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CLERK OF THE SUPERIOR COURT
FILED
JAN 28 2019 5:00 pm
T McCallm, Deputy

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

STATE OF ARIZONA,

Plaintiff,

v

LAWRENCE RAYMON PARGO (001),

Defendant

Case No **CR 2019 - 001314 - 001**

84 SGJ 100

INDICTMENT

CHARGING VIOLATIONS OF

**COUNTS 1-2: FRAUDULENT
SCHEMES AND ARTIFICES, Class 2
Felonies, in violation of A R S § 13-2310,**

**COUNT 3: MONEY LAUNDERING, a
Class 2 Felony, in violation of A R S § 13-
2317,**

**COUNTS 4-5: ILLEGAL CONTROL OF
AN ENTERPRISE, Class 3 Felonies, in
violation of A R S § 13-2312,**

**COUNTS 6, 7, and 15: THEFT, Class 2
Felonies, in violation of A R S § 13-1802,**

**COUNTS 8-14 and 16: THEFT, Class 3
Felonies, in violation of A R S § 13-1802**

The Arizona State Grand Jury accuses **LAWRENCE RAYMON PARGO (001)**, charging on this 28th day of January, 2019, that in or from Maricopa County, Arizona

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between March 28, 2014 and May 1, 2014, **LAWRENCE RAYMON PARGO (001)**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit by means of fraudulent pretenses, representations, promises or material omissions, in violation of A R S §§13-2310(A), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES

On or between April 29, 2014 and March 18, 2015, **LAWRENCE RAYMON PARGO (001)**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit by means of fraudulent pretenses, representations, promises or material omissions, in violation of A R S §§13-2310(A), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 3

MONEY LAUNDERING

On or between April 29, 2014 and March 18, 2015, **LAWRENCE RAYMON PARGO (001)** knowingly initiated, organized, planned, financed, directed, managed, supervised or was in the business of money laundering, in violation of A R S §§13-2317(A), (B), and (E), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

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COUNT 4

ILLEGAL CONTROL OF AN ENTERPRISE

On or between March 28, 2014 and May 1, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, through racketeering or its proceeds to-wit theft and/or scheme or artifice to defraud, acquired or maintained by investment or otherwise, control of an enterprise to-wit E Mall Retailers, LLC, an Arizona Limited Liability Company, in violation of A R S §§13-2312(A), 13-701, 13-702, and 13-801

COUNT 5

ILLEGAL CONTROL OF AN ENTERPRISE

On or between April 29, 2014 and March 18, 2015, **LAWRENCE RAYMON PARGO (001)**, knowingly, through racketeering or its proceeds to-wit theft and/or a scheme or artifice to defraud and/or money laundering, acquired or maintained by investment or otherwise, control of an enterprise to-wit Buyers Cash Club, LLC, an Arizona Limited Liability Company, in violation of A R S §§13-2312(A), 13-701, 13-702, and 13-801

COUNT 6

THEFT

On or between March 28, 2014 and May 1, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$25,000 or more, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

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COUNT 7

THEFT

On or between November 5, 2014 and December 2, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$25,000 or more, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 8

THEFT

On or about November 14, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 9

THEFT

On or about November 18, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 10

THEFT

On or about November 21, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of

[REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 11

THEFT

On or between December 4, 2014 and December 9, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 12

THEFT

On or about December 12, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 13

THEFT

On or between December 18, 2014 and December 28, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

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COUNT 14

THEFT

On or about December 19, 2014, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 15

THEFT

On or between January 21, 2015 and February 10 2015, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$25,000 or more, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

COUNT 16

THEFT

On or between March 1, 2015 and March 18, 2015, **LAWRENCE RAYMON PARGO (001)**, knowingly, obtained, by means of a material misrepresentation, property or services of [REDACTED] to-wit U S Currency of a value of \$4,000 or more but less than \$25,000, in violation of A R S §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

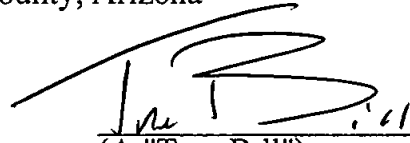
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Pursuant to A R S § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona

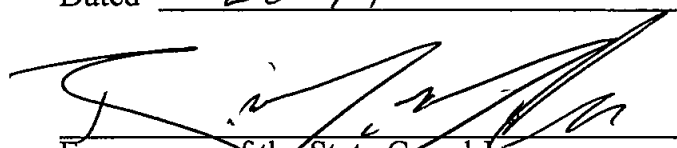

(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated

128 19


SCOTT W BLAKE
Assistant Attorney General


Foreperson of the State Grand Jury

#7407868v2