

<p>County Court, Adams County, Colorado Justice Center 1100 Judicial Center Drive Brighton, CO 80601</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v. Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, Dallas BELLER, Ivan RODRIGUEZ, Jorge TREJO, Aaron OWENS, Gabriella OLDS, Diego SALAZAR, Cristian QUINTANILLA-GALVAN, Defendants.</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Brian S. Mason Seventeenth Judicial District District Attorney, # 38008 1000 Judicial Center Drive Brighton, CO 80601 Phone Number: 303-659-7720</p>	<p>GJ Case No.: 23CV100</p> <p>Ctrm: 305</p>
<p align="center"><b>SEVENTEENTH JUDICIAL DISTRICT GRAND JURY INDICTMENT</b></p>	

Of the 2023-2024 term of the Seventeenth Judicial District Grand Jury in the year 2023; 2023-2024 Seventeenth Judicial District Grand Jurors, chosen, selected, and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

- COUNT 1:            COCCA – Pattern of Racketeering –  
37284                    Participation in an Enterprise; § 18-17-104(3), C.R.S., (F2)
- Juan SANUDO-RIVERA and Joel GALVEZ-PEREZ
- COUNT 2:            COCCA – Conspiracy; § 18-17-104(4), C.R.S., (F2)  
37284
- Juan SANUDO-RIVERA and Joel GALVEZ-PEREZ

COUNT 3: Conspiracy to Distribute a Controlled Substance (Fentanyl)—  
87124 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Dallas BELLER

COUNT 4: Conspiracy to Distribute a Controlled Substance  
8105P (Methamphetamine)—Schedule II—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Dallas BELLER

COUNT 5: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Dallas BELLER

COUNT 6: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Joel GALVEZ-PEREZ and Dallas BELLER

COUNT 7: Distribution of a Controlled Substance (Fentanyl)—  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Joel GALVEZ-PEREZ

COUNT 8: Distribution of a Controlled Substance (Methamphetamine)—  
8202J Schedule II—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Joel GALVEZ-PEREZ

COUNT 9: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Dallas BELLER

COUNT 10: Possession with Intent to Distribute a Controlled Substance  
8104B (Methamphetamine)—Schedule II—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Dallas BELLER

COUNT 11: Possession with Intent to Distribute a Controlled Substance  
81047 (Cocaine)—Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Dallas BELLER

COUNT 12: Possession with Intent to Distribute a Controlled Substance (Crack  
81047 Cocaine)—Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Dallas BELLER

COUNT 13: Possession with Intent to Distribute a Controlled Substance  
87143 (Fentanyl)—Less than 4 Grams;  
§ 18-18-405(1),(2)(c)(V), C.R.S., (DF2)

Dallas BELLER

COUNT 14: Special Offender – Firearm; § 18-18-407(1)(d)(II), C.R.S., (DF1)  
33A46

Dallas BELLER

COUNT 15: Conspiracy to Distribute a Controlled Substance (Fentanyl)—  
87124 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Ivan RODRIGUEZ

COUNT 16: Conspiracy to Distribute a Controlled Substance  
8105L (Methamphetamine)—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Ivan RODRIGUEZ

- COUNT 17: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
- Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Ivan RODRIGUEZ
- COUNT 18: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Jorge TREJO and Ivan RODRIGUEZ
- COUNT 19: Distribution of a Controlled Substance (Fentanyl)—  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)
- Joel GALVEZ-PEREZ
- COUNT 20: Distribution of a Controlled Substance (Methamphetamine)—  
8202J Schedule II—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)
- Joel GALVEZ-PEREZ
- COUNT 21: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)
- Ivan RODRIGUEZ
- COUNT 22: Possession with Intent to Distribute a Controlled Substance  
8104B (Methamphetamine)—Schedule II—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)
- Ivan RODRIGUEZ
- COUNT 23: Special Offender – Firearm; § 18-18-407(1)(d)(II), C.R.S., (DF1)  
33A46
- Ivan RODRIGUEZ
- COUNT 24: Vehicular Eluding;  
27162 § 18-9-116.5, C.R.S., (F5)
- Ivan RODRIGUEZ

