

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO  1437 Bannock Street Denver, CO 80202	
<b>THE PEOPLE OF THE STATE OF COLORADO,</b>  v.  <b>BRUCE DOUCETTE,          STEPHEN NALTY,          JANIS BLEASE,          STEVEN BYFIELD,          LAURENCE GOODMAN,          DAVID COFFELT,          HARLAN SMITH,          and          BRIAN BAYLOG</b>  Defendants.	
<b>▲ COURT USE ONLY ▲</b>	
CYNTHIA H. COFFMAN, Attorney General ROBERT S. SHAPIRO, First Assistant Attorney General 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO 80203 720-508-6000 Registration Number: 26869	Case No.: GJ Case No.: 16CR001  Ctrm: 259
<b>COLORADO STATE GRAND JURY INDICTMENT</b>	

Of the 2016-2017 term of the Denver District Court in the year 2017; the 2016-2017 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      COCCA-Pattern of Racketeering- Participation in an Enterprise, §18-17-104(3), C.R.S. (F2) **37284**
- COUNT 2      COCCA-Conspiracy, §18-17-104(4), C.R.S. (F2) **37285**
- COUNT 3      Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) **24051**
- COUNT 4      Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) **24051**
- COUNT 5      Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) **24051**
- COUNT 6      Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) **24051**

- COUNT 7 Criminal Extortion, §18-3-207, C.R.S. (F4) **02063**
- COUNT 8 Conspiracy to Commit Criminal Extortion, §§18-3-207, 18-2-201 C.R.S. (F5) **02063C**
- COUNT 9 Offering a False Instrument for Recording in the First Degree, §18-5-114(1), C.R.S. (F5) **10121**
- COUNT 10 Retaliation Against a Judge, §18-8-615, C.R.S. (F4) **26074**
- COUNT 11 Retaliation Against a Prosecutor, §18-8-616, C.R.S. (F4) **26131**
- COUNT 12 Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) **24051**
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<b>Defendant</b>	<b>Counts Applicable</b>
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Stephen Nalty	1-21, 23-29, 31-33 and 35-39
Janis Blease	1-16, 19, 20, 23, 24, 25-27, 29, 31-33, 35-39
Steven Byfield	1-13, 15, 16, 19-21, 23-27 and 31-33
Laurence Goodman	1-16, 19, 20, 23, 24, 25-27, 31 and 32
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## COUNT 1

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

On or about January, 2014 through March 30, 2017, and initially discovered on or about May 1, 2014, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** 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 2

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

On or about January 1, 2014 through March 30, 2017, and initially discovered on or about May 1, 2014, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** and/or others to the Grand Jury and the Attorney General known or unknown, did unlawfully, knowingly, and feloniously 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 essential facts in support of the offenses alleged in Counts 1 and 2 are as follows:

### The Enterprise

The Enterprise alleged in Counts 1 and 2 is primarily a group of individuals, associated in fact, although not a legal entity, as well as a group of affiliated entities. More specifically the enterprise includes, but is not limited to, the following associated in fact individuals, trusts and/or associations:

**Bruce Doucette,  
Stephen Nalty,  
Janis Blease,  
Steven Byfield,  
Laurence Goodman,  
David Coffelt,**

**Harlan Smith,  
Brián Baylog,  
Eric Brandt,  
William Livsey,  
Steven Curry,  
Charlene Von Schlesien,  
John Harrison,  
Michael Marshall,  
James Frank Williams,  
People's Grand Jury Administration,  
People's Grand Jury Administration in Colorado,  
People's Grand Jury in Colorado,  
Indestructible Trust for the People in Colorado and/or Indestructible Trust,  
Colorado Superior Court and/or De Jure Colorado Superior Court,  
Superior Court of the Continental United States of America,  
Continental United States Marshals and/or De Jure Continental United States  
Marshals,**

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

The above listed members of the enterprise collaborated with one or more of the others as principals and/or complicitors as part of a long term scheme and endeavor to initially attempt to influence various Colorado based public servants, including Colorado state and municipal court judges, prosecutors, sheriffs, and other public officials who in their legal capacities had responsibilities related to a legal matter which involved a member of this enterprise. For example, the Statewide Grand Jury determined that a common triggering event for the subsequent criminal behavior which serves as the foundation for this Indictment was when a member of the enterprise became a named party in a legal proceeding in either a state, municipal or federal court which was presided over by a judge. Whether the legal proceeding was a criminal matter being prosecuted by an elected District Attorney through that prosecutor's designated Deputy District Attorney or was a civil matter, evidence was developed by the Statewide Grand Jury showing that when the legal proceeding in question did not result in a decision favorable to the member of the enterprise one or more members of the enterprise would then engage in a methodical series of actions and statements specifically targeting the trial court judge, the assigned prosecutor, the local sheriff and other related public servants who had a designated role of some form which was related to the subject litigation. Additionally other targeted public servants included elected county commissioners who were often responsible for making funding decisions in response to the requests of elected prosecutors and sheriffs so that those respective offices could operate.

Typical actions employed by the enterprise at the initial stage of the chronology would include a member of the enterprise making a grievance to a self appointed "Grand

Jury Administrator,” such as Stephen Nalty. Evidence showed that the complainant would then have an expectation that the targeted public servants would be the subject of a demand, notice, order and/or a writ which was apparently designed to oust the public officials and/or to dismiss the bona fide legal action that was pending in a legitimate court. Once the public servant(s) did not respond to the enterprise’s demand, notice, order and/or writ the Statewide Grand Jury observed that various other documents would then be filed and served upon the public servants by the enterprise, including but not limited to, a “Criminal Complaint” as well as a “Consensual Commercial Lien.” Besides Mr. Nalty these other documents were often signed or filed by Bruce Doucette (sometimes in his capacity as a “Superior Court Judge”), Janis Blease, Steven Byfield, Laurence Goodman, David Coffelt, Harlan Smith or Brian Baylog.

As the enterprise continued its focus by making what appear to be legally defined “true threats” towards or demands of the targeted public servants another tactic which was employed against the public servants was the enterprise choosing to serve the public servants with a document that appeared to be a collections demand which contained a threat stating that if payment of the “debt” is not made that a “negative credit report reflecting on your credit record may be submitted to a reporting agency...” The Statewide Grand Jury especially became aware that these collection related demands were mailed to the home addresses of the some of the public servants, including judges and prosecutors and as such the Statewide Grand Jury can reasonably infer that based on the context, timing and circumstances of the escalated demands that these actions were extortive, retaliatory and served as retribution against some of the public servants.

The alleged behavior occurred in various jurisdictions, including but not limited to, the City and County of Denver, Boulder County, Gilpin County, Jefferson County and Pueblo County, all in the State of Colorado.

### Pattern of Racketeering Activity

**Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman Janis Blease, David Coffelt, Harlan Smith, Brian Baylog** and 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, 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:

Attempt to Influence a Public Servant, §18-8-306;  
Criminal Extortion, §18-3-207;  
Conspiracy to Commit Criminal Extortion, §18-3-207 and §18-2-201;  
Offering a False Instrument for Recording, §18-5-114;  
Criminal Impersonation, §18-5-113;  
Second Degree Forgery, §18-5-104;  
Fraud Upon the Department of Revenue, § 39-21-118, including the offenses of Tax Evasion and Failure to File a Tax Return; and  
Mail Fraud, 18 U.S.C. §1341.

Pursuant to C.R.S. § 18-17-103(5)(a), "Racketeering Activity" means and also includes any conduct defined as "racketeering activity" under 18 U.S.C. §1961 (1)(A), (1)(B), (1)(C) and (1)(d). As a result, the federal offense of Mail Fraud, 18 U.S.C. §1341, is an applicable offense which can serve as "racketeering activity" (Predicate Act) in support of Counts 1 and 2, as alleged in this State Indictment. Furthermore, the alleged Mail Fraud in this Indictment is directly related to the ongoing behavior of this Enterprise during the charged time period.

