora, Leopoldo Rodriguez-Padilla, Fredy Paz Herrera, Oscar Eric Mora-Campos, Jose Chica-Orellana aka "Adrian Flores," Eduardo Jimenez-Sanchez and others.

7. Based on intercepted calls, the two primary sources of supply for the Tapia-Rubio DTO have been identified as "Bancholas" and FNU LNU, also known as "UM-9584," who are located in the Republic of Mexico.

II. CONFIDENTIAL SOURCE

8. During the course of this investigation, Confidential Source (CS-1) told officers that his/her source of supply for cocaine and methamphetamine was a Hispanic male, approximately 50 years old, who CS-1 knew only as "Don Chaquetas" or "Jackets" (later fully identified as Jose Tapia-Rubio). CS-1 described Don Chaquetas as short, chubby, with short gray hair and a mustache. CS-1 advised that he/she talks to Don Chaquetas in Spanish.

9. CS-1 stated that his/her drug purchases occurred at the El Rancho Market (hereinafter the "Market"), owned by Don Chaquetas, which was located near the intersection of East Mississippi Avenue and South Chambers Road. According to CS-1, the Market is essentially a Hispanic oriented grocery store, containing a money transfer station, a tax office, and a restaurant. CS-1 told officers that he/she goes to the Market during the week without advance permission, meets with Don Chaquetas and purchases narcotics.

10. According to Versadex (APD's Records Management System) and other police databases, "Don Chaquetas" was identified as Jose Tapia-Rubio, the listed owner of El Rancho Market located at 15401 East Mississippi Avenue, Unit A, Aurora, Colorado 80017. According to Versadex records, along with records from the Colorado's Department of Revenue ("DOR") and Department of Motor Vehicles ("DMV") show Tapia-Rubio's resides at 12091 East Arizona Avenue, Aurora, Colorado 80012 and is married to Elva Hernandez De Tapia. CS-1 was shown Tapia-Rubio's driver's license photo and CS-1 confirmed the man in the photograph was "Don Chaquetas."

11. CS-1 told officers that he/she was introduced to Tapia-Rubio by Juan Carlos Medina-Soberanis, who had been purchasing cocaine directly from Tapia-Rubio for a year. During the past six months, CS-1 and Medina-Soberanis jointly purchased two to six ounces of cocaine at \$1,000.00 per ounce, and one to one-half ounces of methamphetamine at \$500.00 per ounce from Tapia-Rubio.

12. CS-1 explained that drug purchases occurred either at Tapia-Rubio's home (defendant Arizona Avenue) or at the Market. Medina-Soberanis would call Tapia-Rubio on the phone. If Tapia-Rubio was home, Medina-Soberanis dropped CS-1 off at the

Market, went alone to Tapia-Rubio's residence (defendant Arizona Avenue), and came back to the Market with drugs. CS-1 explained that Medina-Soberanis and Tapia-Rubio shared a close relationship, so Medina-Soberanis was allowed to go to Tapia-Rubio's residence and into the Market after hours, but CS-1 was not.

13. CS-1 told officers that Medina-Soberanis said Tapia-Rubio keeps multiple kilograms of cocaine and multiple pounds of methamphetamine at his residence (defendant Arizona Avenue) and routinely uses hiding places, both inside and outside the house, to stash narcotics. CS-1 reported that Medina-Soberanis specifically saw a false storage compartment in the attached garage and a container buried in the backyard. Medina-Soberanis also told CS-1 that Tapia-Rubio had owned a residence where his daughter and son-in-law lived and used that location to stash drugs. Medina-Soberanis claimed to have purchased drugs from the second residence. Based on Medina-Soberanis's later comments, CS-1 believes Tapia-Rubio sold the second residence. Medina-Soberanis also told CS-1 that he was in the Market one night after hours and saw eight ounces of cocaine. That same night, Tapia-Rubio bragged about selling \$18,000.00 worth of drugs on a single day.

14. CS-1 stated he/she and Tapia-Rubio did not have a close relationship so Medina-Soberanis always accompanied CS-1 to the Market to buy drugs. CS-1 explained that Tapia-Rubio was usually working either at the front cash register or at the money transfer station and the drug deals essentially occurred out in the open. Tapia-Rubio asked how much CS-1 wanted, sometimes using the word fruit as code for an ounce, and CS-1 said a number. Tapia-Rubio then walked to the rear of the store, presumably to a storage room, or to a room surrounding the money transfer station and, within five

minutes, came back with drugs already packaged in vacuum sealed bags or occasionally wrapped in green cellophane plastic. While Tapia-Rubio was gone, CS-1 purchased a random item which was placed in generic plastic grocery bag. Tapia-Rubio simply put the drugs inside the grocery bag, CS-1 left the Market, and the drug deal was done.

15. CS-1 said Tapia-Rubio, even without advance notice, always had enough cocaine at the Market to complete a two-to-six ounce deal. On one occasion, Tapia-Rubio was out of methamphetamine but was able to complete the deal the following day.

16. Medina-Soberanis was arrested on December 17, 2015 by Aurora Police Department for distribution of narcotics. CS-1 advised that Medina-Soberanis had fled after his arrest and currently lives in the Cancun, Mexico area. CS-1 and Medina-Soberanis agreed that Medina-Soberanis would give CS-1 a list of all his drug contacts and, in exchange, CS-1 owed Medina-Soberanis \$200.00 to \$400.00 for each ounce of cocaine purchased/sold. Medina-Soberanis also convinced Tapia-Rubio to sell directly to CS-1 and gave CS-1 Tapia-Rubio's cellular telephone number.

17. CS-1 explained that Tapia-Rubio initially refused to deal directly with him/her after Medina-Soberanis' arrest. Tapia-Rubio's reluctance stemmed from the arrest of Medina-Soberanis and another customer within the past six months. For short periods after the arrests, Tapia-Rubio stopped selling out of the Market because he was afraid of law enforcement presence.

