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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.

**RHONDA LATRICE RUSSELL A.K.A.
RHONDA RUSSELL SMITH(001),**
*(Counts 1, 2, 3, 4, 5, 8, 9, 11, 12, 14, 15, 17,
18, 20, 21)*

CURTIS ANTHONY SMITH (002),
(Counts 1, 2, 3, 23, 24, 25)

ARIELL OLIVIA DIX (003),
(Counts 1, 2, 3)

**LEASA YVONNE CARTER A.K.A
LEASA SANDERS (004),**
(Counts 1, 2, 3)

LAWRENCE "LARRY" CARTER (005),
(Counts 1, 2, 3)

[REDACTED]
(006),
(Counts 4, 5, 6, 7)

KRISTAL LEA BLANTON (007),
(Counts 8, 9, 10)

Case No:

92 SGJ 45

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1, 4, 8, 11, 14, 17, 20:
CONSPIRACY,** Class 2 felonies, in
violation of A.R.S. § 13-1003

**COUNTS 2, 5, 9, 12, 15, 18, 21:
ILLEGALLY CONDUCTING AN
ENTERPRISE,** Class 3 felonies, in
violation of A.R.S. § 13-2312

**COUNTS 3, 6, 7, 10, 13, 16, 19, 22, 23:
FRAUDULENT SCHEMES AND
ARTIFICES:** Class 2 felonies, in violation
of A.R.S. § 13-2310

**COUNT 24: FAILURE TO REGISTER
AS A SEX OFFENDER AFTER
ENTERING MARICOPA COUNTY:** a
Class 4 felony, in violation of A.R.S. §§ 13-
3821 and 13-3824.

YVETTE DENISE BARNES (008),
(Counts 11, 12, 13)

TANA D. RAIKES (009),
(Counts 11, 12, 13)

KAMARA DENISE NASH (010),
(Counts 14, 15, 16)

MILISSA BAUGH WINSTON (011),
(Counts 17, 18, 19)

RITA NTUSA ANAGHO (012),
(Counts 20, 21, 22),

Defendants.

COUNT 25: FAILURE TO REGISTER AS A SEX OFFENDER AFTER CHANGING ADDRESS TO MARICOPA COUNTY: a Class 4 felony, in violation of A.R.S. §§ 13-3822, and 13-3824.

The Arizona State Grand Jury accuses **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH, ARIELL OLIVIA DIX, LEASA YVONNA CARTER, A.K.A. LEASA SANDERS, LAWRENCE “LARRY” CARTER, [REDACTED], [REDACTED], [REDACTED], KRISTAL LEA BLANTON, YVETTE DENISE BARNES, TANA D. RAIKES, KAMARA DENISE NASH, MILISSA BAUGH WINSTON, RITA NTUSA ANAGHO,** and, charging on this 15th day of March, 2023 that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between May 1, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH, ARIELL OLIVIA DIX, LEASA YVONNA CARTER, A.K.A. LEASA SANDERS,** and **LAWRENCE “LARRY” CARTER,** 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 May 1, 2020, and September 17, 2021 **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH, ARIELL OLIVIA DIX, LEASA YVONNA CARTER, A.K.A. LEASA SANDERS,** and **LAWRENCE “LARRY” CARTER** 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, ARIELL OLIVIA DIX, LEASA YVONNA CARTER, A.K.A. LEASA SANDERS,** and **LAWRENCE “LARRY” CARTER.**

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 May 1, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, CURTIS ANTHONY SMITH, ARIELL OLIVIA DIX, LEASA YVONNA CARTER, A.K.A. LEASA SANDERS,** and **LAWRENCE “LARRY” CARTER,** pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$10,059,933.36) 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.

COUNT 4

CONSPIRACY

On or between July 31, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH,** and [REDACTED], 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 6 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 5

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between about July 31, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and [REDACTED] [REDACTED] 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** and [REDACTED]

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 6 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 6

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 31, 2020, and September 17, 2021, [REDACTED] [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$171,405.41) 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.

