

23TM425



COMBINED COURTS, MESA COUNTY, STATE OF COLORADO
CASE NUMBER 23TM425 23CR794
Grand Junction Police Department Incident: 2022-00046015

DATE FILED August 2, 2023 3:06 PM
CASE NUMBER: 2023CR794

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

IN THE MATTER OF:

The People of The State of Colorado

V.

Tiffany Momilani Miller, DOB/11.14.1984;

and in support of the Application for Arrest Warrant, **Detective T. Wright**, hereinafter referred to as "Affiant", presents the following Affidavit in support of Arrest Warrant and asserts the following:

That the Affiant is of lawful age and is a duly sworn law enforcement officer currently employed by the Grand Junction Police Department and was so at all times relevant to the facts contained herein. All of the information herein contained was compiled by CI. Kristi Knowles in the course of a criminal investigation, including speaking with fellow law enforcement officers and named citizens. All locations referred to are in the County of Mesa, State of Colorado, unless specifically noted otherwise.

1. On 09.28.22, PST Sanchez completed Grand Junction Police Department report 2022-00046015, in which victims, Mia Bozof and William Burton III reported to be the victims of criminal impersonation, forgery and identity theft.
2. On 09/10/2022 William and Mia went to Red Rock GMC located at 741 N. 1st St. Grand Junction, CO 81501 to apply for a vehicle loan. The vehicle they purchased is a 2017 brown Dodge Durango, VIN#: 1C4RDJDG0HC785445. Their trade in vehicle was a 2016 Fiat 500X VIN#: ZFBCFYCT4GP474957. The trade in value was approximately \$11,351.20. The documents were signed by both William and Mia on 09/10/2022 at the Red Rock GMC dealership.
3. Mia reported on 09/23/2022 she and William returned a call from Canvas Credit Union to verify information on the vehicle loan application. They spoke with a female named Myra. Myra informed them that she had just spoken with a male and female who claimed to be Mia and William from phone number (970) 216-4406 to verify the information on the auto application. Mia said this phone number is the number for the Finance manager at Red Rock GMC, Matthew Morris. Mia said she had no idea who the female claiming to be her is but assured Myra it was not her (Mia).
4. Mia said she and William received a call from Matt a few days after they took the Dodge Durango. Matt informed them there was an issue with the financing, so he was going to send out more applications to other finance lenders. Mia said she and William were aware Matt was going to do that; however, when Myra was verifying the information on the auto application some of the information was incorrect.
5. Other information that was incorrect on the application is: William and Mia share a phone number, Mia would be the primary driver, they live with Mia's parents, and Mia lived at her residence for 22 years, while William lived there for two years.
6. Incorrect information on the Dodge Durango were the following added accessories: Running boards,

rear bucket seats, rear entertainment system and blind spot monitors. Mia said the vehicle does not have these features.

7. Myra informed Mia she had recordings of the conversations with the male and female that she can provide to law enforcement.

8. PST Sanchez contacted Canvas Credit Union and was advised a third party handles the auto loan financing and was referred to Credit Union Direct Corp ("CUDC"). Erin Wilson, General Counsel for CUDC, advised court order is required for the voice recordings.

9. According to Wilson, the first call was on 09/23/2022 approximately 1258 PM from phone # (970) 216-4406. The recording was of a female voice, male voice in background. On 09/23/2022 at 1:07 PM an incoming call was received from the victim's phone number (901) 848-9981 returning a call from Myra at CU Direct to verify their information. Erin Wilson advised this was confusing to Myra as she had just spoken with who she thought were the applicants (victims). There may be other conversations as well. Erin Wilson also advised the voices on the recordings did not sound like they were the same person as the victims. Erin confirmed CU Direct had received additional calls from the (970) 216-4406 phone number requesting an update on the status of the loan.

10. On 10.20.2022, the case was transferred to Colorado Department of Revenue Auto Industry Division (DOR AID) upon their request for further investigation.

11. On 05.10.23, the case was transferred back to GJPD by DOR AID. "After further review of the GJPD report and the complaint by our division, this case will have to be investigated by the local jurisdiction as the allegations are for felony criminal activity."

12. On 05.10.2023, CI Knowles spoke with Red Rock GMC General Manager, Tyson Chambers regarding this case. Tyson stated he was not aware the victim's had reported anything to law enforcement regarding their vehicle deal. Tyson went on to advise at the time of the deal the dealership was not aware of a problem until a few days into it when the dealership was "locked out" of Canvas Credit Union via the Credit Union Direct Lending site. They initially believed it was due to system updates until they contacted Canvas Credit Union and were advised of the victim complaint and the potential forgery on the loan application.

