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MICHAEL K. JEANES, CLERK
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DR # 2008-81385922 - PPD
East Phoenix Precinct
VACATE PRELIM

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA, RCC - DOWNTOWN**

STATE OF ARIZONA,
Plaintiff,

v.

JASON JOHN KELLER,
Defendant.

Case No: CR2008-161461

DIRECT COMPLAINT

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY TO
COMMIT PROMOTING PRISON
CONTRABAND, a Class 2 Felony, in
violation of A.R.S. § 13-1003;**

**COUNTS 2, 3 AND 4: PROMOTING
PRISON CONTRABAND, a Class 5
Felony, in violation of A.R.S. § 13-2505;**

**COUNTS 5, 6 AND 7: ASSISTING A
CRIMINAL STREET GANG, a Class 3
Felony, in violation of A.R.S. §§ 13-
2308(C)(F)**

IN-CUSTODY

The complainant herein personally appears and, being duly sworn, complains on information and belief against JASON JOHN KELLER, charging that in Maricopa County, Arizona:

COUNT 1:

Conspiracy to Commit Promoting Prison Contraband

In early to mid 2008, the defendant, JASON JOHN KELLER, with the intent to promote or aid the commission of the offense of promoting prison contraband, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense of promoting prison contraband and one of the parties committed an overt act in furtherance of the offense, in violation of A.R.S. §§ 13-1003, 13-2505, 13-2501, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 2 felony.

The conduct occurred when JASON JOHN KELLER conspired with other persons to smuggle heroin into the Fourth Avenue Jail and give it to an inmate or inmates.

COUNT 2:

Promoting Prison Contraband

On or about July 2008, the defendant, JASON JOHN KELLER, knowingly took contraband into a correctional facility or the grounds of such facility and/or knowingly conveyed contraband to any person confined in a correctional facility, in violation of A.R.S. §§ 13-2505, 13-2501, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 5 felony.

The conduct occurred when JASON JOHN KELLER smuggled a cell phone into the Fourth Avenue Jail and gave it to an inmate or inmates.

COUNT 3:

Promoting Prison Contraband

On or about August 13th, 2008, the defendant, JASON JOHN KELLER, knowingly took contraband into a correctional facility or the grounds of such facility and/or knowingly conveyed contraband to any person confined in a correctional facility, in violation of A.R.S. §§ 13-2505, 13-2501, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 5 felony.

The conduct occurred when JASON JOHN KELLER smuggled a cell phone charger into the Fourth Avenue Jail and gave it to an inmate or inmates.

COUNT 4:

Promoting Prison Contraband

In early to mid 2008, the defendant, JASON JOHN KELLER, knowingly took contraband into a correctional facility or the grounds of such facility and/or knowingly conveyed contraband to any person confined in a correctional facility, in violation of A.R.S. §§ 13-2505, 13-2501, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 2 felony.

The conduct occurred when JASON JOHN KELLER smuggled heroin into the Fourth Avenue Jail and gave it to an inmate or inmates.

COUNT 5:

Assisting a Criminal Street Gang

On or about mid 2008, the defendant, JASON JOHN KELLER, committed a felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang with the intent to promote, further or assist any criminal conduct by the gang, in violation of A.R.S. §§ 13-2308(C)(F), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 3 felony.

The conduct occurred when JASON JOHN KELLER assisted a criminal street gang by smuggling a cell phone into the Fourth Avenue Jail and giving it to an inmate or inmates that were members of the Mexican Mafia.

COUNT 6:

Assisting a Criminal Street Gang

On or about mid 2008, the defendant, JASON JOHN KELLER, committed a felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang with the intent to promote, further or assist any criminal conduct by the gang, in violation of A.R.S. §§ 13-2308(C)(F), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 3 felony.

The conduct occurred when JASON JOHN KELLER assisted a criminal street gang by smuggling a cell phone charger into the Fourth Avenue Jail and giving it to an inmate or inmates that were members of the Mexican Mafia.

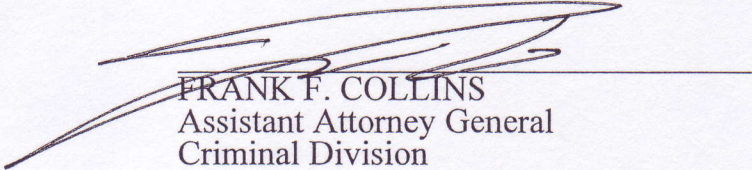
COUNT 7:

Assisting a Criminal Street Gang

On or about mid 2008, the defendant, JASON JOHN KELLER, committed a felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang with the intent to promote, further or assist any criminal conduct by the gang, in violation of A.R.S. §§ 13-2308(C)(F), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801, a class 3 felony.

The conduct occurred when JASON JOHN KELLER assisted a criminal street gang by smuggling heroin into the Fourth Avenue Jail and giving it to an inmate or inmates that were members of the Mexican Mafia.

TERRY GODDARD
ATTORNEY GENERAL



FRANK F. COLLINS
Assistant Attorney General
Criminal Division

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IN-CUSTODY

BOOKING # P467301

AGENCY: Phoenix Police Department
Detective Paul DeCoste, #6358, COMPLAINANT

SUBSCRIBED AND SWORN upon information and belief this ____ day of October,
2008.