18. CS-1 advised that, after Medina-Soberanis' arrest, he/she went to see Tapia-Rubio at the Market but was confronted by a male employee later identified as Rodrigo Mora-Sanchez, who demanded to know all the circumstances surrounding Medina-Soberanis' arrest before allowing CS-1 to talk with Tapia-Rubio. Because CS-1

did not know Rodrigo Mora-Sanchez, he/she refused to answer, and Rodrigo Mora-Sanchez told CS-1 to leave.

19. CS-1 believes that after the encounter with Mora-Sanchez, a female named Emmy Tun-Medina, Medina-Soberanis' wife, talked to Tapia-Rubio, provided details about her husband's arrest, and CS-1 started buying directly from Tapia-Rubio.

20. CS-1 explained that Tapia-Rubio avoids telephone conversations so CS-1 simply shows up at the Market without advance notice and buys drugs. CS-1 said he/she called Tapia-Rubio a few times to say he/she was going to the Market, prompting a call from Medina-Soberanis, who told CS-1 to stop calling, go directly to the Market, and assume Tapia-Rubio has drugs available. Based on this event and other information explained below, CS-1 believes Tapia-Rubio and Medina-Soberanis still talk despite the fact that Medina-Soberanis is in Mexico and that Medina-Soberanis is keeping track of CS-1's dealings with Tapia-Rubio.

Controlled Purchases by CS

21. On March 3, 2016, CS-1 made a controlled purchase of two ounces (55.55 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$2,000.00.

22. On Mach 29, 2016, CS-1 made a controlled purchase of two ounces (56.25 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$2,000.00. CS-1 also attempted to purchase two ounces of methamphetamine from Tapia-Rubio on this day, but Tapia-Ruboi informed CS-1 that he didn't have the "other kind" that day.

23. On April 21, 2016, CS-1 made a controlled purchase of four ounces (111.74 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$4,000.00. The cocaine was concealed in a noodle container.

24. On April 26, 2016, CS-1 made a wire transfer of \$790.00 (plus \$10 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the four ounce cocaine purchase made on April 21, 2016.

25. On June 1, 2016, CS-1 made a controlled purchase of two ounces (55.6 grams) of cocaine and one ounce (27.8 grams) of methamphetamine from Jose Tapia-Rubio at the El Rancho Market for \$2,500.00. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

26. On July 7, 2016, CS-1 made a controlled purchase of two ounces (54.39 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$2,000.00. CS-1 attempted to purchase two ounces of methamphetamine at the same time, but Tapia-Rubio did not have any methamphetamine on hand. Tapia-Rubio told CS-1 that he recently purchased two kilograms of cocaine but was unsure of the quality of it. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

27. On September 20, 2016, CS-1 made a controlled purchase of four ounces (112.31 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$4,000.00. In addition, CS-1 made a wire transfer of \$790.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the four ounce cocaine purchase.

28. On October 20, 2016, CS-1 made a controlled purchase of two ounces (56.07 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$2,000.00. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos

Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase. During this meet, CS-1 and Tapia-Rubio discussed a future large methamphetamine purchase. Tapia-Rubio offered CS-1 a one ounce sample to try prior to the larger purchase.

29. On November 2, 2016, CS-1 placed an order for nine ounces of methamphetamine and two ounces of cocaine with Tapia-Rubio, who said to CS-1 that the drug order could be fulfilled the following day.

30. On the same date, there were intercepted calls between Selestino Hernandez-Mayo and Jose Tapia-Rubio, coordinating the drug order for CS-1 and delivering the Nissan Frontier, which has a hidden compartment to Tapia-Rubio's residence (defendant Arizona Avenue).

31. On the same date, the Nissan Frontier was observed on a covert camera arriving at Tapia-Rubio's residence (defendant Arizona Avenue).

32. On November 3, 2016, CS-1 contacted Tapia-Rubio by telephone and confirmed the drug order. Tapia-Rubio tells CS-1 that he is at the market working.

33. On the same date, CS-1 made a controlled purchase of two ounces (56.46 grams) of cocaine and nine ounces of methamphetamine from Jose Tapia-Rubio at the El Rancho Market for \$5,500.00 (\$2,000.00 for cocaine and \$3,500.00 for the meth). During the purchase, Tapia-Rubio was observed going out to the Nissan Frontier to retrieve the drugs. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

34. On December 8, 2016, CS-1 made a controlled purchase of two ounces

(56.99 grams) of cocaine from Jose Tapia-Rubio at the El Rancho Market for \$2,000.00. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

35. On January 16, 2017, CS-1 informed investigators that Jose Tapia-Rubio would be traveling to Mexico on January 20, 2017, for approximately three weeks.

36. On January 19, 2017, CS-1 contacted Tapia-Rubio by telephone and informed Tapia-Rubio that he/she would not be able to make a drug purchase prior to Tapia-Rubio's departure to Mexico. Tapia-Rubio instructed CS-1 to go into the El Rancho Market and meet with "Chaparro" (Heberto Mora-Sanchez) if he/she needed drugs while Tapia-Rubio was out of the country.

37. On January 26, 2017, CS-1 made a controlled purchase of two ounces (55.78 grams) of cocaine and two ounces (55.86 grams) of methamphetamine from Heberto Mora-Sanchez a.k.a. "Chaparro" at the El Rancho Market for \$3,000.00. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

38. On March 9, 2017, CS-1 made a controlled purchase of two ounces (56.89 grams) of cocaine from Heberto Mora-Sanchez a.k.a. "Chaparro" and Jose Tapia-Rubio at the El Rancho Market for \$2,000.00. In addition, CS-1 made a wire transfer of \$390.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the two ounce cocaine purchase.

**III. DRUG DEALS/LOADS AT 12091 E. ARIZONA AVENUE
(Defendant Arizona Avenue)**

(DRUG LOAD DELIVERY #1)

39. On May 20, 2016, there were a series of intercepted calls from Lara Zamora-

Cruz and Jose Tapia-Rubio, which indicated that Zamora-Cruz was en-route from California to Colorado with a load of narcotics. During the interceptions, Tapia-Rubio and Zamora-Cruz discussed her location and directions to Tapia-Rubio's residence (defendant Arizona Avenue). Tapia-Rubio told Zamora-Cruz, "Well from here, you will take off from here. You will go sleep from here. I will give you the car, we'll exchange them. You will take my truck." Zamora-Cruz told Tapia-Rubio, "And you are going to take care of the rest?" Tapia-Rubio told Zamora-Cruz, "Yeah."

40. On May 20, 2016, surveillance observed a red Mazda 5, bearing Washington license plate ASU9012, registered to PV Holding Corp (Avis Rental) arrive and pull into Tapia-Rubio's garage at defendant Arizona Avenue. Surveillance observed two females (Zamora-Cruz and an unidentified female) leave the residence in Tapia-Rubio's white Toyota Tundra.

41. On the same date, surveillance observed Zamora-Cruz and the unidentified female drive the white Toyota Tundra to an I-HOP Restaurant and then to a Best Western Hotel (Gateway Inn & Suites). According to the hotel records, Tapia-Rubio rented the room for two people with an arrival date of May 20, 2016, and a departure date of May 21, 2016 for \$114.99.

42. On May 21, 2016, there were intercepted calls between Tapia-Rubio and Zamora-Cruz. Tapia-Rubio told Zamora-Cruz, "It's done. I'm going." Zamora-Cruz told Tapia-Rubio, "Okay, I'll wait for you here." Shortly after the conversation, Tapia-Rubio was observed on a covert camera exiting the rear doors of El Rancho Market and met with Zamora-Cruz, who had arrived driving Tapia-Rubio's white Toyota Tundra. Both Tapia-Rubio and Zamora-Cruz were observed inspecting inside the rear hatchback of the red

Mazda 5.

43. On May 22, 2016, there were intercepted calls between Tapia-Rubio and Zamora-Cruz. Zamora-Cruz told Tapia-Rubio, "Already here." Tapia-Rubio told Zamora-Cruz, "Oh, that's good." The two parties discussed that Zamora-Cruz had not stopped to rest and that she should get some rest now. Tapia-Rubio told Zamora-Cruz, "Tell the, the man to call me if he wants, in case he doesn't know, but I think it's easy there."

44. On May 22, 2016, there were intercepted calls between Tapia-Rubio and Zamora-Cruz. Zamora-Cruz told Tapia-Rubio: "I'm going to put him on. Hold on." #UM-9124 gets on the phone and says, "What's the word?" Tapia-Rubio: "When opening the rear door, on the right hand side....remove the visible screw, and then there are two lids. Remove the first one.....there you will find...you have to pull out eight from there. They have a, it has a rope. In case...the first one does not have it but the others have a rope for you to pull."

45. According to PV Holding Corp (Avis Rental) records, the red Mazda 5 bearing Washington license ASU9012, was rented by Lara Samora Cruz from May 19, 2016 through May 23, 2016, in Northridge, California for \$177.68.

(DRUG LOAD DELIVERY #2)

46. Between June 15, 2016 and June 18, 2016, cellular site data and toll record data for Lara Zamora-Cruz's cell phone revealed Zamora-Cruz traveled to Salt Lake City, Utah and then to Aurora, Colorado prior to returning to California. During this time period, Zamora-Cruz was in contact with Tapia-Rubio.

47. Cellular site data for Zamora-Cruz's cell phone showed:

- June 15, 2016, at 10:27 a.m., area of San Ysidro point of entry, California, near the United States and Mexico border.

- June 16, 2016, at 9:45 a.m., area of Salt Lake City, Utah.
- June 17, 2016, at 10:18 a.m., area of Laramie, Wyoming.
- June 17, 2016, at 1:33 p.m., area of East Mississippi Avenue and South Peoria Street, Aurora, Colorado (near Tapia-Rubio's residence).
- June 18, 2016, at 10:05 a.m., area of Green River, Utah.

48. Toll records for calls between Tapia-Rubio and Zamora-Cruz's phones showed:

- June 16, 2016, three calls between the two phones, at 10:22 a.m., 12:36 p.m., and 1:07 p.m.
- June 18, 2016, three calls between the two phones, at 5:00 a.m., 10:00 a.m., and 9:11 p.m.

49. The covert camera footage for the camera located at defendant Arizona Avenue revealed on June 17, 2016, at approximately 1:14 p.m., Tapia-Rubio was outside of his residence near the attached garage with the garage door open, when a newer model black Nissan sport utility vehicle, with an appearance consistent with a Nissan Murano, arrived at the residence and drove directly into the garage. This vehicle had not previously been observed at the residence or at El Rancho Market by investigators. Shortly after driving into the garage, Tapia-Rubio walked into the garage and the garage door shut. At approximately 2:35 p.m., the garage door opened and Tapia-Rubio exited the garage. At approximately 2:36 p.m., the Nissan Murano backed out of the garage and left the area.

50. Although there were not intercepted conversations during this event, investigators note the totality of the toll records, cell site data, and covert camera footage, was consistent with the drug load that arrived on May 20, 2016, at Tapia-Rubio's residence (defendant Arizona Avenue).

(DRUG DEAL #1)

51. On July 23, 2016, there were intercepted calls between Fredy Paz Herrera

and Jose Tapia Rubio arranging a three ounce cocaine deal for the following day. Paz Herrera was going to send a female runner to pick up the three ounces of cocaine and to make a payment to Tapia-Rubio towards Paz Herrera's debt.

52. On July 24, 2016, Paz Herrera called Tapia-Rubio to say that he was enroute to Tapia-Rubio's residence (defendant Arizona Avenue). Tapia-Rubio replied, "How long?" Paz Herrera told Tapia-Rubio, "Thirty minutes at the most..."

53. On the same date, Paz Herrera advised Tapia-Rubio that the quality of the cocaine that he purchased was poor and that he had customers that rejected it.

(DRUG DEAL #2)

54. On August 1, 2016, CS-1 made a controlled purchase of two ounces (56.05 grams) of cocaine from Jose Tapia-Rubio at his residence, defendant Arizona Avenue, for \$2,000.00. CS-1 had a discussion with Tapia-Rubio about making a larger cocaine purchase, which Tapia-Rubio instructed CS-1 to make the arrangements through Juan Carlos Medina-Soberanis.

(DRUG DEAL #3)

55. On August 12, 2016, Fredy Paz Herrera called Jose Tapia-Rubio to order five ounces of cocaine.

56. On August 14, 2016, Fredy Paz Herrera coordinated with Tapia-Rubio to pick up the five ounces of cocaine and discussed the quality of the drugs.

57. On August 16, 2016, Tapia-Rubio told Fredy Paz Herrera that he is not working at the Market tomorrow, but that his cocaine order is ready and to call a half hour before arriving.

58. On August 17, 2016, Paz Herrera calls Tapia-Rubio to say that his runner is

a half hour out from Tapia-Rubio's house (defendant Arizona Avenue). Tapia-Rubio replied, "Okay that is fine." Paz Herrera called Tapia-Rubio to say that his runner has arrived. Tapia-Rubio says, "Okay, I am here and do not see her." Paz Herrera says, "Okay, let me check." Tapia-Rubio replies, "I am at the house."

(DRUG LOAD DELIVERY #3 & CASH SEIZURE #1)

59. Between July 13, 2016 and August 29, 2016, there were a series of intercepted calls between Jose Tapia-Rubio and "Bancholas" a source of supply and others, regarding Tapia-Rubio collecting a drug debt from "Mojarra" on behalf of Bancholas. In addition, there were intercepted calls between Tapia-Rubio and "Bancholas," regarding future drug loads and the delivery of the drugs by Lara Zamora-Cruz.

60. On August 28, 2016, Lara Zamora-Cruz and Vilma Zamora arrived at defendant Arizona Avenue at approximately 6:38 p.m. driving a maroon 2016 Chevrolet Tahoe bearing Tennessee license plate Z8708M, which was pulled into the garage of the residence.

61. On the same date at approximately 7:42 p.m., surveillance officers observed Zamora-Cruz and Zamora leave defendant Arizona Avenue in the maroon 2016 Chevrolet Tahoe. The two females traveled to Walgreens and then to an I-HOP Restaurant, before checking into a Best Western Hotel (Gateway Inn & Suites).

62. According to the hotel records, Rodrigo Mora-Sanchez rented the room for two people with an arrival date of August 28, 2016, and a departure date of August 29, 2016, for \$109.99.

63. Shortly after Zamora-Cruz and Zamora left Tapia-Rubio's residence. Tapia-

Rubio was observed exiting the garage carrying a laundry basket and offloading the contents into his Nissan Frontier, which has a trap/hidden compartment.

64. There was an intercepted call between Tapia-Rubio and Selestino Hernandez-Mayo a.k.a. "Chakichan" where Tapia informed "Chakichan" that he was en-route to the stash house (4572 S. Pagosa Circle, Aurora, Colorado). At approximately 8:02 p.m., Tapia-Rubio was observed on a covert camera arriving at the stash house in the Nissan Frontier.

65. On August 29, 2016, at approximately 3:50 p.m., surveillance officers observed Zamora-Cruz and Zamora exit the Best Western Hotel and leave in the maroon Chevrolet Tahoe. Surveillance was maintained on the Chevy Tahoe as it travelled west bound on Interstate 70 from Denver, Colorado towards Grand Junction, Colorado.

66. On the same date, surveillance contacted the Colorado State Patrol (CSP) and a traffic stop of the Chevy Tahoe was initiated by CSP Trooper Anderson at approximately 7:50 a.m. for a speeding violation near Rifle, Colorado. The Chevy Tahoe was occupied by Lara Zamora-Cruz and Vilma Zamora. The two occupants provided inconsistent statements to the Trooper about their travels. Zamora-Cruz gave Trooper Anderson consent to search the Chevy Tahoe and Trooper Anderson's K-9 alerted on the Tahoe. A search of the Tahoe was conducted and four rectangular packages were recovered from a natural void in the third row seat/rear storage compartment. The packages contained bulk currency totaling \$114,000.00, which was seized by law enforcement.

67. On the same date, there was an intercepted call between Zamora-Cruz and Jose Tapia-Rubio, where Zamora-Cruz notified Tapia-Rubio of the cash seizure. Zamora-

Cruz tells Tapia-Rubio, "They took the papers away from me.....don't worry, they didn't check any device, not at all."

68. On August 30, 2016, there was an intercepted call between Jose Tapia-Rubio and Zamora-Cruz, where Tapia-Rubio informs Zamora-Cruz that he will call her from a new number, presumably as a result of the bulk cash seizure by law enforcement.

69. On August 31, 2016, there was an intercepted call between Tapia-Rubio and "Bancholas," where they discussed the bulk cash seizure by law enforcement and how Zamora-Cruz is less than truthful with "Bancholas."

(DRUG PICK-UP #1)

70. On August 31, 2016, Heberto Mora-Sanchez was observed on a covert camera arriving at Jose Tapia-Rubio's defendant Arizona Avenue. In addition, there was an intercepted call between Heberto Mora-Sanchez and Tapia-Rubio, where Heberto Mora-Sanchez explains to Tapia-Rubio that he is in the backyard and Tapia-Rubio proceeds to explain where the drugs are buried in the backyard. Tapia-Rubio states, "There is a piece of block that is on the floor...Right there between the tree and the block....start digging there....in the bottom part where the pointed...water device ended...if you notice right the dirt is fresh there... Take it out, take out whatever you need. Cover it up and then scratch it again." Heberto Mora-Sanchez acknowledged Tapia-Rubio's instructions and found the buried cache of drugs. Heberto Mora-Sanchez was observed leaving Tapia-Rubio's residence (defendant Arizona Avenue) on the covert camera.

(DRUG DEAL #4)

71. On September 5, 2016, there was an intercepted call between Fredy Paz

Herrera and Jose Tapia-Rubio, arranging a cocaine order for September 9, 2016.

72. On September 8, 2016, there was an intercepted call between Fredy Paz Herrera and Jose Tapia-Rubio to determine where to meet for the cocaine purchase for the following day. Tapia-Rubio advised Paz Herrera to meet at his residence (defendant Arizona Avenue).

