

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202	DATE FILED: February 2, 2023 3:57 PM FILING ID: EE1E2515ED6F3 CASE NUMBER: 2023CR328
THE PEOPLE OF THE STATE OF COLORADO, v. JOSEPH CAMILLO TYLER and AMELIA MARIE TYLER, Defendants.	▲ COURT USE ONLY ▲
PHILIP J. WEISER, Attorney General ROBERT S. SHAPIRO, First Assistant Attorney General, Registration Number: 26869 1300 Broadway, 9 th Floor Denver, CO 80203 720-508-6000 rob.shapiro@coag.gov	Grand Jury Case No.: 22CR0001 Courtroom: 259 Case No.:
COLORADO STATEWIDE GRAND JURY INDICTMENT	

Of the 2022-2023 term of the Denver District Court in the year 2023; the 2022-2023 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:

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| COUNT ONE | Violation of the Colorado Organized Crime Control Act-Pattern of Racketeering- Participation in an Enterprise, §18-17-104(3), C.R.S. (F2) 37284 |
| COUNT TWO | Violation of the Colorado Organized Crime Control Act-Conspiracy, §18-17-104(4), C.R.S. (F2) 37285 |
| COUNT THREE | Theft-\$5,000-\$20,000, §18-4-401(1)(a),(2)(g),(4) C.R.S. (F5) 08A14 |
| COUNT FOUR | Conspiracy to Commit Theft - \$5,000-\$20,000, §18-4-401(1)(a),(2)(g),(4) and §18-2-201, C.R.S. (F6) 08A14 C |

COUNT FIVE Aggravated Motor Vehicle Theft-Less Than \$20,000, §18-4-409(2)(a),(3)(a), C.R.S. (F5) **0804G**

COUNT SIX Theft-\$5,000-\$20,000, §18-4-401(1)(a),(2)(g),(4) C.R.S. (F5) **08A14**

COUNT SEVEN Conspiracy to Commit Theft - \$5,000-\$20,000, §18-4-401(1)(a),(2)(g),(4) and §18-2-201, C.R.S. (F6) **08A14 C**

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COUNT NINE Theft-\$500 or More-At-Risk Victim, §18-6.5-103(5) and §18-4-401(1)(a), C.R.S. (F3) **1854C**

COUNT TEN Criminal Exploitation -Under \$500-At-Risk Person, §18-6.5-103(7.5)(a), (b), C.R.S. (F5) **18624**

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COUNT ONE

VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT - PATTERN OF RACKETEERING - PARTICIPATION IN AN ENTERPRISE, C.R.S. §18-17-104(3) (F2) 37284

On or about February 3, 2020 through October 23, 2022, and discovered on or about July 26, 2020, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** 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 section 18-17-104(3), C.R.S.

COUNT TWO

VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT- CONSPIRACY, C.R.S. §18-17-104(4) (F2) 37285

On or about February 3, 2020 through October 23, 2022, and discovered on or about July 26, 2020, in the State of Colorado, **James Camillo Tyler, Amelia Marie Tyler** and/or others to the Grand Jury and the Attorney General known or unknown, did unlawfully, feloniously and knowingly conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of section 18-17-104(4), C.R.S.

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

The Enterprise

The Enterprise alleged in Counts One and Two is primarily a group of individuals, associated in fact, although not a legal entity. More specifically the enterprise includes, but is not limited to, the following associated in fact individuals and/or entities:

Joseph Camillo Tyler

Amelia Marie Tyler

J&S Tree Trimming

Double A Tree Trimming Service

J.A. Tree Service and/or J&A Tree Service

and other persons or entities known or unknown to the Grand Jury and the Attorney General.

The above listed members of the Enterprise, were associated in fact individuals who collaborated with each other as both principals and/or complicitors to operate an illicit scheme for a lengthy period of time. In particular this associated in fact Enterprise, consisting of a couple who were related to each other, repeatedly used a set of deceptive tactics to commit or conspire to commit a financial fraud upon a population of individuals, many of which can be primarily defined as older adults, defined by the law as “at-risk” by reason of age and/or because of a statutory vulnerability.

The members of the Enterprise employed a consistent ruse, representing themselves as members and operators of a legitimate and established tree trimming and/or home repair business. In reality this was a front operation with little evidence of it operating as a genuine business entity. Instead, this group operated in a methodical and systematic manner to defraud and steal money from Colorado residents, including senior citizens. The basic premise of how the scheme was done occurred in a substantially similar manner with the members showing up at a residence to solicit a homeowner to trim trees or do home repairs for a set amount of money. Once the amount of money was agreed upon a check covering the full job was written by the homeowner. This check was payable to an enterprise member (usually the wife). While the husband would cut a few branches at a victim’s home the wife would leave with their vehicle to go to the homeowner’s bank and cash the check. Once the check was cashed the wife would return to pick up the husband before he completed most of the job. A member of the enterprise would often then tell the homeowner that they needed to get something and would be back. Neither Joseph or Amelia Tyler would typically return to a jobsite once they obtained and exercised control over the homeowner’s money. Note: Cash was sometimes exchanged by some victims instead of a check being issued.

Throughout the course of this investigation, law enforcement (led by the Arvada PD) and the Grand Jury has developed evidence to show that the Enterprise and its members are highly

mobile, travelling and operating widely and repeatedly throughout Colorado. Within the State of Colorado, evidence shows that the Enterprise operated in at least the following counties: Adams, Arapahoe, Denver, El Paso, Jefferson, and Otero.

Pattern of Racketeering Activity

Joseph Camillo Tyler, Amelia Marie Tyler and/or others 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:

Theft, C.R.S. §18-4-401

Conspiracy to Commit Theft, C.R.S. §§ 18-2-201 and 18-4-401

Aggravated Motor Vehicle Theft in the First Degree, C.R.S. 18-4-409

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 ONE

THEFT - \$300-\$1,000, C.R.S. 18-4-401

On or about February 3-9, 2020, in Otero County, State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Mary Switser, without authorization or by threat or deception, with the the thing of value being three hundred dollars or more but less than one thousand dollars, and intended to deprive Mary Switser permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

PREDICATE ACT TWO

CONSPIRACY TO COMMIT THEFT-\$300-\$1000,
C.R.S. §§ 18-4-401(1)(a), (2)(c) and 18-2-201

On or about February 3-9, 2020, in Otero County, State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** with the intent to promote or facilitate the commission of the crime of Theft-\$300-\$1000, unlawfully agreed with each other and/or a person or persons to the Grand Jury and Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1)(a), and 18-2-201, C.R.S.

The offenses alleged in Predicate Acts One and Two were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about February 3, 2020, Mary Switser (70 plus years old) was resident at 303 E. Florence Ave. in Fowler, Otero County, CO. Ms. Switser, who had a variety of medical issues, including being impacted by an early stage of dementia while also recovering from hip surgery, was contacted at her home by two people who were later identified as Joseph Camillo Tyler and Amelia Marie Tyler. The Tylers asserted that they were affiliated with a company named J&S Tree Trimming and that they could trim her trees for \$650.00. After Ms. Switser wrote a check for \$650.00, which was payable to Joseph Tyler, Amelia Tyler drove with Joseph Tyler to Ms. Switser's bank in Fowler and they cashed the check. A few days later the Tyler's came back to Ms. Switser's home and sought out additional money from Ms. Switser that she declined to pay out. The Tylers left and never returned without the tree trimming job being completed.

PREDICATE ACT THREE

THEFT – LESS THAN \$300, C.R.S. 18-4-401(1)(a)

On or about July 26, 2020-September 1, 2020, in El Paso County, State of Colorado, **Joseph Camillo Tyler**, unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Elmer Plumlee, without authorization or by threat or deception, with the thing of value less than three hundred dollars, and intended to deprive Elmer Plumlee permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

The offense alleged in Predicate Act Three was committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about July 26, 2020, Elmer Plumlee (70 plus years old) was the resident at 2604 Concord in Colorado Springs, El Paso County, CO. Mr. Plumlee was contacted at his home by

two adults with a child. One of the adults was later identified at Joseph Camillo Tyler. The unsolicited sales pitch by Tyler included that he could do some home repairs (painting the house trim and a gutter replacement) for \$300.00. After Mr. Plumlee provided \$300.00 in cash to Mr. Tyler some, but not all, of the painting of the trim occurred before Tyler left and never returned.

PREDICATE ACT FOUR

THEFT – \$300-\$1000, C.R.S. 18-4-401(1)(a)

On or about September 3-4, 2020, in El Paso County, State of Colorado, **Joseph Camillo Tyler**, unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Vicki Giannatala, without authorization or by threat or deception, with the thing of value being three hundred dollars or more but less than one thousand dollars, and intended to deprive Vicki Giannatala permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

The offense alleged in Predicate Act Four was committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about September 3, 2020, Vicki Giannatala was the resident at 2030 S. Corona in Colorado Springs, El Paso County, CO. She was contacted at her home in late August 2020 by a man who was later identified at Joseph Camillo Tyler (Tyler). Tyler offered to trim her trees for \$450.00, with a caveat that he would drop the price to \$400.00 if the job was done that day. Since Ms. Giannatala could not have the job that day they agreed to have the job done on Labor Day. Tyler later called to say that he was in the area and could do the job that day. After Tyler asked for and received \$450.00 in cash he stated that he had to go to the dump. After leaving he did not return without completing the job. Tyler was observed with a woman whose description was consistent with the description of Tyler's wife, Amelia Marie Tyler.

PREDICATE ACT FIVE

THEFT – LESS THAN \$300, C.R.S. 18-4-401(1)(a)

On or about October 13, 2020, in El Paso County, State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Margaret Henkins, without authorization or by threat or deception, with the thing of value being fifty dollars or more but less than three hundred dollars, and intended to deprive Margaret Henkins permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

The offense alleged in Predicate Act Five was committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about October 13, 2020, then 85-year old Margaret Henkins was the resident at 2125 Condor in Colorado Springs, El Paso County, CO. She was contacted at her home by a man and woman who were identified as Joseph Camillo Tyler and Amelia Marie Tyler. The Tylers offered to trim her trees for \$300.00 via a check that was payable to Amelia Tyler. Amelia cashed the check that same day at Ms. Henkins' bank. Joseph Tyler only trimmed a few branches before leaving prior to completing the job. After leaving the jobsite the Tylers did not return.

PREDICATE ACT SIX

THEFT – LESS THAN \$300, C.R.S. 18-4-401(1)(a)

On or about July 7, 2021-August 19, 2021, in El Paso County, State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Barbara Langdon, without authorization or by threat or deception, with the thing of value being less than three hundred dollars, and intended to deprive Barbara Langdon permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

The offense alleged in Predicate Act Six was committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about and between July 7, 2021-August 19, 2021, then 80-year-old Barbara Langdon was the resident at 3602 Windflower in Colorado Springs, El Paso County, CO. She was contacted on July 7, 2021, at her home by a man and woman who were identified as Joseph Camillo Tyler and Amelia Marie Tyler who offered to trim her trees for \$500.00-\$600.00. With Ms. Langdon only having \$200.00 at the time she paid them that amount with her actually giving a check to Amelia Tyler. After only a few branches were cut and leaving the debris at the jobsite the Tylers left without completing the job and did not return.

PREDICATE ACT SEVEN

THEFT – \$300-\$1000, C.R.S. 18-4-401(1)(a)

On or about July 4-7, 2021, in El Paso County, State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully and knowingly obtained, retained, or exercised control over a thing of value, namely: money, of Helen Hiestand, without authorization or by threat or deception, with the thing of value being three hundred dollars but less than one thousand, and intended to deprive Helen Hiestand permanently of its use or benefit; in violation of section 18-4-401(1)(a), C.R.S.

The offense alleged in Predicate Act Seven was committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On or about and between July 4-7, 2021, then 91- year old Helen Hiestand, was at her home located at 3106 Wesley Ln in Colorado Springs, El Paso County, CO, by two people later identified Joseph and Amelia Tyler. They were soliciting for landscaping work for \$400. Ms. Hiestand only had \$398 in cash that she then provided to Amelia at the request of Joseph since she handles the finances. Despite providing the cash no work was done.

PREDICATE ACT EIGHT

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1), (2)(G), (4)

On or about August 28, 2021 through January 27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing value, namely: money (checks and/or cash), of Kenneth Fisher, Linda Fisher, Penny Morrow, Deborah Tillison, Walter Hall, Carolyn Goers, Roy Spencer, Patty Spencer, Betty Alexander, Myrta Anderson, Willa “June” Strome, Rogelio “Roger” Juarez, Terry Mallinson, John Stephen Mallinson, Miles Malmgren, William Boyle, Brian Williams, Michele Olivas, Gary Olivas, Tom Knapp, Ronald “Ron” Arner, Dwight Kellogg, Laura Castens, Alex Guest, Jill Guest, Helen Moore, Uta Swanson, John Swanson, Michelle Gutierrez, Ronald Armstrong, Sandra Pratt and/or Marvin Pratt within a period of six months and with the aggregate value of five thousand dollars or more but less than twenty thousand dollars and intended to deprive Kenneth Fisher, Linda Fisher, Penny Morrow, Deborah Tillison, Walter Hall, Carolyn Goers, Roy Spencer, Patty Spencer, Betty Alexander, Myrta Anderson, Willa “June” Strome, Rogelio “Roger” Juarez, Terry Mallinson, John Stephen Mallinson, Miles Malmgren, William Boyle, Brian Williams, Michele Olivas, Gary Olivas, Tom Knapp, Ronald “Ron” Arner, Dwight Kellogg, Laura Castens, Alex Guest, Jill Guest, Helen Moore, Uta Swanson, John Swanson, Michelle Gutierrez, Ronald Armstrong, Sandra Pratt and/or Marvin Pratt, permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g), (4), C.R.S.

PREDICATE ACT NINE

CONSPIRACY TO COMMIT THEFT-\$5,000-\$20,000,
C.R.S. §§ 18-4-401(1)(a), (2)(g), (4) and 18-2-201

On or about August 28, 2021 through January 27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** with the intent to promote or facilitate the commission of the crime of Theft-\$5,000-\$20,000, unlawfully agreed with each other and/or a person or persons to the Grand Jury and Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1)(a), (2)(g), (4) and 18-2-201, C.R.S.

