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SUPERIOR COURT
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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

**MICHAEL-DAVID TYCOON HALL
(001),**

Defendant

Cause No. **CR2025-111567-001**

96 SGJ 24

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(B) and (D)

**COUNT 3: 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 4: MARIJUANA POSSESS
FOR SALE – LESS THAN 2 POUNDS**, a
Class 4 Felony, in violation of A R S § 13-
3405(A)(2), (B)(4)

**COUNT 5: MISCONDUCT
INVOLVING WEAPONS, a Class 4
Felony, in violation of A R S § 13-
3102(A)(8)**

The State Grand Jury accuses **MICHAEL-DAVID TYCOON HALL**, charging on this 24th day of March, 2025 that in or from Maricopa County, Arizona

COUNT 1
CONSPIRACY

On or between about February 15, 2025 and March 11, 2025, **MICHAEL-DAVID TYCOON HALL** defendant 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 A NARCOTIC DRUG FOR SALE**, in violation of A R S § 13-3408; and
- 2) **MARIJUANA POSSESS FOR SALE – LESS THAN 2 POUNDS**, in violation of A.R.S. § 13-3405.

In furtherance of this conspiracy and to effect the foregoing objects thereof, this defendant and his co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 3 and 4 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 about February 15, 2025 and March 11, 2025, **MICHAEL-DAVID TYCOON HALL** was 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 he knew was being conducted through racketeering. The enterprise(s) included, but were not limited to **MICHAEL-DAVID TYCOON HALL**, 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 Snapchat (Snap Inc.), Telegram Messenger (Telegram FZ, LLC), Instagram (Meta Platforms, Inc) and Potato (Potato mobile App Ltd)

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

On or about March 11, 2025, **MICHAEL-DAVID TYCOON HALL**, knowingly possessed a narcotic drug for sale, in an amount over the statutory threshold, to wit cannabis (166 grams), in violation of A.R.S §§ 13-3408(A)(2), 13-3401(36), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811

COUNT 4

MARIJUANA POSSESS FOR SALE – LESS THAN 2 POUNDS

On or about March 11, 2025, **MICHAEL-DAVID TYCOON HALL** knowingly did possess for sale an amount of marijuana having a weight of less than two pounds (28 35 grams), in violation of A R S. §§ 13-3401, 13-3405(A)(2), (B)(4), 13-3418, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

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COUNT 5

MISCONDUCT INVOLVING WEAPONS

On or about March 11, 2025, **MICHAEL-DAVID TYCOON HALL** knowingly did use or possess a semi-automatic Glock handgun, a deadly weapon, during the commission of a felony included in Chapter 34 of Title 13, a felony, in violation of A R S §§ 13-3101, 13-3102, 13-3401, 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

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated 3-24-25

Nichole J. Galusha
NICHOLE J. GALUSHA
Assistant Attorney General

Maura Denny
Foreperson of the Grand Jury