

COUNT FIVE: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S.(Class 3 Felony) {50052} (as to)

COUNT SIX: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT SEVEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT EIGHT: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT NINE: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT TEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to ,)and)

COUNT ELEVEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT TWELVE: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT THIRTEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT FOURTEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT FIFTEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT SIXTEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to all victims -

COUNT SEVENTEEN: SECURITIES FRAUD, § § 11-51-501(1)(B) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to^l

COUNT EIGHTEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to

COUNT NINETEEN: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT TWENTY: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to

COUNT TWENTY ONE: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to^l

COUNT TWENTY TWO: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to

COUNT TWENTY THREE: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to

COUNT TWENTY FOUR: SECURITIES FRAUD, § § 11-51-501(1)(b) and 11-51-603(1) C.R.S. (Class 3 Felony) {50052} (as to)

COUNT TWENTY FIVE:

SECURITIES FRAUD, § § 11-51-501(1)(c) and
11-51-603(1) C.R.S. (Class 3 Felony) {50053} (as
to all investors)

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202 <hr/> PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. DANIEL SCOTT SULLIVAN, DOB: 07/16/1969 Defendant.	▲ COURT USE ONLY ▲
CYNTHIA H. COFFMAN, Attorney General MICHAEL J. BELLIPANNI, Senior Assistant Attorney General* 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6698 Registration Number: 24421 *Counsel of Record	Case No.: 14CR0001 Div. 259
COLORADO STATE GRAND JURY INDICTMENT	

Of the 2014-2015 term of the Denver District Court in the year 2015; the 2014-2015 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:

ESSENTIAL FACTS

Daniel Scott Sullivan (SULLIVAN) owned and operated DIG Energy, LLC, a trade name for DTS Energy, LLC, both Colorado corporations with a listed address of 26 West Dry Creek Circle, #200, Littleton, CO 80120, located in Arapahoe County. SULLIVAN also owned and operated COPS, Inc; COPS, LLC and other associated businesses which he operated in Colorado. The businesses primarily engaged in investments and sales of securities. Beginning in November of 2009 and through April of 2015, SULLIVAN solicited, accepted and held money from investors. Most of the transactions took place at or near Jefferson County Parkway where SULLIVAN worked, in Golden, located in Jefferson County, Colorado. During this time, SULLIVAN solicited approximately forty six investors, who invested approximately one million dollars.

The investments offered by SULLIVAN promised high rates of return with little or no risk to the investor. SULLIVAN primarily offered investors the opportunity to invest in stocks of privately held companies which SULLIVAN represented would return investors substantial profit when the shares were made available through a public offering. SULLIVAN had control of several bank accounts, ostensibly set up for the purpose of investing in companies which were poised to make public stock offerings. SULLIVAN made numerous untrue statements of material facts to induce investors to invest with him. SULLIVAN also failed to disclose material information to investors.

The investment was generally premised upon the representation that investment funds would be used for the purchase of shares in a company that was ready for an "initial public offering" of its stock. The investments were to be made by and through one of SULLIVAN'S own companies. COPS Inc., incorporated in Colorado, was owned and operated by SULLIVAN to invest in different sectors, such as green energy, real estate, and waste to fuel companies. Sullivan indicated to investors that he anticipated COPS Inc. would be traded on the NASDAQ within (8) months. SULLIVAN further stated the price will start trading between \$5.00 and \$15.00 per share and will earn a steady 8% dividend return or four times the investment minimum. SULLIVAN encouraged investors to invest their retirement funds as this stock would pay up to forty times the invested amount. DIG Energy was similar to COPS Inc. and folded or converted into COPS Inc. This company was controlled by SULLIVAN and offered investors the opportunity to invest in green energy, real estate, and waste to fuel companies.

SULLIVAN offered investors the opportunity to invest in "startup" companies, including: Fazer Technologies, Corporation (Fazer) which produced a device to be used on vehicles, planes, and cars for higher energy efficiency; Global Encryption Imaging Corporation (GEIC) which utilized laser technology to create encryptions and serial numbers for jewelry, expensive hand bags, or other high value items; Remediation Earth Inc. (REI) which converted medical waste into useable fuels; SAYGUS, a Cellular Telephone Company; Spectrum Blue Steel, Corporation (SBSC), located in the Philippines used biospheres to create green electricity; True Green Energy Group (TGEG), located in the Philippines converted waste into energy; TGEG merged into Tru Bio Electric (TBE), also located in the Philippines, and purportedly converted waste into energy; True Drinks, a children's sports drink company; and Zenovia, a digital advertising exchange company that purchases platforms for advertisements.

SULLIVAN had most investors make a check out to him personally; he had other investors make payment to DIG Energy LLC, DT Group Inc, or one of his other business entities.