PREDICATE ACT TEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE – LESS THAN \$20,000, C.R.S. 18-4-409(2), (3)(a) (F5)

On or about August 28, 2021 through February 3, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Ronald Armstrong, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours and/or used the motor vehicle in the commission of the crime of Theft as set forth in section 18-4-401, C.R.S., and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2), (3)(a), C.R.S.

The offenses alleged in Predicate Acts Eight, Nine and Ten were committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

On 10/25/21, Arvada Police officers were dispatched to a residence in Arvada, Jefferson County, Colorado regarding an alleged theft from an at-risk adult. The victims, Kenneth and Linda Fisher, reported being "scammed" by individuals advertising their tree trimming services. A detective was assigned to this case for further investigation and initially learned of additional reports from other Arvada residents that were similar to this transaction.

The general allegations of the similar reports showed that the victims were approached at their homes by a male and a female who were previously unknown to them. The victims were asked if they needed tree trimming services based on the overgrowth and appearance of their trees as visible from the curb line of their home. Once the service was agreed upon at a reasonable price, the male suspect would begin working.

While the work was barely in-progress, the female suspect would build rapport with the victim, and then request payment. As soon a check or cash was provided, the suspects would explain they needed to leave the premises to obtain either another tool or a trailer for the tree limb debris removal. The suspects would leave after they immediately cashed the victim's check, and never return to complete the work.

In most instances where a check was issued, the check is written to Amelia Tyler. In the cases where bank surveillance was available, the person identified as Amelia Tyler is shown entering the victims' banks to cash the checks. Amelia has been identified by her Colorado driver's license, bank surveillance, and photo arrays.

It was learned from a previous law enforcement report that Amelia Tyler was associated with a dark blue Chrysler 300 sedan (VIN Last 4#'s being 5254/Colorado license plate 830PFX). Many of the victims during this first six-month series from late 2021 into early 2022 observed the suspects occupy this vehicle, or a vehicle with a similar description, during their landscaping solicitation. Some victims provided the exact

license plate number of Colorado 830PFX. Upon review of law enforcement contacts, it was discovered Joseph Tyler was commonly associated with Amelia Tyler, and he matched the physical description of the male suspect in these reports. Amelia and Joseph Tyler are husband and wife and identified as such to many of the victims.

During these incidents, many victims recalled seeing Joseph and Amelia Tyler with a bound booklet containing carbon copy receipts. This booklet, bank receipts, as well as tree trimming equipment were believed to be in their vehicle. A receipt had been provided to victims in every event and obtaining these booklets would lead to a record of additional victims of criminal exploitation and theft, as well as evidence to current investigations.

On 01/28/22, a search warrant was authorized for the vehicle to locate additional evidence related to these crimes. On 02/03/22, Lakewood Police Department agents located the vehicle unoccupied in the parking lot of a motel. Law enforcement contacted the motel and learned the Joseph and Amelia Tyler were residing at the motel and were associated with the Chrysler sedan in question.

On 02/10/22, law enforcement, led by the Arvada PD, executed the search warrant for this vehicle. Several important items of evidentiary value were located during this search. Tools used for tree trimming were located, to include saws, loppers, and rakes. Various bank deposit envelopes, typically provided by banks when cash is issued, were found in the passenger compartment of the vehicle. Additional items of indicia bearing the names Joseph Tyler and Amelia Tyler, to include court documents, were located in the glovebox of the vehicle. Of these documents, bond paperwork for El Paso County cases of a similar nature to this case were also discovered.

In addition, three handwritten ledgers were found in the vehicle. These ledgers were bound booklets which contained generic carbon copy receipts or invoices, consistent with those given to victims in this case. The first booklet was 8x11" in size and contained receipts dated between 08/08/21-08/28/21. The second booklet was 5x8" in size and contained receipts dated between 09/02/21-11/27/21. The third booklet was 4x7" in size and contained receipts from 12/01/21-02/03/22. Also observed were 11 receipts issued in El Paso County, 11 receipts issued in Lakewood, 25 receipts issued in Arvada, and 54 receipts in other Colorado jurisdictions. A total of 101 receipts were found in these ledgers, all of which consistent with landscaping work. The receipts associated with the victims from the first set of cases in Arvada were also located amongst these receipts.

Arvada PD contacted all additional individuals residing in Arvada who were listed on these receipts. Furthermore, Arvada PD coordinated with other law enforcement agencies and interviewed other potential victims. Each of these victims provided a consistent account of events relative to minimal work being started and the suspects promptly leaving following payment for services. Many of the victims still had evidence of the incomplete work on their property to include damaged trees and large tree branches discarded throughout the yard. The modus operandi was consistent by the suspects when

targeting these victims. Most of the victims listed below had a matching invoice containing their name, address, and date of occurrence found in the vehicle that was searched.

This particular six-month criminal series occurred between 08/28/21-01/27/22. The essential facts regarding each transaction are as follows:

10/25/21- 6542 Iris Street, Arvada, Jefferson County, CO

On 10/25/21, Arvada Police Officers were dispatched to 6542 Iris Street, Arvada, Jefferson County, Colorado, reference a fraud. The reporting party and victim in this event was identified as Kenneth Fisher (with a listed age of at least 70 years). Kenneth resides at this address with his wife, Linda Fisher (with a listed age of at least 70 years) who was also home at the time of this event. Both Kenneth and Linda are at-risk adults based on their age, according to C.R.S. § 18-6.5-102.

On 10/25/21, a male and female approached Kenneth in the front yard of his residence. The male observed Kenneth's landscaping and asked if he needed assistance trimming the trees. The initial offer for the job to be completed was \$1,000.00. The male then stated they would complete the work "today" for \$750.00. Through conversation, Kenneth learned the female was named "Amelia Tyler," and the male never introduced himself. These individuals were later identified as Joseph Tyler and Amelia Tyler.

Kenneth verbally agreed to allow the couple to complete this service that day for \$750.00 with Amelia writing out a receipt. Joseph began the work and cut a few branches from some trees in front yard. Joseph also agreed to trim a pine tree, which was not trimmed at all. Joseph did not have a ladder and said his brother would respond with additional equipment to help him finish the job. Joseph worked for about forty-five minutes and piled the cut branches in the front yard. In this case, it was not requested the debris be removed.

While the work was in-progress, Kenneth's wife Linda wrote a check from their shared 1st Bank account. The check was requested to be written to the female, "Amelia Tyler." While Joseph was working in the yard, Amelia left in their vehicle to cash the check. Amelia returned to the residence to pick up Joseph.

When Joseph left, he told Kenneth that he needed to pick up his brother and would return later in the day to complete the job. Amelia and Joseph Tyler never returned to complete the tree trimming.

Kenneth was given a phone number for the Amelia which was 720-649-1029. Kenneth attempted to contact Amelia several times via the phone number she provided to him but was unsuccessful. At the time of the police report, the incomplete work was observed and photographed by officers.

After the suspects left, and prior to contacting the police, Kenneth went to 1st Bank located on Ward Road in Arvada, to gather more information. A copy of the check which was cashed was provided to Kenneth by the bank, and later provided to officers. Upon review of this check, it was brought into 1st Bank located at 6355 Ward Road, Arvada, to be cashed on 10/25/21. The signature on the back is not legible, but below the signature was the phone number 720-649-1029. The phone number 720-649-1029 was associated to Amelia Tyler. 1st Bank's video surveillance showed the female suspect to enter the bank alone and the suspect strongly resembled Amelia, although the quality of footage is less than optimal.

A detective later contacted 1st Bank regarding this transaction. 1st Bank advised that Amelia came into the branch and provided her Colorado driver's license number in order to cash the check. A query showed the number that was provided matched Amelia Tyler's current Colorado driver's license.

Kenneth was later shown single dossier photographs of Joseph and Amelia and positively identified them as the suspects. Kenneth said, "That's definitely them!" Kenneth added, "Those are the two that scammed us."

11/27/21- 5520 Reed Court, Arvada, Jefferson County, CO

Arvada Police Officers were dispatched to 5520 Reed Court, Arvada, Jefferson County Colorado reference a theft. The reporting party and victim was identified as Brian Williams. On 11/27/21, Brian reported that he was approached at his residence by a male who verbally identified as "Joe." Brian had observed that a neighbor down the street was having their trees trimmed. Joe advertised that he was associated with the same tree cutting service. Joe asked if Brian wanted a quote to remove two trees in his yard. After discussion, Brian and Joe agreed on an amount of \$4,000.00 to remove two trees, with a \$1,000.00 deposit that day. Brian handed Joe \$1,000.00 cash as deposit for this work. Joe provided Brian with an invoice documenting the agreement.

Joe stated that if his crew finished the job down the street early enough, he would send them over to start Brian's job that day. Joe provided a phone number where he could be reached (720-649-1029). Joe was accompanied by a female party who Joe identified as his wife. The couple was associated with a blue Chrysler 300 bearing Colorado license plate 830PFX based on notes kept by Mr. Williams.

Joe was described as a thin build, Hispanic male in his fifties. A female party with "Joe" was described as a heavy set, Hispanic female in her late forties, with blond hair. Brian said no one ever started the job on 11/27/21, and at the time of the report, the work remained incomplete. Brian was unable to make phone contact with Joe despite multiple attempts. Brian also produced a receipt to law enforcement. This invoice matches the copy which was later located in Amelia and Joseph Tyler's vehicle.

08/28/21- 1360 Mariposa Drive, Denver, Adams County, CO

As was summarized above based on reports which listed the vehicle by its license plate it was determined that Amelia and Joseph Tyler were in possession of a blue Chrysler sedan (VIN Last 4#'s being 5254/Colorado license plate 830PFX). Beginning on 01/25/22, law enforcement contacted Ronald Armstrong, the registered owner of this vehicle. Ronald said he did know who had possession of his vehicle and began by providing a similar account of events regarding a trim trimming solicitation. On 08/28/21, a male and female previously unknown to Ronald approached his residence advertising their tree trimming services. Ronald resides at 1360 Mariposa Drive, with a mailing Denver address, but which is located in Adams County. The couple introduced them self as "Joe" and "Amelia." There were about ten trees identified to be trimmed during the discussion of services needed. Ronald agreed to have the couple complete the work. When most of the trimming was complete, the suspects told Ronald they would have to finish the work once they obtained a trailer to haul the branches away. The couple told Ronald they would be back later that day.

Per the suspects' request, Ronald issued a check to "Amelia Tyler" from his US Bank account in the amount of \$700.00. Ronald said he was told by his bank that on 08/28/21 Amelia went into the US Bank branch (5211 West 72nd Avenue, Westminster) to cash the check. Given the time lapse from the date of this event, video surveillance was unavailable. The suspects did not return that day.

Then, on or around 09/04/21 the suspects returned and told Ronald they now needed \$500.00 more to haul away the tree branches. Ronald told them he could not afford that. No additional yard work was done on this date. At this time, the suspects had arrived in a vehicle which was clearly having operational issues. Ronald said that vehicle broke down in his driveway. Ronald was no longer using his Chrysler sedan and offered to sell it to the couple for \$1,000.00. The couple took possession of the vehicle, noting they would pay him at a later date. Despite still being owed a completed tree service and payment for the vehicle, Ronald let the couple leave with his Chrysler. Ronald still had the title to the vehicle and continued to pay insurance.

On 10/09/21, the couple again returned to Ronald's home and provided him with \$300.00 cash, but still did not pay him the full \$1,000.00 for the vehicle. Ronald estimated the value of the vehicle to be \$3,000.00, although he was selling it for \$1,000.00 to cut the couple a break on the price. Ronald had been unable to reach the couple since 10/09/21 and attempted to report the vehicle as stolen to Adams County Sheriff's Office, although no such record was ever entered.

Ronald had a Colorado Department of Revenue "Lost or Stolen License Plate Affidavit" that was completed on 11/10/21. The plate was still showing as registered to this vehicle with no stolen hit associated in CCIC/NCIC. As of 1/28/22, the couple still had not returned to complete the tree trimming nor did they provide full payment for the vehicle.

The broken-down vehicle that was left in Ronald's driveway was observed to have "stacks" of booklets containing receipts, like the one Ronald had from the incomplete service.

On 01/28/22, Ronald was able to successfully identify Amelia Tyler from a double-blind photo array, although he could not positively identify Joseph Tyler. Ronald said this situation has caused him stress because he is worried about the vehicle and the crime being committed as a result of the car having been in Joseph and Amelia Tyler's possession. Ronald said he is worried about the amount it has cost him financially as well.

01/14/22- 5985 Everett Street, Arvada, Jefferson County, CO

On 01/15/22, Arvada Police Officers were dispatched to 5985 Everett Street, Arvada, Jefferson County, Colorado regarding a fraud. The reporting party and victim was identified as Penny Morrow (70 plus years of age). On 01/14/22 a male and female unknown to Penny knocked on her door asking if she was in need of assistance with yard work. Penny agreed to accept these services and asked them to trim a few bushes in the front yard and remove the debris. The male trimmed the bushes as requested but told Penny he would need to return with his brother and a pick-up truck to collect the trimmings.

Penny provided the male with a check written to Amelia Tyler in the amount of \$350.00. Penny stated her check was written out of her Chase Bank account. As soon as Penny handed the check to the male, both he and the female left. No one has returned to pick up the trimmings and complete the work that was agreed upon.

Penny described the male as a white, with a "fit" build, approximately 5' 6" in height. Penny observed a female in a vehicle. The female described as a white female approximately 5' 2" and believed her name was Amelia Tyler based on writing the check. The couple was driving an unknown make and model dark gray sedan (unknown license plate).

As was discussed above a search of law enforcement databases and comparison with known connecting cases determined these suspects were likely to be Amelia Tyler and Joseph Tyler. A detective responded to Penny's residence to show her a double-blind photograph array for each suspect. Penny accurately identified Amelia from the photo array but was unable to select a male suspect from the photos shown.

The lead detective received a copy of this check from Penny. This check was cashed at Chase Bank branch located at 9611 West 58th Avenue, Arvada on 01/14/22 around 1014 hours. The video was provided from the moment Penny's check was cashed. In this video, the lead detective was able to visually identify Amelia Tyler enter the bank alone and approach a teller. Amelia was wearing a gaiter type mask, and grey hoodie. Amelia produces her Colorado identification card and Penny's check to the employee. Amelia received the cash with no envelope and exits the bank.

