

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO  1437 Bannock Street Denver, CO 80202	DATE FILED: October 25, 2021 1:17 PM FILING ID: 2848BA3550995 CASE NUMBER: 2021CR1807
<b>THE PEOPLE OF THE STATE OF COLORADO</b>  <b>PLANTIFF,</b>  <b>VS.</b>  <b>JASON QUIJADA</b>	<p style="text-align: center;"><b>COURT USE ONLY</b></p>
PHILIP J. WEISER, Attorney General SARAH E. McCUTCHEON, Reg. # 33242 Senior Assistant Attorney General* FRED JOHNSON, Reg. # 42479 M. BRECK ROESCH, Reg. # 48037 NICHOLAS TREVINO, Reg. # 51127 Special Assistant Attorneys General* 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO, 80203 (720) 508-6700 <a href="mailto:sarah.mccutcheon@coag.gov">sarah.mccutcheon@coag.gov</a> <a href="mailto:fjohnson@bouldercounty.org">fjohnson@bouldercounty.org</a> <a href="mailto:broesch@bouldercounty.org">broesch@bouldercounty.org</a> <a href="mailto:ntrevino@bouldercounty.org">ntrevino@bouldercounty.org</a> *Counsel of Record	Grand Jury Case No: <b>20CR0001</b>  Div:                      Courtroom: 259
<b>COLORADO STATE GRAND JURY INDICTMENT: 2020-2021 SESSION</b>	

Of the 2020-2021 term of the Denver District Court in the year 2021, the 2020-2021 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:

COUNT 1      AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE,  
 C.R.S.18-4-409(2),(3)(A) [F4] **0804G**

**COUNT ONE**  
**(Series 2, The Sports Garage)**  
**AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE, C.R.S. 18-4-409(2),(3)(A) [F4] 0804G**

Between and including October 1 and 21, 2019, in the State of Colorado, **Jason Quijada** unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of Storage ETC, without authorization, or by threat or deception, and used the motor vehicle in the commission of the crimes of Burglary and Theft as set forth in sections 18-4-203 and 18-4-401, C.R.S., and/or caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, 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.

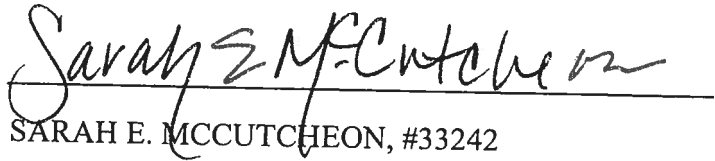
The offense committed in Count One was committed in the following manner.

On October 2, 2019, law enforcement officers recovered a white 2006 Ford box truck, Colorado license plate 709 RQH, VIN 1FDWE35L06DA17488, at 2425 Forest Avenue, City and County of Boulder. The truck was left running and unattended. Subsequent investigation determined that the truck belonged to Hector Flores Aguilera, was valued at \$15,000, and had been stolen earlier from 315 North Stuart Street, City and County of Denver, sometime between October 1 and October 2, 2019. The investigation also determined \$760 worth of damage had been caused to the Aguilera truck. On October 2, 2019, a City of Boulder traffic signal camera captured the Aguilera truck traveling through a red light. Thereafter, officers identified the driver of Aguilera's truck depicted in the photo at the time of the violation as Austin Butler.

On October 3, 2019, a 2003 Ford truck, Colorado license plate 548 TRI, VIN 1FDWE35L53HA44495, valued at \$5,713, and belonging to Storage ETC, was stolen from 8390 Church Ranch Boulevard, City of Westminster, Jefferson County. Thereafter, this truck was used to force entry into The Sports Garage bicycle shop located 2705 Sprue Street, City and County of Boulder. Suspects crashed the truck through a ground level garage door, causing over \$5,000 worth of damage to the truck. Suspects then entered the business and removed thirteen bicycles belonging to the business, valued at \$60,743. The suspects caused an estimated \$58,000 in damage to the physical building of the The Sports Garage and merchandise located inside. On that date, a City of Boulder traffic signal camera captured the Storage ETC truck traveling through a red light. Officers subsequently reviewed Facebook Messenger messages of Austin Butler and Jason Quijada that indicated Jason Quijada was involved in this incident. The Storage ETC truck was recovered on October 21, 2019 at 679 Galapago, City and County of Denver. During an interview with investigators in December, 2019, Austin Butler admitted to being involved in the burglary of The Sports Garage. (See Exhibit 1, Slide 3, 11-12; Grand Jury Testimony December 10, 2020, pages 53-60. See also Grand Jury Testimony, September 23, 2021, pages 1-14.)

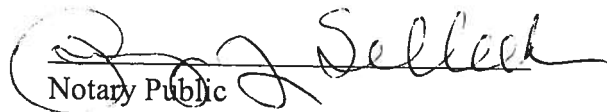
PHILIP J. WEISER

Attorney General

  
SARAH E. MCCUTCHEON, #33242

Senior Assistant Attorney General

Subscribed to before me in the City and County of Denver, State of Colorado, this  
21<sup>st</sup> day of October, 2021.

  
Notary Public

My commission expires: \_\_\_\_\_



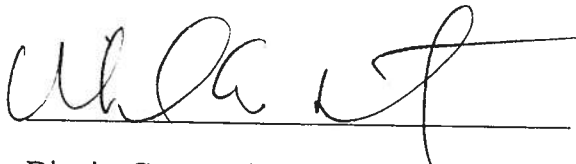
The 2020-2021 Colorado Statewide Grand Jury presents the Indictment contained within, with the Foreperson's signature affixed to each True Bill, and the same is hereby ORDERED FILED this \_\_\_\_ day of October, 2021.

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

Warrants to issue:

JASON QUIJADA, BOND SET AT 15,000.00 <sup>PK</sup> C/S/P

*partial equiv. contract of 20-21; involved  
property, may not have state vld of appeal  
no prior of reasons.*



District Court Judge and Presiding Judge for the Statewide Grand Jury

Second Judicial District,

State of Colorado

*10/21/2021*