SULLIVAN based his representations to investors upon his ability to invest, and profit, from stock investments. SULLIVAN told investors that their money would be used for investment in companies that he had thoroughly investigated and that were very low risk. In truth the investments were high risk. Through these representations, SULLIVAN led investors to believe that the investments provided high returns with little or no risk to the investors.

SULLIVAN did not disclose to investors that he did not use the funds he received from investors as represented. Rather than investing the entire investment amount as indicated, SULLIVAN used investor funds to pay his own business expenses, pay his personal expenses, and repay other investors.

Some investors received documentation and stock certificates to evidence their investments well after the investment; other investors received no documentation at all. Often investors were told that their investment had to be “rolled” into another investment.

The investments offered and sold by SULLIVAN, constitute “securities” pursuant to § 11-51-201(17) C.R.S., and as such, are subject to the provisions of the Colorado Securities Act.

SULLIVAN made material, untrue statements and omissions of material facts in connection with the sales of the investments. SULLIVAN did not disclose the fact that he failed to invest investor funds in stocks as represented. Analysis of SULLIVAN'S banking activity from August of 2009, through December, 2014, shows investor funds as the source of nearly one million dollars; of that amount, only approximately two hundred seventy-seven thousand seven hundred sixty dollars (\$277,760) was actually invested by SULLIVAN in the companies represented. Bank data also shows personal use, payments to SULLIVAN individually, and cash withdrawals, totaling over eight hundred ninety-seven thousand dollars (\$897,000) over the same time period. Furthermore, SULLIVAN used over two hundred fifty thousand dollars (\$250,000) of investor funds as payouts and profits to other investors.

SULLIVAN failed to disclose to investors the actual risks associated with the investments. SULLIVAN knew, but did not disclose, that investor funds were

being used by him for unrelated business expenses, for personal expenses and use, for payments to other investors, and to withdraw hundreds of thousands of dollars in cash, creating an actual risk of loss to investors that was significant.

In furtherance of his course of business, SULLIVAN concealed the actual use of investor funds. Throughout the time he solicited investor funds, SULLIVAN misrepresented the use of the funds after the investments were made. The information SULLIVAN provided to the investors regarding the use of their investment funds did not accurately reflect the actual use of the funds at the time.

SULLIVAN failed to disclose to investors that a civil lawsuit was filed against him by the Colorado Department of Revenue which resulted in a judgment against him. A civil judgment was ordered against SULLIVAN in Douglas County case 2013CV800453, on February 20, 2013 in the amount of two thousand four hundred fifty-five dollars (\$2,455); the amount remained unsatisfied as of the end of the period analyzed.

SULLIVAN failed to inform investors that he had filed for Chapter 7 bankruptcy protection in October of 2005. SULLIVAN filed a Voluntary Petition in US Bankruptcy Court, District of Colorado, filing #05-50350. The bankruptcy was discharged on March 8, 2006.

SULLIVAN failed to inform investors of his prior failed business. The business, DTC Corporation failed in 2005, forcing SULLIVAN to file for bankruptcy protection.

For over five years, SULLIVAN used investor funds for personal expenses, rather than investment in the represented entities. Throughout the time he solicited investor funds, SULLIVAN misrepresented his use of the funds after the investments were made. SULLIVAN represented to investors that the profits from their invested funds were imminent, knowing those representations to be untrue. SULLIVAN furthered these acts, practices and course of business by inducing investors to maintain their investments and increase their investment amounts, encouraging investors to invest their retirement savings and accounts. SULLIVAN also fabricated excuses for failing to pay investors as promised, continually reassuring investors that their investment funds were safe and failing to disclose regulatory sanctions and "cease and desist" orders against several of the companies for which SULLIVAN solicited investments.

COUNT ONE
(Securities Fraud – F3)

About and between November 22, 2011, and February 21, 2013, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count One of this Indictment was committed in the following manner:

1. On or about November 22, 2011, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of GEIC, indicating that when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between November 22 and 29, 2011, in Jefferson County, Colorado; provided to SULLIVAN, four thousand five hundred dollars (\$4,500.00) to be invested in GEIC. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

2. Afterwards, SULLIVAN solicited funds for additional stock purchases in True Drinks, once again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between February 15, 2013 and February 22, 2013, in Jefferson County, Colorado, provided to SULLIVAN, an additional five thousand dollars (\$5,000.00) to be invested in True Drinks. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

3. In connection with this sale of these securities to the SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWO
(Securities Fraud – F3)

About and between October 14, 2010 and April 13, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Two of this Indictment was committed in the following manner:

1. On or about October 14, 2010, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of Fazer, indicating that when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between October 14 and 20, 2010, in Jefferson County, Colorado, provided SULLIVAN with two thousand dollars (\$2,000.00) to be invested in Fazer. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Afterwards, SULLIVAN approached the _____ |for another investment, soliciting funds for stock shares of Fazer, once again indicating that when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between April 12, and April 13, of 2011, in Jefferson County, Colorado, provided to SULLIVAN, an additional one thousand five hundred dollars (\$1,500.00)

to be invested in Fazer. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a “security,” pursuant to the Colorado Securities Act.