The lead detective responded to Penny's residence and observed a large pile of tree branches to the north of the home. Penny confirmed this is the same pile of tree branches left by the suspects on 01/14/22.

01/22/22- 5725 Dover Street, Arvada, Jefferson County, CO

On 01/22/22, Arvada Police Officers were dispatched to 5725 Dover Street, Arvada, Jefferson County, Colorado regarding a fraud. The reporting party and victim was identified as Deborah Tillison. Deborah requires oxygen (mechanical assistance) to breathe, and therefore is classified as an at-risk adult, according to C.R.S. § 18-6.5-102. On 01/22/22 Deborah, who also struggles with mobility due to arthritis and other problems, used her walker which she uses to move to answer the door. Deborah was greeted by a male who stated he was with "Double A Tree Trimming Service" and had 20 years of experience. Deborah noted the male was not in a uniform and did not appear to have any sort of work vehicle. The male never introduced himself by name.

The male pointed out a tree in Deborah's front yard and stated there were several dead limbs on it he could remove for her. Deborah said she agreed to have the male cut the dead limbs from the tree in the front yard, and to do some work on a smaller tree and some weeds near her driveway, including removal of the debris. Deborah discussed an appropriate price until coming to an agreement of \$350.00. Once the price was agreed to, a woman approached the male, and the male introduced her as his wife, "Amelia Tyler" and said she would take the check. Deborah wrote a check out to "Amelia Tyler" for \$350.00 from her Chase Bank checking account.

The male showed Deborah a bound book of receipts (about 10-15 pages). Deborah believed this was to advertise his validity in servicing many customers. The male provided her with a receipt for the check and yard work. Deborah provided officers the receipt the male issued her.

The check was given to "Amelia and she observed the male cut about five dead limbs from the tree in the front yard before he told her something to the effect of him needing to go get a trailer to put this debris in and get a new [saw] blade. Deborah estimated the male and female were in her yard for about 30-45 minutes before leaving in a small, dark-colored sedan (unknown license plate). No one has returned to complete the work agreed upon.

Deborah described the male as about 5'8" tall, around 45 years old, having light brown and gray "wiry" hair, and no facial hair. Deborah described the female as about 40-45 years old.

The lead detective reviewed the check issued, and learned this check was cashed at Chase Bank branch located at 7405 West 38th Avenue, Wheat Ridge, Colorado on 01/22/22 around 1055 hours. The video was provided from the moment Deborah's check was cashed. The lead detective was able to visually identify Amelia Tyler enter the bank alone, approach a teller before producing her Colorado identification card and Deborah's check to the teller with Amelia Tyler receiving the cash.

On 01/28/22, the lead detective responded to Deborah's residence and observed a large pile of tree branches in the front yard of the home. Deborah confirmed this is the same pile of tree branches left by the suspects on 01/22/22.

9/11/21 – 10575 Washington Way, Northglenn, Adams County, CO

After Arvada PD had executed its search warrant of the vehicle that was associated with the Joseph and Amelia Tyler a receipt was located in that vehicle for work that had supposedly been conducted at the above listed address for Marvin and Sandra Pratt on 9/11/21. Ms. Pratt, over age 70 on the date of offense, stated that she was working in her yard when a man and woman (along with a boy aged 10-12 years) approached her to solicit tree trimming services. After a price of \$600 was agreed upon Ms. Pratt went to her bank and withdrew \$600 in cash that was then provided to the woman. Ms. Pratt said that a little work was done but nothing was hauled away which required her to hire another company to complete the job.

09/18/21- 5410 Iris Street, Arvada, Jefferson County, CO

A seized receipt, dated 09/18/21, was written to "Tom Knapp" with the location of 5410 Iris Street was located by law enforcement during the executed search warrant. As a result of this observation law enforcement made phone contact with Thomas "Tom" Knapp. Tom was asked if he had tree trimming services completed at his residence in September of 2021. Tom replied, "I sure did." Tom said, "I was pretty sure it was a scam," but he agreed to let the individuals complete the work. Tom said he was approached by a couple driving an older four door sedan on the date referenced above and was solicited regarding tree trimming. Tom agreed to the tree cutting and debris removal at a total cost of \$1,000.00.

The couple worked for about one hour, not even completing half of the work, before asking for payment. Tom said he would only pay them half up front, and the remaining payment would be given at the end of the job. Tom provided the couple one \$500.00 check from his Wells Fargo bank account written to Joseph Tyler. The couple left, noting they would finish the work tomorrow.

On 09/19/21 in the morning Tom received a text message from a person identifying as Joseph. Joseph said he was unable to cash the check that Tom had provided them, so he requested cash instead. Joseph said they would return to finish if Tom could produce a cash payment. Tom agreed to give them cash instead, but could only withdraw a maximum of \$300.00 from his ATM. A few hours later (unknown exact time), the couple returned to Tom's house. Joseph gave Tom back his check and took the \$300.00 cash. The couple said they had to leave to obtain a trailer to haul away the debris and would be back shortly. The couple completed no additional work on 09/19/21 and never returned to finish the work or remove the debris as agreed upon. Tom eventually disposed of the tree branches after several weeks by breaking them into small pieces to fit in his trash each week. Tom does believe he was "scammed" during this event.

09/30/21- 9103 West 61st Avenue, Arvada, Jefferson County, CO

An acquired receipt, dated 09/30/21, was written to "Carolyn Goers" with the location of 9103 West 61st Avenue. The lead detective made phone contact with and identified the resident as Carolyn Goers. Carolyn was asked if she had tree trimming services completed in September of 2021. Carolyn replied, "Yes I did! By some crooks!" On 09/30/21, sometime in the mid-afternoon, a male unknown to Carolyn came to her front door. The man said he was going through the neighborhood completing tree trimming. The man said he noticed branches which were touching Carolyn's roof and offered to give her a quote. Carolyn needed the trees trimmed and allowed a quote to be given. Carolyn said she saw this as an opportunity to have some work done to ease the burden on her husband, as he works full time and helps take care of her. The male provided a quote of \$300.00 to take all of the tree branches away from the roof, as well as one dead branch off another tree, and remove the debris. Carolyn agreed to the price for the work.

The male said his wife would come in and write it up for her, at which time a female approached the residence. Carolyn described both individuals as very friendly. Carolyn said she "screwed up" by providing the payment up front. The female said they needed the payment up front so they could pay for the disposal of the branches. The female said once the trimming was complete, their "brother" would be by to pick up the debris. Carolyn wrote one check to "Amelia Tyler" out of her 1st Bank account. Carolyn seemed to have a "red flag" about the event at this point and thought to ask for the female's identification card. The female produced a Colorado driver's license which confirmed her as Amelia Tyler with a matching picture.

Amelia asked Carolyn where the nearest 1st Bank was. Carolyn told her the closest branch was at 64th and Ward Road, at which time Amelia departed in the vehicle. Carolyn said the male cut all tree branches as initially discussed but he had left the debris "all over" her yard. The male said he found additional branches to be trimmed and offered to trim them the next morning. The male added that he would pick up the branches when he returned in the morning. This did not seem to match Amelia's statement of their brother coming to pick up the branches, but Carolyn agreed to have them return in the morning. Amelia returned and picked up the male.

On 10/01/21 Carolyn received a text message from 720-649-1029, identifying the author as Amelia. Amelia said they were running late but would arrive at "2 PM" to finish the work. Nobody ever returned to finish the work or remove the debris. Carolyn attempted to contact the couple and received no response.

The lead detective showed Carolyn a copy of the receipt with her name on it. Carolyn said it looked familiar to her, but she could not locate the copy she was given by the suspects. The lead detective then asked Carolyn to describe the suspects. Carolyn said the male was "medium" height, thin build, dark hair, with a darker complexion. Carolyn did not recall any additional distinguishing features, but thought the male was Hispanic. Carolyn watched the male as he worked, and noticed he was a "heavy" smoker. It should be noted

the vehicle which was in Joseph's possession had a large quantity of cigarette butts inside. Carolyn interacted with the male through a security door and did not see his face closely. Carolyn said the female was shorter, medium "chunky" build with light brown hair. Carolyn said the female was personable. Carolyn recalled the female wearing a face covering. Carolyn did not believe she would be able to identify these individuals due to the distance and face covering. Carolyn remembered the suspects driving a small black sedan.

The lead detective responded to Carolyn's residence and observed one medium sized stack of tree branches to the west of the home. The lead detective also observed one note on her security door which read "FedEx Please wait I move slow." Carolyn provided law enforcement with a copy of check #2131 written to Amelia. The check showed it was cashed on 09/30/21 at 1st Bank (6355 Ward Road). The signature displayed on the endorsee line was consistent with other checks produced by Amelia Tyler.

The lead detective observed that Carolyn uses oxygen and requires a walker to move. Carolyn said she has pulmonary hypertension, which requires her to need oxygen 24/7. This issue also affects Carolyn's heart and has regular check-ups for that. Carolyn is considered "home bound" by her medical insurance and has all primary care visits in her residence. Carolyn identified as "disabled" as a result of her medical conditions. Based on this information, Carolyn is considered an at-risk adult according to C.R.S. §18-6.5-102 based on her need for mechanical assistance to breathe

10/20/21 – 6805 W. Iowa Ave., Lakewood, Jefferson County, CO

Michele Gutierrez reported to law enforcement that she saw a 9News article from a about tree trimming scammers and stated the suspects in the article are the same who scammed her in October 2021.

Michele reported that she lives at 6805 W Iowa Ave in the City of Lakewood, County of Jefferson, State of Colorado and on 10/20/21 she was approached by a Joe and Amelia Tyler. Michele stated that the suspects are tree trimmers and said their brother was working down the street. Joe and Amelia offered to trim Michele's trees for \$1,000. Michele agreed and wrote Amelia a check for \$600 as a deposit.

Michele stated after she handed Amelia the check she immediately left and cashed the check while Joseph began trimming the trees. Michele stated that when Amelia came back, she told Michele that they were going to lunch and would be back. Michele stated that they never returned. Michele stated she had to hire another company to complete the job and haul away branches.

Michele stated that when she paid Amelia, she was handed a receipt which details the work and the total dollar amount for the work. Upon review of the receipt the words "No Haul" was barely legible on the receipt.

10/22/21- 1755 S. Ammons Street, Lakewood, Jefferson County, CO

Joyce Knoll called the Lakewood Police Department and reported that her mother, Helen Moore (aged 70 or older), paid an unknown male and female to trim trees and clean the gutters at her residence located at 1755 S. Ammons Street in the City of Lakewood, County of Jefferson, State of Colorado.

Joyce stated that the trees were trimmed but this male and female told Joyce and Helen, they needed leave to get their trailer for the collection of the branches and to get their ladder to clean the gutters.

The man and woman then left the residence and never returned. Multiple calls were made by Joyce to the phone number provided by these two and the calls went unanswered.

Joyce also reported that the female was a white or Hispanic female with a large stomach, and approximately in her 20's or 30's. No description of the male could be provided.

Helen had issued a check to Amelia Tyler for \$550.00 dollars on October 22, 2021, from her Wells Fargo checking account. This check had been cashed on the same day it was issued.

10/23/21- 9553 W. Maryland Drive, Lakewood, Jefferson, County, CO

Uta Swansen, aged 70 plus years of age, reported to Lakewood Police a matter regarding a scam incident.

Uta Swansen informed that "a male and female in their 30s offering yard services came to her home" located at 9553 W. Maryland Drive in the City of Lakewood, County of Jefferson, State of Colorado around 1500 hours on October 23, 2021.

The male gave Ms. Swansen an estimate of \$400 that she agreed to pay. The couple was paid \$400 in cash. Once paid the couple began working on a tree in the yard. Ms. Swansen said that she requested they remove the dead wood from the tree and nothing else. She also said that the work seemed to be finished, however the male stated they had to go pick up a trailer for cleanup of all the dead wood. At approx. 1545 hours the couple left and never returned to finish the job.

Ms. Swansen was able to provide a license plate for the car being used by these two of 830FPX and advised that this plate was on an older dark colored sedan.

Ms. Swansen also stated that she was provided with a yellow-colored receipt for the work to be performed at the residence.

Lakewood Police later found a Wheat Ridge Police Department report showing an Amelia Tyler was issued a summons and arrested on a warrant after she was stopped for driving a blue colored 2003 Chrysler 300 with Colorado license plate, 830PFX, in the City of Wheat Ridge, Colorado on September 21, 2021.

Law enforcement made note of the similarity between the suspects in this case and the suspects, Amelia Tyler and Joseph Tyler from another Lakewood PD incident that was similar.

Uta Swansen's husband, John Swansen, also at least 70 years of age, said that the male suspect only cut a few branches from the tree in the rear of the house and left the branches on the ground. John added that he had to clean up the tree limbs and it took him approximately an hour and a half to do so.

9/29/21-10/29/21- 5174 Dudley Street, Arvada, Jefferson County, CO

A seized receipt, dated 10/29/21, was written to "June Strome" with the location of 5174 Dudley Street. Based on law enforcement databases, it was learned the resident to be Willa "June" Strome. As part of the investigation the lead detective responded to this address, and no one answered the door. Piles of tree branches were observed in the backyard through a transparent chain link fence.

Later the lead detective made contact with June by phone. June confirmed she had these tree services done, and awkwardly paused before the detective asked June how that went; June chuckled and replied, "It didn't go good." June said a couple stopped by her home around the end of September 2021. June did not know the exact date, but recalled it was between 1 and 2 pm on a day near the end of the month. June was walking out to her mailbox when a car pulled up in front of her home. June said a man, a woman and "little boy" exited the car. June said the man gave her a sales pitch. June asked the man if he could fix her porch, but then also ended up agreeing to tree trimming services. June allowed the man to trim some trees, remove debris, and fix her porch for the price of \$350.00. She provided a cash payment.