73. On September 9, 2016, there was an intercepted call between Fredy Paz Herrera and Jose Tapia-Rubio, where Paz Herrera advised Tapia-Rubio that he had arrived at Tapia-Rubio's residence (defendant Arizona Avenue).

74. On the same date, Paz Herrera's runner was observed on a covert camera arriving at Tapia-Rubio's residence (defendant Arizona Avenue) to pick up the cocaine and leaving the residence in a white van.

(DRUG DEAL #5)

75. On September 14, 2016, CS-1 made a controlled purchase of five ounces (140.64 grams) of cocaine from Jose Tapia-Rubio at his residence at 12091 E. Arizona Avenue (defendant Arizona Avenue) for \$5,000.00. Prior to the cocaine purchase, CS-1 had contacted Tapia-Rubio by telephone and Tapia-Rubio told CS-1 to "swing by" and indicated that he was at his residence (defendant Arizona Avenue) cleaning the yard.

76. During the meet, CS-1 observed Tapia-Rubio remove a plant or shrub from a planter in his front yard and remove the cocaine from underneath the plant. In addition, Tapia-Rubio told CS-1 about the bulk cash seizure by law enforcement from Zamora-Cruz.

77. On the same date, CS-1 made a wire transfer of \$990.00 (plus \$10.00 wire fee) to Juan Carlos Medina-Soberanis from El Rancho Market for facilitating the five ounce cocaine purchase.

(DRUG DEAL #6)

78. On October 13, 2016, there was an intercepted call between Oscar Eric Mora-Campos and Jose Tapia-Rubio, where Mora-Campos was ordering nine ounces of cocaine from Tapia-Rubio and wished to pick it up the following day.

79. On October 14, 2016, there was an intercepted call between Oscar Eric Mora-Campos and Jose Tapia-Rubio, to determine what time Mora-Campos was going to arrive to pick up the cocaine at Tapia-Rubio's residence (defendant Arizona Avenue).

80. On the same date, Mora-Campos was observed by surveillance arriving at Tapia-Rubio's residence (defendant Arizona Avenue) to pick up the cocaine and leaving the residence in a blue vehicle driven by a male identified as Roberto Rafael Flores-Espinosa.

(DRUG DEAL #7, #8, & #9)

81. Between October 28, 2016 and October 30, 2016, Jose Tapia-Rubio was intercepted taking drug orders from Oscar Eric Mora-Campos, Fredy Paz Herrera, and Eduardo Jimenez-Sanchez. In addition, Tapia-Rubio was intercepted coordinating those drug orders with Selestino Hernandez-Mayo (drug stash house attendant), who delivered the drug orders in the Nissan Frontier to Tapia-Rubio at the El Rancho Market on October 29, 2016.

82. On the evening of October 29, 2016, Tapia-Rubio takes the Nissan Frontier to his residence (defendant Arizona Avenue) and parks it in the garage.

83. On October 30, 2016, surveillance observed Mora-Campos arriving at Tapia-Rubio's residence (defendant Arizona Avenue) to pick up 13.5 ounces of cocaine in the same blue vehicle as seen on October 14, 2016.

84. On the same date, surveillance observed Eduardo Jimenez-Sanchez arriving at Tapia-Rubio's residence (defendant Arizona Avenue) to pick up one kilogram of cocaine driving in a silver vehicle. Eduardo Jimenez-Sanchez is observed leaving Tapia-Rubio's residence (defendant Arizona Avenue) carrying a green box.

85. On the same date, Paz Herrera is observed on a covert camera arriving at Tapia-Rubio's residence (defendant Arizona Avenue) to pick up a cocaine order driving a white pick-up.

(DRUG DEAL #10)

86. On November 18, 2016, there was an intercepted call between Eduardo Jimenez-Sanchez and Jose Tapia-Rubio, where Eduardo Jimenez-Sanchez was ordering ½ kilogram of cocaine from Tapia-Rubio for the upcoming Sunday.

87. On November 19, 2016, there were intercepted calls between Selestino Hernandez-Mayo and Jose Tapia-Rubio, where Tapia-Rubio was instructing Hernandez-Mayo to drop off ½ kilogram of cocaine to Tapia-Rubio.

88. On November 20, 2016, there was an intercepted call between Eduardo Jimenez-Sanchez and Jose Tapia-Rubio, where Eduardo Jimenez-Sanchez advised Tapia-Rubio that he was in the area and asked where Tapia-Rubio wanted to meet. Tapia-Rubio advised Eduardo Jimenez-Sanchez that he was at his residence (defendant Arizona Avenue).

89. On the same date, a covert camera observed Tapia-Rubio opening up the garage door at defendant Arizona Avenue and Eduardo Jimenez-Sanchez arrive in a silver vehicle. Tapia-Rubio enters his Toyota Tundra, which is parked in the driveway and Eduardo Jimenez-Sanchez exits his vehicle. Tapia-Rubio and Eduardo Jimenez-Sanchez

meet inside of the garage. Eduardo Jimenez-Sanchez exits the garage and leaves the residence (defendant Arizona Avenue) and the garage door closes.

(DRUG DEAL #11 & DRUG SEIZURE #1)

90. Between November 6, 2016 and November 23, 2016, Jose Tapia-Rubio was in contact with his cocaine sources of supply, “Bancholas” and Lara Zamora-Cruz to make arrangements for a cocaine load to be delivered to Aurora, Colorado.

91. On November 6, 2016, there was an intercepted call between Jose Tapia-Rubio and “Bancholas,” where Tapia-Rubio informs “Bancholas” that he has a bulk currency load ready to be picked up whenever “Bancholas” could send out a courier. “Bancholas” asks Tapia-Rubio if he wanted another drug load delivered and Tapia-Rubio says to send enough drugs to last through the end of the year. “Bancholas” and Tapia-Rubio discussed utilizing Claudia Lisseth Lara (daughter of Lara Zamora-Cruz) as the courier.