COUNT 25: Special Offender – Firearm; § 18-18-407(1)(d)(II), C.R.S., (DF1)  
33A46

Jorge TREJO

COUNT 26: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Jorge TREJO

COUNT 27: Possession with Intent to Distribute a Controlled Substance  
8104B (Methamphetamine)—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jorge TREJO

COUNT 28: Conspiracy to Distribute a Controlled Substance (Fentanyl)—  
87124 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Aaron OWENS

COUNT 29: Conspiracy to Distribute a Controlled Substance  
8105P (Methamphetamine)—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Aaron OWENS

COUNT 30: Distribution of a Controlled Substance (Fentanyl)—  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Joel GALVEZ-PEREZ

COUNT 31: Distribution of a Controlled Substance (Methamphetamine)—  
8202J More than 112 Grams; § 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Joel GALVEZ-PEREZ

COUNT 32: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Aaron OWENS

- COUNT 33: Possession with Intent to Distribute a Controlled Substance  
8104B (Methamphetamine)—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)  
  
Aaron OWENS
- COUNT 34: Special Offender – Firearm; § 18-18-407(1)(d)(II), C.R.S., (DF1)  
33A46  
  
Aaron OWENS
- COUNT 35: Conspiracy to Distribute a Controlled Substance (Fentanyl)—  
87124 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Gabriella OLDS
- COUNT 36: Distribution of a Controlled Substance (Fentanyl)—Schedule II—  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Joel GALVEZ-PEREZ
- COUNT 37: Distribution of a Controlled Substance (Fentanyl)—Schedule II—  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Gabriella OLDS
- COUNT 38: Conspiracy to Distribute a Controlled Substance (Fentanyl)—  
87124 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and  
Cristian QUINTANILLA-GALVAN
- COUNT 39: Distribution of a Controlled Substance (Fentanyl)  
87121 More than 50 Grams; § 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Joel GALVEZ-PEREZ
- COUNT 40: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)  
  
Cristian QUINTANILLA-GALVAN

COUNT 41: Possession with Intent to Distribute a Controlled Substance  
87123 (Fentanyl)—More than 50 Grams;  
§ 18-18-405(1),(2)(a)(I)(D), C.R.S., (DF1)

Diego SALAZAR

COUNT 42: Possession with Intent to Distribute a Controlled Substance  
8104B (Methamphetamine)—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Diego SALAZAR

COUNT 43: Possession with Intent to Distribute a Controlled Substance  
81047 (Cocaine)—Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Diego SALAZAR

COUNT 44: Special Offender – Firearm; § 18-18-407(1)(d)(II), C.R.S., (DF1)  
33A46

Diego SALAZAR

COUNT 45: Vehicular Eluding;  
27162 § 18-9-116.5, C.R.S., (F5)

Diego SALAZAR

COUNT 46: Possession of a Dangerous Weapon;  
30011 § 18-12-102(3), C.R.S., (F5)

Diego SALAZAR

COUNT 47: Assault in the First Degree;  
0201B § 18-3-202(1)(e), C.R.S., (F3)

Diego SALAZAR

Defendant:	Charges:
Juan SANUDO-RIVERA	1, 2, 3, 4, 5, 15, 16, 17, 28, 29, 35, 38
Joel GALVEZ-PEREZ	1, 2, 3, 4, 5, 6, 7, 8, 15, 16, 17, 19, 20, 28, 29, 30, 31, 35, 36, 38, 39
Dallas BELLER	3, 4, 5, 6, 9, 10, 11, 12, 13, 14
Ivan RODRIGUEZ	15, 16, 17, 18, 21, 22, 23, 24
Jorge TREJO	18, 25, 26, 27
Aaron OWENS	28, 29, 32, 33, 34
Gabriella OLDS	35, 37
Cristian QUINTANILLA-GALVAN	38, 40
Diego SALAZAR	41, 42, 43, 44, 45, 46, 47

**COUNT 1**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —  
PATTERN OF RACKETEERING—  
PARTICIPATION IN AN ENTERPRISE, (F2)**

Between the dates of February 3, 2023, and August 24, 2023, in the state of Colorado, **Manuel SANUDO-RIVERA and Joel GALVEZ-PEREZ**, and others both known and unknown to the Grand Jury, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of § 18-17-104(3) and § 18-17-105, C.R.S.

**COUNT 2**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —  
CONSPIRACY, (F2)**

Between the dates of February 3, 2023, and August 24, 2023, in the state of Colorado, **Manuel SANUDO-RIVERA and Joel GALVEZ-PEREZ**, and others both known and unknown to the Grand Jury, unlawfully, knowingly, and feloniously conspired to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of § 18-17-104(4) and § 18-17-105, C.R.S.

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

**The Enterprise**

The criminal enterprise alleged in Counts One and Two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals and/or legal



entities: **Manuel SANUDO-RIVERA and Joel GALVEZ-PEREZ**, and others both known and unknown to the Grand Jury.

The individuals associated with the enterprise had a primary objective and a common purpose to import illegal controlled substances, including fentanyl, into the state of Colorado, and to further distribute these illegal controlled substances to various customers throughout the Brighton and Denver Metro area. In order to support and facilitate this drug trafficking activity, members and associates of the criminal enterprise utilized motor vehicles to transport quantities of the illicit controlled substances.

Each of the members of the criminal enterprise relied upon and utilized a complex system of cellular telephones and electronic communication devices to arrange and execute the importation, transportation, and distribution of these illegal controlled substances and to facilitate the collection and transfer of the related criminal proceeds. Because the members of the criminal enterprise used telecommunication devices so extensively to conduct the operations of the enterprise, the members often utilized coded terminology when speaking to each other over the telephone in order to conceal their criminal activities.

### **Pattern of Racketeering Activity**

**Manuel SANUDO-RIVERA and Joel GALVEZ-PEREZ**, and others both known and unknown to the Grand Jury directly and in concert engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the state of Colorado after July 1, 1981, and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

- Conspiracy to Distribute a Controlled Substance (Colorado Revised Statutes)
- Distribution of a Controlled Substance (Colorado Revised Statutes)
- Possession with Intent to Distribute a Controlled Substance (Colorado Revised Statutes)
- Conspiracy to Commit Money Laundering (Colorado Revised Statutes)
- Money Laundering (Colorado Revised Statutes)
- Unlawful Use of a Telecommunications Facility (United States Code)

Pursuant to C.R.S. § 18-17-103(5)(a), “**Racketeering Activity**” includes any conduct defined as “racketeering activity” under 18 U.S.C. 1961 (1)(A), (1)(B), (1)(C), and (1)(D), including the act of Unlawful Use of a Telecommunications Facility, in violation of 21 U.S.C. § 843.

## **Racketeering Activity**

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses:

### **Predicate Act 1**

#### **Conspiracy to Distribute a Controlled Substance—Fentanyl— More than 50 Grams, (DF1)**

On or about April 11, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Dallas **BELLER** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

### **Predicate Act 2**

#### **Conspiracy to Distribute a Controlled Substance—Methamphetamine— More than 112 Grams, (DF1)**

On or about April 11, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Dallas **BELLER** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

### **Predicate Act 3**

#### **Unlawful Use of a Communication Facility**

On or about April 11, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Dallas **BELLER** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 1-3 were committed in the manner described in Counts 3-4.*

**Predicate Act 4**  
**Conspiracy to Commit Money Laundering (F4)**

On or about April 11, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Dallas BELLER, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 5**  
**Money Laundering, (F3)**

On or about April 11, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** and Dallas BELLER unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 4-5 were committed in the manner described in counts 5-6.*

**Predicate Act 6**  
**Distribution of a Controlled Substance— Fentanyl—  
More than 50 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of §. 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 7**  
**Distribution of a Controlled Substance—Methamphetamine—  
More than 112 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*Predicate Acts 6-7 were committed in the manner described in counts 7-8.*

**Predicate Act 8**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about April 14, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Ivan RODRIGUEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 9**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine —  
More than 112 Grams, (DF1)**

On or about April 14, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Ivan RODRIGUEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 10**  
**Unlawful Use of a Communication Facility**

On or about April 14, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Ivan RODRIGUEZ did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 8-10 were committed in the manner described in counts 15-16.*

**Predicate Act 11**  
**Conspiracy to Commit Money Laundering (F4)**

On or about April 14, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Ivan RODRIGUEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*Predicate Act 11 was committed in the manner described in count 17.*

**Predicate Act 12**  
**Distribution of a Controlled Substance— Fentanyl—  
More than 50 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 13**  
**Distribution of a Controlled Substance— Methamphetamine—  
More than 112 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*Predicate Acts 12-13 were committed in the manner described in counts 19-20.*

**Predicate Act 14**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 22, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Aaron OWENS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 15**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

On or about May 22, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Aaron OWENS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 16**  
**Unlawful Use of a Communication Facility**

On or about May 22, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Aaron OWENS did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 14-16 were committed in the manner described in counts 28-29.*

**Predicate Act 17**  
**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 18**  
**Distribution of a Controlled Substance—Methamphetamine—  
More than 112 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*Predicate Acts 17-18 were committed in the manner described in counts 30-31*

**Predicate Act 19**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 24, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Gabriella OLDS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 20**  
**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 21**  
**Unlawful Use of a Communication Facility**

On or about May 24, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Gabriella OLDS did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 19-21 were committed in the manner described in counts 35-36.*

**Predicate Act 22**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 24, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Cristian QUINTANILLA-GALVAN unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 23**  
**Distribution of a Controlled Substance— Fentanyl—  
More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, **Joel GALVEZ-PEREZ** unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**Predicate Act 24**  
**Unlawful Use of a Communication Facility**

On or about May 24, 2023, in the state of Colorado, **Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ,** and Cristian QUINTANILLA-GALVAN did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 22-24 were committed in the manner described in counts 38-39.*



**COUNT 3**

**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about April 11, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Dallas BELLER unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 4**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

On or about April 11, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Dallas BELLER unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 5**

**Conspiracy to Commit Money Laundering (F4)**

On or about April 11, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Dallas BELLER, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 6**  
**Money Laundering, (F3)**

On or about April 11, 2023, in the state of Colorado, Joel GALVEZ-PEREZ and Dallas BELLER unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 7**  
**Distribution of a Controlled Substance— Fentanyl—  
More than 50 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 8**  
**Distribution of a Controlled Substance— Methamphetamine—  
More than 112 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 9**  
**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, Dallas BELLER unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 10**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about April 11, 2023, in the state of Colorado, Dallas BELLER unlawfully, feloniously, and knowingly possessed with intent to distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 11**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—14 to 225 Grams (DF2)**

On or about April 11, 2023, in the state of Colorado, Dallas BELLER unlawfully, feloniously, and knowingly possessed with intent to distribute cocaine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 12**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—14 to 225 Grams (DF2)**

On or about April 11, 2023, in the state of Colorado, Dallas BELLER unlawfully, feloniously, and knowingly possessed with intent to distribute crack cocaine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 13**

**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—Less than Four Grams (DF3)**

On or about April 11, 2023, in the state of Colorado, Dallas BELLER unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed not more than four grams; in violation of § 18-18-405(1),(2)(c)(V), C.R.S.

**COUNT 14**  
**Special Offender (DF1)**

On or about April 11, 2023, Dallas BELLER committed the felony offenses charged in counts 9-13 of this indictment, and the defendant or a confederate of the defendant possessed a firearm to which the defendant or confederate had access in a manner that posed a risk to others; in violation of section 18-18-407(1)(d)(II), C.R.S.

*The offenses alleged in Counts 3-14 were committed in the following manner:*

On or about April 11, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Dallas BELLER made an agreement with each other and others to sell and distribute fentanyl and methamphetamine. As a part of this agreement, they agreed that GALVEZ-PEREZ, at the express direction of SANUDO-RIVERA, would deliver a quantity of fentanyl and methamphetamine to BELLER. On April 11, 2023, GALVEZ-PEREZ picked up a quantity of fentanyl and methamphetamine and then delivered it to BELLER in the vicinity of 1600 Glenarm Place #2707 Denver, Colorado. BELLER was operating this apartment as a base of operations for his own drug distribution operation, where he also stored an amount of cocaine, crack cocaine, fentanyl powder, and kept a handgun to protect the controlled substances. Also in furtherance of the agreement, GALVEZ-PEREZ collected drug proceeds in the form of bulk US currency from BELLER and subsequently transported the bulk US currency to a holding facility controlled by SANUDO-RIVERA. Law enforcement officers executed a search warrant at 1600 Glenarm Place #2707 in the early morning of April 12, 2023, at which time they found approximately 465 net grams of fentanyl, 376 net grams of methamphetamine, 73 grams of cocaine, 17 grams of crack cocaine, a Sig Sauer handgun, and \$5,290 in US currency.