### 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, are as follows:

## The Boulder County Centered Acts

### COUNT 3

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** unlawfully and feloniously attempted to influence Karolyn Moore, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 4

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** unlawfully and feloniously attempted to influence Stanley Garnett, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 5

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease and/or Harlan Smith**, unlawfully and feloniously attempted to influence Joseph Pelle, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.



## COUNT 6

### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease and/or Harlan Smith**, unlawfully and feloniously attempted to influence Raina Bayas, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

## COUNT 7

### CRIMINAL EXTORTION, C.R.S. 18-3-207(1)(A), (B)(I) (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith and/or Brian Baylog** unlawfully, feloniously, and with the intent to induce Karolyn Moore, Stanley Garnett, Joseph Pelle, Raina Bayas, John Gifford, Cindy Domenico, Deb Gardner and/or Elise Jones, against his or her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Karolyn Moore, Stanley Garnett, Joseph Pelle, Raina Bayas, John Gifford, Cindy Domenico, Deb Gardner and/or Elise Jones, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

## COUNT 8

### CONSPIRACY TO COMMIT CRIMINAL EXTORTION, C.R.S. 18-3-207; 18-2-201 (F5)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with one or more of the above named co-defendants and a person or persons to the prosecution unknown that one or more of them would engage in conduct which constituted that crime or an 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 18-3-207 and 18-2-201, C.R.S.

COUNT 9

OFFERING A FALSE INSTRUMENT FOR RECORDING IN THE FIRST DEGREE,  
C.R.S. 18-5-114(1) (F5)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease and/or Harlan Smith** unlawfully, feloniously, and with intent to defraud, presented or offered a written instrument, namely: Writ of Mandamus for Ouster, Order to Release & Dismiss, Writ of Mandamus for Immediate Release, Consensual Commercial Lien, Notice, and/or Notice of ICROPA Filings Consensual Commercial Liens and Ledgers, relating to or affecting real or personal property or directly affecting contractual relationships, to a public office or a public employee, namely: the Boulder County Clerk and Recorder and/or the Clerk and Recorder for the City and County of Denver, with the knowledge or belief that the written instrument would be registered, filed, or recorded or become a part of the records of that public office or public employee, and knowing that the written instrument contained a material false statement or material false information; in violation of section 18-5-114(1), C.R.S.

ADDITIONAL PREDICATE ACT 1 IN SUPPORT OF COUNTS 1 AND 2

MAIL FRAUD, 18 U.S.C. § 1341

On or about January 1, 2015 to March 30, 2017, in the District of Colorado, State of Colorado, the defendant, **Stephen Nalty**, unlawfully devised or intended to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, for the purpose of executing such scheme or artifice or attempting to do so, places in any post office or authorized depository for mail matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at a place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing; in violation of 18 U.S.C. § 1341.

## COUNT 10

### RETALIATION AGAINST A JUDGE, C.R.S. 18-8-615 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** unlawfully, feloniously, and knowingly, as retaliation or retribution against Karolyn Moore, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon Karolyn Moore; in violation of section 18-8-615, C.R.S.

## COUNT 11

### RETALIATION AGAINST A PROSECUTOR, C.R.S. 18-8-616 (F4)

On or about September 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, David Coffelt, Janis Blease, Harlan Smith, and/or Brian Baylog** unlawfully, feloniously, and knowingly, as retaliation or retribution against Stanley Garnett and/or Raina Bayas, both prosecutors who have served or are serving in a legal matter assigned to the prosecutor involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon Stanley Garnett and/or Raina Bayas; in violation of section 18-8-615, C.R.S.

The essential, but non exclusive facts in support of Counts 3 through 9, as well as for Additional Predicate Act 1, which all support Counts 1 and 2, along with additional Counts 10 and 11 which are not enumerated predicate acts in support of Counts 1 and 2, are as follows:

Beginning on or about September 1, 2015 a Boulder County resident named Charlene Von Schlesien was a criminal defendant in a series of pending Boulder County Court matters, including but not limited to, 2014M372 (Longmont). These matters were being presided over by Judge Karolyn Moore and prosecuted by Boulder District Attorney Stanley Garnett and a Deputy District Attorney named Raina Bayas working in DA Garnett's office. Upon Ms. Von Schlesien being taken into custody by sheriff's deputies serving under Boulder County Sheriff Joseph Pelle a series of documents began being received by various public servants who were involved in the pending Von Schlesien matters.

The Statewide Grand Jury obtained evidence and the record supports that documents were being sent and mailed through the United States Postal Service by an entity referring to itself as the "People's Grand Jury Administration in Colorado" with

items such as Writs and Orders demanding or threatening that public servants such as Judge Moore, Sheriff Pelle and District Attorney Garnett vacate their offices and to release Ms. Von Schlesien. Judge Moore and Sheriff Pelle each received a Writ of Mandamus for Ouster which put them on notice that failure to vacate their offices “is an act of insubordination, fraud, insurrection and sedition and will be treated accordingly.” It is important to note that insurrection and sedition are felony crimes in Colorado which are potentially punishable by a prison sentence in the Department of Corrections. In particular an “Order to Release & Dismiss” was prepared and submitted to Judge Moore, DA Garnett and Sheriff Pelle which commanded these public servants to not only release Ms. Von Schlesien but also awarded her monetary damages. These particular documents were signed by Stephen Nalty (as a People’s Grand Jury Administrator and as One of the People), Steven Byfield, Bruce Doucette (as a Superior Court Judge), and/or by Brian Baylog (as a Continental United States Marshal). Note: The lower case “u” in the word “united” was apparently written using a lower case by the enterprise.

Evidence was then developed that when the public servants did not respond to the earlier filings additional filings were occurring in an escalating manner with not only Mr. Nalty serving as a signator but also Janis Blease and Laurence Goodman. The threats now occurring in October 2015 included language that failure by some of the public servants to not vacate their office will result in a criminal complaint being filed and their respective cases then being turned over to a Grand Jury for indictment.

Again with the public servants understandably not abiding by the demands being made of them by the enterprise a “Criminal Complaint” was filed in November 2015 accusing Judge Moore, DA Garnett, Sheriff Pelle and others. This complaint included language that the public servants are now accused persons who have committed offenses and as such are declared to be under Citizen’s Arrest with the actual physical arrest to be by the Continental United States Marshal. This document appears to have been signed by Stephen Nalty and Steven Byfield. Relatively contemporaneous to this complaint being submitted was the creation and uttering of a “Consensual Commercial Lien” in December 2015 which falsely alleged that Judge Moore, DA Garnett, Sheriff Pelle and Deputy State Public Defender John Gifford were debtors to the Indestructible Trust for the People in Colorado by and through a proxy, Stephen Nalty. This lien was signed by Stephen Nalty, Bruce Doucette and one other unidentified person. Then in December 2015 Mr. Doucette and Mr. Nalty followed up with DA Garnett through a set of filed notices with the Clerk for the City and County of Denver because DA Garnett understandably did not respond to the previous notices regarding the issues being threatened by the members of the enterprise.

