

25 JAN 21 PM 2:30

KRISTIN K. MAYES
Attorney General
Firm State Bar No 14000

ALEXANDRA E SWEENEY
State Bar No 035576
Assistant Attorney General
2005 N Central Avenue
Phoenix, AZ 85004-1592
Telephone (602) 542-3881
CRMDrug@azag.gov
Attorney for the Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v

(001),
(Counts 1, 2, 3, 4, 5, 6, 7, 8 & 9)

✓ AARON RAYMOND BRADFORD
(002),
(Counts 1, 2, 10, 11, 12, 13, 14, 15, 16,
17 18 & 19)

Defendants

Cause Nos CR2025-101451-001
CR2025-101451-002✓

INDICTMENT

95 SGJ 138

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) and (D)

COUNT 3: POSSESSION OF
MARIJUANA FOR SALE, a Class 4
Felony, in violation of A.R.S. § 13-
3405(A)(2)

COUNT 4: POSSESSION OF A
DANGEROUS DRUG FOR SALE, a
Class 2 Felony, in violation of A.R.S. § 13-
3407(A)(2)

COUNT 5: POSSESSION OF A DANGEROUS DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(2)

COUNT 6: POSSESSION OF A DANGEROUS DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(2)

COUNT 7: POSSESSION OF A DANGEROUS DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(2)

COUNT 8: POSSESSION OF A NARCOTIC DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(2)

COUNT 9: POSSESSION OF A NARCOTIC DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(2)

COUNT 10: 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(A)(2)

COUNT 11: 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(A)(2)

COUNT 12: POSSESSION OF A NARCOTIC DRUG FOR SALE, a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(2)

COUNT 13: POSSESSION OF A DANGEROUS DRUG FOR SALE, a Class 2 Felony, in violation of A R S § 13-3407(A)(2)

COUNT 14: 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(A)(2)

COUNT 15: 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(A)(2)

COUNT 16: POSSESSION OF A NARCOTIC DRUG FOR SALE, a Class 2 Felony, in violation of A.R S. § 13-3408(A)(2)

COUNT 17: 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(A)(2)

COUNT 18: POSSESSION OF MARIJUANA FOR SALE, a Class 3 Felony, in violation of A.R S § 13-3405(A)(2)

COUNT 19: MONEY LAUNDERING IN THE SECOND DEGREE, a Class 3 Felony, in violation of A R.S § 13-2317(B)(1)

The State Grand Jury accuses **and AARON RAYMOND BRADFORD**, charging on this 21st day of January, 2025 that in MARICOPA County, Arizona

COUNT 1
CONSPIRACY

On or between November 1, 2024 and January 14, 2025,

AND AARON RAYMOND BRADFORD 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) Possession of Narcotic Drugs for Sale, in violation of A.R.S. § 13-3408
- 2) Possession of Dangerous Drugs for Sale, in violation of A.R.S. § 13-3407,
- 3) Possession of Marijuana for Sale, in violation of A.R.S. § 13-3405, and
- 4) Money Laundering, in violation of A.R.S. § 13-2317

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 3-19 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 2
ILLEGALLY CONDUCTING AN ENTERPRISE

On or between November 1, 2024 and January 14, 2025,

AND AARON RAYMOND BRADFORD were employed by or associated with an enterprise and did knowingly conduct the 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. The enterprise(s) included, but were not limited to a group of persons associated in fact, including but not

limited to Joshua Anthony Lubischer and Aaron Raymond Bradford, and others known and/or unknown

The racketeering included Prohibited drugs, marijuana or other prohibited chemicals or substances, in violation of A R S § 13-2301(D)(4)(b)(xi) which were sold and/or advertised to be sold on Instagram, a Meta Platforms, Inc company and Telegram, a Telegram Messenger Inc company, and Money laundering, in violation of A R S § 13-2301(D)(4)(b)(xxvi)

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in 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 3

POSSESSION OF MARIJUANA FOR SALE

On or about January 9, 2025, knowingly did possess for sale an amount of marijuana having a weight of less than two pounds, in violation of A R S §§ 13-3401, 13-3405(A)(2), 13-3418, 13-701, 13-702, and 13-801

