



September 12, 2024

**VIA PORTAL & E-MAIL: [cdps\\_csprecords@state.co.us](mailto:cdps_csprecords@state.co.us)**

Colorado State Patrol Headquarters  
Central Records Unit  
700 Kipling Street  
Lakewood, Colorado 80215

### **Colorado Open Records Act Request: Multinational Gangs in Colorado**

Dear CORA Custodian:

America First Legal Foundation is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) and state-level document requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL has over 269,000 followers on X, and our Founder and President has over 725,000 followers on X.

#### **I. Requested Records**

AFL respectfully requests, under Colorado Revised Statutes (C.R.S.) §§ 24-72-201 – 24-72-206:

- A. All records including the terms “Tren de Aragua” OR “TdA.”
- B. All records including the terms “Venezuela(n),” “gang(s),” AND “apartment(s).”
- C. All records referencing the presence of the Tren de Aragua gang in Aurora, Colorado.<sup>1</sup>

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<sup>1</sup> Aurora Police Dept (@AuroraPD), X (Aug. 28, 2024, 7:49 PM), <https://perma.cc/V445-G32M>.

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Washington, DC 20003

320 South Madison Avenue  
Monroe, Georgia 30655

- D. Records sufficient to show the number of Tren de Aragua gang members identified and arrested in Aurora, Colorado since January 21, 2021.
- E. All records referencing the arrests of Dixon Azuaje-Perez, Nixon Azuaje-Perez, Jhonnarty Dejesus Pacheco-Chirinos, and Jhonardy Jose Pacheco-Chirinos, also known as “Cookie” or “Galleta,”<sup>2</sup> including but not limited to “arrest affidavits and other applicable crime or incident reports.”<sup>3</sup>
- F. All records referencing CBZ Management.
- G. All communications with the Aurora Police Department referencing gang activity in the state of Colorado.
- H. All unedited video and audio recordings, including those from body-worn cameras, dash cameras, or telephone calls to Colorado State Patrol related to incidents involving the Tren de Agua gang.

The time period for this request is January 21, 2021, through the date this request is processed.

## **II. Fee Waiver**

AFL requests a waiver of all search and duplication fees associated with this request under C.R.S. § 24-72-205(4). AFL is a qualified non-commercial public education and news media requester. Our officials routinely appear on national television and use social media platforms to disseminate the information it has obtained about federal government activities. In this case, AFL will make your records and your responses publicly available for the benefit of citizens, scholars, and others, and the public’s understanding of your policies and practices will be enhanced through AFL’s analysis and publication of the requested records. As a nonprofit organization, AFL does not have a commercial purpose, and releasing the requested information is not in AFL’s financial interest.

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<sup>2</sup> Aurora Police Dept (@AuroraPD), X (Sept. 4, 2024, 7:38 PM), <https://perma.cc/678X-4VM5>; see also Jasmine Baehr, *Colorado Mayor Speaks Out After Video of Armed Venezuelan Gang in Apartment Goes Viral: ‘Failed Policy’*, FOX NEWS (Aug. 29, 2024), <https://perma.cc/6CTL-S59H>.

<sup>3</sup> Colorado State Patrol, Dep’t of Public Safety, Release and Disposition of Records, <https://perma.cc/7BZD-G342> (Pursuant to Colorado State Patrol Operational Procedures, “[i]nformation contained in arrest affidavits and other applicable crime or incident reports” may be released even if there is an “active investigation”).

### III. Conclusion

Colorado Open Records Act requires a response within three working days. If access to the records requested takes longer than expected, please provide information about the extenuating circumstances delaying the response. If any or all parts of this request are denied, please cite each specific exemption you feel justifies the refusal to release the records and provide notification of the appeal procedures available under the law. If you have any questions about this request or believe further discussions regarding search and processing would facilitate a more efficient production of records, then please contact me at FOIA@aflegal.org. To accelerate your release of responsive records, AFL welcomes production on an agreed-upon rolling basis. Please provide responsive records in an electronic format via email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Thank you,

*/s/ Rachel Jag*

America First Legal Foundation