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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.

BOBBY JOHN HERRERA,
Defendant.

Case No:

64 SGJ 40

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310

COUNT 2: MONEY LAUNDERING, a Class 3 Felony, in violation of 13-2317

COUNT 3: ILLEGAL CONTROL OF AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(A)

COUNTS 4-8: THEFT, Class 5 Felonies, in violation of A.R.S. § 13-1802(A)(1)

COUNT 9: THEFT, a Class 6 Felony, in violation of A.R.S. § 13-1802(A)(1)

The Arizona State Grand Jury accuses, defendant, BOBBY JOHN HERRERA, charging on this 22nd day of December, 2008 that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

Between the approximate dates of October 1, 2008 and November 14, 2008, defendant, BOBBY JOHN HERRERA, pursuant to scheme or artifice to defraud, knowingly obtained a benefit from Marie Chambers, Theresa Korkosz, John Korkosz, Ryszard Lewicki, Halina Lewicka, Voytek Dub, Tadeusz Maznio, Krystyna Maznio, and Lindsey Mae Semino, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 2

MONEY LAUNDERING

Between the approximate dates of October 1, 2008 and November 14, 2008, defendant, BOBBY JOHN HERRERA, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-702.01.

COUNT 3

ILLEGAL CONTROL OF AN ENTERPRISE

Between the approximate dates of October 1, 2008 and November 14, 2008, defendant, BOBBY JOHN HERRERA, through racketeering or its proceeds, knowingly acquired or maintained, by investment or otherwise, control of any enterprise, in violation of A.R.S. §§13-2312(A), 13-2301(D), 13-701, 13-702, 13-702.01 and 13-801.

COUNT 4

THEFT

On or about October 1, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Theresa Korkosz's funds and John Korkosz's funds, of a value of \$1,000 or more but less than \$2,000, with the intent to deprive Theresa Korkosz and John Korkosz of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 5

THEFT

On or about October 20, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Voytek Dub's funds, of a value of \$1,000 or more but less than \$2,000, with the intent to deprive Voytek Dub of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 6

THEFT

On or about November 14, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Marie Chambers' funds, of a value of \$1,000 or more but less than \$2,000, with the intent to deprive Marie Chambers of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 7

THEFT

On or about October 23, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Tadeusz Maznio's funds and Krystyna Maznio's funds, of a value of \$1,000 or more but less than \$2,000, with the intent to deprive Tadeusz Maznio and Krystyna Maznio of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 8

THEFT

On or about November 12, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Lindsey Mae Semino's funds, of a value of \$1,000 or more but less than \$2,000, with the intent to deprive Lindsey Mae Semino of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 9

THEFT

On or about October 30, 2008, defendant, BOBBY JOHN HERRERA, knowingly controlled Ryszard Lewicki's funds and Halina Lewicka's funds, of a value of \$250 or more but less than \$1,000, with the intent to deprive Ryszard Lewicki and Halina Lewicka of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

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

(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

ANDREI CHERNY
Assistant Attorney General
PHX-#361157-v1

Foreperson of the State Grand Jury