3. In connection with this sale of these securities to the _____, SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT THREE
(Securities Fraud – F3)

About and between October 14, 2010, and November 2, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ ! directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Three of this Indictment was committed in the following manner:

1. On or about October 14, 2010, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest her funds in stock shares of Fazer, indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN’s offer and about and between October 14 and 20, 2010, in Jefferson County, Colorado, provided to SULLIVAN, six hundred dollars (\$600.00) to be invested in Fazer. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a “security,” pursuant to the Colorado Securities Act.
2. Sullivan again approached _____ for an investment in Saygus indicating that that stock could be sold for substantial profit. _____ accepted SULLIVAN’s offer and on and between August 3, 2012 and

August 7, 2012 provided SULLIVAN with a check for one thousand dollars (\$1,000) to be invested in Saygus. In return _____ was to receive shares of stock in Saygus. This investment constitutes a “security,” pursuant to the Colorado Securities Act.

3. Afterwards, SULLIVAN approached _____ for another investment, soliciting funds for stock shares of True Drinks, once again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN’s offer and about and between October 20, 2012 and November 2, 2012, in Jefferson County, Colorado, provided to SULLIVAN, an additional five hundred dollars (\$500.00) to be invested in True Drinks. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a “security,” pursuant to the Colorado Securities Act.
4. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT FOUR
(Securities Fraud – F3)

On or about October 23, 2010, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Four of this Indictment was committed in the following manner:

1. On or about October 23, 2010, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would

invest her funds in stock shares of TGEG, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and on or about October 23, 2010, in Jefferson County, Colorado, provided to SULLIVAN, ten thousand dollars (\$10,000.00) by two checks for \$5000.00 each, to be invested in stock shares of TGEG. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

2. In connection with this sale of these securities to the _____, SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT FIVE
(Securities Fraud – F3)

About and between November 23, 2010 and November 29, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Five of this Indictment was committed in the following manner:

1. On or about November 23, 2010, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest _____ funds in stock shares of Fazer, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and on or about November 23, 2010, in Jefferson County, Colorado, provided to SULLIVAN, one thousand nine hundred ninety three dollars and seventy five cents (\$1,993.75) to be invested in Fazer. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

2. SULLIVAN approached _____ again and asked if he would be interested in investing additional money in stock shares of Spectrum Blue Steel, again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between July 8, and July 13, of 2011, in Jefferson County, Colorado, provided to SULLIVAN, an additional two thousand five hundred dollars (\$2,500.00) to be invested in Spectrum Blue Steel. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. Afterwards, SULLIVAN approached _____ for another investment, soliciting funds for stock shares of GEIC, once again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between November 18, and November 29, of 2011, in Jefferson County, Colorado, provided to SULLIVAN, an additional three thousand dollars (\$3,000.00) to be invested in GEIC. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
4. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT SIX
(Securities Fraud – F3)

About and between May 4, 2011 and November 16, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and

dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Six of this Indictment was committed in the following manner:

1. SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of Spectrum Blue Steel, when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and on or about May 4, 2011, in Jefferson County, Colorado, provided to SULLIVAN, six thousand two hundred fifty dollars (\$6,250.00) to be invested in Spectrum Blue Steel. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, SULLIVAN approached the _____ and asked if they would be interested in investing additional money in stock shares of REI. The _____ agreed and on or about June 14, 2011, in Jefferson County provided SULLIVAN with an additional twelve thousand five hundred dollars (\$12,500.00) for the purchase of shares of REI. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. SULLIVAN approached the _____ again and asked if they would be interested in investing additional money in stock shares of GEIC, again indicating that when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and on or about November 16, 2011, in Jefferson County, Colorado, provided to SULLIVAN, an additional six thousand dollars (\$6,000.00) to be invested in GEIC. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
4. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT SEVEN
(Securities Fraud – F3)

About and between May 2, 2011, and May 26, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Seven of this Indictment was committed in the following manner:

1. On or about May 2, 2011, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in shares of stock when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between May 2, 2011, and May 26, 2011, in Jefferson County, Colorado, provided to SULLIVAN, five hundred dollars (\$500.00) to be invested in stock shares. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT EIGHT
(Securities Fraud – F3)

About and between May 2, 2011 and May 4, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made,

in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Eight of this Indictment was committed in the following manner:

1. On or about A May 2, 2011, SULLIVAN offered an investment opportunity. SULLIVAN told the that he would invest their funds in stock shares of TGEG, when the company went public, the stock could be sold at a substantial profit. The decided to accept SULLIVAN's offer and about and between May 2, 2011 and May 26, 2011, in Jefferson County, Colorado, provided to SULLIVAN, one thousand eight hundred seventy five dollars (\$1,875.00) to be invested in TGEG. In return, were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, SULLIVAN approached and asked if she would be interested in investing additional money in shares of Green Earth Strategies, Inc. (GESI) stock. agreed and about and between April 16, 2012, and May 4, 2012, in Jefferson County provided SULLIVAN with an additional one thousand five hundred dollars (\$1,500.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT NINE
(Securities Fraud – F3)

About and between June 8, 2011, and March 2, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a

material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Nine of this Indictment was committed in the following manner:

1. On or about June 8, 2011, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest the funds in shares of TGEG stock, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between June 8, and June 17, 2011, in Jefferson County, Colorado, provided to SULLIVAN, two hundred fifty dollars (\$250.00) to be invested in shares of stock. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, on or about February 27, 2012, SULLIVAN offered _____ an opportunity to invest money in shares of Saygus stock. The _____ agreed and about and between February 27, and March 2, 2012, in Jefferson County provided SULLIVAN with an additional one thousand five hundred dollars (\$1,500.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TEN
(Securities Fraud – F3)

About and between July 8, 2011 and July 13, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of

any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Ten of this Indictment was committed in the following manner:

1. On or about July 8, 2011, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of Spectrum Blue Steel, when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between July 8, 2011 and July 13, 2011, in Jefferson County, Colorado, provided to SULLIVAN, three thousand seven hundred fifty dollars (\$3,750.00) to be invested in Spectrum Blue Steel. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT ELEVEN
(Securities Fraud – F3)

About and between February 11, 2012, and March 1, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-

51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Eleven of this Indictment was committed in the following manner:

1. On or about February 11, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest her funds in stock shares of GEIC, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between February 11, 2012, and February 21, 2012, in Jefferson County, Colorado, provided to SULLIVAN, three thousand dollars (\$3,000.00) to be invested in GEIC. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. SULLIVAN approached _____ again and asked if she would be interested in investing additional money in stock shares of Saygus, again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between February 24, 2012, and March 1, 2012, in Jefferson County, Colorado, provided to SULLIVAN, an additional three thousand dollars (\$3,000.00) to be invested in Saygus. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWELVE
(Securities Fraud – F3)

About and between February 12 and July 11, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ | directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material

fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twelve of this Indictment was committed in the following manner:

1. About and between February 20 and 23, 2012, SULLIVAN offered [redacted] an investment opportunity. SULLIVAN told [redacted] that he would invest their funds in stock shares of Saygus, when the company went public, the stock could be sold at a substantial profit. [redacted] decided to accept SULLIVAN's offer and about and between February 20 and 23, 2012, in Jefferson County, Colorado, provided to SULLIVAN, three thousand dollars (\$3,000.00) to be invested in stock shares of Saygus. In return, [redacted] were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, SULLIVAN approached [redacted] and asked if he would be interested in investing additional money in shares of stock, [redacted] agreed and about and between April 15 and April 26, 2012, in Jefferson County provided SULLIVAN with an additional five thousand dollars (\$5,000.00) for the purchase of additional shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. SULLIVAN again approached [redacted] and asked if they would be interested in investing additional funds in stock shares of True Bio Electric; [redacted] agreed and about and between February 12 and July 11, 2012, in Jefferson County provided SULLIVAN with an additional two thousand five hundred dollars (\$2,500) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
4. In connection with this sale of these securities to the [redacted] SULLIVAN made untrue statements of material fact, and

failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT THIRTEEN
(Securities Fraud – F3)

About and between February 21, 2012 and February 24, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Thirteen of this Indictment was committed in the following manner:

1. On or about February 21, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of Saygus, when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between February 21, 2012 and February 24, 2012, in Jefferson County, Colorado, provided to SULLIVAN, one thousand five hundred dollars (\$1,500.00) to be invested in Saygus. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT FOURTEEN
(Securities Fraud – F3)

About and between October 17, 2012 and October 24, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Fourteen of this Indictment was committed in the following manner:

1. On or about October 17, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest _____ funds in stock shares of DIG, when the companies DIG invested in went public, the stocks could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between October 17, 2012 and October 24, 2012, in Jefferson County, Colorado, provided to SULLIVAN, five thousand dollars (\$5,000.00) to be invested in shares of DIG. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, SULLIVAN approached _____ and asked if he would be interested in investing additional money in shares of DIG stock. _____ agreed and about and between October 17, 2012 and October 24, 2012, in Jefferson County provided SULLIVAN with an additional twenty thousand dollars (\$20,000.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT FIFTEEN
(Securities Fraud – F3)