In January 2016 an additional “Criminal Complaint” was sent to the same targeted public servants who were discussed above, as well as to Deputy District Attorney Bayas. In this document these public servants were being accused of having committed crimes by the enterprise, specifically by Mr. Nalty, Mr. Byfield and Mr. Goodman. Again, as was seen before the named public servants were declared to be under citizen’s arrest with the actual physical arrest to be by a Continental United States Marshal. This complaint was then followed up by another “Consensual Commercial Lien” being lodged against the

public servants even though no legitimate debts existed between the claimed creditors and the targeted public servants. This February 2016 lien was apparently signed by Mr. Nalty and Mr. Goodman. Also in February 2016 with a continuation of the demands in support of the Von Schlesien matter David Coffelt, serving as a "Proxy for Distress Demandant," signed a document entitled "Distress on Bonds" along with Mr. Goodman and Mr. Nalty which attempted to compel the public servants at issue to not only release Ms. Von Schlesien but that the public servants must also resign or be permanently removed and barred from office and forfeit all pensions and benefits.

In late March 2016 Bruce Doucette, in his capacity as "Superior Court Judge" again demanded the immediate release of Ms. Von Schlesien, along with him seeking "full renumeration for her unlawful imprisonment." This document was served on various public servants including Sheriff Pelle, DA Garnett, Deputy DA Bayas and Judge Moore by Harlan Smith. These same public servants were also named in an Indictment accusing each of them of committing two offenses, both of which were punishable by confinement in a penitentiary for a specified terms of years.

Then in May 2016 a document entitled "Writ of Mandamus for Immediate Release" signed by Mr. Nalty, Ms. Blease and Mr. Coffelt as Grand Jury Administrators, was filed with the Clerk for the City and County of Denver accusing the same group of public servants as being "domestic enemies of the people" and as a result again demanded the immediate release of Ms. Von Schlesien. This document was followed up in August 2016 by the enterprise further escalating its tactics by requesting that an embedded individual personally serve Judge Moore at her home with a document entitled, "Writ of Attachment on a Default Judgment (Real and Corporate Property)." Of note is that this document was commanding the De Jure Continental United States Marshals and/or their Deputies to attach any property in the possession, custody or the control of the public servants (Judge Moore, DA Garnett, Deputy DA Bayas and Sheriff Pelle) who the enterprise continued to refer to as debtors. As was captured on an June 3, 2016 audio recording between Mr. Nalty, Mr. Byfield and an embedded individual this acquired evidence further illustrates that the intent of the enterprise's chosen approach was designed to cause various results, including but not limited to forcing the public servants to release Ms. Von Schlesien, to economically harm or damage the reputations of the identified public servants, as well as to cause other retaliatory consequences to the public servants which were detrimental to them.

In July 2016 and again in August 2016, Mr. Nalty, Mr. Coffelt and Ms. Blease again signed documents entitled "Notice of ICROPA Filings Consensual Commercial Liens and Ledgers." These notices of liens sought large dollar amounts from the named public servants. A similar document signed by Mr. Nalty and two other members of the enterprise was filed in September 2016. These documents named the same group of public servants as was previously observed plus now also included the three elected County Commissioners for Boulder County: Cindy Domenico, Deb Gardner and Elise Jones. In the case of Commissioner Domenico her home address was listed on the documents. In particular the August and September 2016 documents containing materially false information regarding the existence of debts were actually filed with the

Boulder County Clerk and Recorder by Harlan Smith on behalf of the enterprise. Commissioner Domenico reported to case agents that these spurious filings detrimentally impacted her ability to use her home as collateral when she was seeking to finance a loan or acquire a line of credit to pay a relative's tuition bill to a university. By way of example evidence existed of this tactic being used from a January 6, 2016 audio recording obtained from an embedded individual which captured a conversation between Mr. Nalty and Mr. Goodman regarding the enterprise's goal of using liens and providing the public servants with notice of the liens.

Mr. Nalty was heard stating,

"... and showed 'em that there is an opposing force and they don't have free reign on the table anymore... and plant the fear in them. Even if that is all that is done, the fact is that once the lien is placed in the commercial process, on their property correctly they can't do anything with it. They can't sell it - they can maybe still occupy it until they are thrown off but it's really their notice that they are going to be removed at sometime in the future."

Mr. Goodman then follows Mr. Nalty's above statement with,

"They won't be able to buy a car or their credit..."

Which was followed by Mr. Nalty completing Mr. Goodman's statement with,

"Their credit will go to hell in a hand basket."

Also in July 2016 the enterprise, primarily orchestrated by Mr. Nalty, engaged in a series of acts by opening an account with Fidelity Information Corporation to create official looking debt collection notices and demands which were then mailed to Judge Moore, Sheriff Pelle and Deputy DA Bayas demanding large sums of money to resolve the fictitious debts. These notices also threatened "that a negative credit report reflecting on your credit record may be submitted to a reporting agency if you fail to fulfill the terms of your credit obligations."

Then in December 2016 printed flyers consistent with the enterprise's previously articulated agenda and language which were uttered in the earlier filings were distributed in the neighborhoods of some of the targeted public servants, including Judge Moore and DA Garnett. These flyers were entitled, "Colorado Free Press December 26, 2016 If they won't follow the Law, how dare they enforce the Law?"

This was followed in February 2017 when Brian Baylog, serving as the Foreman for the De Jure people's Grand Jury of Colorado, signed off on two documents known as "Criminal Presentment" which were accusing Judge Moore and DA Garnett of having committed various transgressions. Included amongst these multiple page documents

which had been mailed to Judge Moore and to DA Garnett was a document called, "Writ of Mandamus for Contempt of Constitutions" which was dated 23 January 2016. Of note in this particular document that both Judge Moore and DA Garnett received was the following statement:

"Failure to respond and comply with the following compels us to inform you that we will convene a Grand Jury & ask them to consider evidence that we have assembled to indict you for contempt of constitutions, incompetence, insubordination, sedition, insurrection and possibly treason."

Of note, the Statewide Grand Jury observed that the enterprise again used the crimes of sedition and insurrection as accusations against the judge and prosecutor. However, the greatest concern was the enterprise's use of a reference to the capital offense of treason, a Class 1 Felony in Colorado, as a crime that both Judge Moore and DA Garnett could be indicted by the enterprise's grand jury. These 23 January 2016 documents were signed by David Coffelt, Stephen Nalty, Janis Blease, Laurence Goodman and Harlan Smith.

### **The Pueblo County Centered Acts**

#### **COUNT 12**

##### **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, Harlan Smith, and/or Brian Baylog** unlawfully and feloniously attempted to influence Kim Karn, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

#### **COUNT 13**

##### **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease and/or Harlan Smith**, unlawfully and feloniously attempted to influence Deborah Eyler, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**COUNT 14**

**ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Stephen Nalty, Laurence Goodman, Janis Blease and/or Harlan Smith**, unlawfully and feloniously attempted to influence Kirk Taylor, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**COUNT 15**

**CRIMINAL EXTORTION, C.R.S. 18-3-207(1)(A), (B)(I) (F4)**

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, Harlan Smith and/or Brian Baylog** unlawfully, feloniously, and with the intent to induce Kim Karn, Deborah Eyler, Jeff Chostner, and/or Kirk Taylor, against his or her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Kim Karn, Deborah Eyler, Jeff Chostner and/or Kirk Taylor, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

**COUNT 16**

**CONSPIRACY TO COMMIT CRIMINAL EXTORTION, C.R.S. 18-3-207; 18-2-201 (F5)**

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, Harlan Smith, and/or Brian Baylog** with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with one or more of the above named co-defendants and a person or persons to the prosecution unknown that one or more of them would engage in conduct which constituted that crime or an 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 18-3-207 and 18-2-201, C.R.S.



### COUNT 17

#### RETALIATION AGAINST A JUDGE, C.R.S. 18-8-615 (F4)

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty and/or Brian Baylog** unlawfully, feloniously, and knowingly, as retaliation or retribution against Kim Karn, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon Kim Karn; in violation of section 18-8-615, C.R.S.

