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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.

**ISKANDAR HALLAK (001)**, ✓  
(Counts 1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13)

**SAIF SIMON HALLAK (002)**,  
(Counts 1, 2, 4, 5, 8, 9, 10, 11, 12, 13)

Defendants.

Case No: CR2016-005881-001 ✓

79 SGJ 306

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY**, a Class 2  
Felony, in violation of A.R.S. § 13-1003

**COUNT 2: ILLEGALLY CONDUCTING  
AN ENTERPRISE**, a Class 3 Felony, in  
violation of A.R.S. § 13-2312(B)

**COUNTS 3, 4 & 6: SALE OR  
TRANSFER OF A DANGEROUS DRUG**,  
a Class 2 Felony, in violation of A.R.S. § 13-  
3407

**COUNTS 5 & 7: SALE OR TRANSFER  
OF A NARCOTIC DRUG**, a Class 2  
Felony, in violation of A.R.S. § 13-3408

**COUNTS 8 & 12: POSSESSION OF A  
DANGEROUS DRUG FOR SALE IN AN  
AMOUNT OVER THE STATUTORY  
THRESHOLD**, a Class 2 Felony, in  
violation of A.R.S. § 13-3407

**COUNTS 9 & 13: POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408

**COUNT 10: MANUFACTURE OF A DANGEROUS DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3407

**COUNT 11: POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A DANGEROUS DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3407(A)(3) and (B)(3)

The Arizona State Grand Jury accuses **ISKANDAR HALLAK** and **SAIF SIMON HALLAK**, charging on this 15<sup>th</sup> day of November 2016 that in or from Maricopa County, Arizona:

**COUNT 1**  
**CONSPIRACY**

On or between April 7, 2016 and June 2, 2016, **ISKANDAR HALLAK** and **SAIF SIMON HALLAK**, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **SALE OR TRANSFER OF A DANGEROUS DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3407;
- 2) **SALE OR TRANSFER OF A NARCOTIC DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 3) **POSSESSION OF A DANGEROUS DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3407;

- 4) **POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 5) **MANUFACTURE OF A DANGEROUS DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3407; and
- 6) **POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A DANGEROUS DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3407(A)(3) and (B)(3).

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-3407, 13-3408, 13-701, 13-702 and 13-801.

## COUNT 2

### ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between April 7, 2016 and June 2, 2016, **ISKANDAR HALLAK** and **SAIF SIMON HALLA**, defendants herein, employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which they knew was being conducted through racketeering.

B. The enterprise was a group of persons associated in fact, including but not limited to **ISKANDAR HALLAK** and **SAIF SIMON HALLAK**.

C. The racketeering included:

- 1) **SALE OR TRANSFER OF A DANGEROUS DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3407;
- 2) **SALE OR TRANSFER OF A NARCOTIC DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3408;

- 3) **POSSESSION OF A DANGEROUS DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3407;
- 4) **POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 5) **MANUFACTURE OF A DANGEROUS DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3407; and
- 6) **POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A DANGEROUS DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3407(A)(3) and (B)(3).

The racketeering included but was not limited to, the acts of racketeering described in Counts 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-3407, 13-3408, 13-701, 13-702, 13-801 and 13-811.

### COUNT 3

#### SALE OR TRANSFER OF A DANGEROUS DRUG

On or about April 13, 2016, **ISKANDAR HALLAK** knowingly sold or transferred a dangerous drug, namely: AB-PINACA, AB-CHMINACA (indazole-3-carboxamide) in violation of A.R.S. §§ 13-3407 (A)(7), 13-3407(D), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

### COUNT 4

#### SALE OR TRANSFER OF A DANGEROUS DRUG

On or about April 25, 2016, **SAIF SIMON HALLAK** knowingly sold or transferred a dangerous drug, namely: AB-PINACA, AB-CHMINACA (indazole-3-carboxamide), in violation of A.R.S. §§ 13-3407 (A)(7), 13-3407(D), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

**COUNT 5**

**SALE OR TRANSFER OF A NARCOTIC DRUG**

On or about April 25, 2016, SAIF SIMON HALLAK knowingly sold or transferred a narcotic drug, namely: Acetyl Fentanyl, in violation of A.R.S. §§ 13-3408 (A)(7), 13-3408(D), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

**COUNT 6**

**SALE OR TRANSFER OF A DANGEROUS DRUG**

On or about May 3, 2016, ISKANDAR HALLAK knowingly sold or transferred a dangerous drug, namely: AB-PINACA, AB-CHMINACA (indazole-3-carboxamide), in violation of A.R.S. §§ 13-3407 (A)(7), 13-3407(D), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

**COUNT 7**

**SALE OR TRANSFER OF A NARCOTIC DRUG**

On or about May 3, 2016, ISKANDAR HALLAK knowingly sold or transferred a narcotic drug, namely: Acetyl Fentanyl, in violation of A.R.S. §§ 13-3408 (A)(7), 13-3408(D), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

**COUNT 8**

**POSSESSION OF A DANGEROUS DRUG FOR SALE IN AN AMOUNT OVER THE  
STATUTORY THRESHOLD**

On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK knowingly possessed a dangerous drug for sale, namely: Spice, in an amount over the statutory threshold amount, to-wit: at 1308 W Michigan Ave., in violation of A.R.S. §§ 13-3407(D), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 9**

**POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE  
STATUTORY THRESHOLD**

On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK knowingly possessed a narcotic drug for sale, namely: Acetyl Fentanyl, at 1308 W Michigan Ave., in an amount over the statutory threshold amount, in violation of A.R.S. §§ 13-3408 (A)(2), 13-3408(D), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 10**

**MANUFACTURE OF A DANGEROUS DRUG**

On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK knowingly manufactured a dangerous drug, namely: AB-PINACA, fluoro-AMB (indazole-3-carboxamide), at 1308 W Michigan Ave., in violation of A.R.S. §§ 13-3407, 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-709.03 and 13-801.

**COUNT 11**

**POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE  
OF MANUFACTURING A DANGEROUS DRUG**

On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK knowingly possessed equipment or chemicals, or both, for the purpose of manufacturing a dangerous drug, namely: AB-PINACA, fluoro-AMB (indazole-3-carboxamide), at 1308 W Michigan Ave., in violation of A.R.S. §§ 13-3407(A)(3) and (B)(3), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 12

POSSESSION OF A DANGEROUS DRUG FOR SALE IN AN AMOUNT OVER THE  
STATUTORY THRESHOLD

On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK knowingly possessed a dangerous drug for sale, namely: AB-PINACA, fluoro-AMB (indazole-3-carboxamide), in an amount over the statutory threshold amount, to wit: at 6460 S Rural Rd., in violation of A.R.S. §§ 13-3407(D), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 13

POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE  
STATUTORY THRESHOLD

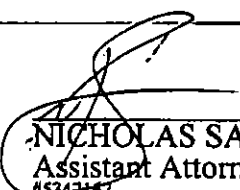
On or about June 2, 2016, ISKANDAR HALLAK and SAIF SIMON HALLAK, knowingly possessed a narcotic drug for sale, namely: Acetyl Fentanyl, in an amount over the statutory threshold amount, to wit: at 6460 S Rural Rd., in violation of A.R.S. §§ 13-3408 (A)(2), 13-3408(D), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

*True Bill*  
\_\_\_\_\_  
(A "True Bill")

Dated: 11-15-2016

  
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NICHOLAS SACCONI  
Assistant Attorney General  
45347167

  
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Foreperson of the State Grand Jury