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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,
Plaintiff,

v.

HAROLD SMITH LEE, JR.(001),
INTERNATIONAL CARD AND GAME
PLAYERS ASSOCIATION, INC., an
Arizona nonprofit corporation (002),
(003),
MICHAEL ORLANDO (004),
Defendants.

Case No:

67 SGJ 60

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 3
Felony in violation of A.R.S. § 13-1003
(All Defendants)

**COUNT 2: ILLEGAL CONDUCT OF
AN ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312
(All Defendants)

**COUNT 3: PROMOTION OF
GAMBLING**, a Class 5 Felony, in violation
of A.R.S. § 13-3303 (A)(1)
(Defendants 003 and 004)

**COUNT 4: PROMOTION OF
GAMBLING**, a Class 5 Felony, in violation
of A.R.S. § 13-3303 (A)(2)
(Defendants 001 and 002)

COUNT 5: BENEFITING FROM GAMBLING, a Class 1 Misdemeanor, in violation of A.R.S. § 13-3304 (Defendants 003 and 004)

COUNT 6: BETTING AND WAGERING, a Class 1 Misdemeanor, in violation of A.R.S. § 13-3305 (Defendants 003 and 004)

The 67th Arizona State Grand Jury accuses HAROLD SMITH LEE, JR., INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC., and MICHAEL ORLANDO, charging on this 23rd day of August, 2010 that in or from Maricopa County, Arizona:

COUNT 1
(CONSPIRACY)

During a period of time beginning on or about on or between July 25, 2008 and ending on or about July 1, 2010, defendants HAROLD SMITH LEE, JR., INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.,

and MICHAEL ORLANDO with the intent to promote or aid the commission of an offense, each person agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense and one of the parties committed an overt act in furtherance of the offense, in violation of A.R. S. §§13-1003, 13-2312 (B), 13-2301, 13-3301, 13-3302, 13-3303, 13-3304, 13-3305, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-801 and 13-803.

Said conduct occurred when the defendants HAROLD SMITH LEE, JR., both acting individually and in an official capacity on behalf of INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC., INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC., and MICHAEL ORLANDO, with the intent to promote or aid in the commission of an offense, did agree

with one or more persons that at least one of them or another person would engage in conduct constituting the offense, namely **ILLEGAL CONDUCT OF AN ENTERPRISE**, by conspiring to set up and operate Ace High Card Room and Social Club d/b/a Ace High Arizona Card Room and Social Club.

COUNT 2

ILLEGAL CONDUCT OF AN ENTERPRISE

On or between July 2, 2008 and July 1, 2010, **HAROLD SMITH LEE, JR., INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.,**

and MICHAEL ORLANDO were employed by or associated with an enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that they knew was being conducted through racketeering, in violation of A.R.S. §§13-2312 (B), 13-2301, 13-3301, 13-3302, 13-3303, 13-3304, 13-3305, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-801 and 13-803.

Said conduct occurred when the defendants **HAROLD SMITH LEE, JR., INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.,**

and MICHAEL ORLANDO participated in an enterprise called Ace High Card Room and Social Club d/b/a Ace High Arizona Card Room and Social Club which conducted gambling for a benefit.

COUNT 3

PROMOTION OF GAMBLING

On or between July 2, 2008 and July 1, 2010, **and MICHAEL ORLANDO**, knowingly conducted, organized, managed, directed, supervised

or financed gambling for a benefit, in violation of A.R.S. §§ 13-3303(A)(1), 13-3301, 13-3302, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

Said conduct occurred when _____ and **MICHAEL ORLANDO** managed the Ace High Card Room and Social Club d/b/a Ace High Arizona Card Room and Social Club for a benefit.

COUNT 4

PROMOTION OF GAMBLING

On or between July 25, 2008 and July 1, 2010, **HAROLD SMITH LEE, JR. and INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.** knowingly furnished advice or assistance for the conduct, organization, management, direction, supervision or financing of gambling for a benefit, in violation of A.R.S. §§ 13-3303(A)(2), 13-3301, 13-3302, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-803.

Said conduct occurred when **HAROLD SMITH LEE, JR. and INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.** furnished advice or assistance to the Ace High Card Room and Social Club d/b/a Ace High Arizona Card Room and Social Club for a benefit.

COUNT 5

BENEFITING FROM GAMBLING

On about August 29, 2009, _____ and **MICHAEL ORLANDO**, knowingly obtained a benefit from gambling, in violation of A.R.S. §§ 13-3304(A), 13-3301, 13-3302, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-707 and 13-802.

Said conduct occurred when _____ and **MICHAEL ORLANDO**, through their enterprise Ace High Card Room and Social Club d/b/a Ace High Arizona Card

Room and Social Club, knowingly obtained a two-dollar "button fee" prior to the start of a hand of Texas Hold-Em.

COUNT 6

BETTING AND WAGERING

On or about August 29, 2009, **and MICHAEL ORLANDO**, engaged for a fee in the business of accepting, recording or registering any bet, purported bet, wager or purported wager, in violation of A.R.S. §§ 13-3305(A), 5-112, 13-3301, 13-3302, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-707 and 13-802.

Said conduct occurred when **and MICHAEL ORLANDO** engaged in the business of accepting bets, purported bets, wagers or purported wagers and received a fee as a result of this business operation.

The 67th Arizona State Grand Jury makes the following findings:

A. That at all times relevant to this indictment, Defendant **INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.** was a nonprofit corporation duly organized under the laws of the State of Arizona and doing business in Arizona under the name "ICGPA."

B. That at all times relevant to this Indictment, Defendant **HAROLD SMITH LEE, JR.** was a high managerial agent of **INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.** and the conduct attributed to **INTERNATIONAL CARD AND GAME PLAYERS ASSOCIATION, INC.** herein was authorized, solicited, commanded or recklessly tolerated by **HAROLD SMITH LEE, JR.** within the scope of his employment.

C. That, pursuant to A.R.S. § 21-425, the offenses described above were committed in Maricopa County, Arizona.