About and between February 23, 2012 and November 8, 2013, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Fifteen of this Indictment was committed in the following manner:

1. On or about February 23, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of Saygus, when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between February 23, 2012, and March 1, 2012, in Jefferson County, Colorado, provided to SULLIVAN, three thousand dollars (\$3,000.00) to be invested in shares of stock. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. On or about July 23, 2012, _____ invested additional money into shares of stock of Saygus. The _____ invested an additional three thousand dollars, (\$3,000.00) for Saygus stock. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. Subsequently, SULLIVAN approached _____ and asked if they would be interested in investing additional money in shares of Saygus stock. The _____ agreed, on and between October 19, 2012, and October 24, 2012, in Jefferson County provided SULLIVAN with an

additional two thousand five hundred dollars (\$2,500.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.

4. Again, SULLIVAN approached _____ and asked if they would be interested in investing additional money in shares of True Drink stock. _____ agreed, on and between October 19, 2012, and October 24, 2012, in Jefferson County provided SULLIVAN with an additional one thousand five hundred dollars (\$1,500.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
5. SULLIVAN approached _____ again and asked if they would be interested in investing additional money in shares of Zenovia stock, again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and on and between October 18, 2012, and November 8, 2012, in Jefferson County, Colorado, provided to SULLIVAN, an additional three thousand dollars (\$3,000.00) to be invested in shares of stock. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
6. On or about February 14, 2013, SULLIVAN offered _____ another investment opportunity. SULLIVAN told the _____ that he would invest their funds in additional shares of stock, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between February 14, 2013, and February 21, 2013, in Jefferson County, Colorado, provided to SULLIVAN, one thousand five hundred dollars (\$1,500.00) to be invested in additional shares of stock. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
7. Subsequently, SULLIVAN approached _____ and asked if they would be interested in investing additional money in stock shares of True Drinks. _____ agreed and about and between February 19, 2013, and February 28, 2013, in Jefferson County provided SULLIVAN with an additional one thousand five hundred

dollars (\$1,500.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.

8. SULLIVAN approached _____ again and asked if they would be interested in investing additional money in stock shares, again indicating that when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and on and between September 24, 2013 and October 16, 2013, in Jefferson County, Colorado, provided to SULLIVAN, an additional five thousand dollars (\$5,000.00) to be invested in stock shares. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
9. Subsequently, SULLIVAN approached _____ and asked if they would be interested in investing additional money in stock shares of Zenovia. _____ agreed and on and between October 30, 2013 and November 8, 2013, in Jefferson County provided SULLIVAN with an additional four thousand dollars (\$4,000.00) for the purchase of shares of Zenovia stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
10. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT SIXTEEN
(Securities Fraud - F3)

About and between October 17, 2012 and February 19, 2013, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud - Class 3 Felony)

The offense in Count Sixteen of this Indictment was committed in the following manner:

1. On or about October 17, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest _____ funds in stock shares of DIG Energy, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between October 17, 2012 and October 24, 2012, in Jefferson County, Colorado, provided to SULLIVAN, fifty thousand dollars (\$50,000.00) to be invested in stock shares of DIG Energy. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. Subsequently, SULLIVAN approached _____ and asked if he would be interested in investing additional money stock shares of Tru Drinks. _____ agreed and on or about February 19, 2013, in Jefferson County provided SULLIVAN with an additional five thousand dollars (\$5,000.00) for the purchase of shares of Tru Drink stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT SEVENTEEN
(Securities Fraud – F3)

About and between October 30, 2012 and November 2, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and

dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Seventeen of this Indictment was committed in the following manner:

1. On or about October 30, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of COPS, when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between October 30, 2012 and November 2, 2012, in Jefferson County, Colorado, provided to SULLIVAN, ten thousand dollars (\$10,000.00) to be invested in COPS. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT EIGHTEEN
(Securities Fraud – F3)

About and between October 31, 2012 and November 2, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Eighteen of this Indictment was committed in the following manner:

1. On or about October 31, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest her funds in stock shares of COPS Inc., and Saygus when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between October 31, 2012 and November 2, 2012, in Jefferson County, Colorado, provided to SULLIVAN, twelve thousand dollars (\$12,000.00) to be invested in shares of stock. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT NINETEEN
(Securities Fraud - F3)

About and between October 17, 2012 and October 16, 2013, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud - Class 3 Felony)

The offense in Count Nineteen of this Indictment was committed in the following manner:

1. On or about October 17, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told the _____ that he would invest their funds in stock shares of COPS Inc., when the company went public, the stock could be sold at a substantial profit. The _____ decided to accept SULLIVAN's offer and about and between October 17, 2012 and November 2, 2012, in Jefferson County, Colorado, provided to SULLIVAN, ten thousand dollars (\$10,000.00) to be invested in stock shares of COPS

