

DISTRICT COURT, COUNTY OF JEFFERSON, STATE OF COLORADO

Case No. 00CR3371

Division 2

AFFIDAVIT OF Charles Harry Clements

Affidavit of Witness to matters relevant to the case

I, Charles Harry Clements, after first being sworn, state as follows:

1. Affiant has known Steve Douglas Gartin for over twenty years. He is a publisher, a computer technician, a world renowned archivist/instructor/model performer, a videographer/sound technician, video editor and producer. He is the most effective animal trainer I've ever known. He has a long history in the cutlery industry as a designer, merchandiser, manufacturer's representative and producer.

2. Affiant has known Carlos Ivan Bonilla-Tafoya for over six years. I know his mother, Arabella Tafoya Bonilla; his brother, Hector Bonilla-Tafoya; various of his extended family; maternal grandfather, uncle, aunt, and numerous 'cousins'. The Bonilla Crime Family, d.b.a. Bonilla Services, Inc. and/or Bonilla Family Investments, L.L.C. is a multigenerational and broad based criminal enterprise affiliated with both Domestic and International Organized Crime. The Bonilla Crime Family is involved in interstate and international illegal firearms purchase, illegal smuggling and distribution of such firearms interstate and internationally. The Bonilla Crime Family is involved with the interstate and international manufacturing, smuggling, receiving, concealment, buying, selling, and otherwise dealing in a broad range of controlled substances and listed chemicals; the transportation, distribution and sale of multiple dangerous drugs and chemicals, as well as other contraband. The Bonilla's are engaged in the illegal smuggling, transportation, and 'safe' housing and employment of fugitive foreign nationals also involved in the international illegal gun and drug trade; illegal money laundering, obtaining fraudulent immigration documentation and their sale to such international fugitives, and such real estate properties described are used for those illegal purposes and were purchased with monies from such criminal enterprise.

3. Affiant has known of the business and personal relationship between the two principals, Steve Gartin and Bonilla Services, Inc., since its inception.

- a. I am witness to various lease/rental agreements and the payment made in satisfaction, in advance, for such agreements. I saw the collectible material, a collection of very desirable knives. I appraised them for Carlos Bonilla and, on several occasions subsequently, saw him offer various examples of the collection for sale/trade, sell them, and reserve the money/trade for them. As of my last contact with him, he still reserved a number of the knives to his own collection.
- b. I am witness to contracts between Carlos Bonilla and Steve Gartin concerning diverse business activities; internet sales, websites, computer services, antiques and collectibles exhibition and sale, security activity and training, training of associates of Carlos Bonilla, animal training, property development for 'tourism', construction labor, business consultation in the knife industry, development of influential performers and contacts, and specialty services such as CAD/CAM and product development and manufacturing