**COUNT 15**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about April 14, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Ivan RODRIGUEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 16**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

On or about April 14, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Ivan RODRIGUEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 17**

**Conspiracy to Commit Money Laundering (F4)**

On or about April 14, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Ivan RODRIGUEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 18**

**Money Laundering, (F3)**

On or about April 14, 2023, in the state of Colorado, Jorge TREJO and Ivan RODRIGUEZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 19**

**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 20**

**Distribution of a Controlled Substance—Methamphetamine—  
More than 112 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 21**

**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Ivan RODRIGUEZ unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 22**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Ivan RODRIGUEZ unlawfully, feloniously, and knowingly possessed with intent to distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 23**  
**Special Offender (DF1)**

On or about April 14, 2023, Ivan RODRIGUEZ committed the felony offenses charged in counts 21-22 of this indictment, and the defendant or a confederate of the defendant possessed a firearm in a vehicle the defendant was occupying during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

**COUNT 24**  
**Vehicular Eluding (F5)**

On or about April 14, 2023, Ivan RODRIGUEZ, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude Thornton Police Department Officer Abraham Balderrama, a peace officer also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

**COUNT 25**  
**Special Offender (DF1)**

On or about April 14, 2023, Jorge TREJO committed the felony offenses charged in counts 26-27 of this indictment, and the defendant or a confederate of the defendant possessed a firearm in a vehicle the defendant was occupying during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

**COUNT 26**  
**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Jorge TREJO unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 27**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about April 14, 2023, in the state of Colorado, Jorge TREJO unlawfully, feloniously, and knowingly possessed with intent to distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 15-27 were committed in the following manner:*

On or about April 14, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Ivan RODRIGUEZ made an agreement with each other and others to sell and distribute fentanyl and methamphetamine. As a part of this agreement, they agreed that GALVEZ-PEREZ, at the express direction of SANUDO-RIVERA, would deliver a quantity of fentanyl and methamphetamine to RODRIGUEZ. In furtherance of this agreement, on April 14, 2023, GALVEZ-PEREZ picked up a quantity of fentanyl and methamphetamine and then delivered it to RODRIGUEZ and TREJO in the vicinity of 241 W. 104<sup>th</sup> Ave, Northglenn, Colorado. Also in furtherance of the agreement, GALVEZ-PEREZ collected drug proceeds in the form of bulk US currency from RODRIGUEZ and subsequently transported the bulk US currency to a holding facility controlled by SANUDO-RIVERA.

After completion of the transaction, RODRIGUEZ and TREJO entered a vehicle and began to leave the scene of the transaction; at this time, a law enforcement operation that had been monitoring that transaction including Thornton Police Officer Abraham Balderrama attempted to stop the vehicle. RODRIGUEZ, who was driving the vehicle, failed to yield to Officer Balderrama despite clear indications of pursuit, and drove at dangerous speeds in an uncontrolled manner. RODRIGUEZ lost control of the vehicle and crashed, at which point both TREJO and RODRIGUEZ fled on foot. During the transaction, RODRIGUEZ and TREJO both possessed backpacks containing quantities of fentanyl, methamphetamine, and handguns. RODRIGUEZ's backpack contained approximately 1600 grams of fentanyl, 2,555 grams of methamphetamine, a Taurus handgun, his ID card, and \$2,974 in US currency. TREJO's backpack contained approximately 113 grams of fentanyl, 158 grams of methamphetamine, and a Sig Sauer handgun.