The male began working, but only cut the tree branches he could reach from the ground with a pole saw. June said the male had no additional equipment. June said the branches which he cut were left on the ground throughout her yard. The family said they would need to return within the next few days to complete the work. June was shocked to see they left the branches all over her yard and had not begun to fix her porch. June said she had to text message the female multiple times to get them to come back to finish the work. June said the female was somewhat confrontational by text. June recalled the female text messaged her saying they needed to finish some work, but that the porch was not on the "receipt." June said it was verbally agreed upon to correct the porch despite it not being mentioned in the work described on the written receipt. June remembered the female saying via text they had to obtain a truck before they could pick up the tree branches. June added this also was not the verbal agreement, as they said they would remove the debris that day.

June said the family returned weeks later on an unknown date. The lead detective told June that one of the receipts (located in the searched vehicle that was associated with the Tylers) was dated 10/29/21. June said that date would have been the second time they came to her residence. June said she paid them for additional work on this date in the amount of \$400.00 in cash. June said the male completed additional tree trimming on this date, but still had not fixed the porch or removed the debris. Altogether, only about 20% of the work agreed upon was completed. June said she only agreed to this because they provided a "song and dance" regarding their past due status at the motel

they were living in. June said they were trying to make her feel bad for them. June was told they had their younger children at the motel with them, and she felt obligated to help them due to their unfortunate circumstances.

June again messaged asking when they would be back to complete the work. The message June received in return was that the work was complete, and they would be back to pick up the branches when they got a truck.

June believed the child to be about ten years old and was "plump" (heavy build). The older male was Hispanic with a thin build. The female was Hispanic, a little bit taller than the older male, and had a heavier build. June thought they were driving an older sedan, possibly brown in color. June recalled the family having car issues and having to jump it to start it one day.

June elaborated further on her medical diagnosis that causes her not to get around well, uses her wheelchair 100% of the time, and only walks to and from her vehicle or the curb line of her home for the mail and trash. June said she relies on a walker when not in the wheelchair. June said she also has heart and lung problems. June uses oxygen about every other day. June's inability to walk almost of the time results in substantial limitation to her major life activities; further, June is considered an at-risk adult according to C.R.S. § 18-6.5-102, based on her medical conditions.

11/05/21- 6125 Utica Street, Arvada, Adams County, CO

A receipt, dated 11/05/21, was written to "Roger Juarez" with the location of 6125 Utica Street. Based on law enforcement databases, it was learned the resident to be Rogelio "Roger" Juarez (Age 70 plus). Roger was contacted and asked about tree trimming services he may have had completed in November 2021. Roger stated that he recalled the incident. Roger produced a few documents for review and discussed the incident.

On 11/05/21 around 0930 hours, Roger was in the front yard of his residence raking leaves. Roger saw a vehicle pull up, and male exited and approached him. The male said he noticed Roger's large trees and asked if he could trim them for Roger. Roger needed the work done and asked about a price for the work. The male told him, \$700.00 to trim one large tree in Roger's backyard, and remove the debris. Roger told the male this price was too high. The male agreed to lower the cost to \$600.00. Roger agreed, and the male began working. Roger went back inside and kept an eye on the work being done in the back yard. In hindsight, Roger found it odd the male claimed he would haul the debris away, but he did not have a trailer or any professional equipment. About thirty minutes passed and Roger heard a knock on the front door. A female and younger boy said they were with the male doing the work. The female asked for payment for the work, which was still in progress. Roger did not feel comfortable providing a check before the work was complete. The female provided a story indicating they were "down on their luck." Roger agreed to write the check, believing they would complete the work as promised. Roger provided one check to "Amelia Tyler" for \$600.00 from his Partner Credit Union account.

A few minutes after providing this check, Roger looked out his back window. The male was nowhere to be found, and the female, young boy, and car they arrived in were also gone. Roger observed about 10% of the work complete that was discussed, and the branches were left on the ground in his back yard. The male also left one extendable Fiskars Power-Leveler pole pruner in Roger's backyard. The lead detective observed the backyard, which included one pile of branches.

Roger went to Partner Credit Union the next day and asked for a copy of the check. Roger was given this copy, which had Amelia Tyler's driver's license scanned with the check. Roger pointed to the ID picture and said this is the same female who was at his home. Upon review of the check and ID, this is Amelia Tyler. Law enforcement obtained a copy of the check which also had the endorsee signature on the back; the signature displayed on the endorsee line matched all checks consistent with those produced by Amelia Tyler. The check was cashed on 11/05/21 at 1130 hours by Amelia.

Roger said about one week later, the suspects returned to his residence. They knocked on the door and provided excuses about being short on finances and having car trouble, causing them not to have finished the work. They did not state they had returned to complete more work, and no additional work was completed on this date.

Roger told them he had reported them to the Arvada Police Department. Roger said they became upset when this was brought up and asked why he did that. Roger told them he reported them because they had not completed the work.

Roger recalled the male as Hispanic, 5'8" in height, thin build, dark hair, and some trimmed facial hair. The female was identified by her Colorado driver's license which the bank provided to Roger. The young male was about 8-9 years old, light complexion with light brown hair. The vehicle was an older sedan, possibly grey or brown in color. Roger also provided the copy of the receipt which synced up with the receipt that was found in the vehicle which was associated with Amelia and Joseph Tyler.

Roger began to describe how he felt deceived in the situation. Roger added the deception was amplified by the woman and her child coming to the door asking for money. Roger said he thought these individuals were targeting "elderly people" who were more likely to trust them. Roger said he should have known better than to provide the payment before the services were finished.

11/8-9/21- 5118 Jellison Court, Arvada, Jefferson County, CO

A receipt, dated 11/08/21, was written to "Ron Arner" with the location of 5118 Jellison Court. On 03/08/22, law enforcement responded to this address and made contact with Ron, who was asked if he had tree trimming completed at his residence in November 2021. Ron said that he was solicited and some of the work was done, but the individuals left the work incomplete and did not return. Observed was one very large pile of tree branches in the back yard. Ron also pointed out a branch which appeared to be hacked at in a reckless manner, noting the work which was done was poor quality.

In a later interview Ron said that on 11/08/21, sometime in the early afternoon, he was approached at his front door by a male previously unknown to him. Ron was asked by this male if he needed tree trimming services. Ron pointed out some work in the backyard to be done, as well as two limbs from a tree in the front yard which needed to be cut. The price agreed upon was \$400.00 for the trimming and debris removal. The male began working and was accompanied by a female who identified herself to Ron as Amelia Tyler. The male began working and did about one hour of work. The male told Ron his brother was around the corner with a truck and would be by to haul away the debris. The male pointed out an issue with the sedan he arrived in and said he needed to leave to take care of this issue. The male asked for payment for the incomplete services so he could fix the battery in his vehicle. Ron found it odd the man arrived in a sedan to trim trees, and noted the man had to borrow many of Ron's tools to complete the work. Ron said he felt like it was okay to pay the man since some of the work was started. Ron issued one check to Amelia Tyler in the amount of \$400.00 from his Wells Fargo account. Amelia handed Ron an invoice for this work, which matched the copy later located in the vehicle that was associated with Amelia and Joseph.

On 11/09/21, sometime in the morning, the male returned driving the same vehicle, but also had a young boy with him who he identified as his son. Ron was surprised the male returned. The male said he would finish the work and his son could rake the leaves in the yard for an additional cost if Ron wanted. Ron agreed to have the young boy rake the yard and issued another check as payment. Ron issued a check to Amelia Tyler in the amount of \$250.00 from his Wells Fargo account. It should be noted Amelia was not on scene at this time. Ron had to leave for work and departed the residence. When Ron returned home later that day, about 50% of the work (tree trimming and raking) was complete, and no debris was removed as was promised. No one has returned to collect the debris, and the pile of branches still present on Ron's property.

Ron said the male was Hispanic, approximately 40 years old, around 5'6", with a thin build, with black/greying hair. Ron noticed the male had yellow, unhealthy teeth. The male told Ron his name, but he could not remember it at this time. Ron recalled the male stating he was trying to raise money for his daughter to go to college.

The female introduced herself as Amelia Tyler and requested the checks be written to her. Amelia was described as Caucasian with a heavy build, blonde hair, and approximately 40 years old. The young boy was described as Hispanic, approximately 10-12 years old with a heavy build. The boy appeared to resemble both the male and female. The family was driving a blue colored four-door sedan.

11/14/21- 5325 Balsam Street, Arvada, Jefferson County, CO

A receipt, dated 11/14/21, was written to "Dwight Kellogg" with the location of 5325 Balsam Street. Dwight Kellogg was later contacted by law enforcement and was asked if he had tree trimming services completed in November of 2021. Dwight said, "Do you mean the people who robbed me?"

On 11/14/21, Dwight said he was approached by a male previously unknown to him. The male asked if Dwight needed his trees trimmed and offered to complete the work for \$600.00. Dwight agreed to have the work done and provided the male \$600.00 in cash. Dwight was given an invoice and confirmed the same number at the top as the copy located in Amelia and Joseph Tyler's vehicle. Dwight said the man did about 30-40 minutes of work. Dwight said they stopped working because they had to get the male's brother's truck and chipper. Once they left, they did not return. Dwight estimated the work to be about 10% completed from what was discussed. Dwight has since had the debris removed by professionals.

Dwight said he believed that suspects used a "greyish" older Chrysler sedan with a "Denver Broncos" license plate. The male was described as a Hispanic male, about 5'08", and about 200 pounds. Dwight recalled the male had gaps in his front teeth. The female was Caucasian, close to 50 years old, with "greyish blonde" hair with a large build. Dwight said he was "dumb," and a "victim" to their scam, and was not surprised to learn this was a larger scale scam. Dwight said, "They talked a good game," and were very personable.

11/26/21- 13410 Braun Road, Jefferson County, CO

A receipt, dated 11/26/21, was written to "Alex Guest" with the location of 13410 Braun Road in Jefferson County. Based on law enforcement databases, it was learned the resident to be Alex Guest. On 11/29/21 a Jefferson County Sheriff's deputy initially responded to 13410 Braun Road on a report of a theft. Then, on 04/01/22, the lead detective conducted a follow up and made phone contact with Alex who discussed the incident. On 11/26/21 a male and female approached his home and said they were with "J&A Tree Service." The couple introduced themselves as Joe and Amelia. These suspects explained their ability to help with this landscaping and asked if Alex needed his trees trimmed. Upon conversation, Alex said Joe seemed to know a few things about trees and instilled confidence in him as the customer. Alex did admit he was skeptical of the sale pitch and asked if they worked with anyone in the area. Joe showed Alex a receipt book with numerous receipts from apparent customers. Alex agreed to let the suspects complete the work as discussed.

The suspects were at his house for about five minutes, trimming approximately two limbs from Alex's locust tree before Joe told Alex he had to leave to obtain a trailer from his brother for debris haul away. Alex's wife, Jill Guest provided a check from their shared bank account. The check was written to Amelia Tyler for \$600.00 from their 1st Bank account. The suspects provided Alex a copy of an invoice (which matched the copy later located in the searched vehicle). Joe and Amelia left the property. Later in the day, Alex received a phone call from Joe stating he would need to return at noon the next day. At no point did Joe or Amelia return to finish the work or haul away the debris. Alex said Joe left one hand tool stuck in a tree branch of his apple tree.

Alex recalled the suspects' vehicle to be a black four door sedan with damage to rear right panel. Alex described Joe as Hispanic, 5'7," thin build in his late 40s, short brown hair, goatee, and brown eyes. Alex said Joe identified Amelia as his wife. Amelia is described

as Hispanic, 5'4," heavy build. Alex noticed tattoos on the left arm of Amelia and described them as "poorly done" flowers or stars.

Alex later obtained a copy of the check provided to Amelia from his bank. The check had the endorsee signature on the back that was consistent with other checks with those produced by Amelia Tyler. The check showed as cashed on 11/26/21 at 0935 hours at a 1st Bank.

12/06/21- 10959 West 62nd Place, Arvada, Jefferson County, CO

A receipt, dated 12/06/21, was written to "Terry Mallinson" with the location of 10959 West 62nd Place. Based on law enforcement databases, it was learned the resident to be Terry Mallinson (Age 70 plus)

Law enforcement contacted and asked Terry if she had tree trimming completed at her residence. Terry replied she did, and stated, "The guy cheated us." Terry said she and her husband, John Stephen "Steve" Mallinson (Age 70 plus) were having renovations done at their house around this time.

On 12/06/21 around 1600 hours, a male previously unknown to Terry arrived and knocked on her door. When Terry answered, the male asked if she needed tree trimming completed. Terry had noticed the couple driving through the neighborhood and believed they had been working on other resident's homes. Terry and Steve walked outside to view the trees in their front yard for discussion on pricing, as they did need assistance with this. The male identified with "J.A. Tree Service." The male gave a quote of \$400.00 for the work needing to be done to include debris removal. Terry asked how the male would remove the branches given they were in a small car. Terry said the male noted his brother was also in the neighborhood and would soon be by to pick up the debris.

The male began working and completed about forty-five minutes of work. Terry said the male "butchered the tree" they wanted trimmed along with an additional living branch being removed from an unrelated healthy pine tree, which upset Terry and Steve. Terry estimated about 75% of the work expected to be done was completed. The male used one long pole saw during this project. Overall, the professionalism and tools used did not represent those of a professional or certified service.

Terry said while the work was in progress, the female asked for a check so they could get to the bank before it closed for the day. Terry said, "I knew better. .. but I wanted to trust these people." Terry wrote one check to Amelia Tyler in the amount of \$400.00 from their shared Wells Fargo account.

Terry said the couple had a "sob story" to go along with their ruse. Terry said the male believed his wife "saved him" by introducing him to Jesus. The male was wearing a religious t-shirt of some sort. Once the check was issued, the couple said they were going to get something to eat and would be "right back." They departed the premise and did not return. Terry said they never saw a "brother" to these people, and now does not believe

there ever actually was another person involved.

Terry and Steve had contacted their bank and received a copy of their check. Terry had a copy the check which had a phone number under the endorsement (720-649-1029). The signature displayed on the endorsee line was consistent with other checks to those produced by Amelia Tyler. Terry and Steve did not try to call this phone number. Given the time lapse from the date of this event, video surveillance was unavailable.

Terry and Steve observed both suspects at their residence on 12/06/21. Terry described both individuals as 40-50 years old and Caucasian. The female had shoulder length light brown hair with a heavy build, about 5'06." The male was "scruffy," not clean shaven, dark hair, medium build, about 5'10." The vehicle was an older sedan, unknown make, model or color. Terry recalled both parties saying they were down on their luck.

