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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.

PERRY LEE HESTER (001),
(Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12,
13, 14, 15, 16)

BRANDON LEE HESTER (002),
(Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12,
17, 39, 40)

JAMES ALLAN DONALDSON (003),
(Counts 1, 3, 7, 8, 9, 10, 11, 18, 19, 20, 21,
22, 23, 24, 25, 26, 27)

**CHRISTOPHER NEIL RAFFERTY
(004)**,
(Counts 1, 3, 7, 8, 9, 10, 11, 28, 29, 30)

**CHRISTOPHER YANCY MARTIN
(005)**,
(Counts 1, 3, 5, 6)

(006),
(Counts 1, 3, 5, 6)

(007),
(Counts 1, 3, 7, 8, 9, 10, 11, 31, 32, 33, 34,
35, 36, 37, 38)

Case No: CR2016-118424-001 DT ✓
CR2016-118424-002 DT
CR2016-118424-003 DT
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CR2016-118424-007 DT
CR2016-118424-008 DT
CR2016-118424-009 DT
CR2016-118424-010 DT
CR2016-118424-011 DT

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INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. § 13-1003

**COUNT 2: ILLEGAL CONTROL OF AN
ENTERPRISE**, a Class 3 Felony, in violation
of A.R.S. § 13-2312(A)

**COUNT 3: ILLEGALLY CONDUCTING
AN ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312(B)

**COUNT 4: FRAUDULENT SCHEMES
AND ARTIFICES**, a Class 2 Felony, in
violation of A.R.S. § 13-2310

(008),
(Counts 1, 3, 7, 8, 9, 10, 11, 39, 40, 41)

(009),
(Counts 1, 3, 7, 8, 9, 10, 11, 42, 43, 44)

(010),
(Counts 1, 3, 7, 8, 9, 10, 11, 45, 46, 47)

(011),
(Counts 1, 2, 3, 4, 7, 8, 9, 10, 11)

Defendants.

COUNT 5: TRANSPORTATION FOR SALE, TRANSFER OR SALE OF NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3408

COUNTS 6, 12, 14, 19, 28, 33, 40, 43 & 46: MONEY LAUNDERING, a Class 3 Felony, in violation of A.R.S. § 13-2317

COUNT 7: POSSESSION OF MARIJUANA FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3405

COUNTS 8 & 39: PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 3 Felony, in violation of A.R.S. § 13-3405

COUNT 9: 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

COUNT 10: MANUFACTURE OF A NARCOTIC DRUG, a class 2 felony, in violation of A.R.S. §13-3408

COUNT 11: POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A NARCOTIC DRUG, a Class 3 Felony, in violation of A.R.S. §§ 13-3408(A)(3) and (B)(3)

COUNTS 13, 18, 31, 42 & 45: POSSESSION OF MARIJUANA FOR SALE, a Class 4 Felony, in violation of A.R.S. § 13-3405 (A)(2),(B)(4), (C)

COUNTS 15, 16, 21, 22, 23, 24, 25, 26, 27, 29, 30, 34, 35, 36, 37, 38 & 41: MISCONDUCT INVOLVING WEAPONS, a Class 4 Felony, in violation of A.R.S. § 13-3102(A)(8)

**COUNTS 17, 20, 32, 44 & 47:
POSSESSION OF A NARCOTIC DRUG, a
Class 4 Felony, in violation of A.R.S. § 13-
3408**

The Arizona State Grand Jury accuses **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY, CHRISTOPHER YANCY MARTIN,**

charging on this 25th day of April, 2016 that in
or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between December 1, 2015 and April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY, CHRISTOPHER YANCY MARTIN,**

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**, a Class 2 Felony, in violation of A.R.S. § 13-2310;
- 2) **TRANSPORTATION FOR SALE, TRANSFER OR SALE OF NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 3) **MONEY LAUNDERING**, a Class 3 Felony, in violation of A.R.S. § 13-2317;
- 4) **POSSESSION OF MARIJUANA FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3405;

- 5) **PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 3 Felony, in violation of A.R.S. § 13-3405;
- 6) **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;
- 7) **MANUFACTURE OF A NARCOTIC DRUG**, a class 2 felony, in violation of A.R.S. §13-3408;
- 8) **POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A NARCOTIC DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3408(A)(3) and (B)(3); and
- 9) **POSSESSION OF MARIJUANA FOR SALE**, a Class 4 Felony, in violation of A.R.S. § 13-3405 (A)(2),(B)(4), (C).