92. On November 10, 2016, there was an intercepted call between Jose Tapia-Rubio and Lara Zamora-Cruz, where they discussed the recent conversations with “Bancholas” regarding the bulk money pick up that Tapia-Rubio had for “Bancholas.” Tapia-Rubio informed Zamora-Cruz of the incoming drug load coordinated by Rodrigo Mora-Sanchez. Zamora-Cruz told Tapia-Rubio that she would like to bring additional drugs of her own to deliver to Tapia-Rubio to make the trip more beneficial for her. Tapia-Rubio told Zamora-Cruz to let him sell more drugs and gather money for her load. Zamora-Cruz asked what the timeline would be before Tapia-Rubio will be ready. Tapia-Rubio replied to talk again mid-week. Zamora-Cruz asked what excuse she should provide to “Bancholas” for the delay in picking up the money. Tapia-Rubio suggested for Zamora-

Cruz to tell “Bancholas” that Tapia-Rubio would be out of town.

93. On November 16, 2016, there was an intercepted call between Jose Tapia-Rubio and Lara Zamora-Cruz, where they discussed that “Bancholas” was pushing for the money pick up from Tapia-Rubio towards the end of the week. Zamora-Cruz and Tapia-Rubio agreed for her to come the following week to make the money pick up. Tapia-Rubio informed Zamora-Cruz about a bulk money seizure involving Rodrigo Mora-Sanchez and Leopoldo Rodriguez-Padilla (\$135,000.00 seized by law enforcement on November 12, 2016).

94. On November 21, 2016, there was an intercepted call between Jose Tapia-Rubio and Lara Zamora-Cruz, discussing the upcoming Thanksgiving holiday and that Claudia Lisseth Lara had reminded Zamora-Cruz that rental cars would be scarce. Zamora-Cruz told Tapia-Rubio that she would like to take advantage of the holiday because a lot of people are going to be on the roads. Tapia-Rubio told Zamora-Cruz that he would either let her know if he is going to be ready either later today or the following day. Zamora-Cruz indicated that “Bancholas” was pressuring her to drive his drug load out to Tapia-Rubio and to pick up the money owed to “Bancholas.”

95. On November 22, 2016, there was an intercepted call between Jose Tapia-Rubio and Lara Zamora-Cruz, where Tapia-Rubio informed Zamora-Cruz that he had enough money for two drug units and was hoping to have money for another drug unit by the time that Zamora-Cruz would arrive in Colorado.

96. On the same date, GPS Ping data for Claudia Lisseth Lara’s cellular phone showed the following:

- 11:16 a.m. - 15 meter ping in the area of Zamora-Cruz’ residence in Northridge, CA.

- 11:31 a.m. – 4 meter ping in the area of Avis Car Rental in Northridge, CA.
- 11:46 a.m. – 24 meter ping in the area of Zamora-Cruz' residence in Northridge, CA.

97. On the same date at approximately 11:44 a.m., a covert camera observed a black SUV, later identified as the drug load vehicle, arriving at Zamora-Cruz' residence in Northridge, California.

98. On November 22 and 23, 2016, there were intercepted calls where Tapia-Rubio coordinates cocaine purchases and payments towards drug debts with Jose Chica-Orellana aka "Adrian Flores," and Oscar Eric Mora-Campos in preparation for the incoming drug load. In addition, Tapia-Rubio coordinates the packaging and quantities of cocaine orders with Selestino Hernandez-Mayo and has the drugs delivered to his residence (defendant Arizona Avenue) by Hernandez-Mayo.

99. On November 23, 2016 at approximately 2:34 a.m., a covert camera captured a vehicle leaving Zamora-Cruz' residence in Northridge, California. GPS ping data for Claudia Lisseth Lara's cellular phone were consistent with travels via Interstate 5 to Interstate 15 to Interstate 70 (east bound) to Colorado.

100. Investigators learned from Avis Car rental that Zamora-Cruz rented a 2017 black GMC Terrain, bearing Idaho license plate 8BHN152 on November 22, 2016.

101. On November 23, 2016 at approximately 1:45 p.m., investigators observed the 2017 black GMC Terrain traveling east bound on Interstate 70 in Utah approximately 15 miles from the Colorado border.

102. On the same date, at approximately 2:12 p.m., Colorado State Patrol Officer Anderson conducted a traffic stop of the 2017 black GMC Terrain near Fruita, Colorado. The vehicle was occupied by Claudia Lisseth Lara, Lara Zamora-Cruz and Jorge

Alexander Lara (adult son of Claudia Lisseth Lara). The three occupants provided inconsistent statements to the Trooper regarding their travels and Claudia Lisseth Lara provided consent to search the vehicle. Trooper Anderson's K-9 alerted on the GMC Terrain and a search of the vehicle revealed eight kilograms of cocaine from the natural voids in two of the doors.

103. On November 23, 2016, there were intercepted calls between Lara Zamora-Cruz and Jose Tapia-Rubio where Zamora-Cruz was informing Tapia-Rubio that the drug load had been seized by law enforcement and that Zamora-Cruz was going to try and pass the blame onto the car rental agency for renting her a car which contained drugs in it. They also discussed not telling "Bancholas" about the seizure of the drugs.

104. On November 22 and 23, 2016, there were intercepted calls where Tapia-Rubio coordinates cocaine purchases and payments towards drug debts with Jose Chica-Orellana aka "Adrian Flores," and Oscar Eric Mora-Campos in preparation for the incoming drug load. In addition, Tapia-Rubio coordinates the packaging and quantities of cocaine orders with Selestino Hernandez-Mayo and has the drugs delivered to his residence (defendant Arizona Avenue) by Hernandez-Mayo.

105. On November 23, 2016, there was an intercepted call between Jose Chica-Orellana, aka Adrian Flores, and Jose Tapia-Rubio where Jose Chica-Orellana informs Tapia-Rubio that he had already met with Oscar Eric Mora-Campos and that he was on his way to meet with Tapia-Rubio at his residence (defendant Arizona Avenue).

106. On the same date, there was an intercepted call between Oscar Eric Mora-Campos and Jose Tapia-Rubio where Mora-Campos advised Tapia-Rubio that he would be arriving shortly to drop off Jose Chica-Orellana debt and to pick up the drug orders from

Tapia-Rubio's residence (defendant Arizona Avenue).

