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[REDACTED]

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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.

YUNIEL RODRIGUEZ LEON (001),
(Counts 1-42, 44-45)

[REDACTED]
Defendant.

Case No: **CR2023-155557-001**
CR2023-155557-002

93 SGJ 133

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class Three Felony, in violation of A.R.S. § 13-2312(B).

COUNT 2: CONSPIRACY, a Class Two Felony, in violation of A.R.S. § 13-1003(A).

COUNTS 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 15, 16, 17, 18, 19, 21, 23, 25, 27, 29, 31, 32, 33, 34, 35, 36, 39, 40, 41, 42, 43, 44 and 45: FRAUDULENT SCHEMES AND ARTIFICES, a Class Two Felony, in violation of A.R.S. § 13-2310(A).

COUNTS 10, 14, 20, 22, 24, 26, 28, 30, 37 and 38: TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, a Class Two Felony, in violation of A.R.S. § 13-2307.

The State Grand Jury accuses **YUNIEL RODRIGUEZ LEON (001)** and [REDACTED], charging on this 18th day of December, 2023 that in or from Maricopa County, Arizona:

COUNT ONE
ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

From on or October 25, 2023, and continuing through on or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise included, but was not limited to, Absolute Electronics, a partnership, and/or a group of persons associated in fact, including but not limited to **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] and others KNOWN and/or UNKNOWN.

The racketeering included:

- Forgery, in violation of A.R.S. § 13-2301(D)(4)(b)(iv)
- Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v)
- Trafficking in Stolen Property, in violation of A.R.S. § 13-2301(D)(4)(b)(xii)
- A scheme or artifice to defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx)
- Money laundering, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi)

The alleged racketeering includes, but is not limited to the Fraudulent Schemes and Artifices and Trafficking in Stolen Property described in this Indictment (which are incorporated herein by reference as if set forth in full), violation of A.R.S. §§ 13-2312(B) and (D), 13-2301, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

COUNT TWO
CONSPIRACY, A CLASS 2 FELONY

From on or about October 25, 2023, and continuing through on or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] [REDACTED] with the intent to promote or aid in the commission of an offense, did agree with one or more persons, including but not limited to, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] and/or others known and/or unknown, that at least one of them or another person would engage in conduct constituting the offenses of:

- **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310;
- **TRAFFICKING IN STOLEN PROPERTY**, in violation of A.R.S. § 13-2307;

in furtherance of this conspiracy and to effect the forgoing 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 through 43 of this indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2310, 13-2307, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

YUNIEL RODRIGUEZ LEON (001) and [REDACTED] [REDACTED] removed Wal-Mart gift cards from Wal-Mart stores across Arizona. The card information was then cloned onto blank cards, which were returned to the gift card cube in a Wal-Mart store, while the original cards were kept by the co-conspirators. **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] and/or other co-conspirators would then check the balance on the copy of the card they retained. Once money was loaded onto the card available for sale in Wal-Mart, the co-conspirators would use their copy of the card to withdraw the funds by making purchases.

COUNT THREE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 25, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 5190.

COUNT FOUR
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 25, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 2112.

COUNT FIVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 25, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards on a gift card cube and removing gift cards from gift card cubes at Wal-Mart # 2482.

COUNT SIX
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 25, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 2768.

COUNT SEVEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 2554.

COUNT EIGHT
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 5369.

COUNT NINE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards for purchases at Wal-Mart Store # 3604.

COUNT TEN
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE,
A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #3604, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT ELEVEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 3465.

COUNT TWELVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about October 29, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 6477.

COUNT THIRTEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Wal-Mart # 1746.

COUNT FOURTEEN
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE,
A CLASS TWO FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #1746, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT FIFTEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 3799.

COUNT SIXTEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310,

13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 2768.

COUNT SEVENTEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 5304.

COUNT EIGHTEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 1, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 5428.

COUNT NINETEEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 4, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Wal-Mart # 6477.

COUNT TWENTY
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE,
A CLASS TWO FELONY

On or about November 4, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #6477, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT TWENTY-ONE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 4, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Wal-Mart # 2512.

COUNT TWENTY-TWO
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS TWO
FELONY

On or about November 4, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #2512, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT TWENTY-THREE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 5, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 2512.

COUNT TWENTY-FOUR
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE,
A CLASS TWO FELONY

On or about November 5, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #2512, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT TWENTY-FIVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 5, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Wal-Mart # 6477.

COUNT TWENTY-SIX
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE,
A CLASS TWO FELONY

On or about November 5, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #6477, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT TWENTY-SEVEN
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 7, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Sam's Club Store # 6608.

COUNT TWENTY-EIGHT
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS TWO
FELONY

On or about November 7, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Sam's Club Store #6608, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT TWENTY-NINE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 8, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 6477.

COUNT THIRTY
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS TWO
FELONY

On or about November 8, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #6477, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT THIRTY-ONE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 9, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 2113.

COUNT THIRTY-TWO
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 9, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart Store # 5330.

COUNT THIRTY-THREE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 10, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Sam's Club # 6608.

COUNT THIRTY-FOUR
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 10, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Sam's Club # 6608.

COUNT THIRTY-FIVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 11, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

YUNIEL RODRIGUEZ LEON (001) placing cloned gift cards and removing stacks of unused gift cards from gift card cubes at Wal-Mart # 6477.

COUNT THIRTY-SIX
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 13, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310,

13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** using cloned gift cards to make purchases at Wal-Mart # 6477.

COUNT THIRTY-SEVEN
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS TWO
FELONY

On or about November 13, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #6477, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT THIRTY-EIGHT
TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS TWO
FELONY

On or about November 14, 2023, **YUNIEL RODRIGUEZ LEON (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of another that has been stolen, to wit: using cloned gift cards to make purchases at Wal-Mart #2512, in violation of A.R.S. §§ 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT THIRTY-NINE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about November 14, 2023, **YUNIEL RODRIGUEZ LEON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310,

13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 2512.

COUNT FORTY
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 1218.

COUNT FORTY-ONE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] placing cloned gift cards and

removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 5031.

COUNT FOURTY-TWO
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 4264.

COUNT FORTY-THREE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved [REDACTED] [REDACTED] placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 1325.

COUNT FORTY-FOUR
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 1612.

COUNT FORTY-FIVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or about December 1, 2023, **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

The fraudulent schemes and artifices involved **YUNIEL RODRIGUEZ LEON (001)** and/or [REDACTED] placing cloned gift cards and removing blank cards from the gift card cube and using cloned gift cards to make purchases at Wal-Mart # 5626.

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

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 12/18/23

Matthew McCray for
MATTHEW MCCRAY
Assistant Attorney General

[Signature]
Foreperson of the Grand Jury