Steve stated that the male was Hispanic, approximately forty years old, 5'07," dark hair, slender build and unknown on facial hair. The female had shoulder length brown hair, heavy build, about 5'05," with glasses with a "round" face.

Steve said the male was well spoken and they trusted them, and they were "pretty convincing." Steve said he was upset to see how horrible the work looked, in addition to it not being complete. Steve said the male's sales pitch made sense and was upset and sad about the circumstance. Steve said he felt like they had been "had," in other words, taken advantage of. Terry outright said she felt taken advantage of in this circumstance. Terry said he convinced us he knew what he was doing. Terry and Steve had to hire someone else to help them remove the debris given their age and immobility

12/31/21- 5460 Flower Court, Arvada, Jefferson County, CO

A receipt, dated 12/31/21, was written to "Michelle Olivas" with the location of 5460 Flower Court. Based on law enforcement databases, it was learned the resident to be Michele Olivas. On 03/08/22 Gary Olivas was contacted at that address. Gary said he lives here with his wife, Michele Olivas and he confirmed that tree trimming was done and said there was a large pile of branches still in the backyard.

Michele then talked about the tree trimming that was done at her property on 12/31/21. Michele slightly chuckled, and confirmed she was "robbed by some tree trimming thieves." On 12/31/21 around 0800 hours, Michele said Gary notified her someone was at the door offering landscaping services. Michele said she was really "caught off guard" by being woken up so early. A male was at the door and verbally identified himself as "Joseph." Joseph said he was servicing other residents in the area and noticed tree branches from Michele's yard were touching her neighbor's shed and powerlines. Joseph seemed to imply her neighbors were complaining, so he offered to help. Michele was very annoyed but allowed the work to be done at the price of \$300.00.

Joseph began working, and Michele watched him climb onto her neighbor's shed to cut the branches. Michele was surprised at the methods the male was using, noting he did not appear to be a professional. Once the work was in progress, Joseph said he needed a

new saw blade after his broke. About this time, a female approached Michele and requested payment for the services. Michele issued one check to the female, "Amelia Tyler," in the amount of \$ 300.00 from her Bellco Credit Union account and Amelia gave Michele a receipt.

After about forty-five minutes, the male stopped working and said he needed to leave to get a ladder for the higher limbs, and a truck to haul away the debris. Michele said she "should have known better," but let Joseph and Amelia leave. No one returned to the residence to finish the work or pick up the debris. Michele said she tried to call Amelia at 720-574-6148 about five days later, and no one answered or responded. The branches were left scattered all over the yard. Michele has since piled them into one stack.

Joseph was described as a Hispanic male, medium build with dark hair, and about 5'7" in height. Amelia was described as a "heavy" build and was shorter than Joseph. Michele made mentioned of something related to God at some point and said Amelia "jumped" on this opportunity to "play the Christian card." Michele described them both as smooth talkers, intending to deceive her.

Michele went to Bellco Credit Union and spoke with a branch employee. Michele was told about Amelia coming in to cash the check. Michele said that the bank employee who she talked to thought that the transaction was unusual since Michele's checks are not usually issued in this manner. A copy of the check was later provided. The check had the Colorado driver's license number written at the top that is Amelia Tyler's Colorado driver's license number according to the DMV. The lead detective requested video surveillance form this transaction. On 03/09/22, various angles of the teller station that Amelia Tyler approached were provided. Law enforcement visually identified the female in the still images provided as Amelia Tyler.

01/03/22- 6062 Van Gordon Street, Arvada, Jefferson County CO

A receipt, dated 12/03/22, (evidence later showed it was actually 01/03/22) was written to "Shane Malmgren" with the location of 6062 Van Gordon Street. On 03/10/22, the lead detective made phone contact with a resident at this location who identified as Miles Malmgren (Age 70 plus years). Miles was asked if Shane was available. Miles said Shane Smith was his roommate but had passed away one month earlier.

Miles confirmed that he was actually the one who dealt with that situation. Miles stated, "Well, I think I got burnt."

On 01/03/22 around 1200 hours, a female previously unknown to Miles knocked on his door. The female asked if Miles needed tree trimming completed. The female said her husband was nearby and would be happy to complete the work as soon as he was done at a job nearby. Miles agreed and explained he wanted specific branches to cut from a tree in his front yard and hauled away. Miles thought he pointed out the branches to the male, but later could not remember if he actually talked to the male at all. The female

agreed and said they would complete the work for \$375.00. Miles located his checkbook and provided one check to Amelia Tyler in the amount of \$400.00 from his Wells Fargo account. Miles said they amount agreed upon was \$375.00, but he added a tip, rounding the total up to \$400.00.

Miles said after he issued the check to "Amelia," he remained inside. The female told Miles her husband would be there to complete the work shortly. About one hour later, Miles looked outside and saw a few branches on the ground, and one thin black rope hanging from the tree. Miles really knew he "got burnt" when he saw this rope because actual tree trimming personnel "use more than a rope to climb a tree." Miles said the branches cut were not even the ones he needed cut. Miles believed the male showed up and cut the branches, although he never actually saw him. There was no sign of anyone there, and Miles "never heard from them again." Miles was asked how much work was completed based on his explanation of what needed to be done. Miles said about 10%, and all of the branches were left in the yard. Miles said, "I really got taken." Miles said he felt stupid allowing them to complete this work without first obtaining contact information from them. Miles said the branches have since been disposed of.

Law enforcement called Wells Fargo Bank and requested a copy of check provided in this event. A copy of the check which was written to Amelia Tyler in the amount of \$400.00 from Miles' Wells Fargo account was emailed to the lead detective. The signature displayed on the endorsee line was consistent with all checks with those produced by Amelia Tyler. This check was cashed 01/03/22 at a Wells Fargo branch located in Wheat Ridge.

01/05/22- 9294 W 75th Way, Arvada, Jefferson County, CO

A receipt, dated 01/05/22, was written to "William Boyle" with the location of 9294 W 75th Way. Based on law enforcement databases, it was learned the resident to be William Boyle (Age 70 plus). On 03/16/22, the lead detective made contact with William by phone and asked William if he had tree trimming done earlier this year. William replied, he had and he "got ripped off."

On 01/05/22 around 1000 hours, a male previously unknown to William knocked on the door to his residence. The male said he noticed William needed tree trimming done and asked if he could complete those services for him. William said the male acted interested and made it sound like he would go the "extra mile." William had just come back from Wyoming the night before and was tired and said he was not thinking clearly. William agreed to have the male completely remove one juniper tree, trim a few branches on another tree, and remove the debris for \$1,000.00. The male began working and took a few limbs off the juniper with a chainsaw. The male told William, "Wouldn't it look funny if I left it like that?" William did not think the suspect would abandon the job and actually leave the tree dismembered with the work incomplete. William asked the male if he had a chipper to remove the debris. The male told William he would return with his brother and their tree chipper to dispose of the debris.

While the male was working, a female came inside to "talk money." William issued the female a check written to "Amelia Tyler" in the amount of \$1,000.00 from his Coors Credit Union account. Amelia provided William a receipt. This invoice was shown to the lead detective and it matched the copy located in the searched vehicle. Amelia and the male said they had to depart to obtain the woodchipper and would be "right back." After thirty minutes, William called his bank to cancel the check. His bank informed him the suspects had already cashed the check and they could not cancel it at this point. The check was cashed at Coors Credit Union, (816 Washington Avenue, Golden) on 01/05/22 at 1127 hours. William provided a picture of this check, which had a signature displayed on the endorsee line consistent with other checks produced by Amelia Tyler. Below the signature was phone number 720-574-6148.

William tried to call this phone number about one week later, and Amelia answered. Amelia confirmed they would be back to get the debris once the snow melted. The work remained incomplete, and William had to pay another professional to complete the work, costing him \$1,500.00.

The male was described as being Hispanic about 5'6"-5'8,"fit build, and possibly had unkempt facial hair. The female was Hispanic, slightly heavy set, about 5'5," with dark hair. The couple was driving a black, small, four-door sedan.

01/07/22- 6374 Lamar Street, Arvada, Jefferson County, CO

A receipt, dated 01/07/22, was written to "Laura Castens" with the location of 6374 Lamar Street. Based on law enforcement databases, it was learned the resident to be Laura Castens. Laura was contacted and asked if she had any tree trimming completed in January 2022. Laura confirmed she did have some services done, noting she was "scammed out of \$275.00."

Laura was in her driveway shoveling snow when a gentleman appeared out of nowhere and offered to help her shovel snow. The man shoveled some snow for her, and then told Laura he noticed she needed some trees trimmed. The male offered to complete the services, but the amount he was asking was too high for Laura to afford. The male kept lowering the price, until Laura agreed upon \$275.00. A female associated with the male then approached Laura. The male was let into the backyard, and the female was invited inside Laura's home. Laura said something to the effect that she is normally smarter than to do this but agreed to pay the female before the services were finished. Laura wrote one check to Amelia Tyler in the amount of \$275.00. A copy of the check was later obtained which also had the endorsee signature on the back; the signature displayed on the endorsee line matched all checks consistent with those produced by Amelia Tyler.

The male worked for about 30-60 minutes. Laura said the couple said they had to leave to obtain their brother's truck to remove the debris and would promptly return. No one ever returned to finish the work or remove the debris. It caused Laura significant inconvenience to cut up and slowly get rid of branches. Laura still has branches left in her backyard. Laura could not remember what they looked like, or what car they drove. Laura sent photographs of her

backyard which show the branches spread across the ground. Laura said she was embarrassed and frustrated about this incident.

01/10/22- 6341 Jay Street, Arvada, Jefferson County, CO

A receipt, dated 01/10/22, was written to "Roy Spencer" with the location of 6341 Jay Street. Based on law enforcement databases, the resident was learned to be Roy Spencer (Aged 90). On 03/02/22, the lead detective responded to this address and made contact Roy on the front porch. Roy was asked if he had any tree trimming services in January 2022.

Roy said on 01/10/22 between 1430-1500 hours, and male approached his residence and offered his tree trimming services. The male offered Roy \$350.00 to trim two trees, which seemed very reasonable to Roy, so the man was allowed to begin working. Roy said the male had another younger man with him, about 14-15 years old. The male began by using one pole saw. Roy was watching the male in the backyard, who then began tossing thin ropes around in an odd manner. Roy found this strange and asked the male how he planned to trim trees without a ladder. The male reportedly replied, "I'm a monkey!" Roy said, "That's when I knew I was being taken..."

About forty-five minutes went by, and a female showed up in a black or dark color sedan. The female began speaking with Roy's wife, Patty Spencer (Aged 80 plus). Patty was told by the female their family was struggling and did not have gas money. The female requested payment from Patty for the services. Patty approached Roy asking if they could go to the bank for cash. Roy really did not want to go along with the payment based on the quality of work he observed but wanted to appease Patty. Roy and Patty drove to Sooper Credit Union (5150 W 60th Ave) and withdrew \$350.00 cash. Upon return, they paid the female, and were given one receipt (matching the carbon copy that the lead detective found in Amelia and Joseph Tyler's vehicle). Roy described the female as "fumbling" with the receipt book while she was there. Next, Roy was approached by the male, who said they needed to leave to obtain the truck needed for debris removal. The suspects departed, only having completed about 50% of the tree trimming. They did not return to complete the work or pick up the debris.

The lead detective entered the back yard where there was still one black rope hanging from a tree branch. During the search of the vehicle in Joseph and Amelia Tyler's possession, multiple thin black ropes like this one were located. Two large piles of tree branches were also observed by law enforcement.

01/11/22- 9672 West 63rd Place, Arvada, Jefferson County, CO

A receipt, dated 01/11/22, was written to "Walter Hall" with the location of 9672 West 63rd Place. Based on law enforcement databases, the resident was identified as Walter Hall (Aged 95 years). Walter was asked by law enforcement if he had tree trimming services completed in January 2022. Walter immediately recalled this event. On 01/11/22, sometime around noon, Walter was solicited by a male previously unknown to him at

his front door. Walter was asked if he needed tree branches trimmed in his front yard. Walter said he did and agreed to the price of \$500.00 for the trimming and debris removal. Walter watched the male go to his vehicle, described as an older sedan, and obtain a pole saw. Walter said the male got "right to work" and started trimming. Walter added, "I should've known when he didn't have the right equipment." Walter clarified he should have been alerted when the male only began working with one tool, and no other equipment usually needed for this service.

Walter did not remember how long the male was working for, but at some point, Walter was approached by a female associated with the male, who requested payment for the service. The male was still working when she asked him for the money, and Walter found this suspicious. Walter asked why she was requesting payment before the work was done. Walter recalled the female stating something about needing a chipper to dispose of the branches. Walter agreed to provide the payment and wrote one \$500.00 check from his 1st Bank account. Walter said he "foolishly" allowed the female to write her name on the pay to line, which read "Amelia Tyler." The female left to cash the check, and the male remained on scene working.

In terms of descriptions Walter could only recall that the female was shorter than the male, and both were shorter than he was (at about 6'0"). Walter thought both individuals could have been in their thirties but was not sure.

On 03/08/22 at approximately 1640 hours, the lead detective responded to Walter's home after learning he had obtained a copy of the check involved in the case. This was the check from Walter's 1st Bank account in the amount of \$500.00, written to Amelia Tyler on 01/11/22. The signature displayed on the endorsee line matched all checks consistent with those produced by Amelia Tyler. This check was cashed on 01/11/22 at 1350 hours at a 1st Bank located at 6355 Ward Road.

01/20/22- 6415 Independence Way, Arvada, Jefferson County, CO

A receipt, dated 01/20/22, was written to "Betty Alexander" with the location of 6415 Independence Way. Based on law enforcement databases, it was learned the resident to be Betty Alexander (Aged 90 plus). On 03/02/22, the lead detective responded to this address and contacted Betty who was asked if she had tree trimming services completed in January 2022. Betty said she was solicited by a male who was previously unknown to her on 01/20/22. The male told Betty he noticed she needed some trees trimmed and asked if he could give her a quote. Betty replied she could not afford this service right now. The male just asked to look around the property for now, which Betty allowed. The male suggested \$300.00 for trimming and debris removal. Betty agreed to let the male complete the work at this price.