13. Once Tyson was made aware of the issue, he immediately had a conversation with former finance managers, Matthew Morris, and Tiffany Miller. Both Matthew and Tiffany admitted to wrongdoing and calling the credit union to expedite the loan process, claiming the buyers, Mia Bozof and William "Trey" Burton were not following up on the loan with Canvas as required. Matthew and Tiffany were both terminated immediately.

14. On 05.22.23 a search warrant (23SW377) for the records held at CUDC (voice recordings) was submitted to Credit Union Direct Corp.

15. On 06.20.23, the records from CUDC were received from Rebecca Spira. The following records were received.

- Dealer docs uploaded Sept. 23 2022 - documents appear to be the same documents as already received from GMC and victims

- Dealer docs uploaded Sept. 26 2022 - documents appear to be the same documents as already received from GMC and victims

- Dealer docs uploaded Sept. 27 2022 - Copy of the Credit application, this document is the same as Document 5 below

- Document 5 - Credit Application

- Original CUDL3 id 248809725

- Original CUDL3 id 249173042

- View App Summary: CU Direct Connect Application Summary

16. In listening to the voice recordings, the following was observed.

Call 1: A female asked to speak with Myra with CUDL. The female (later identified to be Tiffany Miller) states: "This if Tif... Mia Bozof". Also, during the call, a male (later identified as Matthew Morris) is heard claiming to be William "Trey" Burton. The voices sound nothing like Bozof and Burton as CI Knowles had previously interviewed the victims via phone. During the call Myra confirms the account number (Provided by Tiffany) at the beginning of the call, income earnings and vehicle details for the purchased vehicle to include some of the accessories installed on the vehicle. This is to determine the correct loan value of the vehicle. Tiffany Miller and Matthew Morris told Myra the vehicle has running boards, rear seat entertainment, rear bucket seats and blind spot alert. These items would increase the value of the vehicle. (Victims later advise the vehicle does not have these items).

Call 2: A male, identified as Burton called to speak with Myra. Myra is obviously confused as to why Burton is calling as she had "just talked to them" within minutes. Myra states she could clearly tell the subjects on this call were not the same as the previous (Call 1). Myra quickly came to the realization that members from the dealership had called her impersonating Bozof and Burton. Myra even told Burton the female initially began to say her own name "Tif" at the outset of the call. Burton explained to Myra, he and Bozof had been trying to call her, but they couldn't get through. They knew they needed to complete the credit application interview and they had received calls from GMC employees stating it had to be completed.

17. Myra went through the application process with Burton and Bozof at which time the vehicle accessories were discussed as mentioned above. Burton stated the new vehicle does not have running boards, rear bucket seats, blind spot detection or rear entertainment. Myra advised them this detail lowered the value of the vehicle by about \$400.

18. Myra had both Bozof and Burton confirm the details on the credit application to include earnings and time living at the address listed. Bozof stated her earnings were incorrect on the application; however, she did state she receives about \$3500 of income from her mother associated with a trust type account. This may be an error in the original reporting of income by Bozof rather than her \$1500 of monthly income from her job. The other error is in the time Bozof has lived at her current address, listed as 22 years. When Tiffany was speaking to Myra in Call 1, she advised Myra that they (Burton and Bozof) live at the residence with Bozof's parents. This is a false statement. Bozof and Burton have lived at the address for about 2 years and Bozof's mother assists with rent.

19. On 0706.23, Matthew Morris, in the presence of his attorney (Stephan Schweissing) was interviewed by CI Knowles. Matthew confirmed he indeed worked for Red Rock GMC for about four months. Matthew stated he was advised by making the customer interview calls it was just part of the business and everyone knows they do it, to include the banks. Matthew stated he felt pressure to make the calls (advising he had made 3-4 total in his time with GMC), as Tyson and the sales manager, Caleb Stillman knew the calls were being made and essentially encouraged the behavior. Matthew stated he was terminated not for making the call; but for being caught.

20. Matthew also confirmed the female on the call was indeed Tiffany Miller. Matthew added that Tiffany had several years in the auto industry and would often make the customer interview calls during his time at GMC. Matthew also added when he first arrived at GMC he had zero auto financing / sales background and was supposed to take a test for DOR in which Tyson and Caleb recruited another individual to do for him.

