

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>MICHAEL CRONIN TAYLOR, DOB 08/24/1968</p> <p>Defendant.</p>	<p>DATE FILED: August 24, 2017 CASE NUMBER: 2017CR452</p> <p>▲ COURT USE ONLY ▲</p>
<p>CYNTHIA H. COFFMAN, Attorney General JASON SLOTHOUBER* Assistant Attorney General Registration Number: 43496 (720) 508-6703 Criminal Justice Section 1300 Broadway, 9th Floor Denver, Colorado 80203 *Counsel of Record</p>	<p>Case No.: 17CR0001</p> <p>Div: 259</p>
<p align="center">COLORADO STATE GRAND JURY INDICTMENT</p>	

- COUNT ONE: THEFT \$1,000 – \$20,000, § 18-4-401(1),(2)(c), C.R.S. (Class 4 Felony) {0801U}
- COUNT TWO: THEFT \$1,000 – \$20,000, § 18-4-401(1),(2)(c), C.R.S. (Class 4 Felony) {0801U}
- COUNT THREE: INSURANCE FRAUD, § 18-5-211(1)(b),(4) (Class 5 Felony) {11064}
- COUNT FOUR: INSURANCE FRAUD, § 18-5-211(1)(b),(4) (Class 5 Felony) {11064}
- COUNT FIVE: INSURANCE FRAUD, § 18-5-211(1)(e),(4) (Class 5 Felony) {11064}
- COUNT SIX: THEFT \$5,000 – \$20,000, § 18-4-401(1),(2)(g), C.R.S. (Class 5 Felony) {08A14}

COUNT SEVEN: FORGERY, § 18-5-102(1)(c), C.R.S. (Class 5 Felony)
{1001C}

COUNT EIGHT: FORGERY, § 18-5-102(1)(c), C.R.S. (Class 5 Felony)
{1001C}

COUNT NINE: FORGERY, § 18-5-102(1)(c), C.R.S. (Class 5 Felony)
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Of the 2017-2018 term of the Denver District Court in the year 2017; the 2017-2018 Colorado State 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:

ESSENTIAL FACTS

On June 13, 2010, Michael Cronin Taylor (D.O.B. 08/24/1968) (“Taylor”) reported to the New Castle Police Department that his home at 17 Redstone Drive in New Castle (Garfield County) had been burglarized while he was out of town. He reported many items missing including: a Sentry safe, a Rolex Sea Dweller Watch, a KitchenAid Blender, and his passport. The same day Taylor made a claim to Nationwide Insurance for the value of his allegedly stolen items. Based upon information Taylor provided about the value of his items, amongst other things he was paid \$4,076 for the Rolex and \$100 for the passport. Later investigation revealed that Taylor’s passport was never stolen, and he turned it in to the Department of State to obtain a new passport. In a later interview

with investigators Taylor admitted the Rolex was a knockoff he had purchased for only \$2,000 years before in Pennsylvania.

On May 11, 2012, Taylor reported to the New Castle Police Department that his home at 17 Redstone Drive in New Castle (Garfield County) had been burglarized while he was at a movie and his wife was out of town. He reported many items stolen including a Sentry safe, his passport, and four items of valuable jewelry listed on a Valuable Personal Property rider with his insurance carrier including a diamond ring. The same day Taylor made a claim to United States Automobile Association (USAA) Insurance seeking payment for the value of items #1, 4, 6 and 7 listed on a Valuable Personal Property rider. Taylor submitted an appraisal for VPP Item #1, a diamond ring, showing it had a value of \$7,500.

Taylor was paid for his lost passport, other items, and \$50,000.08 for the value of the jewelry items #1, 4, 6 and 7 that he claimed were stolen. He informed USAA that items #2, 3 and 5 had not been stolen and remained in his possession. Later investigation revealed that Taylor had taken item #1 in to a jeweler shortly before he made his claim, and the ring now had a cubic zirconium stone in it rather than a diamond ring shown in the appraisal, and thus would no longer be worth the \$7,500 appraisal Taylor submitted. Investigation revealed Taylor's passport was never stolen, because he used it to travel to Mexico after he made this insurance claim.

On September 14, 2015, Taylor contacted USAA and claimed that items #2, 3 and 5 had been stolen in the 2012 burglary. Because it had been over a year since the alleged burglary USAA denied coverage. The next day Taylor contacted the New Castle Police Department and reported that the same items #2, 3 and 5 had been stolen out of his wife's car. On September 17, he made an insurance claim to USAA for the value of those items. He spoke on the phone with USAA representatives and claimed that items #2, 3 and 5 had been stolen in the alleged vehicle trespass. USAA honored the claim and paid Taylor \$9,918.42.