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 4-14, 18, 19, 31, 33, 39, 40, 42, 43, 45 and 46 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, 13-2317, 13-3408, 13-3405, 13-701, 13-702 and 13-801.

COUNT 2

ILLEGAL CONTROL OF AN ENTERPRISE

A. On or between December 1, 2015 and April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER** and _____ through racketeering or its proceeds, knowingly acquired or maintained, by investment or otherwise, control of any enterprise.

B. The enterprise was a group of persons associated in fact, including but not limited to **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY, CHRISTOPHER YANCY MARTIN,**

C. The racketeering included:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310;
- 2) **TRANSPORTATION FOR SALE, TRANSFER OR SALE OF NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 3) **MONEY LAUNDERING**, a Class 3 Felony, in violation of A.R.S. § 13-2317;
- 4) **POSSESSION OF MARIJUANA FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3405;
- 5) **PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 3 Felony, in violation of A.R.S. § 13-3405;
- 6) **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;
- 7) **MANUFACTURE OF A NARCOTIC DRUG**, a class 2 felony, in violation of A.R.S. §13-3408;
- 8) **POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A NARCOTIC DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3408(A)(3) and (B)(3); and
- 9) **POSSESSION OF MARIJUANA FOR SALE**, a Class 4 Felony, in violation of A.R.S. § 13-3405 (A)(2),(B)(4), (C).

The racketeering included but was not limited to, the acts of racketeering described in Counts 4-14, 18, 19, 31, 33, 39, 40, 42, 43, 45 and 46 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(A), 13-2301, 13, 2310, 13-3408, 13-2317, 13-3405, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between December 1, 2015 and April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY, CHRISTOPHER YANCY MARTIN,**

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 **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY, CHRISTOPHER YANCY MARTIN,**

C. The racketeering included:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310;
- 2) **TRANSPORTATION FOR SALE, TRANSFER OR SALE OF NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3408;
- 3) **MONEY LAUNDERING**, a Class 3 Felony, in violation of A.R.S. § 13-2317;
- 4) **POSSESSION OF MARIJUANA FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 2 Felony, in violation of A.R.S. § 13-3405;
- 5) **PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, a Class 3 Felony, in violation of A.R.S. § 13-3405;

- 6) **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;
- 7) **MANUFACTURE OF A NARCOTIC DRUG**, a class 2 felony, in violation of A.R.S. §13-3408;
- 8) **POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE OF MANUFACTURING A NARCOTIC DRUG**, a Class 3 Felony, in violation of A.R.S. §§ 13-3408(A)(3) and (B)(3); and
- 9) **POSSESSION OF MARIJUANA FOR SALE**, a Class 4 Felony, in violation of A.R.S. § 13-3405 (A)(2),(B)(4), (C).

The racketeering included but was not limited to, the acts of racketeering described in Counts 4-14, 18, 19, 31, 33, 39, 40, 42, 43, 45 and 46 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, 13-3408, 13-2317, 13-3405, 13-701, 13-702, 13-801 and 13-811.

COUNT 4

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 1, 2015 and April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER** and _____ pursuant to scheme or artifice to defraud, knowingly obtained a benefit by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 5

TRANSPORTATION FOR SALE, TRANSFER OR SALE OF NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about February 17, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, CHRISTOPHER YANCY MARTIN** and _____ knowingly

transported a narcotic drug for sale, transferred a narcotic drug, or sola a narcotic drug, Cannabis, in an amount over the statutory threshold amount, in violation of A.R.S. §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 6

MONEY LAUNDERING

On or about February 17, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, CHRISTOPHER YANCY MARTIN** and 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 and 13-702.