**COUNT 28**

**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 22, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Aaron OWENS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 29**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

On or about May 22, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Aaron OWENS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 30**

**Distribution of a Controlled Substance— Fentanyl—  
More than 50 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 31**

**Distribution of a Controlled Substance— Methamphetamine—  
More than 112 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 32**

**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, Aaron OWENS unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 33**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about May 22, 2023, in the state of Colorado, Aaron OWENS unlawfully, feloniously, and knowingly possessed with intent to distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 34**

**Special Offender (DF1)**

On or about May 22, 2023, Aaron OWENS committed the felony offenses charged in counts 32-33 of this indictment, and the defendant or a confederate of the defendant possessed a firearm to which the defendant or confederate had access in a manner that posed a risk to others; in violation of section 18-18-407(1)(d)(II), C.R.S.

*The offenses alleged in Counts 28-34 were committed in the following manner:*

On or about May 22, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Aaron OWENS made an agreement with each other and others to sell and distribute fentanyl and methamphetamine. As a part of this agreement, they agreed that GALVEZ-PEREZ, at the express direction of SANUDO-RIVERA, would deliver a quantity of fentanyl and methamphetamine to OWENS. In furtherance of this agreement, on May 22, 2023, GALVEZ-PEREZ picked up a quantity of fentanyl and methamphetamine and then delivered it to OWENS in the vicinity of 11929 Lavinia Lane, Northglenn, Colorado. OWENS stored the drugs in 11929 Lavinia Lane, where he also kept a firearm in order to protect his drugs as well as the proceeds he gained from selling drugs. A search warrant executed by law enforcement officers on this location on May 22, 2023, recovered approximately 131 grams of fentanyl pills, 3,321 grams methamphetamine, and two handguns.

**COUNT 35**  
**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 24, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Gabriella OLDS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 36**  
**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 37**  
**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Gabriella OLDS unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

*The offenses alleged in Counts 35-37 were committed in the following manner:*

On or about May 24, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Gabriella OLDS made an agreement with each other and others to sell and distribute fentanyl. As a part of this agreement, they agreed that GALVEZ-PEREZ, at the express direction of SANUDO-RIVERA, would deliver a quantity of fentanyl to OLDS. In furtherance of this agreement, on May 24, 2023, GALVEZ-PEREZ picked up a quantity of fentanyl and then delivered it to OLDS in the vicinity of 92<sup>nd</sup> Ave and Tejon St in Federal Heights, Colorado. OLDS then sold a portion of the fentanyl she had just purchased to Diego SALAZAR, who was waiting in a nearby car in the same parking lot. SALAZAR was

arrested shortly after this transaction after a vehicle pursuit, and which time approximately 1,178 grams of fentanyl pills were found in his vehicle.

**COUNT 38**

**Conspiracy to Distribute a Controlled Substance—Fentanyl—  
More than 50 Grams, (DF1)**

On or about May 24, 2023, in the state of Colorado, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Cristian QUINTANILLA-GALVAN unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 39**

**Distribution of a Controlled Substance—Fentanyl—  
More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Joel GALVEZ-PEREZ unlawfully, feloniously, and knowingly sold or distributed fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 40**

**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Cristian QUINTANILLA-GALVAN unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

*The offenses alleged in Counts 38-40 were committed in the following manner:*

On or about May 24, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Juan SANUDO-RIVERA, Joel GALVEZ-PEREZ, and Cristian QUINTANILLA-GALVAN made an agreement with each other and others to sell and distribute fentanyl. As a part of this agreement, they agreed that GALVEZ-PEREZ would deliver a quantity of fentanyl to QUINTANILLA-GALVAN. In furtherance of this agreement, on May 24, 2023, GALVEZ-PEREZ picked up a quantity of fentanyl and then delivered it to QUINTANILLA-GALVAN in the vicinity of 7228 E. 61<sup>st</sup> Pl., Commerce City,

Colorado. QUINTANILLA-GALVAN stored the fentanyl in the home where he planned to keep it until he would provide it to other members of a drug trafficking organization or customers.

