

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Case No. 18-cr-00381-MSK-GPG

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. BRUCE HOLDER,
2. LEXUS HOLDER,
3. CORINA HOLDER,
4. GERI BOCHMANN,
5. JESSICA BRADY,
6. MARIE MATOS,

Defendants.

**FILED**  
**UNITED STATES DISTRICT COURT**  
**DENVER, COLORADO**  
**01/24/19**  
**JEFFREY P. COLWELL, CLERK**

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**SUPERSEDING INDICTMENT**

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The Grand Jury charges:

**COUNT 1**

On or about December 26, 2017, within the State and District of Colorado, the defendant, BRUCE HOLDER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of J.E. on or about December 28, 2017.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 2**

On or about December 26, 2017, within the State and District of Colorado, the defendant, BRUCE HOLDER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in serious bodily injury to Z.G. on or about December 28, 2017.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 3**

From on or about June 1, 2018, to on or about June 10, 2018, within the State and District of Colorado, the defendants, BRUCE HOLDER, LEXUS HOLDER, CORINA HOLDER, GERI BOCHMANN, and JESSICA BRADY, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in the death of A.R. on or about June 11, 2018.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT 4**

From a date unknown, but no later than November 2, 2017, and continuing to on or about January 10, 2018, within the State and District of Colorado and elsewhere, the defendants, BRUCE HOLDER, MARIE MATOS, and LEXUS HOLDER, did knowingly

and intentionally conspire with each other and with persons known and unknown to the Grand Jury to distribute and possess with intent to distribute 400 grams and more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(vi).

All in violation of Title 21, United States Code, Section 846.

#### **COUNT 5**

On or about June 12, 2018, within the State and District of Colorado, the defendant, LEXUS HOLDER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing detectable amounts of fentanyl, a Schedule II controlled substance, and acetylfentanyl, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), and (b)(1)(C).

#### **COUNT 6**

On or about June 19, 2018, within the State and District of Colorado, the defendant, LEXUS HOLDER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 7**

On or about June 27, 2018, within the State and District of Colorado, the defendant, LEXUS HOLDER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 8**

On or about July 3, 2018, within the State and District of Colorado, the defendant, LEXUS HOLDER, did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 9**

On or about January 10, 2019, within the State and District of Colorado, the defendant, MARIE MATOS, did knowingly and intentionally possess with intent to distribute 40 grams and more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1 through 9 of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the violations alleged in Counts 1 through 9 of this Superseding Indictment involving violations of Title 21, United States Code, Sections 841(a)(1), the defendants, BRUCE HOLDER, LEXUS HOLDER, CORINA HOLDER, GERI BOCHMANN, JESSICA BRADY, and MARIE MATOS, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 any and all of the defendants' right, title, and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offense, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to a money judgment in the amount of proceeds obtained by the defendants.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section

853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL

Ink signature on file in Clerk's Office  
FOREPERSON

JASON R. DUNN  
United States Attorney

s/ Jeremy Chaffin  
JEREMY CHAFFIN  
Assistant United States Attorney  
United States Attorney's Office  
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Grand Junction, CO 81501  
Tel: (970) 257-7113  
Fax: (970) 248-3630  
E-mail: [jeremy.chaffin@usdoj.gov](mailto:jeremy.chaffin@usdoj.gov)

DEFENDANT: Bruce Holder

YOB: 1965 AGE: 53

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No

If No, a new warrant is required

OFFENSE(S): **Counts 1-3: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution of fentanyl resulting in death or serious bodily injury

**Count 4: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), and 846.**  
Conspiracy to distribute and possess with intent to distribute 400 grams or more of fentanyl.