In June 2010 Taylor received a check for \$85.81 made out to "Michael Taylor and Julie Leaf." He signed both his and Julie Leaf's names on the check and deposited it on or about June 21, 2010. He did not have Julie Leaf's knowledge or permission to forge her signature endorsing that check.

In 2012 Taylor received a check for \$950.00 made out to "Julie Leaf and Michael Taylor." He signed both his and Julie Leaf's names on the check and deposited it on or about September 4, 2012. He did not have Julie Leaf's knowledge or permission to forge her signature endorsing that check.

In 2015 Taylor received a check for \$365.70 made out to "Julie Leaf and Michael C Taylor." He signed both his and Julie Leaf's names on the check and

deposited it on or about April 27, 2015. He did not have Julie Leaf's knowledge or permission to forge her signature endorsing that check.

At all times relevant to the charges Taylor lived in Garfield County, and all counts occurred in or are triable in Garfield County.

COUNT ONE

THEFT \$1,000 – \$20,000 (F4)

C.R.S. § 18-4-401(1)(b),(2)(c)

On or about between June 13, 2010 and June 30, 2010, with a date of discovery on or about January 6, 2016, Michael Taylor, unlawfully, feloniously, and with the intent to defraud United States Automobile Association, presented or caused to be presented any written, oral, or electronic material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the statement contains false material information or withholds material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT TWO

THEFT \$1,000 – \$20,000 (F4)

C.R.S. § 18-4-401(1)(b),(2)(c)

On or about between May 11, 2012, and July 31, 2012, with a date of discovery on or about January 6, 2016, Michael Taylor, unlawfully, feloniously, and with the intent to defraud United States Automobile Association, presented or caused to be presented any written, oral, or electronic material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the statement contains false material information or withholds material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT THREE

INSURANCE FRAUD (F5)

C.R.S. § 18-5-211(1)(b),(4)

On or about September 14, 2015, Michael Taylor, unlawfully, feloniously, and with the intent to defraud United States Automobile Association, presented or caused to be presented a claim for loss or injury which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT FOUR
INSURANCE FRAUD (F5)
C.R.S. § 18-5-211(1)(b),(4)

On or about between September 17, 2015 and September 29, 2015, Michael Taylor, unlawfully, feloniously, and with the intent to defraud United States Automobile Association, presented or caused to be presented a claim for loss or injury which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT FIVE
INSURANCE FRAUD (F5)
C.R.S. § 18-5-211(1)(e),(4)

On or about September 17, 2015, Michael Taylor, unlawfully, feloniously, and with the intent to defraud United States Automobile Association, presented or caused to be presented any written, oral, or electronic material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the statement contains false material information or withholds material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT SIX
THEFT \$5,000 – \$20,000 (F5)
C.R.S. § 18-4-401(1)(b),(2)(g)

On or about between September 17, 2015 and September 29, 2015, in and triable in the County of Garfield, State of Colorado, Michael Taylor, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over, a thing of value, namely: money of United State Automobile Association, with the value of five thousand dollars or more but less than twenty thousand dollars, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive United State Automobile Association of its use or benefit; in violation of section 18-4-401(1)(a),(2)(g), C.R.S.

COUNT SEVEN
FORGERY (F5)
C.R.S. § 18-5-102(1)(c)

On or about June 21, 2010, Michael Taylor, with the intent to defraud Julie Leaf, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, a commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a check; in violation of section 18-5-102(1)(c), C.R.S.


COUNT EIGHT
FORGERY (F5)
C.R.S. § 18-5-102(1)(c)

On or about September 4, 2012, Michael Taylor, with the intent to defraud Julie Leaf, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, a commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a check; in violation of section 18-5-102(1)(c), C.R.S.

COUNT NINE
FORGERY (F5)
C.R.S. § 18-5-102(1)(c)

On or about April 27, 2015, Michael Taylor, with the intent to defraud Julie Leaf, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, a commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a check; in violation of section 18-5-102(1)(c), C.R.S.


CYNTHIA H. COFFMAN
ATTORNEY GENERAL
STATE OF COLORADO


Jason Slothouber, #43496
Assistant Attorney General
Criminal Justice Section

The 2017-2018 Colorado Statewide Grand Jury presents the within Indictment,
and the same is hereby

ORDERED FILED this 24th day of August 2017.

Pursuant to § 13-73-107, C.R.S., the Court designates Garfield County,
Colorado as the county of venue for the purposes of trial.


MICHAEL A. MARTINEZ
Chief Judge, Second Judicial District