**COUNT 41**

**Possession with Intent to Distribute a Controlled Substance—  
Fentanyl—More than 50 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Diego SALAZAR unlawfully, feloniously, and knowingly possessed with intent to distribute fentanyl, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fifty grams; in violation of § 18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 42**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about May 24, 2023, in the state of Colorado, Diego SALAZAR unlawfully, feloniously, and knowingly possessed with intent to distribute methamphetamine, a schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 43**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—14 to 225 Grams (DF2)**

On or about May 24, 2023, in the state of Colorado, Diego SALAZAR unlawfully, feloniously, and knowingly possessed with intent to distribute cocaine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 44**

**Special Offender (DF1)**

On or about May 24, 2023, Diego SALAZAR committed the felony offenses charged in counts 41-43 of this indictment, and the defendant or a confederate of the defendant possessed a firearm in a vehicle the defendant was occupying during the commission of the offense; in violation of section 18-18-407(1)(d)(II), C.R.S.

**COUNT 45**  
**Vehicular Eluding (F5)**

On or about May 24, 2023, Diego SALAZAR, while operating a motor vehicle, unlawfully, feloniously, and knowingly eluded or attempted to elude Adams County Sheriff's Deputy Joshua Maloy, a peace officer also operating a motor vehicle, when the defendant knew or reasonably should have known that he was being pursued by the peace officer, and operated his vehicle in a reckless manner; in violation of section 18-9-116.5, C.R.S.

**COUNT 46**  
**Possession of a Dangerous Weapon (F5)**

On or about May 24, 2023, Diego Salazar unlawfully, feloniously, and knowingly possessed a dangerous weapon, namely: AR-15 Spikes Tactical Rifle (SN SRM002789); in violation of section 18-12-102(3), C.R.S.

**COUNT 47**  
**Assault in the First Degree (F3)**

On or about May 24, 2023, Diego Salazar, with intent to cause serious bodily injury upon the person of Joshua Maloy, a peace officer, unlawfully and feloniously threatened the peace officer with a deadly weapon, while Joshua Maloy was engaged in the performance of his duties, and the defendant knew or reasonably should have known that Joshua Maloy was a peace officer acting in the performance of his duties; in violation of section 18-3-202(1)(e), C.R.S.

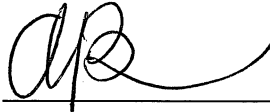
*The offenses alleged in Counts 41-47 were committed in the following manner:*

On or about May 24, 2023, Diego SALAZAR purchased a quantity of fentanyl from Gabriella OLDS in the vicinity of 92<sup>nd</sup> Ave and Tejon St in Federal Heights, Colorado. SALAZAR was surveilled engaging in this transaction by law enforcement officers monitoring the activities of a drug trafficking organization. Law enforcement officers attempted to stop SALAZAR shortly after he purchased the fentanyl, at which time SALAZAR failed to yield and drove away at speeds in excess of the posted limit. Adams County Sheriff Deputy Joshua Maloy located Salazar's vehicle shortly after his initial escape and activated his police cruiser's overhead lights and sirens in an attempt to stop SALAZAR. SALAZAR again failed to yield, and drove at high rates of speed in excess of posted limits in areas of high civilian traffic. SALAZAR continued driving after countermeasures disabled his a number of his vehicle's tires. During the pursuit, SALAZAR fired a number of shots from a firearm at Deputy Maloy, who was still engaged in pursuit. SALAZAR eventually stopped his vehicle, exited, and briefly fled on foot where he was observed throwing something over a bridge into a body of water. At this time he was detained by law enforcement. Inside

a search of SALAZAR's vehicle produced approximately 1,178 grams of fentanyl pills, 62 grams of methamphetamine, 32 grams of cocaine, a loaded pistol magazine, and a Spikes Tactical AR-15 rifle.

Respectfully submitted:

BRIAN S. MASON, #38008  
DISTRICT ATTORNEY



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ANNEMARIE L. BRAUN  
Senior Deputy District Attorney  
Seventeenth Judicial District

The 2023-2024 Seventeenth Judicial District Grand Jury presents the ~~the~~ within  
Indictment, and the same is hereby ORDERED FILED this 25<sup>th</sup> day of  
September 25<sup>th</sup>, 2023.

Dated this 25<sup>th</sup> day of September, 2023.



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DONALD S. QUICK  
Chief Judge, Seventeenth Judicial District  
Brighton, Adams County, Colorado