COUNT 7

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 31, 2020, and September 28, 2020, [REDACTED] [REDACTED] pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$6,609.00) 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.

COUNT 8

CONSPIRACY

On or between August 4, 2020, and October 15, 2020, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and **KRISTAL LEA BLANTON**, 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 16 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 9

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between August 4, 2020, and October 15, 2020, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and **KRISTAL LEA BLANTON**,

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** and **KRISTAL LEA BLANTON**,

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 16 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 10

FRAUDULENT SCHEMES AND ARTIFICES

On or between August 4, 2020, and October 15, 2020, **KRISTAL LEA BLANTON**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$22,071.48) 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.

COUNT 11

CONSPIRACY

On or between November 23, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, YVETTE DENISE BARNES**, and **TANA D. RAIKES**, 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 10 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 12

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between November 23, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH, YVETTE DENISE BARNES**, and **TANA D. RAIKES**, 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, YVETTE DENISE BARNES**, and **TANA D. RAIKES**.

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 10 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 13

FRAUDULENT SCHEMES AND ARTIFICES

On or between November 23, 2020, and September 17, 2021, **YVETTE DENISE BARNES** and **TANA D. RAIKES**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$84,970.00) 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.

COUNT 14

CONSPIRACY

On or between December 3, 2020, and March 24, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH**, and **KAMARA DENISE NASH**, 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 11 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 15

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between December 3, 2020, and March 24, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and **KAMARA DENISE NASH**, 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** and **KAMARA DENISE NASH**.

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 12 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 16

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 3, 2020, and March 24, 2021, **KAMARA DENISE NASH**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$58,254.53) 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.

COUNT 17
CONSPIRACY

On or between July 20, 2020, and August 20, 2020, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH**, and **MILISSA BAUGH WINSTON**, 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 19 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 18
ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between July 20, 2020, and August 20, 2020, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and **MILISSA BAUGH WINSTON**, 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** and **MILISSA BAUGH WINSTON**.

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 19 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 19

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 20, 2020, and August 20, 2020, **MILISSA BAUGH WINSTON**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$5,000.00) 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.

COUNT 20

CONSPIRACY

On or between September 26, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH**, and **RITA NTUSA ANAGHO**, 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 22 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 21

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between September 26, 2020, and September 17, 2021, **RHONDA LATRICE RUSSELL A.K.A RHONDA RUSSELL SMITH** and **RITA NTUSA ANAGHO**, 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** and **RITA NTUSA ANAGHO**.

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 22 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 22

FRAUDULENT SCHEMES AND ARTIFICES

On or between September 26, 2020, and September 17, 2021, **RITA NTUSA ANAGHO**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: \$29,110.00) 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.

COUNT 23

FRAUDULENT SCHEMES AND ARTIFICES

On or between March 16, 2021, and continuing to the present date, **CURTIS ANTHONY SMITH**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: avoiding the burdens of registering as a sex offender in Arizona) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-3821, 13-822, 13-3824, 13-2301, 13-701, 13-702, 13-801, and 13-804.

COUNT 24

**FAILURE TO REGISTER AS A SEX OFFENDER AFTER ENTERING
MARCIOPA COUNTY**

On or between March 16, 2021, and continuing to the present date, **CURTIS ANTHONY SMITH**, a person required to register as a sex offender, failed to register with the sheriff of Maricopa County as a sex offender seventy-two hours after entering and remaining for at least seventy-two hours in Maricopa County, in violation of A.R.S. §§ 13-3821, 13-3824, 13-701, 13-702, 13-801, and 13-804.

COUNT 25

**FAILURE TO REGISTER AS A SEX OFFENDER AFTER CHANGING
ADDRESS TO MARCIOPA COUNTY**

On or between March 16, 2021, and continuing to the present date, **CURTIS ANTHONY SMITH**, a person required to register as a sex offender, failed to inform the

sheriff of Maricopa County of his change in address and residence, in in violation of A.R.S. §§ 13-3822, 13-3824, 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
#11005972

A True Bill
(A "True Bill")

Dated: 03/15/2023


Foreperson of the State Grand Jury