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Counts 1-3:** NLT 20 years imprisonment, NMT life imprisonment, \$1,000,000 fine or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

**Count 4:** NLT 10 years imprisonment, NMT life imprisonment, \$10,000,000 fine or both; NLT 5 years supervised release; NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less  X  over five days \_\_\_\_\_ other

THE GOVERNMENT

X  will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

\_\_\_\_\_ will not seek detention

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE:  X  Yes \_\_\_\_\_ No

DEFENDANT: Lexus Holder

YOB: 1996 AGE: 22

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No  
If No, a new warrant is required

OFFENSE(S): **Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution of fentanyl resulting in death  
  
**Count 4: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), and 846.**  
Conspiracy to distribute and possess with intent to distribute 400 grams or more of fentanyl.

**Counts 5-8: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution and possession with intent to distribute fentanyl

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Count 3:** NLT 20 years imprisonment, NMT life imprisonment, \$1,000,000 fine or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

**Count 4:** NLT 10 years imprisonment, NMT life imprisonment, \$10,000,000 fine or both; NLT 5 years supervised release; NMT life supervised release; \$100 special assessment.

**Counts 5-8:** NMT 20 years imprisonment, \$1,000,000 fine, or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less  X  over five days \_\_\_\_\_ other



THE GOVERNMENT

  X   will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

       will not seek detention

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE:      X   Yes           No

DEFENDANT: Corina Holder

YOB: 1972 **AGE:** 46

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No  
If No, a new warrant is required

OFFENSE(S): **Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution of fentanyl resulting in death

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Count 3:** NLT 20 years imprisonment, NMT life imprisonment,  
\$1,000,000 fine or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less  X  over five days \_\_\_\_\_ other

THE GOVERNMENT

X  will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

\_\_\_\_\_ will not seek detention

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE:  X  Yes \_\_\_\_\_ No

DEFENDANT: Geri Bochmann

YOB: 1977 **AGE:** 41

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No  
If No, a new warrant is required

OFFENSE(S): **Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution of fentanyl resulting in death

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Count 3:** NLT 20 years imprisonment, NMT life imprisonment, \$1,000,000 fine or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less  X  over five days \_\_\_\_\_ other

THE GOVERNMENT

X  will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

\_\_\_\_\_ will not seek detention

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE:  X  Yes \_\_\_\_\_ No

DEFENDANT: Jessica Brady

YOB: 1991 AGE: 27

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No  
If No, a new warrant is required

OFFENSE(S): **Count 3: 21 U.S.C. § 841(a)(1), (b)(1)(C)**  
Distribution of fentanyl resulting in death

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Count 3:** NLT 20 years imprisonment, NMT life imprisonment,  
\$1,000,000 fine or both; NLT 3 years supervised release, NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less  X  over five days \_\_\_\_\_ other

THE GOVERNMENT

X  will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

\_\_\_\_\_ will not seek detention

The statutory presumption of detention is applicable to this defendant.

OCDETF CASE:  X  Yes \_\_\_\_\_ No

DEFENDANT: Marie Matos

YOB: 1981 AGE: 37

COMPLAINT FILED? \_\_\_\_\_ Yes  X  No

If Yes, MAGISTRATE CASE NUMBER \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ Yes  X  No

If No, a new warrant is required

OFFENSE(S): **Count 4: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), and 846.**  
Conspiracy to distribute and possess with intent to distribute 400 grams or more of fentanyl.

**Count 9: 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi)**  
Distribution and possession with intent to distribute 40 grams or more of fentanyl

LOCATION OF OFFENSE: Mesa County, Colorado

PENALTY: **Count 4:** NLT 10 years imprisonment, NMT life imprisonment, \$10,000,000 fine or both; NLT 5 years supervised release; NMT life supervised release; \$100 special assessment.

**Counts 9:** NLT 5 years imprisonment, NMT 40 years imprisonment, \$5,000,000 fine, or both; NLT 4 years supervised release, NMT life supervised release; \$100 special assessment.

AGENT: Kevin Doheny, Special Agent, DEA

AUTHORIZED BY: Jeremy Chaffin  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_ five days or less  X  over five days \_\_\_\_\_ other

THE GOVERNMENT

X  will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

\_\_\_\_\_ will not seek detention

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE:  X  Yes \_\_\_\_\_ No