The male began trimming the trees, and Betty was approached by a female, who verbally identified as "Amelia." Amelia said she had to leave to obtain additional equipment and requested payment from Betty while the male finished working. Betty provided Amelia one

check from her US Bank account for \$300.00. Amelia provided Betty a copy of the receipt. Amelia asked Betty where the closest US Bank was and then left. The male continued trimming trees, and Betty watched him work for about two hours. Betty observed about 75% of the trimming completed. The debris was left on Betty's lawn, and she was told it would be picked up later in the day. When Amelia returned, the male got into their vehicle and left. The next day, Betty attempted to phone Amelia and received no answer. No one returned to finish the work or remove the debris. The receipt given to Betty was provided and matched the copy your affiant had from the vehicle search.

The lead detective observed one large pile of branches on the side of Betty's home. Betty said the male was "medium" height with dark hair. The female was described as "shorter" in stature, but Betty could not recall much further.

US Bank, located at 9590 W. 58th Avenue, provided a copy of Betty's check to law enforcement who viewed the check issued by Betty. US Bank advised the check was cashed at their branch on 01/20/22 at 1223 hours. The signature displayed on the endorsee line was consistent with the other checks with those produced by Amelia Tyler.

01/24/22- 6445 Newland Street, Arvada, Jefferson County, CO

A receipt, dated 01/24/22, was written to "Myrta Anderson" with the location of 6445 Newland Street. Based on law enforcement databases, it was learned the resident to be Myrta Anderson (Aged 90 plus). Myrta was advised as to a receipt being located which documented landscaping at her residence in January 2022 and asked if she recalled having these services done. Myrta recalled the event and described the event as follows:

On 01/24/22 around "midday," Myrta was alone at her residence and out in her garage with the garage door open. A man previously unknown to Myrta walked up the driveway and asked if she needed any help with yardwork. Myrta said there were some overgrown bushes and trees which needed trimming in the back yard. The male asked if he could view the area and told her he could complete this work for \$350.00. Myrta has been unable to complete this yard work since her husband died, and desperately needed it done. Myrta agreed to let the male complete the work. Myrta then noticed the male did not have many tools and asked to borrow her garden clippers and crosscut saw. When the male did not have his own tools, Myrta said, "This should have put a light bulb in my head." Myrta believes the suspects still have possession of the saw, and the clippers were later located discarded in her backyard.

Myrta was then approached by a female who identified as "Amelia." Amelia asked Myrta for payment so she could leave to purchase the root killer Myrta requested to kill the bushes. Myrta thought it was odd the payment was requested up front, but she issued Amelia one check for \$350.00 dollars from her Westerra Credit Union account. Amelia departed, while the male kept working. Amelia returned and pointed out an error on the date of the check which prevented her from cashing it. Myrta had accidentally written the wrong month for the check year. Myrta reissued the same amount on a new check. At

this point, only part of the work had been completed. Amelia and the male said they would be back the next day to finish the work and remove the debris. The male said he had to coordinate with his brother to bring a truck for the debris.

The next day no one came back, and Myrta attempted to call Amelia. On 01/27/22 the couple returned and completed more of the yard work. Amelia said they needed additional payment to finish the work. Myrta issued another check for \$275.00 on this date, because she needed the work to be finished. Upon receiving the check, the couple again departed and did not return. The work agreed upon was not completely finished, and the debris was still left in Myrta's backyard.

Law enforcement observed multiple branches in the backyard which were stacked in piles. Myrta also produced the copy to the invoice which was located in Joseph and Amelia's vehicle.

Myrta recalled them driving a black colored car. The female was described as fair skinned, dark hair, medium-heavy build. The female seemed to identify as a Christian based on comments in her conversation. The male was described as medium to average height and with a medium build. Myrta remembered the male was wearing a grey t-shirt which had large writing on it which said, "God is Not Dead." Myrta believed this was an appeal to associate with Christian beliefs. When interacting with Myrta, she mentioned having macular degeneration, and used a large magnifying class to read her checkbook register. Even with the magnifying glass, Myrta had difficulty seeing this.

Myrta's financial institution, Westerra Credit Union at 7270 West 88th Avenue, Arvada, provided copies of two checks to law enforcement. The checks were cashed at that branch on 01/24/22 at 1436 hours and 01/27/22 at 1447 hours. Upon request, the lead detective received photographs of various angles of the teller station that Amelia approached and was able to visually identify the female in the still images as Amelia Tyler.

PREDICATE ACT ELEVEN

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1), (2)(G), (4)

On or about May 18, 2022 through October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money (checks, cash or via PayPal), of Barbara Lou Hooker, James Brochard, Marie Brochard, Shirley Miller, Sabrina Willis, Lawrence Warriner, Keith Jensen, Mike Washatko, Bernard Leintz, Adam Van Alstyne, Jonell Van Alstyne, Lawrence Bodiker and/or Robert Pierce, within a period of six months and with the aggregate value of five thousand dollars or more but less than twenty thousand dollars and intended to deprive Barbara Lou Hooker, James Brochard, Marie Brochard, Shirley Miller, Sabrina Willis, Lawrence Warriner, Keith Jensen, Michael Washatko, Bernard Leintz, Adam Van Alstyne, Jonell Van Alstyne, Lawrence Bodiker, and/or Robert Pierce, permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g),(4), C.R.S.

PREDICATE ACT TWELVE

CONSPIRACY TO COMMIT THEFT-\$5,000-\$20,000,
C.R.S. §§ 18-4-401(1)(a), (2)(g), (4) and 18-2-201

On or about May 18, 2022 through October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** with the intent to promote or facilitate the commission of the crime of Theft-\$5,000-\$20,000, unlawfully and feloniously agreed with each other and/or a person or persons to the Grand Jury and Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1)(a), and 18-2-201, C.R.S.

The offenses alleged in Predicate Acts Eleven and Twelve were committed in the following manner and serves as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

05/18/22 – 522 N. Galena, Aurora, Arapahoe County, CO

On 05/18/22, at the address listed above, Barbara Lou Hooker (Age 70 plus) had a man offer to remove dead tree branches and cut down two dead trees. Between the man and his wife it was agreed that Ms. Hooker would pay \$825 (\$200 by cash and a check for \$625). While the male and two school aged boys started the work the wife engaged Ms. Hooker and asked that the check be payable to “Amelia Tyler.” Ms. Hooker received a receipt (with a phone number) from a receipt book but no company name was listed. After approximately 20 minutes of work one of boys approached Ms. Hooker and stated that the chain saw had broken and that they would be back the next morning before leaving without completing the job despite \$825 having been given to them.

When the solicitors did not come back the next morning Ms. Hooker tried reaching out to them but without success. Ms. Hooker also learned that the check had been cashed. Ms. Hooker described the female as White, 30’s, average/stocky build, dark colored hair and noticeable teeth. She described the male as Hispanic, 30’s, thin/average build and dark hair.

08/10/22 – 221 E. 105th Ave., Northglenn, Adams County, CO

Northglenn PD investigated an alleged fraud which occurred at 221 E 105th Ave., Northglenn, Adams County, CO which is the home of Marie and James Brochard, who were both 70 years of age and older on the date of offense. The Brochards informed that they had been doing yardwork on 8/10/22 and that around noon on that day two people had shown up and offered to remove a tree in the backyard for \$550. They had agreed and Ms. Brochard advised that a male party had gone into the backyard and began trimming the tree. She stated that he had trimmed all of the branches off, and she had written a check for \$550 which was given to the female party who had then left. She stated that the female party had returned and then the male had left with her stating he was going to come back after lunch.

Ms. Brochard advised the couple had not returned and had not finished removing the tree. Furthermore, Ms. Brochard stated that she had seen a news bulletin stating that the Arvada PD was investigating a tree trimming fraud in which an Amelia and Joseph Tyler were defrauding elderly people in the way that she and her husband had been.

She stated that after seeing the photographs in the news article she recognized them as the people that had been there that day. Mr. Brochard also stated that he recognized the Tylers.

8/12/22 - 7021 Utica St., Westminster, Adams County, CO

Family members for then 88-year-old Robert Pierce reported to law enforcement that beginning on 8/12/22 Mr. Pierce was approached by a couple who first offered to cut branches for \$600 and then came back offering to do work more for an additional \$150 for a total of \$750 with a receipt being issued for the job. After Mr. Pierce prepared and issued a check payable to Amelia Tyler for \$750 to cover the job that had been agreed to the couple ultimately left with the job being incomplete. Mr. Pierce passed away in October 2022.

09/01/22- 7460 Teller St., Arvada, Jefferson County, CO

Sabrina Willis, who resides at 7460 Teller Street in Arvada, had recently observed a social media post authored by the Arvada Police Department providing awareness to a “tree trimming” scam. Sabrina called the police when she realized she was a victim of this scam on 09/01/22.

On 09/01/22 sometime around 1000 hours, Sabrina answered a knock at her front door. When Sabrina answered, she observed a thin Hispanic male, about 5’5” tall, at her front door. The male told Sabrina her tree branches could use some trimming. The male pointed to the large tree in her front yard, which had low hanging branches. Sabrina described the male as “knowledgeable” as they began discussing the work.

The male and Sabrina walked through her garage to access her backyard to identify additional trees in need of trimming. Two additional large trees in the backyard were identified in need of trimming. To complete the entirety of the work for the two trees in the backyard and the single tree in the front yard, the male offered a total cost of \$1,200.00. Sabrina told the male she could not afford that price. The male offered to only cut the branches of the trees in the backyard that day (09/01/22) for \$600.00.

Sabrina noticed a “boxy,” midsize, silver SUV parked on the street near the tree in the front of her home. Sabrina did not look for a license plate number and was unable to recall if there was a license plate on the SUV. Sabrina observed a female sitting in the driver’s seat. Once the services were agreed upon, the male said his “wife” would be coming to collect payment and complete a “contract.” The female exited the SUV and met with Sabrina.

The female hand wrote a generic work order for a total of \$600.00. The yellow carbon copy of this handwritten work order was provided to Sabrina.

Sabrina wrote a check from her Credit Union of Colorado checking account for \$600.00 and gave it to the female. The female told Sabrina she was going to go cash the check, while the male continued working. The female left in the silver SUV. The male told Sabrina, "You can do whatever you want now." Sabrina clarified the male meant he did not need any assistance, and Sabrina returned inside.

A short time later, Sabrina noticed the male began walking away from her house with the tools he was using. Sabrina did not recall what direction he went. Sabrina did not observe the silver SUV, or the other suspects anywhere. Sabrina said they just "took off." At the time of the report, there were two large piles of branches in the backyard which were photographed by officers.

Sabrina stated that the female suspect, "...looked exactly like that picture that you guys posted." Sabrina said she viewed this information on Arvada Police Department's Facebook page. Law enforcement sent Sabrina a "screen shot" of this post from 09/02/22 at what time Sabrina confirmed this was the post she viewed, and these were the adult male and female suspects she interacted with on 09/01/22. These suspects are positively identified as Joseph Tyler and Amelia Tyler. The Facebook post was generated as a result of Shirley Miller's victimization on 09/01/22 and regarding the active warrant from previous Arvada incidents.

Sabrina initially stated there was still work to be completed on the trees. Sabrina said about 30% of the agreed upon work was completed, leaving 70% still remaining. Sabrina was asked if the debris removal was discussed. Sabrina said the male told her all debris would be removed as part of the agreed upon cost. The male added his father was working on a job nearby and would be by that day with a trailer to haul the debris away. Sabrina confirmed no individual ever arrived for the removal.

A copy of the check was obtained by law enforcement. The relevant check was made payable to Amelia Tyler, and the signature on the back was consistent to that of Amelia's other cases. The check was cashed inside the branch at Credit Union of Colorado, located at 1390 Logan Street, Denver, Colorado, on 09/01/22 at 0956 hours. Sabrina said the money was immediately withdrawn from her account and her bank has not reimbursed her for the theft. Given the timestamp on the check, it is likely the suspects arrived at Sabrina's house closer to 0900 hours than 1000 hours as she initially reported.

09/01/22 – 7331 W. 78th Pl. Arvada, Jefferson County, CO

On 09/01/22 around 1000 hours, Shirley Miller, (Age 70 plus) was outside her home, located at 7331 W. 78th Pl in Arvada, Jefferson County, mowing her lawn when a silver Dodge Journey SUV pulled up beside her house. A male exited the vehicle and approached her. The male offered her "a great deal" on tree trimming services. The male said he would trim the trees in her yard and remove the debris for \$1,000.00. Shirley agreed to let the male complete these services. Shirley was uncomfortable writing a check for the full amount before the work was completed but agreed to write a check for \$500.00 up front. Shirley planned to write a check for the final \$500.00 after the job was completed.

A female then exited the vehicle and approached Shirley. The female identified herself as "Amelia." Shirley provided one check for the amount of \$500.00 payable to "Amelia Tyler" with the memo "tree trimming." This check was from Shirley's Canvas Credit Union checking account. The female completed a handwritten work order for Shirley and handed her the yellow carbon copy.

After Shirley wrote the check, the male remained in the front and side yard cutting tree branches utilizing one pole saw. Amelia departed in the silver SUV with the check. At approximately 1100 hours Amelia came back to the residence in the vehicle. Shirley was told the male's father had a flat tire and they needed to go help him fix it. Shirley was told they would return to finish the job later that day. When the suspects said they had to leave. Shirley told the male, "You better come back." The male replied, "I will, you can trust me." The suspects drove away and never returned to finish the job.

Shirley contacted her bank and learned the check was cashed at Canvas Credit Union (7502 West 80th Avenue, Arvada) on 09/01/22. The funds were immediately withdrawn from Shirley's account, and her bank did not reimburse her for the loss. Photographs were taken of the incomplete work to include large piles of tree branches left in Shirley's yard.

Associated surveillance from inside Canvas Credit Union was obtained and reviewed. The individual in this video was visually identified as suspect, Amelia Tyler. Amelia produced her associated Colorado driver's license number during the transaction which is documented via the transaction receipt. This transaction occurred on 09/01/22 at 1055 hours. Upon review of the check, the endorsement is consistent with Amelia Tyler's signature from her Colorado driver's license and from previous events that were substantially similar to this incident.