COUNT 7

POSSESSION OF MARIJUANA FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY,** and , knowingly possessed marijuana for sale, in an amount over the statutory threshold and more than four pounds, to wit: at 35 S. 40th Street, in violation of A.R.S. §§ 13-3405 (A)(2), 13-3401, 13-3405 (B) (6), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 8

**PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY
THRESHOLD**

On or about April 19, 2016, PERRY LEE HESTER, BRANDON LEE HESTER,
JAMES ALLAN DONALDSON; CHRISTOPHER NEIL RAFFERTY,

and knowingly produced marijuana in an amount over the
statutory threshold of more than four pounds, to wit: at 35 S. 40th Street, in violation of A.R.S.
§§ 13-3405(A)(3),(B)(9), 13-3401, 13-301; 13-302; 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 9

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

On or about April 19, 2016, PERRY LEE HESTER, BRANDON LEE HESTER,
JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY,

and knowingly possessed a narcotic drug for sale, namely:
Cannabis, in an amount over the statutory threshold amount, to wit: at 35 S. 40th Street, in
violation of A.R.S. §§ 13-3408 (A)(2), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304,
13-701, 13-702 and 13-801.

COUNT 10

MANUFACTURE OF A NARCOTIC DRUG

On or about April 19, 2016, PERRY LEE HESTER, BRANDON LEE HESTER,
JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY,

and knowingly manufactured a narcotic drug, namely: Cannabis,

to wit: at 35 S. 40th Street, in violation of A.R.S. §§ 13-3408(A)(4), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 11

**POSSESSION OF EQUIPMENT OR CHEMICALS, OR BOTH, FOR THE PURPOSE
OF MANUFACTURING A NARCOTIC DRUG**

On or about April 19, 2016, **PERRY LEE HESTER, BRANDON LEE HESTER, JAMES ALLAN DONALDSON, CHRISTOPHER NEIL RAFFERTY,**

and knowingly possessed equipment or chemicals, or both, for the purpose of manufacturing a narcotic drug, namely: Cannabis, to wit: at 35 S. 40th Street, in violation of A.R.S. §§13-3408(A)(3) and (B)(3), 13-3401, 13-701, 13-301, 13-302, 13-303, 13-304, 13-702, 13-702.01 and 13-801.

COUNT 12

MONEY LAUNDERING

On or between April 19, 2016, **PERRY LEE HESTER** and **BRANDON LEE HESTER** 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 to wit: at 35 S. 40th Street, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702.

COUNT 13

POSSESSION OF MARIJUANA FOR SALE

On or about April 19, 2016, **PERRY LEE HESTER** knowingly possessed marijuana for sale, having a weight of less than two pounds, to wit: at 12188 E. Saquaro Drive, in violation of A.R.S. §§ 13-3405(A)(2), (B)(4), (C), 13-3401, 13-701, 13-702 and 13-801.

COUNT 14

MONEY LAUNDERING

On or about April 19, 2016, **PERRY LEE HESTER** 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, to wit: at 12188 E. Saquaro Drive, in violation of A.R.S. §§ 13-2317 and 13-702.

COUNT 15

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, **PERRY LEE HESTER** knowingly used or possessed a deadly weapon, namely: a Walther handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 12188 E. Saquaro Drive, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 16

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, **PERRY LEE HESTER** knowingly used or possessed a deadly weapon, namely: a Beretta handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 12188 E. Saquaro Drive, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 17

POSSESSION OF A NARCOTIC DRUG

On or about April 19, 2016, **BRANDON LEE HESTER** knowingly possessed a narcotic drug, namely: Cannabis, to wit: at 17839 N. 49th Avenue, in violation of A.R.S. §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801.

COUNT 18

POSSESSION OF MARIJUANA FOR SALE

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly possessed marijuana for sale, having a weight of less than two pounds, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3405(A)(2), (B)(4), (C), 13-3401, 13-701, 13-702 and 13-801.

COUNT 19

MONEY LAUNDERING

On or about April 19, 2016, JAMES ALLAN DONALDSON 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, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702.

COUNT 20

POSSESSION OF A NARCOTIC DRUG

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly possessed a narcotic drug, namely: Cannabis, to wit: at 9019 N. Broken Bow Avenue, in violation of A.R.S. §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801.

COUNT 21

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a .38 Revolver, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 22

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a .32 Revolver, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 23

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a .357 Revolver, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 24

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a .22 Rifle, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 25

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a Springfield Rifle, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at

9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 26

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a 20 Gauge Shotgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 27

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, JAMES ALLAN DONALDSON knowingly used or possessed a deadly weapon, namely: a 870 shotgun during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 9019 N. Broken Bow, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 28

MONEY LAUNDERING

On or between April 19, 2016, CHRISTOPHER NEIL RAFFERTY 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, to wit: at 540 E. Rose Lane, Unit #2, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702.