### COUNT 18

#### RETALIATION AGAINST A JUDGE, C.R.S. 18-8-615 (F4)

On or about August 6, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, and/or Stephen Nalty** unlawfully, feloniously, and knowingly, as retaliation or retribution against Deborah Eyler, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon Deborah Eyler; in violation of section 18-8-615, C.R.S.

#### ADDITIONAL PREDICATE ACT 2 IN SUPPORT OF COUNTS 1 AND 2

#### MAIL FRAUD, 18 U.S.C. § 1341

On or about January 1, 2015 to March 30, 2017, in the District of Colorado, State of Colorado, the defendant, **Stephen Nalty**, unlawfully devised or intended to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, for the purpose of executing such scheme or artifice or attempting to do so, places in any post office or authorized depository for mail matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at a place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing; in violation of 18 U.S.C. § 1341.

The essential, but non exclusive facts in support of Counts 12 through 16, as well as for Additional Predicate Act 2, which all support Counts 1 and 2, along with additional Counts 17 and 18 which are not enumerated predicate acts in support of Counts 1 and 2, are as follows:

Beginning on or about August 6, 2015 Pueblo District Court Judge Kim Karn was presiding over two separate legal matters in Pueblo District Court. In one matter a litigant named Michael Marshall was involved in a domestic relations case, while in the second matter a litigant named John Harrison was involved in a civil matter involving real estate. In the Harrison matter, Pueblo District Court case 14CV58, Mr. Harrison was the litigant who was ultimately unsuccessful in the legal proceeding and as a result a judgment was entered against him. In the Marshall matter, Pueblo District Court case 13DR30116, the Court was presiding over a case with Mr. Marshall being unruly and disrespectful at times along with some members of the public who were present in the gallery.

Contemporaneous with the above cases Judge Karn was the recipient of a mailed "Writ of Mandamus for Ouster" which was dated on August 6, 2015 and filed with the Clerk and Recorder for the City and County of Denver on August 10, 2015. This document was signed by Stephen Nalty in his capacity as a People's Grand Jury Administrator and by Bruce Doucette in his capacity as a "Superior Court Judge." This document accompanied an "Oath of Office" signed by Mr. Doucette and filed with the Clerk and Recorder in Arapahoe County. In this Writ Judge Karn is accused by the enterprise of occupying a vacant office and embezzling public funds. Mr. Nalty and Mr. Doucette then demand that Judge Karn should resign forthwith. They then state to Judge Karn, "Failure to do so is an act of .... insurrection and sedition and will be treated accordingly."

Then approximately three weeks later Judge Karn was the recipient of a mailed "Notice of Contempt" which was also filed with the Clerk and Recorder for the City and County of Denver. This particular document was signed by Mr. Nalty and advised Judge Karn that this matter was to "be turned over the Grand Jury and they may indict." Mr. Nalty then goes on to state in this same document that "a Warrant for Arrest maybe issued forthwith" and that "The Grand Jury will decide if you will be held without a recognizance bond until you obtain due process of Law in a common law court of record in Colorado."

As was also observed in Boulder County when Judge Karn understandably did not respond to the members of the enterprise in September 2015 both she and her colleague, Judge Deborah Eyler became recipients of a "Bill of Exchange" along with a "Criminal Complaint" which included an assessment of a financial liability by the enterprise of \$1,000,000.00 each which contained materially false information. The signatures on the Return of Service associated with the Bill of Exchange appear to be that of Stephen Nalty and Steven Byfield. One of the bases cited by the enterprise supporting their assertion that Judges Karn and Eyler were financially liable to them centered on Judge Karn's Oath of Office being administered by Judge Eyler and then not being properly filed.

Building on the use of the above employed tactics, the enterprise, specifically made up by Stephen Nalty, Janis Blease and Laurence Goodman, then signed and submitted another Writ of Mandamus for Ouster against Pueblo County Sheriff Kirk

Taylor in October 2015. This document was filed with the Clerk and Recorder for the City and County of Denver. Then in December 2015 Bruce Doucette, in his capacity of a "Superior Court Judge," issued an "Arrest Warrant" which was filed with the Clerk and Recorder for the City and County of Denver which attempted to order Sheriff Taylor to arrest Judge Karn. This event and document was followed up on January 7, 2016 with a conversation amongst Laurence Goodman, Stephen Nalty and possibly Steven Byfield which was audio recorded by a confidential human source. A key statement contained in this recording, which focused on their Grand Jury's decision to return a "true bill" regarding Judge Karn, came from Laurence Goodman who stated where Judge Karn's trial would be held and how they would physically get her there. In particular as to how Judge Karn would be made to appear Mr. Goodman stated that if Judge Karn did not appear as she was commanded by them that they would. "Go and grab her, haul her ass down there."

Following another "Notice" being sent to Judge Karn in December 2015 which was signed by Bruce Doucette, both Judge Eyler along with Sheriff Taylor, amongst other public servants as well, were sent documents called, "Writ of Mandamus for Ouster" in December 2015 which accused them of crimes. In the case of Judge Eyler the enterprise members made up by Janis Blease, Laurence Goodman, Stephen Nalty and Harlan Smith, demanded that she resign forthwith and failure to do so would be an act of "...insurrection, sedition and will be treated accordingly." In the case of Sheriff Taylor it was suggested that he publicly declare that he was not qualified for office and resign forthwith. Sheriff Taylor was also informed that his failure to resign would be an act of "...insurrection, sedition and will be treated accordingly." Both writs of mandamus for ouster were filed with the Clerk and Recorder for the City and County of Denver on December 21, 2015.

Then in July 2016 Stephen Nalty was observed at a United States Post Office in Denver mailing documents to four recipients associated with a "Notice of Writ of Garnishment in Aid of Notice of Writ of Attachment Addendum to the Consensual Commercial Lien." The recipients included Judge Karn and Judge Eyler who had these documents mailed to their home addresses. Of note the enterprise was alleging that the Judges owed \$127,981,652.16 to the "Veteran's Public Wealth Rebate Bank Trust, c/o Post Office Box 11724, Denver, Colorado [80211]." This Post Office box is registered to Stephen Nalty. The signatures on this document included one associated with Bruce Doucette. Also in July 2016, just like what was observed in Boulder, Judge Karn and Judge Eyler then both received official appearing demand/collection notices which included the same language of threatened negative credit reporting reflecting on their respective credit reports if they each failed to pay the enterprise large sums of money. Evidence was submitted showing that this retaliatory tactic was primarily being employed by Stephen Nalty.

In the case of Judge Karn in January 2017 she was also the recipient of consensual commercial lien that was being used by the enterprise on behalf of John Harrison who was the litigant who had lost the civil case being presided over by Judge Karn. This lien, signed by Stephen Nalty, for \$100,850,000.00 was a "punitive

commercial Lien” for alleged damages involving John Harrison. Accompanying this lien was a “Criminal Presentment” from the De Jure people’s Grand Jury in Colorado which was signed by Brian Baylog, as the Foreman of this Grand Jury. These documents were mailed to Judge Karn via the United States Mail. In March 2017 Pueblo District Attorney Jeff Chostner was also a recipient of a “Criminal Presentment” which was signed by Brian Baylog in his capacity of Foreman of this Grand Jury.