21. Tiffany was also contacted by CI Knowles for an interview. Tiffany initially lied to Knowles stating she left Red Rock GMC because of the commute to Grand Junction from Montrose (where she resides). Tiffany also advised CI Knowles that she (Tiffany) is in the Delta-Montrose Police Academy as a recruit for Montrose Police Department. Tiffany denied any involvement in the case even though being told her voice is on the call recordings. Tiffany claimed it was another Tiffany hired after she left the business.

22. On 07.11.23, Tiffany responded to the police department and again stated she left Red Rock GMC voluntarily due to the commute. Tiffany stated she had even called her friend, Amy Felix with Red Rock Human Resources to confirm what Montrose Police Department had been told the reason for leaving Red Rock was. Tiffany maintained it was due to the commute. This statement is contradictory to the Termination form in Tiffany's file held at Red Rock GMC HR department stating Tiffany was terminated for company policy violation.

23. Tiffany adamantly denied making any customer interview phone calls to any banks. Tiffany listened to the call recording of her and Matt calling Canvas Bank posing as Mia and William. Tiffany agreed the female on the call was indeed her.

24. Throughout the interview with Tiffany, she maintained she never made such calls. Tiffany was asked several times during the interview how many other such calls she had made. Tiffany stated several times she never made any of the calls. It was pointed out that she had indeed made the call posing as Mia to which Tiffany was indifferent.

25. Tiffany later advised she recalled the call-in question, stating she was walking down the hall and a phone was put in her face and she was told to talk to the bank on the deal. Tiffany made references to people at the dealership feeling forced to do things and how she regretted ever working for Red Rock Group. Tiffany was asked if she had any regrets about making the call to which she stated her regrets were working for Red Rock. Tiffany did not appear to have any remorse for her actions.

26. On 07.11.23, Montrose Police Department provided Tiffany's Employment Verification Form submitted by Red Rock GMC. The form contradicts Tiffany's termination form; stating she left due to the commute and she is eligible for rehire. The form was completed by Amy Felix, Red Rock HR Manager.

27. On 07.13.23, CI Knowles interviewed Amy Felix. Amy stated she did indeed complete the form (against her wishes). Amy was directed by General Manager, Tyson Chambers to complete it falsely stating he "didn't want to ruin her life". Amy confirmed Tiffany was indeed terminated and was not eligible for rehire. Amy stated she felt pressured to falsely complete the record and regrets doing so.


28. Amy also advised that Tiffany had called her late June asking about what was happening and what was listed on her termination form. Amy advised Tiffany; she (Tiffany) was aware of her termination status; but the employment verification form would state she left due to the commute.

29. CI Knowles also interviewed Tyson Chambers who advised he may have told Amy to list the falsehood on the employment verification form; but he could not recall the exact conversation. Tyson also confirmed that Tiffany was terminated and was not eligible for rehire. Tyson stated he was the individual who terminated Tiffany and she was very well aware of the reason she was terminated.

That based upon the above information, the Affiant has probable cause to believe the following:

1. That the Defendant, on / or between 09.10.2022 and 09.30.2022 in Mesa County, Colorado, committed OFFENSE, Identity Theft 18-5-902.
2. That the Defendant, on / or between 09.10.2022 and 09.30.2022 in Mesa County, Colorado, committed OFFENSE, Forgery 18-5-102.
3. That the Defendant, on / or between 09.10.2022 and 09.30.2022 in Mesa County, Colorado, committed OFFENSE, Criminal Impersonation 18-5-113.

That your Affiant respectfully requests the issuance of a warrant for the arrest of **Tiffany Momilani Miller, DOB/11.14.1984**, for the above-named offenses.

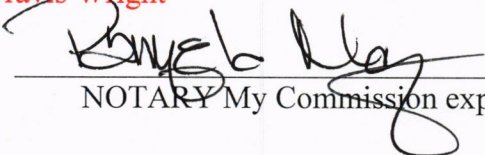

Detective Travis Wright
Grand Junction Police Department
555 Ute Ave.
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STATE OF COLORADO)

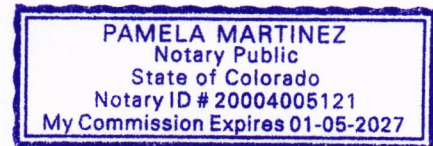
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MESA COUNTY)

The foregoing was subscribed and sworn to before me this, 31 Day of July 2023 by **Detective Travis Wright**


NOTARY My Commission expires 1/5/27

Or



COUNTY / DISTRICT COURT JUDGE