## **Accusations**

The attached document has excerpts from a letter that was hand delivered to the US Attorney in Denver Colorado.

These are the lies what started the investigation.

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March 8, 2004

## VIA HAND DELIVERY

Mr. Matt Kirsch, Esq. Assistant U.S. Attorney U.S. Attorney's Office 1225 17th Street, Suite 700 Denver, CO 80202

Re: Report of Mail Fraud, Wire Fraud, Racketeering & Conspiracy

Dear Assistant U.S. Attorney Kirsch:

This letter and attached documentation summarizes a criminal scheme perpetuated by a small group of individuals and companies operating in Colorado Springs, Colorado, to defraud several companies throughout the United States. To date, victim loss exceeds \$1 million, and the fraud appears to be continuing.

To our knowledge, the perpetrators (and contact information) are identified as:

- DKH, LLC d/b/a DKH Enterprises, a Colorado limited liability company ("DKH")
  - o 15747 Tradewind Point, Colorado Springs, CO 80917
- Leading Team, Inc., a Nevada corporation ("LT") (a/k/a IRP Solutions ("IRP"))
  - √o 3950 North Academy Blvd. #B Colorado Springs, CO 80919
  - √o 7645 North Union Blvd. #432, Colorado Springs, CO 80920
  - (719) 573-9258 (o)
- Demetrius Harper ("Harper")
  - o 5747 Tradewinds Pt., Colorado Springs, CO 80917
  - o (719) 266-1371 (h)
  - o (719) 930-8234 (c)
  - o d.k.harper@worldnet.att.net
- Clinton Stewart ("Stewart")
  - 7350 Campus Dr. #200, Colorado Springs, CO 80920
    - c (719) 955-0040 (o)
    - o (719) 955-0041(f)

## HOLLAND & HART LLP

Assistant U.S. Attorney Matt Kirsch March 8, 2004

- o clinton.stewart@irp-solutions.com
- Gary Walker ("Walker"):
  - 7350 Campus Dr. #200, Colorado Springs, CO 80920
    - o (719) 955-0040 (o)
    - c (719) 955-0041(f)
    - o gary.walker@irp-solutions.com
  - c Residence: 4835 Expedition Dr., Colorado Springs, CO 80911
  - c Residence: 2720 Hamermesh Drive, Colorado Springs, Colorado 80911
- David Banks, a/k/a, Andre Banks
  - o contact information unknown

Based upon our review of the facts and relevant criminal statutes, we believe that DKH, LT, Harper, Stewart, Banks, Walker and others (collectively, the "Perpetrators") have violated federal law by committing mail fraud, wire fraud, racketeering and conspiracy. In submitting this summary, we invite your expertise and experience in conducting an independent analysis of the facts and circumstances.

The evidence strongly suggests a pattern of illegal activity through an enterprise or conspiracy affecting interstate commerce. Once you have had a chance to review the attached materials, I would be happy to answer any questions you may have or provide any additional information.

Very truly yours,

Gregory E. Goldberg Molland & Hart LLP

Attachments

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