

KRISTIN K. MAYES
Attorney General
Firm Bar No. 14000

CATIE KELLEY
State Bar No. 037066
Assistant Attorney General
BRETT HARAMES
State Bar No. 024701
2005 N. Central Avenue
Phoenix, Arizona 85004-1592
Telephone 602-542-3881
crmhcfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**RHONDA LATRICE RUSSELL A.K.A.
RHONDA RUSSELL SMITH (001),**
(Counts 1, 2, 3),

**CURTIS ANTHONY SMITH A.K.A.
MARVIN SMITH (002),**
(Counts 1, 2, 3),

MARVIN SMITH (003),
(Counts 1, 2, 3),

Defendants.

Case No:

92 SGJ 96

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

**COUNT 3: FRAUDULENT SCHEMES
AND ARTIFICES:** a Class 2 felony, in
violation of A.R.S. § 13-2310

The Arizona State Grand Jury accuses **RHONDA LATRICE RUSSELL A.K.A. RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH A.K.A. MARVIN SMITH,** and **MARVIN SMITH,** and, charging on this 24th day of April, 2023 that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between August 11, 2022, and August 26, 2022, **RHONDA LATRICE RUSSELL A.K.A. RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH A.K.A. MARVIN SMITH, and MARVIN SMITH**, 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) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310.

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 Count 3 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2010, 13-2310, 13-2301, 13-303, 13-301, 13-701, 13-702, and 13-801.

COUNT 2
ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between August 11, 2022, and August 26, 2022, **RHONDA LATRICE RUSSELL A.K.A. RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH A.K.A. MARVIN SMITH, and MARVIN SMITH**, 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 **RHONDA LATRICE RUSSELL A.K.A. RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH A.K.A. MARVIN SMITH, and MARVIN SMITH**,

C. The racketeering included:

1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310.

The racketeering included but was not limited to, the acts of racketeering described in Count 3 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, 13-2310, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

FRAUDULENT SCHEMES AND ARTIFICES

On or between August 11, 2022, and August 26, 2022, **RHONDA LATRICE RUSSELL A.K.A. RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH A.K.A. MARVIN SMITH, and MARVIN SMITH**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$435,727.89) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-804.

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

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

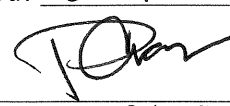


CATIE KELLEY
Assistant Attorney General
BRETT HARAMES

#11082176

A True Bill
(A "True Bill")

Dated: 04/24/2023



Foreperson of the State Grand Jury