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| District Court, Eagle County, Colorado Eagle County Justice Center 885 Chambers Ave PO Box 597 Eagle, CO 81631 | DATE FILED: October 4, 2017 2:22 PM FILING ID: 9CE0C4D14CFAD CASE NUMBER: 2017CR137 |
| THE PEOPLE OF THE STATE OF COLORADO vs. DAK BRANDON STEIERT, Defendant | <input type="checkbox"/> COURT USE ONLY <input type="checkbox"/> |
| Bruce I. Brown Fifth Judicial District District Attorney, # 24294 P. O. Box 295 955 Chambers Avenue Eagle, CO 81631 Phone Number: 970-328-6947 Fax: 970-328-1016 | Case No: D0192017CR000137 Div: Courtroom: |
| COMPLAINT AND INFORMATION | |

CHARGES: 5

COUNT 1: CRIMINAL IMPERSONATION, C.R.S. 18-5-113(1)(b)(II) (F6){1011F}

COUNT 2: CRIMINAL IMPERSONATION, C.R.S. 18-5-113(1)(b)(II) (F6){1011F}

COUNT 3: CRIMINAL IMPERSONATION, C.R.S. 18-5-113(1)(b)(II) (F6){1011F}

COUNT 4: FRAUD IN EFFECTING SALES-FALSE STATEMENT, C.R.S. 18-5-301(1)(e) (M2){12015}

COUNT 5: BAIT ADVERTISING, C.R.S. 18-5-303 (M2){12031}

Bruce I. Brown, District Attorney for the Fifth Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of Eagle:

COUNT 1-CRIMINAL IMPERSONATION (F6)

Between and including May 1, 2016 and September 15, 2016, DAK BRANDON STEIERT unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Cody Barela, 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.

COUNT 2-CRIMINAL IMPERSONATION (F6)

Between and including May 1, 2016 and September 15, 2016, DAK BRANDON STEIERT unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Lisa Primiano, 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.

COUNT 3-CRIMINAL IMPERSONATION (F6)

Between and including May 1, 2016 and September 15, 2016, DAK BRANDON STEIERT unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, legal or other, namely: Debbie Kwon, 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.

COUNT 4-FRAUD IN EFFECTING SALES-FALSE STATEMENT (M2)

Between and including May 1, 2016 and September 15, 2016, DAK BRANDON STEIERT unlawfully, made a false or misleading statement in an advertisement addressed to the public or to a substantial segment thereof for the purpose of promoting the purchase or sale of property or services, in violation of section 18-5-301(1)(c), C.R.S.

COUNT 5-BAIT ADVERTISING (M2)

Between and including May 1, 2016 and September 15, 2016, DAK BRANDON STEIERT unlawfully, in any manner, including advertising or any other means of communication, offered property or services as part of a scheme or plan, with the intent, plan, or purpose not to sell or provide the advertised property or services at all, or not at the price at which he offered them, or not in a quantity sufficient to meet the reasonable expected public demand, unless the quantity is specifically stated in the advertisement, in violation of section 18-5-303(1), C.R.S.

All offenses against the peace and dignity of the people of the State of Colorado.

Bruce I. Brown
District Attorney, #: 24294

By: /s/ Joseph R. Kirwan Date: 10/4/2017
Joseph R. Kirwan #: 37684
Deputy District Attorney

ENDORSED WITNESS LIST

Jason J Hebrard
Cbi
Unknown

Jason Boston
Eagle County District Attorneys Office
P.o. Box 295
Eagle, CO 81631

Cody Barela
Sherman And Howard, Llc

Denver, CO

Joseph Bronesky
Sherman And Howard Llc
Denver, CO

DEFENDANT INFORMATION

DOB: 3/21/1986

Race: W Gender: M

Height: 508 Weight: 145 Hair: BRO Eye: BLU

Birthplace: CO Tattoo:

Address: 165 CHAROLAIS CIR., APT. A
EDWARDS, CO 81632

Home Phone #: 970-926-3776

Work Phone #: -

AKA:

CASE INFORMATION

Arresting Agency:

Arresting ORI: Other Number:

Offense Agency: CBI Denver-Investigations

Offense ORI: COCBI0004

Arrest #: Agency Case #: 2016000294

Date of Arrest: BAC: _____

CCIC#: _____ NCIC #: SID#: XJ416922