## **The Gilpin County Centered Acts**

### **COUNT 19**

#### **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about April 15, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease and/or Brian Baylog** unlawfully and feloniously attempted to influence Bruce Hartman, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### **COUNT 20**

#### **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about July 7, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, and/or Janis Blease**, unlawfully and feloniously attempted to influence James Petrock, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 21

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about July 7, 2015 to March 30, 2017, in the State of Colorado, **Stephen Nalty and/or Steven Byfield**, unlawfully and feloniously attempted to influence Allyn Huffman, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 22

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about July 7, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette**, unlawfully and feloniously attempted to influence Zane Laubhan, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 23

CRIMINAL EXTORTION, C.R.S. 18-3-207(1)(A), (B)(I) (F4)

On or about April 15, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, Harlan Smith and/or Brian Baylog** unlawfully, feloniously, and with the intent to induce Bruce Hartman, James Petrock, David Gloss, Allyn Huffman, Buddy Schmalz, Linda Isenhardt, Gail Watson, Roger Baker and/or Frederic Barker Rodgers against his or her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Bruce Hartman, James Petrock, David Gloss, Allyn Huffman, Buddy Schmalz, Linda Isenhardt, Gail Watson, Roger Baker and/or Frederic Barker Rodgers, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

COUNT 24

CONSPIRACY TO COMMIT CRIMINAL EXTORTION, C.R.S. 18-3-207; 18-2-201 (F5)

On or about April 15, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, Harlan Smith, and/or Brian Baylog** with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with one or more of the above named co-defendants and a person or persons to the prosecution unknown that one or more of them would engage in conduct which constituted that crime or an 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 18-3-207 and 18-2-201, C.R.S.

ADDITIONAL PREDICATE ACT 3 IN SUPPORT OF COUNTS 1 AND 2

MAIL FRAUD, 18 U.S.C. § 1341

On or about January 1, 2015 to March 30, 2017, in the District of Colorado, State of Colorado, the defendant, **Stephen Nalty**, unlawfully devised or intended to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, for the purpose of executing such scheme or artifice or attempting to do so, places in any post office or authorized depository for mail matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at a place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing; in violation of 18 U.S.C. § 1341.

The essential, but non exclusive facts in support of Counts 19 through 24, as well as for Additional Predicate Act 3, which all support Counts 1 and 2, are as follows:

Beginning on or about April 20, 2015 Gilpin County Sheriff Bruce Hartman was the recipient of a document that had been mailed to him by the "People's Grand Jury Administration in Colorado." The Post Office box associated with this entity, PO Box 21233, Denver, Colorado, was opened by David Coffelt. This document accused Sheriff Hartman of violating his oath of office and that if he did not comply with their "suggested" remedy that the senders of the letter would be forced to impanel a grand jury for possible indictments/presentments of various offenses, including insurrection, treason

and “et al.” Treason is a Class 1 Felony in Colorado and is punishable by life in prison without parole or death. Based on a review of the signature accompanying this document investigators reasonably inferred that Brian Baylog signed this document in his stated capacity as “Administrative Foreman.” This inference was supported by other observed instances in this investigation where Mr. Baylog signed as the Foreman of the De Jure People’s Grand Jury in Colorado.

In an attempt to put this occurrence into its proper context it is important that some historical background be provided. Beginning in 2012 a person named William Livsey was being prosecuted in Gilpin County court for a traffic related matter, 2012M267, which was being presided over by Judge Gloss. During the course of this prosecution Mr. Livsey was at some point prior to him posting a bond incarcerated in the Gilpin County jail, a facility which was operated by Sheriff Hartman and his office. This traffic case continued in the Gilpin courts until early 2015. Court records showed the David Coffelt had some role with Mr. Livsey’s case.

Somewhat contemporaneous to the Livsey matter occurring, Laurence Goodman, then a Gilpin County resident, was the subject of a tax court matter in the federal court system which was initiated in approximately 2011 and was based on allegations that Mr. Goodman had failed to pay his taxes. By 2013 Mr. Goodman’s tax court matter had resulted in the Internal Revenue Service (IRS) being authorized to seize his home which was located in Gilpin County. This IRS seizure included representatives of the Gilpin County Sheriff’s office being present. Evidence was admitted into the record that during this seizure Mr. Goodman had demanded that Sheriff Hartman arrest the IRS agents for violating his rights.

Then in July 2015 Sheriff Hartman, Judge Gloss and Gilpin County were targeted by the enterprise by receiving a “Bill of Exchange” and a “Criminal Complaint and Demand for Specific Performance.” The complaint alleges that the Sheriff and Judge are associated with a “criminal oligarchy” which has conspired and instigated an insurrection against the Constitution of the United States of America. Additionally the “criminal complaint” alleges that this “criminal oligarchy” has advanced a common plan to create a series of unconstitutional taxing schemes. Next, the “criminal complaint” accused Sheriff Hartman of routinely assisting imposters posing as police officers and accused Judge Gloss of committing acts of “treason” when the Judge moved forward with Mr. Livsey’s traffic case in November 2014. Furthermore, this “criminal complaint” then references Sheriff Hartman’s alleged unlawful assistance when the seizure of Mr. Goodman’s property lawfully occurred following the tax case being concluded after Mr. Goodman received an unfavorable ruling. In the end, the enterprise, as represented by Stephen Nalty as the signer, demanded that both Sheriff Hartman and Judge Gloss were indebted to the enterprise for \$1,000,000.00 each and thus were supposed to pay the “Indestructible Trust for the People in Colorado.”

Also in July 2015, in response to the above referenced documents, Gilpin County Attorney, James Petrock, provided legal advice to the Gilpin County Treasurer, Allyn Huffman, by emphasizing that the “Bill of Exchange” in question meets the definition of

a spurious lien pursuant to Colorado law. Approximately one week later County Attorney Petrock received a letter from "People's Grand Jury Administration in Colorado" with an allegation that more than enough evidence existed to "convene a Grand Jury to determine if a Presentment/Indictment" should be issued against Mr. Petrock for "impersonating one who knows the law, barraty, inland piracy, sedition and much more." The letter included a suggested remedy that Mr. Petrock first rescind his letter to the County and that he then should resign as County Attorney. The letter then goes on to say that People's Grand Jury Administration in Colorado might be forced to convene a Grand Jury. The letter to Mr. Petrock concluded with a footnote citation to a federal crime entitled Seditious Conspiracy with a punishment listed as imprisonment not more than twenty years.

Then contemporaneous to the above communications a "Notice of Dishonor" was signed by Stephen Nalty and Steven Byfield which was then filed and recorded in Denver accusing Sheriff Hartman, Judge Gloss and Gilpin County of dishonoring the "Bill of Exchange" which had been served by Stephen Nalty, Steven Byfield and William Livsey for the enterprise. This was followed up in August 2015 with a "Writ of Subpoena Duces Tecum" (SDT) being served on Mr. Petrock by the "Continental United States Marshals for the "People's Grand Jury Administration in Colorado." This SDT was signed by Stephen Nalty, as a Grand Jury Administrator and by Bruce Doucette, as a "Superior Court Judge."

The next set of received documents occurred in October 2015 with the "People's Grand Jury Administration in Colorado" seeking the ouster of Sheriff Hartman and Gilpin County Treasurer Alynn Huffman as well as accusing them of feloniously embezzling public funds. These documents also included the signatures of Janis Blease and Laurence Goodman.

Then in October 2015 the "People's Grand Jury in Colorado" issued an Indictment accusing Sheriff Hartman, Judge Gloss and Gilpin County of various offenses, including Insurrection, Forgery, Embezzlement, as well as other allegations. This written document was supplemented by members of enterprise, including Brian Baylog and Laurence Goodman, meeting on or about May 21, 2016 and agreeing to indict the Gilpin County officials for the perceived wrongdoing that Laurence Goodman claimed to have incurred by the Gilpin County officials.

In November 2015 Bruce Doucette signed an "Arrest Warrant" which was filed and recorded in Denver which attempted to command Gilpin County Coroner Zane Laubhan to arrest Gilpin County Attorney James Petrock and hold him in the Gilpin County Jail for "contempt of subpoena." This supposed arrest warrant also stated that a full investigation was underway by the People's Grand Jury Administrators and that more charges may be addressed by the Grand Jury.

Then in approximately December 2015 a "Writ of Subpoena Duces Tecum" was served on the Gilpin County Clerk and Recorder commanding that a letter certified by the Gilpin County Clerk and Recorder be sent to People's Grand Jury Administration in



Colorado regarding to a title document regarding a specific reception number which research showed pertains to real estate historically associated with Laurence Goodman. This writ was signed by Bruce Doucette in his capacity as a Superior Court Judge as well as by Stephen Nalty, Janis Blease and Harlan Smith, in their capacities as People's Grand Jury Administrators.

As was seen before in both Boulder and Pueblo Counties the enterprise completed and mailed a "Notice of Writ of Garnishment in Aid of Notice of Writ of Attachment Addendum to the Consensual Commercial Lien" in July 2016. This document was signed by Bruce Doucette and mailed by Stephen Nalty using the United States Postal Service. This document references another Bill of Exchange and a Commercial Consensual Lien which alleges that Sheriff Hartman, Judge Gloss and County Attorney Petrock are debtors to the Indestructible Trust for the People in Colorado in an amount of \$254,708,682.24. These documents were then observed by the Statewide Grand Jury, in addition to another copy of the supposed Indictment, all of which had been served upon James Petrock, Bruce Hartman, David Gloss and others on June 28, 2016. It should be noted that Stephen Nalty and Steven Byfield were the apparent signators on the "Notice of ICROPA Filing" for the Consensual Commercial Lien.

Also in July 2016 more Fidelity Information Corporation official looking demand/collection notices were created and sent by Stephen Nalty notifying James Petrock, Bruce Hartman, David Gloss and Allyn Huffman that they have debts which are past due and have been referred for collection. As was seen in both Boulder and in Pueblo these public servants were put on notice by Mr. Nalty, with him making, uttering and mailing these fabricated documents, that "a negative credit report reflecting on your credit record may be submitted to a reporting agency if you fail to fulfill the terms of your credit obligations."

Then most recently, the enterprise, including Stephen Nalty, Brian Baylog and David Coffelt, modified its tactics and sent a Consensual Commercial Lien and a Criminal Presentment to other former or current public servants with ties to Gilpin County. This lien alleged that money was owed by the public servants to the enterprise. These public servants included the three County Commisisoners, Buddy Schmalz, Linda Isenhart and Gail Watson, along with County Manager Roger Baker and retired Judge Frederick Barker Rodgers, who was the key focus of the Criminal Presentment. This criminal presentment declared the judge to be under citizen's arrest.

## The Denver Centered Incidents

### COUNT 25

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Janis Blease, Laurence Goodman, Steven Byfield and/or Brian Baylog** unlawfully and feloniously attempted to influence Alfred Harrell, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 26

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Janis Blease, Laurence Goodman, Steven Byfield and/or Brian Baylog** unlawfully and feloniously attempted to influence Mitchell Morrissey and/or Katherine Kirk, both public servants, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 27

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Janis Blease, Laurence Goodman, and/or Steven Byfield** unlawfully and feloniously attempted to influence Catherine Cary, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 28

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty and/or Brian Baylog**, unlawfully and feloniously attempted to influence Patrick Firman, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 29

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Janis Blease, David Coffelt and/or Harlan Smith** unlawfully and feloniously attempted to influence J. Eric Elliff, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT 30

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette**, unlawfully and feloniously attempted to influence Elizabeth Starrs, Sabra Millett, Scott Martinez, and/or Jamesy Owen, all public servants, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 31

#### CRIMINAL EXTORTION, C.R.S. 18-3-207(1)(A), (B)(I) (F4)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, David Coffelt, Harlan Smith and/or Brian Baylog** unlawfully, feloniously, and with the intent to induce Alfred Harrell, Mitchell Morrissey, Katherine Kirk, Catherine Cary, Patrick Firman, J. Eric Elliff, Elizabeth Starrs, Sabra Millett, Scott Martinez, Jamesy Owen, James Jeffrey, Jason Foos, and/or Donald Reed, against his or her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Alfred Harrell, Mitchell Morrissey, Katherine Kirk, Catherine Cary, Patrick Firman, J. Eric Elliff, Elizabeth Starrs, Sabra Millett, Scott Martinez, Jamesy Owen, James Jeffrey, Jason Foos, and/or Donald Reed, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

### COUNT 32

#### CONSPIRACY TO COMMIT CRIMINAL EXTORTION, C.R.S. 18-3-207; 18-2-201 (F5)

On or about February 1, 2015 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Laurence Goodman, Janis Blease, David Coffelt, Harlan Smith, and/or Brian Baylog** with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with one or more of the above named co-defendants and a person or persons to the prosecution unknown that one or more of them would engage in conduct which constituted that crime or an 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 18-3-207 and 18-2-201, C.R.S.

### COUNT 33

#### RETALIATION AGAINST A JUDGE, C.R.S. 18-8-615 (F4)

On or about February 1, 2017 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty, Steven Byfield, Janis Blease, David Coffelt and/or Harlan Smith** unlawfully, feloniously, and knowingly, as retaliation or retribution against J. Eric Elliff, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon J. Eric Elliff; in violation of section 18-8-615, C.R.S.

The essential, but non exclusive facts in support of Counts 25 through 32, which all support Counts 1 and 2, along with additional Count 33 which is not an enumerated predicate act in support of Counts 1 and 2, are as follows:

Beginning on or about February 8, 2015 Stephen Nalty was accused in a traffic related matter, case number 15M01412 in Denver County Court. During the course of the legal proceedings in this matter Mr. Nalty was arrested on an unrelated matter in addition to Steven Byfield and James Frank Williams being detained or arrested for their behavior when attending the proceedings which were related to Mr. Nalty's pending case. As a result of Mr. Nalty's pending Denver case, in August 2015 a "Notice of Contempt and Demand" was signed by Bruce Doucette (in his stated capacity of a "Supreme Court Justice") along with an associate of his named Steven Curry. This filed document alleged that Denver County Court Judge Alfred Harrell, then Distict Attorney Mitchell R. Morrissey and Deputy District Attorney Katherine Kirk "have failed to comply with Superior Court Justice Steven Duane Curry's **Order to Dismiss** filed on May 21, 2015," and because of this failure Bruce Doucette found them to be in contempt. As a result Bruce Doucette stated, "If this case is not dismissed with extreme prejudice forthwith, I shall issue warrants for their arrests." Furthermore, Bruce Doucette, awarded Stephen Nalty \$1.25 million for each 24 hours of his "unlawful assault, arrest, kidnapping, incarceration, and false imprisonment." Mr. Doucette also stated to the public servants that this document was "a demand for payment." This document was filed in concert with the May 2015 "Order to Dismiss."

In October 2015 DDA Kirk, Judge Harrell, DA Morrissey and Magistrate Catherine Ann Cary each were sent a "Writ of Mandamus for Ouster" which were signed by Janis Blease, Laurence Goodman and Stephen Nalty. These writs contained similar language in that documents that the public officials in Boulder, Pueblo and Gilpin counties had also received.

Also in October 2015 Bruce Doucette, in his capacity of a "Superior Court Justice," signed and had filed an "Arrest Warrant" which attempted to command Denver Sheriff Patrick Firman to arrest and bring Judge Harrell before "Superior Court Judge Bruce Doucette without unnecessary delay." This "warrant" accused Judge Harrell of having committed two acts of treason by being in contempt of the Curry Order and the Doucette Notice and Demand as well as having "unlawfully ordered the arrest of one of those witnessing his treason, "Superior Court Judge" Steven Dean Byfield."