107. On the same date, a covert camera observed Mora-Campos arrive at Tapia-Rubio's defendant Arizona Avenue and enter into the garage.

108. On the same date, there was an intercepted call between Jose Chica-Orellana and Tapia-Rubio where Jose Chica-Orellana asks Tapia-Rubio if Mora-Campos had arrived yet and Tapia-Rubio informs him that Mora-Campos just left. Jose Chica-Orellana and Tapia-Rubio discuss how much money Jose Chica-Orellana had sent to Tapia-Rubio and the quantity of cocaine that was purchased from Tapia-Rubio.

109. On November 25, 2016, there were intercepted calls between Lara Zamora-Cruz and Jose Tapia-Rubio where Zamora-Cruz tells Tapia-Rubio that she was going to call "Bancholas," but was not going to be truthful about what had happened and wanted Tapia-Rubio to be on the same page as Zamora-Cruz should "Bancholas" call Tapia-Rubio about the drug load. In addition, Zamora-Cruz tells Tapia-Rubio that Claudia Liseth Lara had received a call from Trooper Anderson who advised that the GMC Terrain was impounded. There was discussion as to whether or not the drugs would still be in the vehicle.

110. On November 26, 2016, there were intercepted calls between Lara Zamora-Cruz and Jose Tapia-Rubio where Zamora-Cruz tells Tapia-Rubio that she spoke with a coordinator of "Bancholas" because she could not reach "Bancholas" directly. The two discuss getting their story straight for "Bancholas." Tapia-Rubio became very suspicious that law enforcement may be listening to their phone conversations, but Zamora-Cruz was not convinced that their phones had been compromised.

111. On the same date, there were intercepted calls between Lara Zamora-Cruz

and Jose Tapia-Rubio where Zamora-Cruz tells Tapia-Rubio that she spoke with “Bancholas” and that he is very upset with her and wants documentation to prove that the drugs were seized by law enforcement. Tapia-Rubio restates that he is suspicious that law enforcement may be listening to their conversations.

112. On November 28, 2016, there was an intercepted call between Jose Chica-Orellana and Jose Tapia-Rubio where Jose Chica-Orellana is asking Tapia-Rubio about the quality of the new shipment of drugs that Tapia-Rubio had received. Tapia-Rubio informs Jose Chica-Orellana that the drug load had been seized by law enforcement and that Tapia-Rubio would have to spread out his current drug supply amongst his customers until he receives another load in approximately one week.

IV. DRUG DEALS/LOADS AT 17994 E. UTAH PLACE
(Defendant Utah Place)

(DRUG LOAD DELIVERY #1 & CASH SEIZURE #1)

113. Between October 21, 2016 and November 12, 2016, there were intercepted calls between Rodrigo Mora-Sanchez and a cocaine source of supply to make arrangements for a drug load to be delivered to his residence at 17994 E. Utah Place (defendant Utah Place). There was indication that four to six kilograms of cocaine was to be delivered to Mora-Sanchez from a source of supply.

114. On November 12, 2016, surveillance officers observed the delivery of the drug load at Rodrigo Mora-Sanchez’ residence (defendant Utah Place). The drug courier was identified as Leopoldo Rodriguez-Padilla, who was driving a green and brown 2000 Ford Explorer.

115. On the same date, Leopoldo Rodriguez-Padilla was observed leaving defendant Utah Place going westbound on Interstate 70. There was an enforcement

traffic stop conducted by the Jefferson County Sherriff's Office on Interstate 70, near Evergreen, Colorado. Rodriguez-Padilla gave the Officer consent to search and there was a K-9 alert on the Ford Explorer driven by Rodriguez-Padilla. During the search of the Ford Explorer, there was \$135,000.00 in U.S. currency found in a modified natural void within the vehicle, which was seized by law enforcement.

116. Shortly after Leopoldo Rodriguez-Padilla left defendant Utah Place there was an intercepted call between Mora-Sanchez and Jose Tapia-Rubio discussing the drug load that had arrived and talking about moving the drugs to the stash house (4572 S. Pagosa Circle, Aurora, Colorado).

117. Later on that same date, Tapia-Rubio was observed on a covert camera arriving at the stash house, located at 4572 S. Pagosa Circle, Aurora, Colorado. A short time later, Mora-Sanchez arrived at the stash house in the blue Nissan Frontier and pulled into the garage. About 15 minutes later, the blue Nissan Frontier was observed leaving the stash house with two occupants.

118. On November 12, 2016, there were intercepted calls between Mora-Sanchez and the source of supply discussing the \$135,000.00 bulk currency seizure and the similarities to the Zamora-Cruz cash seizure on August 29, 2016.

V. FINANCIAL ANALYSIS

119. As summarized below, analysis of Financial Crimes Enforcement Network (FINCEN) records revealed that from 2013 to 2016 Jose Tapia-Rubio made 140 cash deposits, totaling \$3,018,120.00, into various financial institutions. Likewise, Rodrigo Mora-Sanchez made 33 cash deposits, totaling \$610,240.00, into several financial institutions for the period 2013 to 2016.

Individuals	2013	2014	2015	2016 ¹	Totals
Jose Rubio Tapia					
#Transactions	36	46	51	7	140
Annual Amount	\$405,427.00	\$942,106.00	\$1,465,536.00	\$205,051.00	\$3,018,120.00
Rodrigo Mora Sanchez					
#Transactions	2	14	9	8	33
Annual Amount	\$24,626.00	\$220,624.00	\$206,840.00	\$158,150.00	\$610,240.00

120. The investigation has revealed large cash deposits being made by both Tapia-Rubio and Mora-Sanchez into financial institutions, which is indicative of money laundering activities.

VI. LEGAL INCOME INFORMATION

121. Colorado Department of Labor records were obtained for the following individuals, which revealed:

- a. Jose Tapia-Rubio had reported wages of \$26,000.00 in 2014, \$47,000.00 in 2015, \$54,000.00 in 2016, and \$12,000.00 for the first quarter of 2017;
- b. Elva Hernandez De Tapia had a reported wages of \$0 in 2014, \$24,000.00 in 2015, \$27,000.00 in 2016, and \$6,000.00 for the first quarter of 2017; and
- c. Rodrigo Mora-Sanchez had reported wages of \$24,000.00 in 2014, \$47,000.00 in 2015, \$54,000.00 in 2016 and \$12,000.00 for the first quarter of 2017.

VII. CONCLUSION

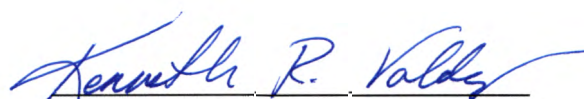
122. Based upon the facts and circumstances described above, the evidence shows that Jose Tapia-Rubio, Rodrigo Mora-Sanchez , and others named herein, were all involved in the distribution of cocaine and methamphetamine in the Denver, Colorado

¹ - Only includes FINCEN records through March of 2016

area, and that the defendant properties were used to facilitate the distribution of narcotics trafficking and are subject to forfeiture.

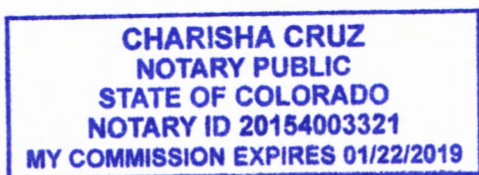
**VERIFICATION OF KENNETH VALDEZ, SPECIAL AGENT
INTERNAL REVENUE SERVICE, CRIMINAL INVESTIGATION DIVISION**

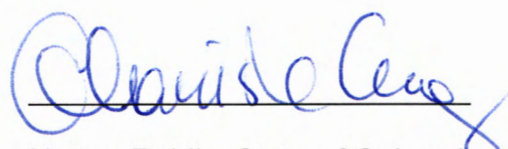
I, Special Agent Kenneth Valdez, hereby state and aver under the pains and penalties of perjury that I have read the foregoing Factual Basis for Forfeiture and that the facts and information contained therein are true.


Kenneth Valdez, Special Agent
Internal Revenue Service -
Criminal Investigation

STATE OF COLORADO)
CITY AND)ss.
COUNTY OF DENVER)

The foregoing VERIFIED COMPLAINT FOR FORFEITURE IN REM was subscribed before me this 12th day of April, 2017, by Kenneth Valdez, Internal Revenue Service, Criminal Investigation Division.




Notary Public, State of Colorado
My Commission Expires: 1-22-2019

FIRST CLAIM FOR RELIEF

123. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

124. By the foregoing and other acts, defendant Arizona Avenue constitutes

property traceable to an exchanged of controlled substances in violation of 21 U.S.C. § 801, et seq., and therefore, is forfeited to the United States pursuant to 21 U.S.C. § 881(a)(6).

SECOND CLAIM FOR RELIEF

125. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

126. By the foregoing and other acts, defendant Arizona Avenue constitutes real property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of violations of 21 U.S.C. § 801, et seq., and therefore, is forfeited to the United States pursuant to 21 U.S.C. § 881(a)(7).

THIRD CLAIM FOR RELIEF

127. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

128. By the foregoing and other acts, defendant Utah Place constitutes real property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of violations of 21 U.S.C. § 801, et seq., and therefore, is forfeited to the United States pursuant to 21 U.S.C. § 881(a)(7).

DATED this 20th day of April, 2017.

Respectfully submitted,

ROBERT C. TROYER
Acting United States Attorney

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Tonya S. Andrews
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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

12091 E. ARIZONA AVENUE, AURORA, CO;
17994 E. UTAH PLACE, AURORA, COLORADO;

Defendants.

ORDER FOR WARRANT FOR ARREST OF PROPERTY *IN REM*

THIS MATTER comes before the Court on the United States' *Verified Complaint for Forfeiture In Rem*, and the Court being fully apprised, FINDS that the Court has jurisdiction over the following defendant financial assets, that there is probable cause to believe the defendant assets are subject to forfeiture, and that a Warrant for Arrest of the following defendant assets should enter:

- a. 12091 E. ARIZONA AVENUE, AURORA, CO;
- b. 17994 E. UTAH PLACE, AURORA, CO.

IT IS THEREFORE ORDERED that the Clerk of the Court shall enter a Warrant for Arrest of Property *In Rem* and that the United States Marshals Service and/or any other duly authorized law enforcement officer is directed to arrest and seize the above-referenced defendant assets as soon as practicable, and to use whatever means may be appropriate to protect and maintain it in your custody until further order of this Court.

IT IS FURTHER ORDERED that the United States shall post notice on an official internet government site for at least 30 consecutive days, stating that all persons claiming or asserting an interest in the defendant assets must file a Claim and an Answer to the Complaint with the Court, and serve copies of same to the Assistant United States Attorney, to the addresses listed below:

Clerk of the United States District Court
901 19th Street
Denver, Colorado 80294

Tonya S. Andrews
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202

SO ORDERED this ____ day of _____, 2017.

BY THE COURT:

United States District Court
Judge/Magistrate Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

12091 E. ARIZONA AVENUE, AURORA, CO;
17994 E. UTAH PLACE, AURORA, CO;

Defendants.

WARRANT FOR ARREST OF PROPERTY *IN REM*

TO: UNITED STATES MARSHALS SERVICE AND/OR ANY OTHER DULY
AUTHORIZED LAW ENFORCEMENT OFFICER:

PURSUANT to the *Order for Warrant for Arrest of Property In Rem* issued by this Court, YOU ARE HEREBY COMMANDED TO ARREST AND SEIZE as soon as practicable, the following defendant assets described in the *Verified Complaint for Forfeiture In Rem* filed herewith, and to use whatever means may be appropriate to protect and maintain it in your custody until further order of this Court:

- a. 12091 E. ARIZONA AVENUE, AURORA, CO;
- b. 17994 E. UTAH PLACE, AURORA, CO.

DATED this ____ day of _____, 2017.

JEFFREY P. COLWELL
Clerk of the U.S. District Court

By: _____
Deputy Clerk

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