COUNT 4

POSSESSION OF A DANGEROUS DRUG FOR SALE

On or about January 9, 2025, knowingly possessed a dangerous drug for sale, to wit. psilocybin, in violation of A R S §§ 13-3407(A)(2), 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 5

POSSESSION OF A DANGEROUS DRUG FOR SALE

On or about January 9, 2025, knowingly possessed a dangerous drug for sale, to wit alprazolam, in violation of A R S. §§ 13-3407(A)(2), 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 6

POSSESSION OF A DANGEROUS DRUG FOR SALE

On or about January 9, 2025, knowingly
possessed a dangerous drug for sale, to wit: Lysergic Acid Diethylamide (LSD), in
violation of A.R.S. §§ 13-3407(A)(2), 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 7

POSSESSION OF A DANGEROUS DRUG FOR SALE

On or about January 9, 2025, knowingly
possessed a dangerous drug for sale, to wit: Ecstasy, in violation of A.R.S. §§ 13-
3407(A)(2), 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 8

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about January 9, 2025, knowingly
possessed a narcotic drug for sale, to wit: THC vape cartridges, in violation of A.R.S. §§
13-3407(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-
811

COUNT 9

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about January 9, 2025, knowingly
possessed a narcotic drug for sale, to wit: cannabis wax, in violation of A.R.S. §§ 13-
3407(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 10

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

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly
possessed a narcotic drug for sale, in an amount over the statutory threshold, to wit: THC 1

gram vape cartridges, in violation of A R S §§ 13-3408(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 11

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

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a narcotic drug for sale, in an amount over the statutory threshold, to wit: THC 2 gram vape cartridges, in violation of A R S §§ 13-3408(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 12

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a narcotic drug for sale, to wit: THC edibles, in violation of A R S. §§ 13-3407(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 13

POSSESSION OF A DANGEROUS DRUG FOR SALE, A CLASS 2 FELONY

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a dangerous drug for sale, to wit: ecstasy pills, in violation of A R S §§ 13-3407(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 14

**POSSESSION OF A DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER
THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a dangerous drug for sale, in an amount over the statutory threshold, to wit

lysergic acid diethylamide (LSD) gel tabs, in violation of A R S. §§ 13-3407(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 15

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

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a narcotic drug for sale, in an amount over the statutory threshold, to wit, cannabis resin, in violation of A R S §§ 13-3408(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 16

POSSESSION OF A NARCOTIC DRUG FOR SALE, A CLASS 2 FELONY

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a narcotic drug for sale, to wit powdered cannabis mix, in violation of A R S §§ 13-3407(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 17

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

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly possessed a dangerous drug for sale, to wit psilocybin, in violation of A.R.S §§ 13-3407(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 18

POSSESSION OF MARIJUANA FOR SALE

On or about January 14, 2025, AARON RAYMOND BRADFORD knowingly did possess for sale an amount of marijuana having a weight of at least two pounds but less

than four pounds, having a weight or value which exceeds the statutory threshold amount, in violation of A R S §§ 13-3401, 13-3405(A)(2), 13-3418, {{13-301, 13-302, 13-303, 13-304,}} 13-701, 13-702, and 13-801

COUNT 19

MONEY LAUNDERING IN THE SECOND DEGREE

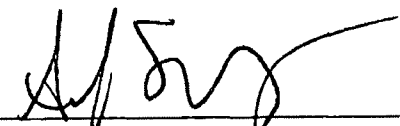
On or about January 14, 2025, AARON RAYMOND BRADFORD knowing or having reason to know that U S currency was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A R S §§ 13-2317, 13-701, 13-702, and 13-801

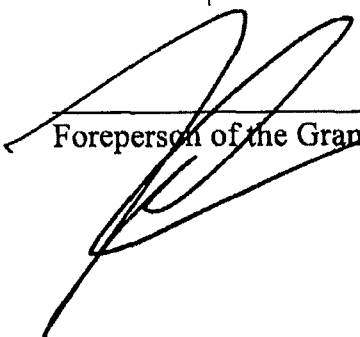
Pursuant to A.R S § 21-425, the Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona

A "True Bill"
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated. 1/21/2025


ALEXANDRA E SWEENEY
Assistant Attorney General


Foreperson of the Grand Jury