Then in November 2015 a series of documents entitled "Consensual Commercial Lien" accompanied by a "Criminal Complaint" and/or an "Asservation" were prepared and/or filed for recording with the Clerk and Recorder in Denver. The language and threats in the liens and complaints was quite similar to the language and threats which was directed towards the other public servants in the other counties. The first lien and complaint was based on the enterprise rallying around Steven Byfield. The second lien and complaint was based on the enterprise rallying around Stephen Nalty. The third lien and complaint was based on the enterprise rallying around James Frank Williams.

Signers on at least one of the above referenced liens and complaints included the following:

Bruce Doucette,  
Stephen Nalty,  
Brian Baylog,  
Steven Byfield,  
Harlan Smith,  
and  
Laurence Goodman.

The alleged lien debtors targeted by the enterprise included the following public servants who apparently had no legitimate debt obligation with a member of the enterprise:

Judge Alfred Harrell,  
DA Mitchell Morrisey,  
DDA Katherine Kirk,  
Sheriff Patrick Firman,  
Magistrate Catherine Cary,  
The City and County of Denver, c/o Treasurer Steve Ellington,  
The City and County of Denver, c/o Mayor Michael Hancock,  
Deputy James Jeffrey of the Denver Sheriff's Department,  
Deputy Jason Foes of the Denver Sheriff's Department,  
and  
Ofc. Donald Reed of the Denver Police Department.

Then in January 2016 the City Attorney for the City and County of Denver filed a petition on behalf of not only the City and County of Denver but also on behalf of Judge Harrell, Magistrate Cary, Deputy Jeffrey, Deputy Foes and Officer Reed, to have the filed liens declared spurious and thus have them invalidated. The City Attorney was Scott Martinez who had attorney Jamesy Owen appearing for the City Attorney. This legal action was Denver District Court case 16CV30109. Respondents included the Indestructible Trust for the People in Colorado, Stephen Nalty and James Frank Williams. During the course of the litigation in this matter, which was presided over by either Judge J. Eric Elliff and Judge Elizabeth Starrs, various documents were filed, including a Steven Byfield signed document which was intended to settle the Attorney's Fees which had been imposed against Mr. Nalty after Judge Elliff had declared that the liens were spurious. The problem was that Mr. Byfield filed a "Bond/Note" a/k/a Public Wealth Rebate Note with the Court in the amount \$3,400.00 which included instructions from Mr. Byfield to the Court to take the "Bond/Note" to its bank for collection from the United States Treasury.

Being undeterred by Judge Elliff's ruling in the spurious lien civil case another "Criminal Complaint" was submitted by the enterprise in June 2016. This time additional public servants were added to the list of targeted officials, including Judge Starrs, Judge Elliff, Clerk of the Court Sabra Millett, Scott Martinez, Jamesy Owen, Kelly Boe, and representatives from the United States Attorney's Office. This complaint contained similar language and threats, including that the public servants were under citizen's arrest, with the actual physical arrest to follow by their marshals. The primary signator of this June 2016 criminal complaint was Bruce Doucette.

Then on August 5, 2016 Stephen Nalty was recorded stating the following to a confidential human source:

"On my spurious uh criminal complaint is where they hauled me in for spurious liens, down in Denver District Court. By the way, that is all these judges just got put on notice, so that Denver District Court Judges if they try and retaliate against me personally... or anymore for criminal complaints, commercial obligation liens, you're on the lien? You're not even a valid judge, what the hell are you doing calling me into you're your pseudo-court? I'm, I'm gonna they, the, the two, the two that signed up and got involved in my spurious that are in red ink, big names on there, they wish that they have never seen my name at this point in time. I guarentee it. Because they know what they did is wrong and they know what that that my retaliation is relentless."

Finally, in February 2017 Judge J. Eric Elliff received a "Writ of Mandamus for Ouster" followed by "Writ of Mandamus for Contempt of Constitutions." The documents were sent by the "De Jure People's Grand Jury Administration in Colorado" and were both signed by Janis Blease, David Coffelt and Stephen Nalty. Harlan Smith apparently only signed the "Writ of Mandamus for Ouster." In the contempt of constitutions document the enterprise is threatening Judge Elliff that if he does not comply with the Writ of Mandamus for Ouster then they will convene a Grand Jury and ask the Grand Jury to consider evidence which has been assembled to indict Judge Elliff for various offenses such as sedition, insurrection and possibly treason. As was observed before these three offenses are felony crimes, with treason being a class 1 felony crime which is punishable by either a prison term of life or even death.

#### COUNT 34

#### CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(B)(II) (F6)

On or about January 1, 2015 to March 23, 2017, in the State of Colorado, **Bruce Doucette** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Judge or Justice, and in such identity or capacity performed an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(b)(II), C.R.S.

The essential, but non exclusive facts in support of Counts 34 which also supports Counts 1 and 2, was contained in the summaries of essential facts contained in this Indictment and are incorporated herein.

### COUNT 35

#### TAX EVASION - FAILURE TO PAY, C.R.S. 39-21-118(1) (F5)

On or about January 1, 2014 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty and Janis Blease** unlawfully, feloniously, and willfully attempted to evade or defeat a tax administered by the Colorado Department of Revenue, or the payment thereof, namely Income Tax; in violation of section 39-21-118(1), C.R.S.

### COUNT 36

#### FAILURE TO FILE RETURN OR PAY TAX, C.R.S. 39-21-118(3) (M)

On or about January 1, 2014 to March 30, 2017, in the State of Colorado, **Bruce Doucette, Stephen Nalty and Janis Blease** unlawfully and willfully failed to pay a tax or estimated tax, make a return, keep tax records, or supply tax information as required; in violation of section 39-21-118(3), C.R.S.

The essential, but non exclusive facts in support of Counts 35 and 36 which both support Counts 1 and 2 are as follows:

Evidence was admitted that Bruce Doucette and Stephen Nalty, both being Colorado residents, failed to file Colorado state income tax returns for the 2014 and 2015 tax years when they were required to do so. Mr. Doucette's last state income tax return was filed for the 2008 tax year. Mr. Nalty's last state income tax return was filed for the 2001 tax year. Janis Blease, also a Colorado resident, failed to file her 2015 Colorado state income tax return when she was required to do so. As of March 30, 2017 none of the required returns for either the 2014 or 2015 tax year had been filed by the three named individuals. Furthermore, all three of the above named Colorado residents earned sufficient income in either 2014 and/or 2015 and as such willfully attempted to evade or defeat a tax administered by the Colorado Department of Revenue by not declaring that earned income. It should be noted that the five other named individuals in this Indictment also did not file state income tax returns for the 2014 or 2015 tax years. However, because investigators have not yet located verifiable earned income attributable to these individuals they cannot be charged with these offenses at this time.



## The Jefferson County Centered Incidents

### COUNT 37

#### ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about February 11, 2017 to March 30, 2017, in the State of Colorado, **Stephen Nalty, Janis Blease, David Coffelt, Harlan Smith and/or Brian Baylog** unlawfully and feloniously attempted to influence Susan Fisch, a public servant, by means of deceit, or threat of violence or economic reprisal against a person or property, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### COUNT 38

#### CRIMINAL EXTORTION, C.R.S. 18-3-207(1)(A), (B)(I) (F4)

On or about February 11, 2017 to March 30, 2017, in the State of Colorado, **Stephen Nalty, Janis Blease, David Coffelt, Harlan Smith and/or Brian Baylog** unlawfully, feloniously, and with the intent to induce Susan Fisch, against her will to perform an act or to refrain from performing a lawful act, made a substantial threat to confine or restrain, cause economic hardship to, cause bodily injury to, damage the property of, or damage the reputation of Susan Fisch, and the defendant threatened to cause these results by performing an unlawful act or causing an unlawful act to be performed; in violation of section 18-3-207(1)(a),(b)(I), C.R.S.