Shirley resides at this address with her daughter, Jolene Miller. Jolene was home at the time of this event. Jolene observed the male, but not the female suspect. On 09/28/22 at approximately 1000 hours, Jolene and Shirley responded to Arvada Police Department headquarters to view suspect photograph arrays. Shirley identified photo number five in the male array, and stated she was "somewhat" confident in her identification. Photograph number five in the array is Joseph Tyler. Shirley could not identify anyone from the female array.

Shirley said about 20% of the agreed upon work was completed, leaving 80% still remaining. Shirley was asked if the debris removal was discussed. Shirley said the male told her all debris would be removed as part of the agreed upon cost. The male added his father was working on a job nearby and would be by that day with a trailer to haul the debris away. Shirley confirmed no individual ever arrived for the removal.

Shirley said she was upset and mad at herself for being so gullible. Shirley said, "I knew better." Shirley continued stating she was irritated they lied to her, and they planned to "take me" from the beginning. Shirley was trying to be compassionate and said she was willing to pay them if they did the work. Shirley said she wants the suspects to be caught because they should be responsible for their actions.

Jolene was also asked about Shirley's demeanor as a result of this incident. Shirley was described as upset and concerned when she realized she was the victim of a scam. Shirley is non-confrontational and hard of hearing which would have made it difficult for her to dispute the offer. It should be noted Sabrina Willis' residence is approximately one mile from Shirley Miller's residence and was estimated at being a three-minute drive.

09/04/22 – 8139 W. Louisiana, Lakewood, Jefferson County, CO

On 09/05/22 Lawrence Warriner, who is 81 years old, reported a fraud that occurred at his residence at 8139 W. Louisiana Ave in Lakewood.

Lawrence stated that on 09/04/22 a male knocked on his door and offered to trim Lawrence's trees that appeared overgrown or damaged. The male who was later identified as Joseph Tyler provided a quote for trees in the front and back yard of Warriner's property. Lawrence and Joseph agreed that Joseph would cut the trees in the backyard for \$400.

Joseph, Joseph's wife, and their son began to cut branches in the backyard. Joseph's wife who was later identified as Amelia Tyler left to get the truck and trailer for the cut branches. Around 30 minutes later, Amelia returned and stated she was unable to unload the trailer from a previous job because the dump was closed.

Lawrence stated that Joseph said he would return on 09/05/22 to finish cutting branches and to pick up the cut branches. Lawrence stated he paid them in cash. Lawrence stated he received a general receipt from Amelia detailing the work and price of the job.

Lawrence stated that on 09/05/22 Joseph and his family did not return to his house to complete the job. Lawrence attempted to contact Joseph from the telephone number he received from Amelia but was unable to contact anyone.

Lawrence had surveillance cameras on the front and rear of his house and uploaded footage that was reviewed by law enforcement. The footage obtained by Lawrence showed Joseph, Amelia, and a juvenile in the backyard.

Law enforcement later located and spoke with Joseph Tyler and Amelia Tyler. Joseph was asked what the name of his tree trimming business was called and he stated there is no name for his business. Joseph explained that when he got out of prison, he had to find a job and so he tried cutting trees and he did not know how to cut trees. Joseph stated he is not insured or bonded. Joseph stated that on Facebook you will see comments from customers making negative comments about him. Joseph stated that once the first negative comment appeared on his Facebook page everyone followed along with wanting to shoot him or wanting him dead. Joseph stated he cut their trees for \$400.00 when others wanted thousands of dollars for the same work.

Joseph then told the detective that he wanted law enforcement to contact the people making complaints against him and tell them that when Joe gets out of jail, he will pay them all back and they will get their trees cut for free or their gutters cleaned for free.

Joseph was shown Amelia's name on the receipt, and he stated, "it's not me" and "I cut trees is all I can say."

A video and audio review of the camera footage from Lawrence's residence occurred. From the camera at the front of the house Joseph Tyler was observed walking up the driveway and knocking on Lawrence's front door. When Lawrence answered the door Joseph tells him his grandmother lives up the street and that he does tree work and noticed the tree in front of Lawrence's house, and it is overgrown and getting close to the chimney. Joseph tells Lawrence he is bonded and insured and does everything in contract, even though in the interview Joseph told law enforcement that he is not insured or bonded.

A review of camera footage from the rear of the residence which showed Joseph and Amelia talking to Lawrence and his wife. Joseph is seen talking to Lawrence about how roofers scammed his mother as well as a painter who did a poor job. Joseph then tells Lawrence he is going to be back in the morning around 10:00 am. Joseph tells Lawrence that they are going to back up straight to the gate to start moving as he motions to the pile of branches on the ground. Joseph tells Lawrence that then he will cut the aspen tree and other little trees.

Lawrence stated that he agreed to pay them \$400.00 to cut the trees in the back of his yard. Lawrence stated that Joseph told him that they have a truck, but it is being used somewhere else. Lawrence stated that Amelia left and when she returned, she told him the dump was closed so they could not empty the trailer. Lawrence estimated that the man did around two hours of work and only trimmed the trees that were hanging over the fence. Lawrence stated that the man's son was stacking branches and there were three piles of branches. Lawrence stated that the man told him they would haul away the branches when they returned the next day. Lawrence stated that the man failed to cut the aspen tree and the choke cherry bushes.

09/15/22 – 4140 and 5040 S. Inca, Englewood, Arapahoe County, CO

Michael "Mike" Washatko reported an alleged fraud which occurred on September 15, 2022, at his residence located at 4140 S. Inca, Englewood, CO.

Washatko stated he was home for lunch on September 15, 2022, when a women knocked on his door offering tree trimming services. While the woman spoke to Washatko, a male began to trim branches from trees in the yard. Washatko was told the couple would trim the branches, remove the branches and complete the job for \$1000.00. Washatko agreed and wrote a check for \$500 to "Amelia Tyler" as partial payment. Washatko left and returned to work. Washatko returned home in the evening and observed the job was not completed and the branches were left in his yard along with the debris not hauled away. Washatko called the number on the receipt which had been provided by the female. The phone number turned out to be an invalid number. Washatko waited to report the incident as to give the male and female an opportunity to return and complete the job.

Washatko described the female as 5'05" to 5'06" tall, dirty blonde and "squatly" in appearance. The male was described as short, maybe 5'06", dark complexion, and dark hair. The suspects drove a small white unknown make SUV. Washatko stated the check he wrote was cashed

almost immediately at the Canvass Bank on W. Littleton Blvd.

Next, Keith Jensen reported an alleged fraud involving tree trimmers which occurred on September 15, 2022, at his residence, located at 5040 S. Inca in Englewood, Arapahoe County, CO, which is close to the Washatko residence.

Jensen said that he spoke to a male and female who offered to cut three trees down for \$1,200.00. Jensen's neighbor also hired these people, so Jensen thought it was a legit service. He paid the female who identified herself as Amelia Tyler via PayPal. Jensen sent the entire amount of \$1,200.00 to the account given to him. The people left and never showed up to do the work. Jensen has been unable to get in touch with them since the day he met them.

Jensen also stated that he watched the news and recognized both suspects from pictures on the news report out of Arvada.

09/17/22 – 10702 Larson Dr., Northglenn, Adams County, CO

Northglenn PD were tasked with investigating an alleged fraud which occurred at 10702 Larson Dr., Northglenn, Adams County, CO.

The victim, identified as Bernard Leintz (Age 80 plus), stated that on Saturday September 17, 2022, at about 1030 hours, while working in his front yard, a male approached him and told him he could trim back his dead tree branches. Bernard agreed to allow the male into his backyard and described him as Hispanic, in his late 20's, with short black hair, slender build, standing about 5'7 to 5'8, who smoked cigarettes.

Bernard went on to state that the male immediately started taking pictures and moving items in his back yard to access the tree, when a female who identified herself as Amelia Tyler exited an unknown make or model sedan that he thought was silver, with a young teenaged boy with her. Bernard stated that Amelia brought up a receipt book and intentionally covered the business name at the top, as she began to fill it out. Bernard repeatedly asked for a business card, that Amelia stated she would get for him. When Amelia told Bernard that the job would cost \$2,000.00, with half up front, and the remaining when they returned, he told her he was in his 80's and could not afford that. Bernard said Amelia then brought the price down to \$750 up front, which he agreed to, and wrote her a personal check. Bernard said it seemed that Amelia intentionally ripped the top of the receipt off, that included the business name when the male suddenly approached and stated that he would need to get ahold of his father in order to bring out his boom-truck, so he could reach the higher branches. At this point, Amelia and the young boy drove away to Bernard's Bellco Credit Union, located on Washington St. in Thornton, leaving "Daniel" who went back into the back yard and continued to photograph the tree and clear debris nearby.

A short time later, the same sedan pulled up and parked too far away for Bernard to see any license plate, or identify the make and model, when the male ran to the car from his backyard and said he'd see him later with the boom truck.

After about two days, when the man and woman never returned, and the phone number left on the receipt was not reachable, when Bernard called it multiple times. Bernard believed he was the victim of a scam and did not follow his initial instincts and later realized what had happened and called police. He insisted that the female was very outgoing and very nice.

Law enforcement reviewed surveillance images from the Bellco Credit Union, from the above incident. In the images, a white unknown newer model Nissan SUV with unknown Colorado plates attached can be seen. The bank lobby images included the female believed to be Amelia Tyler. These images also show a young child and a white or Hispanic male accompanying Amelia. The child was described as heavy-set, between 10 and 14 years of age.

10/07/22 – 7215 S. Logan St., Centennial, Arapahoe County, CO

Law enforcement in Arapahoe County investigated an incident which occurred on 10/7/22 at 7215 S. Logan St, Centennial, Arapahoe County, Colorado involving Adam and Jonell Van Alstyne. Adam informed law enforcement that the following occurred:

On 10/07/22 a male and female came to his house and offered to cut down branches from their trees and remove the limbs from the property. The male provided a quote of \$1,200.00 for the job and required \$800.00 up front. The couple was paid the \$800.00 down payment via cash. They only cut down a few limbs from one tree and then left without doing any work on the other trees. They also left all the limbs in their yard.

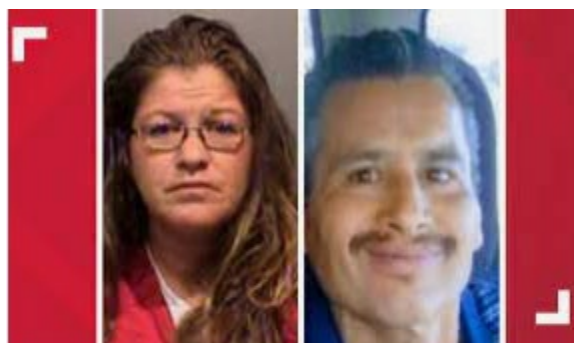
Adam found a news article on the date that he reported the incident to law enforcement that showed photos of the same male and female that had taken his payment. The article identified the couple as: Tyler, Joseph Camillo, and Tyler, Amelia Marie.

Adam also provided a more detailed written statement which, in essence, the same as was documented in the original report, however, he would add that Joseph originally introduced himself as “Teofilo”. Next, Joseph, Adam and Jonell walked around his property and Joseph identified which trees needed trimming and specific limbs that would be cut down. Joseph stated multiple times that his father and brother were working at a house close by and would bring a trailer to Adam’s house when they were finished to haul away limbs. Adam went to the bank to withdraw cash to pay Joseph and Jonell stayed at the residence.

While Adam was gone, Joseph used a pole saw to cut down a few branches. Jonell called Adam and told him that Joseph was constantly asking how long it would take for him to return with the cash because he needed the \$800.00 down payment to buy chains and pay the dump fees. When Adam returned, Joseph had only cut down limbs from one tree. Jonell paid him \$800.00 and asked to take a picture of his driver’s license. Joseph stated he did not have an ID with him but agreed to let her take a photo of him instead. Jonell had asked to take a photo of Amelia’s driver’s license as well, but Joseph told her to not to speak with Amelia.

Adam then saw Joseph running to his car yelling that he had to go get another trailer. Joseph got into the passenger seat of his car, and they drove away.

A few days later, Adam's neighbors showed him a post on Nextdoor with Ring camera photos of Joseph and a description of an identical situation that took place about a mile from his house. The post had a phone number for Joseph that was used by the other victim. Adam started contacting Joseph who responded stating that he wanted to show him "how expensive tree trimming is" and that branch removal was not part of their agreement. Adam received a message from his boss with a link to a 9News article about an arrest the Arvada Police Department made where Joseph and Amelia Tyler were charged with defrauding people out of money through a tree trimming business.



tree-trimming scam ...
9news.com

Adam confirmed that the two individuals in the 9News post above were the two individuals that were at his house and took \$800.00 from him without completing the tree trimming work they had promised.

10/13/22 – 3129 S. Lowell, City and County of Denver, CO

Denver PD contacted Lawrence Bodiker, aged 71 years, who resides at 3129 S. Lowell in Denver. Mr. Bodiker advised on 10/13/22, a man by the name of Joe knocked on his door and offered to trim deadfall from a large tree in his front yard, to remove nuisance branches from around his gas meters, and to haul away all agricultural waste. Bodiker advised the suspect quoted him \$800 to perform the work as described to which he agreed. Bodiker advised the suspect wanted full payment up front, which after some discussion, he provided via a check. Bodiker advised shortly after the work had begun, the suspect told him he needed to go to Home Depot to get supplies, at which time he left the location and never returned.

Bodiker advised the suspect to cut down live branches and left all of the downed limbs laying in the front yard. Bodiker advised the work was not completed, and that he is now liable to have the downed branches removed which will cost him an estimated \$300 plus labor. Bodiker advised through the course of this incident, he dealt exclusively with 'Joe'. Bodiker advised there was a female sitting in the suspect's vehicle throughout the duration of this event, but he never spoke with her and would not be able to identify her. Bodiker advised the suspect told him to make the check out to Amelia Tyler and provided him with a handwritten receipt. When asked if he would be able to identify the male suspect, Bodiker advised he would.