- c. Affiant is aware that 'Bonilla Services, Incorporated' is a sham. Bonilla Services, Inc. was never registered, never chartered, no articles of incorporation were ever filed in any jurisdiction.
4. Affiant has had business dealings with both men individually, and in association together.
 - a. Developing a martial arts program with an urban school and mountain training camp with world famous instructors.
 - b. Developing and training Carlos Bonilla as a trade show exhibitor.
 - c. Developing Carlos Bonilla's art, antique and collectibles collections for sale and exhibition.
 - d. Developing a production company for videography, periodical publishing, product design, development and distribution.
 - e. An association as a product accessory designer for Carlos Bonilla's prospective line of cutlery.
5. Affiant is aware by personal knowledge and eye witness that Steve Douglas, Gartin has provided to 'Bonilla Services, Inc.'; Arabella Tafoya Bonilla, Carlos Ivan Bonilla-Tafoya and Hector Bonilla-Tafoya services and materials on the promise of payment and the expectation of good faith dealings in contractual commitments whilst the paperwork was in review/revision.
6. Carlos Ivan Bonilla-Tafoya is the son of Arabella T. Bonilla, her Managing Agent and Heir Apparent in the Bonilla Crime Family, d.b.a. Bonilla Family Investments, L.L.C. and/or Bonilla Services, Inc. His criminal activities are the source for capital for 'Bonilla Services, Inc.', and that fact well known to his mother and his brother. I have witnessed Carlos Bonilla administer their interests; visit properties, engage and pay workmen, make contractual agreements for goods and services, purchase and authorize materials purchase, pay bills, collect receipts, perform work, oversee tools and supplies storage and maintenance, and report to Arabella and Hector in detail while delivering monies and receipts- every indication of his agency on behalf of his families' interests.
7. Hector Bonilla-Tafoya is the son of Arabella T. Bonilla, her acknowledged agent and close co-conspirator in the Bonilla Crime Family, d.b.a. Bonilla Family Investments, L.L.C. and Bonilla Services, Inc. I have met with Hector many times and discussed his family enterprise, his participation in Carlos Bonilla's criminal endeavors, his wealth and substance and it's criminal genesis. I have met with him alone, in the company of his family, with friends and business associates, with Steve Gartin, and in every instance and by every indication, he evidenced being fully familiar and engaged in his families' enterprises as a responsible enabler and beneficiary of. criminal proceeds.
8. Affiant believes, and on the basis of that informed belief, alleges that the process, by Steve Gartin, of trying to get paid for his good work, culminating in the demands to cure and subsequent lien filings would seem to be a proper and lawful attempt to receive payment for goods and services rendered and the substantial performance to the agreements and contracts made with the agents of Arabella T. Bonilla. I have spoken with Arabella Bonilla on a number of occasions; discussed Mr. Gartin, discussed her sons and their plans, discussed various business agreements, including as an associate, performed services for Mrs. Bonilla as an art and antiques appraiser and prospective broker for her fine goods. She was also aware of my association with the martial arts enterprise, the trade show business, and the prospective plans to develop a custom computer assembly facility.
9. Affiant believes, and on the basis of that informed belief, alleges that Arabella T. Bonilla is, and has always been, fully and completely conversant with the agreements made and the commitments made by her agents, Carlos Ivan Bonilla-Tafoya and Hector Bonilla-Tafoya; a full party to every agreement and all made with her full understanding and complete knowledge. She assembled material and submitted it to her lawyer for review.; ok'd some projects and rejected others on his advice and counsel. Subsequent to

her approval, work went forward or projects were abandoned, as administered by her business agent, Carlos Bonilla, and with the knowledge and support of her agent, Hector Bonilla.

10. Affiant is aware that Arabella T. Bonilla has been presented with all information concerning this dispute; both in hand and through her legal representative, Glen Roscoe Anstine II, Esquire, by hand delivery, and fax service. On several occasions, I discussed the delivery of contracts, business plans, supporting documentation and associated material, with Carlos Bonilla, and with Hector Bonilla and also in the company of both Carlos Bonilla and Steve Gartin, and also in the company of Hector Bonilla and Steve Gartin, and also in the presence of more peripheral figures who were employed by Carlos; ‘Dan’, ‘Paul’, and ‘Sean’.

11. Affiant is aware that Hector Bonilla-Tafoya destroyed a great deal of work product by the deliberate introduction of a virus into Steve Gartin’s computers. I am also aware of a great deal of physical material that was stolen by Hector Bonilla that was hard copy of various work product; posters, flyers, handbills, business plans, CAD/CAM blueprints and manufacturing schedules, HTML programming and associated material.

12. Affiant is aware that Glen Roscoe Anstine, II, Esq. was in possession or control of that, and other, material evidence, and that he was enjoined to conserve such material for production as evidence before a court of law.

13. I swear, under penalty of perjury, that this information is correct to the best of my knowledge and submitted without intent to mislead, deceive or otherwise misrepresent.

Affiant: **Charles Harry Clements**

State of Colorado)
) ss.
County of Adams)

Affirmed and Attested to before me by Charles Harry Clements on this Xth day of March, 2001.

Notary Public

My commission expires: