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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.

**DAYLON G. PIERCE AKA DAYLON  
JUNG (001),**

Defendant.

Case No:

80 SGJ 86

**INDICTMENT**

CHARGING VIOLATIONS OF:

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

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

**COUNTS 6, 8, 10, 14, 16, 18, 20, 22, 26,  
and 28: THEFT**, Class 2 Felonies, in  
violation of A.R.S. § 13-1802(A)(1);

**COUNTS 4, 12, and 24: THEFT**, Class 3  
Felonies, in violation of A.R.S. § 13-  
1802(A)(1);

**COUNTS 5, 7, 9, 11, 13, 15, 17, 19, 21, 23,  
25, 27, and 29: TRANSACTIONS BY  
UNREGISTERED DEALER OR  
SALESPERSON**, Class 4 Felonies, in  
violation of A.R.S. § 44-1842.

The Arizona State Grand Jury accuses **DAYLON G. PIERCE AKA DAYLON JUNG**, charging on this 23<sup>rd</sup> day of January, 2017 that in or from Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between July 1, 2013 and December 19, 2016, **DAYLON G. PIERCE AKA DAYLON JUNG**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: U.S. currency, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, and 13-801.

**COUNT 2**

**ILLEGAL CONTROL OF AN ENTERPRISE**

On or between September 5, 2014 and November 17, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly, through racketeering or its proceeds, acquired or maintained by investment or otherwise, control of an enterprise, to-wit: Credit Investment Group LLC, in violation of A.R.S. §§13-2312(A), 13-701, 13-702, and 13-801.

**COUNT 3**

**ILLEGAL CONTROL OF AN ENTERPRISE**

On or between November 18, 2015 and December 19, 2016, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly, through racketeering or its proceeds, acquired or maintained by investment or otherwise, control of an enterprise, to-wit: Rebuild Solution Group LLC, in violation of A.R.S. §§13-2312(A), 13-701, 13-702, and 13-801.

**COUNT 4**

**THEFT**

On or between July 1, 2013 and October 31, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of AMY MUIR, to-wit: U.S. currency, of a

value of \$4,000.00 or more but less than 25,000.00, with the intent to deprive AMY MUIR of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 5**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between July 1, 2013 and October 31, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for AMY MUIR, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 6**

**THEFT**

On or between November 1, 2013 and May 31, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of STACIE NICELY, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive STACIE NICELY of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 7**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between November 1, 2013 and May 31, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for STACIE NICELY, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

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**COUNT 8**

**THEFT**

On or between December 1, 2013 and December 31, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of TARRA JACKSON, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive TARRA JACKSON of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 9**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or about December 1, 2013, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for TARRA JACKSON, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 10**

**THEFT**

On or between January 1, 2014 and February 28, 2014, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of SAMANTHA HAAF, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive SAMANTHA HAAF of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 11**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between January 1, 2014 and February 28, 2014, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for SAMANTHA HAAF, at a time when he was not registered

pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 12**

**THEFT**

On or about June of 2014, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of TARA DE GRAZIA, to-wit: U.S. currency, of a value of \$4,000.00 or more but less than 25,000.00, with the intent to deprive TARA DE GRAZIA of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 13**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or about June of 2014, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for TARA DE GRAZIA, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 14**

**THEFT**

On or between April 9, 2015 and May 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of ROSE REDDY, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive ROSE REDDY of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 15**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between December 1, 2014 and May 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for ROSE REDDY, at a time when he was not registered pursuant to

A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 16**

**THEFT**

On or between March 1, 2015 and April 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of SARAH MICHELLE GARY, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive SARAH MICHELLE GARY of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 17**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between February 1, 2015 and April 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for SARAH MICHELLE GARY, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 18**

**THEFT**

On or between May 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of SARAH SCHROEDER, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive SARAH SCHROEDER of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

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**COUNT 19**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between April 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for SARAH SCHROEDER, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 20**

**THEFT**

On or between July 1, 2015 and October 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of CHRISTINA DE GUZMAN, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive CHRISTINA DE GUZMAN of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 21**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between July 1, 2015 and October 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for CHRISTINA DE GUZMAN, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

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**COUNT 22**

**THEFT**

On or between September 1, 2015 and October 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of AMANDA BRENNAN, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive AMANDA BRENNAN of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 23**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between September 1, 2015 and October 31, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for AMANDA BRENNAN, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 24**

**THEFT**

On or between November 1, 2015 and November 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of WHITNEY FARRIS, to-wit: U.S. currency, of a value of \$4,000.00 or more but less than 25,000.00, with the intent to deprive WHITNEY FARRIS of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 25**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between November 1, 2015 and November 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within



or from the State of Arizona, for WHITNEY FARRIS, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 26**

**THEFT**

On or between November 1, 2015 and March 31, 2016, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of JULIANNA CAIN, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive JULIANNA CAIN of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

**COUNT 27**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between November 1, 2015 and November 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for JULIANNA CAIN, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 28**

**THEFT**

On or between December 30, 2015 and January 31, 2016, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of MONIQUE BRIBIESCAS, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive MONIQUE BRIBIESCAS of such property, in violation of A.R.S. §§13-1802(A)(1), 13-701, 13-702, and 13-801.

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COUNT 29


TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON

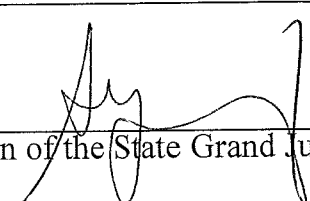
On or between December 30, 2015 and January 31, 2016, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for **MONIQUE BRIBIESCAS**, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 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

  
\_\_\_\_\_  
SCOTT W. BLAKE  
Assistant Attorney General

Dated: Jan 23, 2017  
  
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Foreperson of the State Grand Jury

#5532628