A photographic lineup containing 6 photographs containing subjects with similar physical attributes, with Joseph Tyler pictured in position number 3. An independent officer presented the photographs to Bodiker one at a time. When shown photograph number 3, Bodiker stated, "that's him" and confirmed making a positive identification of Joseph Tyler.

The following additional substantive counts (some of which also serve as additional predicate acts of racketeering activity in support of Counts One and Two) include any lesser included offenses:

COUNT THREE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1)(a), (2)(G), (4) (F5) **08A14**

On or about August 28, 2021 through January 27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money (checks and/or cash), of Kenneth Fisher, Linda Fisher, Penny Morrow, Deborah Tillison, Walter Hall, Carolyn Goers, Roy Spencer, Patty Spencer, Betty Alexander, Myrta Anderson, Willa "June" Strome, Rogelio "Roger" Juarez, Terry Mallinson, John Stephen Mallinson, Miles Malmgren, William Boyle, Brian Williams, Michele Olivas, Gary Olivas, Tom Knapp, Ronald "Ron" Arner, Dwight Kellogg, Laura Castens, Alex Guest, Jill Guest, Helen Moore, Uta Swanson, John Swanson, Michelle Gutierrez, Ronald Armstrong, Sandra Pratt and Marvin Pratt, within a period of six months and with the aggregate value of five thousand dollars or more but less than twenty thousand dollars and intended to deprive Kenneth Fisher, Linda Fisher, Penny Morrow, Deborah Tillison, Walter Hall, Carolyn Goers, Roy Spencer, Patty Spencer, Betty Alexander, Myrta Anderson, Willa "June" Strome, Rogelio "Roger" Juarez, Terry Mallinson, John Stephen Mallinson, Miles Malmgren, William Boyle, Brian Williams, Michele Olivas, Gary Olivas, Tom Knapp, Ronald "Ron" Arner, Dwight Kellogg, Laura Castens, Alex Guest, Jill Guest, Helen Moore, Uta Swanson, John Swanson, Michelle Gutierrez, Ronald Armstrong, Sandra Pratt and Marvin Pratt, permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g), (4), C.R.S.

COUNT FOUR

CONSPIRACY TO COMMIT THEFT-\$5000-\$20,000,
C.R.S. §§ 18-4-401(1)(a), (2)(g), (4) and 18-2-201 (F6) **08A14 C**

On or about August 28, 2021 through January 27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** with the intent to promote or facilitate the commission of the crime of Theft-\$5,000-\$20,000, unlawfully and feloniously agreed with each other and/or a person or persons to the Grand Jury and Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1)(a),(2)(g),(4) and 18-2-201, C.R.S.

COUNT FIVE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE – LESS THAN \$20,000, C.R.S. 18-4-409(2), (3)(A) (F5) **0804G**

On or about August 28, 2021 through February 3, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Ronald Armstrong, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or used the motor vehicle in the commission of the crime of Theft as set forth in section 18-4-401, C.R.S., and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2), (3)(a), C.R.S.

The essential facts for Counts Three through Five were summarized above, including in the narrative for Predicate Acts Eight through Ten which support of Counts One and Two and are incorporated herein.

COUNT SIX

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1), (2)(G),(4) (F5) **08A14**

On or about August 10, 2022 through October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money (checks, cash or via PayPal), of James Brochard, Marie Brochard, Shirley Miller, Sabrina Willis, Lawrence Warriner, Keith Jensen, Michael Washatko, Bernard Leitz, Adam Van Alstyne, Jonell Van Alstyne, and Lawrence Bodiker, within a period of six months and with the aggregate value of five thousand dollars or more but less than twenty thousand dollars and intended to deprive James Brochard, Marie Brochard, Shirley Miller, Sabrina Willis, Lawrence Warriner, Keith Jensen, Michael Washatko, Bernard Leitz, Adam Van Alstyne, Jonell Van Alstyne, Lawrence Bodiker, and Robert Pierce permanently of its use or benefit; in violation of section 18-4-401(1)(a), (2)(g),(4), C.R.S.

COUNT SEVEN

CONSPIRACY TO COMMIT THEFT-\$5,000-\$20,000, C.R.S. §§ 18-4-401(1)(a), (2)(g), (4) and 18-2-201 (F6) **08A14C**

On or about August 10, 2022 through October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** with the intent to promote or facilitate the commission of the crime of Theft-\$5,000-\$20,000, unlawfully and feloniously agreed with each other and/or a person or persons to the Grand Jury and Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of sections 18-4-401(1)(a),(2)(g),(4) and 18-2-201, C.R.S.

The essential facts for Counts Six and Seven were summarized above in the narrative for Predicate Acts Eleven and Twelve which were in support of Counts One and Two and are incorporated herein.

NOTE: All of the following charged counts of Theft-\$500 or More-At-Risk Victim and Theft-Under \$500-At-Risk Victim also serve as acts of racketeering activity (predicate acts) in support of Counts 1 and 2.

COUNT EIGHT

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F3) **18623**

On or about October 25, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Kenneth Fisher and/or Linda Fisher, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT NINE AND PREDICATE ACT THIRTEEN

THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about October 25, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Kenneth Fisher and/or Linda Fisher, with the value of five hundred dollars or more, and intended to deprive Kenneth Fisher and/or Linda Fisher permanently of its use or benefit; in violation of sections 18-4-401(1)(a)and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TEN

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about January 14, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Penny Morrow, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT ELEVEN AND PREDICATE ACT FOURTEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 14, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Penny Morrow, with the value of less than five hundred dollars, and intended to deprive Penny Morrow permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWELVE

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about January 22, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Deborah Tillison, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTEEN AND PREDICATE ACT FIFTEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 22, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Deborah Tillison, with the value of less than five hundred dollars, and intended to deprive Deborah Tillison permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FOURTEEN

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about January 11, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Walter Hall, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FIFTEEN AND PREDICATE ACT SIXTEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 11, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Walter Hall, with the value of less than five hundred dollars, and intended to deprive Walter Hall permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT SIXTEEN

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about September 30, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Carolyn Goers, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT SEVENTEEN AND PREDICATE ACT SEVENTEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about September 30, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Carolyn Goers, with the value of less than five hundred dollars, and intended to deprive Carolyn Goers permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT EIGHTEEN

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about January 10, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Roy Spencer and/or Patty Spencer, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT NINETEEN AND PREDICATE ACT EIGHTEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 10, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Roy Spencer and/or Patty Spencer, with the value of less than five hundred dollars, and intended to deprive Roy Spencer and/or Patty Spencer permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWENTY

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F5) **18624**

On or about January 20, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Betty Armstrong, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT TWENTY-ONE AND PREDICATE ACT NINETEEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 20, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Betty Armstrong, with the value of less than five hundred dollars, and intended to deprive Betty Armstrong permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWENTY-TWO

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F5) **18624**

On or about January 24-27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Mryta Anderson, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT TWENTY-THREE AND PREDICATE ACT TWENTY

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 24-27, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Mryta Anderson, with the value of less than five hundred dollars, and intended to deprive Myrta Anderson permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWENTY-FOUR

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F3) **18623**

On or about November 5, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Rogelio “Roger” Juarez, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT TWENTY-FIVE AND PREDICATE ACT TWENTY-ONE

THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about November 5, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Rogelio “Roger” Juarez, with the value of five hundred dollars or more, and intended to deprive Rogelio “Roger” Juarez permanently of its use or benefit; in violation of sections 18-4-401(1)(a)and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWENTY-SIX

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F5) **18624**

On or about December 6, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Terry Mallinson and/or John Stephen Mallinson, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT TWENTY-SEVEN AND PREDICATE ACT TWENTY-TWO

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about December 6, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Terry Mallinson and/or John Stephen Mallinson, with the value of less than five hundred dollars, and intended to deprive Terry Mallinson and/or John Stephen Mallinson, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT TWENTY-EIGHT

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about January 3, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Miles Malmgren, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT TWENTY-NINE AND PREDICATE ACT TWENTY-THREE

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about January 3, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Miles Malmgren with the value of less than five hundred dollars, and intended to deprive Miles Malmgren, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT THIRTY

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON, C.R.S. 18-6.5-103(7.5)
(A),(B) (F3) **18623**

On or about January 5, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive William Boyle, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTY-ONE AND PREDICATE ACT TWENTY-FOUR

THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about January 5, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of William Boyle, with the value of five hundred dollars or more, and intended to deprive William Boyle permanently of its use or benefit; in violation of sections 18-4-401(1)(a)and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT THIRTY-TWO

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about September 29-October 29, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Willa “June” Strome, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTY-THREE AND PREDICATE ACT TWENTY-FIVE

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about September 29-October 29, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Willa “June” Strome with the value of less than five hundred dollars, and intended to deprive Willa “June” Strome, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT THIRTY-FOUR

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about September 1, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Shirley Miller, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTY-FIVE AND PREDICATE ACT TWENTY-SIX

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about September 1, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Shirley Miller with the value of less than five hundred dollars, and intended to deprive Shirley Miller, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT THIRTY-SIX

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about October 22, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Helen Moore, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTY-SEVEN AND PREDICATE ACT TWENTY-SEVEN

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about October 22, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Helen Moore with the value of less than five hundred dollars, and intended to deprive Helen Moore, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT THIRTY-EIGHT

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about October 23, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive John Swanson and/or Uta Swanson, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT THIRTY-NINE AND PREDICATE ACT TWENTY-EIGHT

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about October 23, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of John Swanson and/or Uta Swanson with the value of less than five hundred dollars, and intended to deprive John Swanson and/or Uta Swanson, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FORTY

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about August 10, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive James Brochard and/or Marie Brochard, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FORTY-ONE AND PREDICATE ACT TWENTY-NINE

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about August 10, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of James Brochard and/or Marie Brochard with the value of less than five hundred dollars, and intended to deprive James Brochard and/or Marie Brochard, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FORTY-TWO

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F3) **18623**

On or about September 11, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler** unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Bernard Leintz, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FORTY-THREE AND PREDICATE ACT THIRTY

THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about September 11, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Bernard Leintz, with the value of five hundred dollars or more, and intended to deprive Bernard Leintz permanently of its use or benefit; in violation of sections 18-4-401(1)(a) and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FORTY-FOUR

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about September 11, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Sandra Pratt and/or Marvin Pratt, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FORTY-FIVE AND PREDICATE ACT THIRTY-ONE

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about September 11, 2021, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Sandra Pratt and/or Mavin Pratt with the value of less than five hundred dollars, and intended to deprive Sandra Pratt and/or Marvin Pratt, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FORTY-SIX

CRIMINAL EXPLOITATION - UNDER \$500 - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B)(F5) **18624**

On or about August 12, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Robert Pierce, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was less than five hundred dollars, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FORTY-SEVEN AND PREDICATE ACT THIRTY-TWO

THEFT - UNDER \$500 - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F5) **1854B**

On or about August 12, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Robert Pierce with the value of less than five hundred dollars, and intended to deprive Robert Pierce, permanently of its use or benefit.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FORTY-EIGHT

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F3) **18623**

On or about May 18, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Barbara Lou Hooker, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FORTY-NINE AND PREDICATE ACT THIRTY-THREE

THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about May 18, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Barbara Lou Hooker, with the value of five hundred dollars or more, and intended to deprive Barbara Lou Hooker permanently of its use or benefit; in violation of sections 18-4-401(1)(a)and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

COUNT FIFTY

CRIMINAL EXPLOITATION - \$500 OR MORE - AT-RISK PERSON,
C.R.S. 18-6.5-103(7.5) (A),(B) (F3) **18623**

On or about October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly used deception, harassment, intimidation, or undue influence to permanently or temporarily deprive Lawrence Bodiker, an at-risk person, of the use, benefit, or possession of any thing of value. Further, the thing of value was five hundred dollars or more, in violation of section 18-6.5-103(7.5) (a),(b), C.R.S.

COUNT FIFTY-ONE AND PREDICATE ACT THIRTY-FOUR

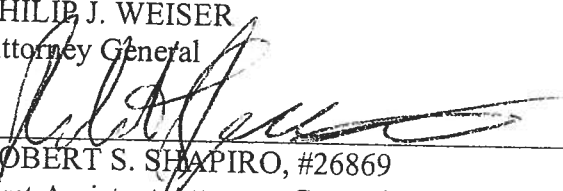
THEFT - \$500 OR MORE - AT-RISK VICTIM, C.R.S. 18-6.5-103(5);18-4-401(1) (F3) **1854C**

On or about October 13, 2022, in the State of Colorado, **Joseph Camillo Tyler and Amelia Marie Tyler**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over a thing of value, namely: money, of Lawrence Bodiker, with the value of five hundred dollars or more, and intended to deprive Lawrence Bodiker permanently of its use or benefit, in violation of sections 18-4-401(1)(a) and 18-6.5-103(5), C.R.S.

Further, the victim was an at-risk person, and an element or portion of the offense was committed in the presence of the victim and/or the defendant knew that the victim was an at-risk person; in violation of 18-6.5-103(5) and 18-4-401(1), C.R.S.

The essential facts for Counts Eight through Fifty-One (which includes Predicate Acts Thirteen through Thirty-Four) were summarized above in this Indictment, including the narratives for Predicate Acts Eight through Twelve which support Counts One and Two and are incorporated herein.

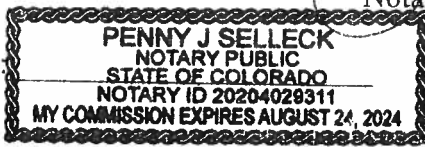
PHILIP J. WEISER
Attorney General


ROBERT S. SHAPIRO, #26869
First Assistant Attorney General
Special Prosecutions Unit
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado,
this 2nd day of February 2023.


Notary Public

My commission expires



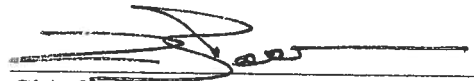
The 2022-2023 Colorado Statewide Grand Jury presents the within Indictment, and
the same is hereby ORDERED FILED this 2nd day of February 2023.

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

Arrest Warrants are Issued for:

Joseph Camillo Tyler, with a bond set at \$ _____, with the following
conditions: _____

Amelia Marie Tyler, with a bond set at \$ _____, with the following
conditions: _____


Chief Judge Christopher J. Baumann
Presiding Judge, Statewide Grand Jury