### COUNT 39

#### CONSPIRACY TO COMMIT CRIMINAL EXTORTION, C.R.S. 18-3-207; 18-2-201 (F5)

On or about February 11, 2017 to March 30, 2017, in the State of Colorado, **Stephen Nalty, Janis Blease, David Coffelt, Harlan Smith, and/or Brian Baylog**, with the intent to promote or facilitate the commission of the crime of Criminal Extortion, unlawfully and feloniously agreed with one or more of the above named co-defendants and a person or persons to the prosecution unknown that one or more of them would engage in conduct which constituted that crime or an 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 18-3-207 and 18-2-201, C.R.S.

## COUNT 40

### RETALIATION AGAINST A JUDGE, C.R.S. 18-8-615 (F4)

On or about March 18, 2017 to March 30, 2017, in the State of Colorado, **Brian Baylog** unlawfully, feloniously, and knowingly, as retaliation or retribution against Susan Fisch, a judge who has served or is serving in a legal matter assigned to the judge involving the defendant or a person on whose behalf the defendant is acting made a credible threat or committed an act of harm or injury upon a person or property against or upon Susan Fisch; in violation of section 18-8-615, C.R.S.

The essential, but non exclusive facts in support of Counts 37 through 39, which all support Counts 1 and 2, along with additional Count 40 which is not an enumerated predicate act in support of Counts 1 and 2, are as follows:

Beginning in November 2016 Eric Brandt, a member of the above Enterprise, was charged with a criminal offense in Jefferson County Court case number 16M7205. This case was assigned to Judge Susan Fisch. Through the course of the proceedings Mr. Brandt was representing himself and did so by filing a plethora of pleadings, including a Motion for Dismissal because he argued that the statements which served as a basis of the crime that he was charged with constituted protected speech. The Court ultimately denied Mr. Brandt's motion to dismiss the case.

Then on March 20, 2017 Mr. Brandt was late for his scheduled Jury Trial and was declared by the Judge Fisch as having Failed to Appear with the Court then ordering a bench warrant for Mr. Brandt's arrest. Contemporaneous to this occurrence the Court received a "Criminal Presentment" which the De Jure People's Grand Jury in Colorado alleged that Judge Fisch had committed various offenses and was not only a "lien debtor" to the claimed "aggrieved" persons or entities via a lien but that as a result of this lien she was also liable to the enterprise for \$17,065,720,000.00. Furthermore this presentment declared Judge Fisch "to be under Citizen's Arrest, the actual physical arrest to be by Continental Marshals..." This presentment was signed by Brian Baylog as the foreman of the De Jure People's Grand Jury in Colorado.

In the weeks leading up to the filing of this "Criminal Presentment" which occurred on or about March 20, 2017 Judge Fisch had been targeted by the enterprise in February 2017 with the enterprise submitting a Writ of Mandamus for Ouster which was followed by a Writ of Mandamus for Contempt of Constitutions. Signers of these documents included Stephen Nalty, Janis Blease and David Coffelt. Harlan Smith appeared to have only signed the Writ of Mandamus for Contempt of Constitutions. Regarding this particular Writ the identified enterprise members put Judge Fisch on notice that she was subject of a Grand Jury investigation that was considering evidence that she could be indicted for various offenses, including sedition, insurrection and possibly treason.

The following are additional predicate acts of racketeering activity which support of Counts 1 and 2. The essential facts for these acts were summarized above and are incorporated herein:

**ADDITIONAL PREDICATE ACT 4 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about December 16, 2015, in the State of Colorado, **Stephen Nalty and/or Bruce Doucette**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 5 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about January 30, 2016, in the State of Colorado, **Stephen Nalty and/or Laurence Goodman**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 6 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about July 9-11, 2016, in the State of Colorado, **Bruce Doucette, Janis Blease and/or David Coffelt**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Notice of Writ of Garnishment in Aid of Notice of Writ of Attachment Addendum to the Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 7 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about July 9-11, 2016, in the State of Colorado, **Stephen Nalty, Janis Blease and/or David Coffelt**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Notice of ICROPA Filings Consensual Commercial Liens and Ledgers; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 8 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about August 13, 2016-September 8, 2016, in the State of Colorado, **Stephen Nalty, Janis Blease, Harlan Smith, and/or David Coffelt**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Notice of ICROPA Filings Consensual Commercial Liens and Ledgers; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 9 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about September 28, 2015, in the State of Colorado, **Stephen Nalty and/or Steven Byfield**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Bill of Exchange; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 10 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about July 18, 2016, in the State of Colorado, **Stephen Nalty and/or Bruce Doucette**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Notice of Writ of Garnishment in Aid of Notice of Writ of Attachment Addendum to the Consensual Commercial Lien documents; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 11 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about July 9, 2016, in the State of Colorado, **Stephen Nalty**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Fidelity Information Corporation Demand for Payment documents; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 12 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about January 28, 2017, in the State of Colorado, **Stephen Nalty**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 13 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about June 28, 2016, in the State of Colorado, **Stephen Nalty and/or Steven Byfield**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Notice of ICROPA Filings Consensual Commercial Lien and Ledgers as well as a Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 14 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about November 2, 2015, in the State of Colorado, **Stephen Nalty and/or Bruce Doucette**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 15 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**


On or about November 23-24, 2015, in the State of Colorado, **Bruce Doucette**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

**ADDITIONAL PREDICATE ACT 16 IN SUPPORT OF COUNTS 1 AND 2**

**SECOND DEGREE FORGERY, C.R.S. 18-5-104 (M1)**

On or about November 23-27, 2015, in the State of Colorado, **Stephen Nalty**, with the intent to defraud, unlawfully and falsely made, completed, altered, or uttered a written instrument, namely: Consensual Commercial Lien; in violation of section 18-5-104, C.R.S.

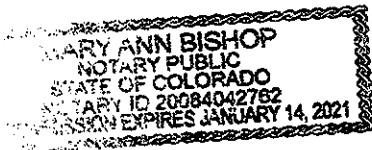
CYNTHIA H. COFFMAN  
Attorney General

  
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  
25<sup>th</sup> day of March, 2017.

  
Notary Public

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



The 2016-2017 Colorado Statewide Grand Jury presents the Indictment contained within and the same is hereby ORDERED FILED this 30<sup>th</sup> day of March, 2017.

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

Arrest Warrants are Issued for:

**Bruce Doucette**, with a bond set at \$ 250,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**Stephen Nalty**, with a bond set at \$ 250,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**Janis Blease**, with a bond set at \$ 100,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

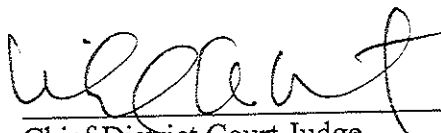
**Steven Byfield**, with a bond set at \$ 250,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**Laurence Goodman**, with a bond set at \$ 200,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**David Coffelt**, with a bond set at \$ 150,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**Harlan Smith**, with a bond set at \$ 100,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

**Brian Baylog**, with a bond set at \$ 350,000.00 c/s, with the following conditions: as set forth in Exhibit "A" attached hereto.

  
\_\_\_\_\_  
Chief District Court Judge,  
Second Judicial District,  
State of Colorado

**Exhibit "A" - Bond Conditions:**

Execute a Waiver of Extradition

Acknowledge and Adhere to a Mandatory Protection Order, pursuant 18-1-1001, issued by the Court

Commit No Felony Offense

No Contact (including direct or indirect communication) with any named public servant listed in the Indictment, including at their homes and workplaces

No Contact with any co-defendant during the pendency of the criminal case

Electronic or Global Positioning Monitoring

No Weapons, including Firearms

Surrender All Passports