COUNT 29

MISCONDUCT INVOLVING WEAPONS

On or between April 19, 2016, **CHRISTOPHER NEIL RAFFERTY** knowingly used or possessed a deadly weapon, namely: a .25 handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 540 E. Rose Lane, Unit #2, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 30

MISCONDUCT INVOLVING WEAPONS

On or between April 19, 2016, **CHRISTOPHER NEIL RAFFERTY** knowingly used or possessed a deadly weapon, namely: a Winchester Rifle, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 540 E. Rose Lane, Unit #2, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 31

POSSESSION OF MARIJUANA FOR SALE

On or about April 19, 2016, knowingly possessed marijuana for sale, having a weight of less than two pounds, to wit: at 2302 N Central Ave, #301, in violation of A.R.S. §§ 13-3405(A)(2), (B)(4), (C), 13-3401, 13-701, 13-702 and 13-801.

COUNT 32

POSSESSION OF A NARCOTIC DRUG

On or about April 19, 2016, knowingly possessed a narcotic drug, namely: Cannabis, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801.

COUNT 33

MONEY LAUNDERING

On or between April 19, 2016, _____ 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, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702.

COUNT 34

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, _____ knowingly used or possessed a deadly weapon, namely: a Smith and Wesson, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 35

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, _____ knowingly used or possessed a deadly weapon, namely: a Glock Handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

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COUNT 36

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, knowingly used or possessed a deadly weapon, namely: a Mossberg shotgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 37

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, knowingly used or possessed a deadly weapon, namely: a Bushmaster Rifle, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

COUNT 38

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, knowingly used or possessed a deadly weapon, namely: a Springfield Rifle, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 2302 N. Central Avenue, #301, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

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COUNT 39

PRODUCTION OF MARIJUANA IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about April 19, 2016, **BRANDON LEE HESTER** and knowingly produced marijuana in an amount over the statutory threshold of more than four pounds, to wit: at 16312 E. Gamble Lane, in violation of A.R.S. §§ 13-3405(A)(3),(B)(9), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 40

MONEY LAUNDERING

On or about April 19, 2016, **BRANDON LEE HESTER** and 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, to wit: at 16312 E. Gamble Lane, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702.

COUNT 41

MISCONDUCT INVOLVING WEAPONS

On or about April 19, 2016, knowingly used or possessed a deadly weapon, namely: a Ruger handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, to wit: at 16312 E. Gamble Lane, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

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COUNT 42

POSSESSION OF MARIJUANA FOR SALE

On or about April 19, 2016, knowingly possessed marijuana for sale, having a weight of less than two pounds, to wit: at 3040 E. Shea #2193, in violation of A.R.S. §§ 13-3405(A)(2), (B)(4), (C), 13-3401, 13-701, 13-702 and 13-801.

COUNT 43

MONEY LAUNDERING

On or about April 19, 2016, 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, to wit: at 3040 E. Shea #2193, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702

COUNT 44

POSSESSION OF A NARCOTIC DRUG

On or about April 19, 2016, knowingly possessed a narcotic drug, namely: Cannabis, to wit: at 3040 E. Shea #2193, in violation of A.R.S. §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801.

COUNT 45

POSSESSION OF MARIJUANA FOR SALE

On or about April 19, 2016, knowingly possessed marijuana for sale, having a weight of less than two pounds, to wit: at 2220 E. Beardsley #2064, in violation of A.R.S. §§ 13-3405(A)(2), (B)(4), (C), 13-3401, 13-701, 13-702 and 13-801...

COUNT 46

MONEY LAUNDERING

On or about April 19, 2016, _____ 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, to wit: at 2220 E. Beardsley #2064, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304 and 13-702

COUNT 47

POSSESSION OF A NARCOTIC DRUG

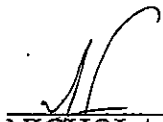
On or about April 19, 2016, _____ knowingly possessed a narcotic drug, namely: Cannabis, to wit: at 2220 E. Beardsley #2064, in violation of A.R.S. §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801.

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

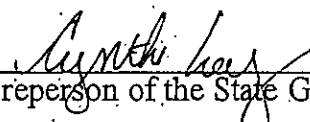
A True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: April 25, 2016



NICHOLAS SACCONI
Assistant Attorney General



Foreperson of the State Grand Jury

#5040421