Inc. In return, _____ were to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

2. Subsequently, SULLIVAN approached _____ and asked if they would be interested in investing additional money in stock shares of COPS Inc. The _____ agreed and on or about September 21, 2013, and October 16, 2013, in Jefferson County provided SULLIVAN with an additional ten thousand dollars (\$10,000.00) for the purchase of shares of stock. This investment constitutes a "security," pursuant to the Colorado Securities Act.
3. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY
(Securities Fraud – F3)

On or about November 2, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____ directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twenty of this Indictment was committed in the following manner:

1. On or about November 2, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest their funds in stock shares of COPS Inc., when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and on or about November 2, 2012, in Jefferson County, Colorado, provided to SULLIVAN, thirty five thousand dollars

(\$35,000.00) to be invested in stock shares of COPS Inc. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.

2. In connection with this sale of these securities to SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY ONE
(Securities Fraud – F3)

About and between November 17, 2012 and December 11, 2012, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twenty One of this Indictment was committed in the following manner:

1. On or about November 17, 2012, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest _____ funds in stock shares of DIG Energy, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between November 17, 2012 and December 11, 2012, in Jefferson County, Colorado, provided to SULLIVAN, five thousand dollars (\$5,000.00) to be invested in in stock shares of DIG Energy. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to SULLIVAN made untrue statements of material fact, and failed to

disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY TWO
(Securities Fraud – F3)

About and between February 19, 2013 and February 21, 2013, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to: _____, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twenty Two of this Indictment was committed in the following manner:

1. On or about February 19, 2013, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest _____ funds in stock shares of REI, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about and between February 19, 2013 and February 21, 2013, in Jefferson County, Colorado, provided to SULLIVAN, five thousand one hundred dollars (\$5,100.00) to be invested in stock shares of REI. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY THREE
(Securities Fraud – F3)

On or about February 25, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to:

directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twenty Three of this Indictment was committed in the following manner:

1. On or about On February 25, 2011, SULLIVAN offered an investment opportunity. SULLIVAN told that he would invest her funds in stock shares of Fazer Technologies, when the company went public, the stock could be sold at a substantial profit. decided to accept SULLIVAN's offer and on or about February 25, 2011, in Jefferson County, Colorado, provided to SULLIVAN, thirty-five thousand dollars (\$35,000.00) in four separate checks, to be invested in stock shares of Fazer. In return, , was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to the SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY FOUR
(Securities Fraud – F3)

On or about March 26, 2011, in and triable in the State of Colorado, DANIEL SCOTT SULLIVAN, in connection with the offer or sale of any security to directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact

necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

The offense in Count Twenty Four of this Indictment was committed in the following manner:

1. On or about March 26, 2011, SULLIVAN offered _____ an investment opportunity. SULLIVAN told _____ that he would invest funds in stock shares of TGEG, when the company went public, the stock could be sold at a substantial profit. _____ decided to accept SULLIVAN's offer and about In March of 2011, in Jefferson County, Colorado, provided to SULLIVAN, one thousand dollars (\$1,000.00) to be invested in stock shares of TGEG. In return, _____ was to receive shares of stock in the company from SULLIVAN. This investment constitutes a "security," pursuant to the Colorado Securities Act.
2. In connection with this sale of these securities to the _____ SULLIVAN made untrue statements of material fact, and failed to disclose material facts as described in the narrative of Essential Facts, which is hereby incorporated by reference.

COUNT TWENTY FIVE
(Securities Fraud, Course of Business – F3)

On and between May 5, 2009 and April 6, 2015, in and triable in the State of Colorado, Daniel Scott Sullivan, in connection with the offer or sale of any security to investors in COPS, Inc.; DIG Energy, LLC; FAZER; GEIC; REI; Saygus; Spectrum Blue Steel; TGEG; True Bio Electric; TRU Drinks; and Zenovia. directly or indirectly, unlawfully, feloniously, and knowingly engaged in any course of business which operated or would operate as a fraud or deceit upon any person, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501 (1) (c) and 11-51-603 (1), and against the peace and dignity of The People of the State of Colorado, and as more fully set out below:

1. SULLIVAN solicited investors to invest in fraudulent investment activity. SULLIVAN never told investors of any risks associated with the investments. The investments are past due, and remain, in whole or in part, unpaid.
2. In connection with the fraudulent sale of these securities, SULLIVAN conducted business in Colorado. In furtherance of the commission of this offense, SULLIVAN opened COPS and DIG Energy, LLC and related entities. SULLIVAN had investors provide funds to him, personally, and by and through his businesses. SULLIVAN did cash the funds and deposit the funds, directly, or through wire transfer, or otherwise, into SULLIVAN'S personal, DTS Energy, DIG Energy, Mile High Real Estate, and DT Group, accounts at Wells Fargo and personal account at Chase Bank.
3. The investments SULLIVAN solicited directly or indirectly, in connection with this count, on and between July 14, 2009, and December 11, 2014, include one or more of the following:
 - _____ invested approximately eighty seven thousand dollars (\$87,000) in approximately two transactions, about and between August 4, 2009 and August 5, 2011.
 - _____ invested approximately five thousand dollars (\$5,000) about and between August 14, 2009 and August 17, 2009.
 - _____ invested approximately five thousand dollars (\$5,000) about and between August 13, 2009 and August 17, 2009.
 - _____ invested approximately one hundred seven thousand four hundred fifty five dollars (\$107,455) in approximately eight transactions, about and between July 14, 2009 and February 24, 2012.
 - _____ invested approximately ninety nine thousand dollars (\$99,000) in approximately five transactions, about and between August 29, 2009 and September 5, 2014.
 - _____ invested approximately twelve thousand five hundred dollars (\$12,500) in approximately three transactions, about and between September 1, 2009 and February 21, 2013.

- _____ invested approximately three thousand seven hundred fifty dollars (\$3,750) in approximately three transactions, about and between April 13, 2010 and April 13, 2011.
- _____ invested approximately two thousand one hundred dollars (\$2,100) in approximately three transactions, about and between October 14, 2010, and November 2, 2012.
- _____ invested approximately three thousand dollars (\$3,000) about and between July 8, 2010 and July 9, 2010.
- _____ invested approximately three thousand dollars (\$3,000) in approximately two transactions, about and between July 25, 2010, and August 16, 2013.
- _____ invested approximately seven thousand four hundred ninety three dollars and seventy five cents (\$7,493.75) in approximately three transactions, about and between November 23, 2010 and November 29, 2011.
- _____ invested approximately twenty four thousand seven hundred fifty dollars (\$24,750) in approximately four transactions, about and between May 4, 2011 and November 16, 2011.
- _____ invested approximately five hundred dollars (\$500) about and between May 2, 2011, and May 26, 2011.
- _____ invested approximately three thousand three hundred seventy five dollars (\$3,375) in approximately two transactions, about and between May 2, 2011 and May 4, 2012.
- _____ invested approximately one thousand seven hundred fifty dollars (\$1,750) in approximately two transactions, about and between June 8, 2011, and March 2, 2012.
- _____ invested approximately one thousand two hundred fifty dollars (\$1,250) about and between June 13, 2011, and June 27, of 2011.

- _____ invested approximately nine thousand dollars (\$9,000) in approximately two transactions, about and between July 5, 2011 and October 24, 2012.
- _____ invested approximately three thousand seven hundred fifty dollars (\$3,750) about and between July 8, 2011 and July 13, 2011.
- _____ invested approximately six thousand dollars (\$6,000) in approximately two transactions, about and between February 11, 2012, and March 1, 2012.
- _____ invested approximately ten thousand five hundred dollars (\$10,500) in approximately three transactions, about and between February 20, 2012, and July 11, 2012.
- _____ invested approximately one thousand five hundred dollars (\$1,500) about and between February 21, 2012 and February 24, 2012.
- _____ invested approximately two thousand dollars (\$2,000) about and between February 21, 2012 and February 24, 2012.
- _____ invested approximately one thousand dollars (\$1,000) on or about February 21, 2012.
- _____ invested approximately eight thousand five hundred dollars (\$8,500) in approximately eight transactions, about and between February 28, 2012 and July 24, 2012.
- _____ invested approximately twenty five thousand dollars (\$25,000) in approximately two transactions, about and between October 17, 2012 and October 24, 2012.
- _____ invested approximately twenty two thousand dollars (\$22,000) in approximately eight transactions, about and between February 23, 2012 and November 8, 2013.

- _____ invested approximately four thousand five hundred dollars (\$4,500) about and between February 25, 2012 and March 2, 2012.
- _____ invested approximately four hundred dollars (\$400) in two transactions about and between July 30, 2012 and October 16, 2012.
- _____ invested approximately three thousand dollars (\$3,000) about and between August 4, 2012, and August 7, 2012.
- _____ invested approximately fifty five thousand dollars (\$55,000) in approximately two transactions, about and between October 17, 2012 and February 19, 2013.
- _____ invested approximately ten thousand six hundred dollars (\$10,600) in approximately two transactions, about and between October 30, 2012 and June 12, 2014.
- _____ invested approximately twelve thousand dollars (\$12,000) about and between October 31, 2012 and November 2, 2012.
- _____ invested approximately twenty thousand dollars (\$20,000) in approximately two transactions, about and between October 17, 2012 and November 2, 2012.
- _____ invested approximately thirty five thousand dollars (\$35,000) on or about November 2, 2012.
- _____ invested approximately five thousand dollars (\$5,000) about and between November 17, 2012 and December 11, 2012.
- _____ invested approximately ten thousand dollars (\$10,000) about and between January 16, 2013 and January 17, 2013.
- _____ invested approximately five thousand one hundred dollars (\$5,100) about and between February 19, 2013 and February 21, 2013.

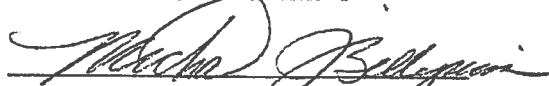
- _____ invested approximately five thousand one hundred dollars (\$5,100) about and between February 19, 2013 and February 21, 2013.
 - _____ invested approximately one hundred thirty thousand dollars (\$130,000) in approximately two transactions, about and between August 7, 2014 and September 9, 2013.
 - _____ invested approximately twenty five thousand dollars (\$25,000) about and between August 7, and Sept 9, 2013.
 - _____ invested approximately one hundred sixty one thousand dollars (\$161,000) in approximately three transactions, about and between August 14, 2014 and December 11, 2014.
 - _____ invested approximately one thousand dollars (\$1,000) on or about November, 2010.
 - _____ invested approximately five hundred dollars (\$500) on or about November 18, 2011.
 - _____ invested approximately thirty five thousand dollars (\$35,000) using four checks, on or about February 25, 2011.
 - _____ invested approximately ten thousand dollars (\$10,000) using two checks on or about October 23, 2010.
 - _____ invested approximately one thousand dollars (\$1,000) in approximately March 26, 2011.
4. SULLIVAN continued to conceal from investors that he had filed for Chapter 7 bankruptcy protection, that he had been involved in previous civil litigation for past business conduct resulting in a civil judgment. SULLIVAN did not disclose to investors that he had an outstanding civil judgment against him during the time he accepted investments in DIG Energy, LLC, and failed to inform investors of the litigation after accepting the investments. SULLIVAN failed to disclose the actual risks of the investments. In addition, SULLIVAN concealed the actual use of investor funds throughout the operation of the business.

5. In connection with the sale of these securities to these investors, SULLIVAN engaged in an act, practice and course of business which operated or would operate as a fraud and deceit upon investors as described in the narrative of Essential Facts and the paragraphs following counts one through twenty four, which are hereby incorporated by reference.

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202	
PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. DANIEL SCOTT SULLIVAN, DOB: 07/16/1969 Defendant.	
CYNTHIA H. COFFMAN, Attorney General MICHAEL J. BELLIPANNI, Senior Assistant Attorney General* 1300 Broadway, 9 th Floor Denver, CO 80203 303-508-6000 Registration Number: 24421 *Counsel of Record	▲ COURT USE ONLY ▲ Case No.: 14CR0001 Div.: 259
NOTIFICATION UNDER C.R.S. §13-73-103	

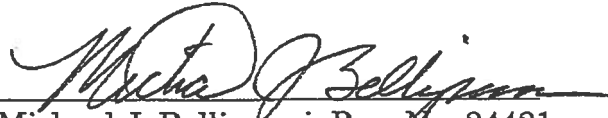
Pages 37 through 42 of the True Bills from the Grand Jury have purposely been omitted due to C.R.S. §13-73-103, which states that the identity of the State-wide Grand Jurors shall be deemed confidential. Pages 37 through 42 have the name and signatures of the Grand Jury Foreperson.

CYNTHIA H. COFFMAN
 ATTORNEY GENERAL
 STATE OF COLORADO



Michael J. Bellipanni, #24421
 Senior Assistant Attorney General
 Criminal Justice Section

CYNTHIA H. COFFMAN
ATTORNEY GENERAL

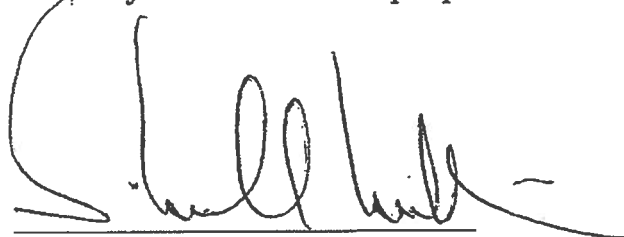


Michael J. Bellipanni, Reg. No. 24421
Senior Assistant Attorney General

The 2014-2015 State Grand Jury presents the within Indictment, and the same is hereby

Ordered filed this 18th day of JUNE, 2015.

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



R. MICHAEL MULLINS
Judge
Second Judicial District