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T002-2019-000057
ATF#: 785085-19-0029

Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

MARC ANTHONY HATTER (001),

Counts 1-10 & 14-28

ISAIAH NIKKO MEZA (002),

Counts 1-9, 11-19, & 27-28

ISRAEL XAVIER MEZA (003),

Counts 1-13, 20, & 25-28

ERUBIEL ALEXIS BOJORQUEZ 004),

Counts 14-19 & 27-28

Defendants.

Case No:

84 SGJ 346

INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1, 4, & 14: DISCHARGING A FIREARM AT A RESIDENTIAL STRUCTURE, DEADLY WEAPON /DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, a Class 2 Felony, in violation of A.R.S. § 13-1211(A).

COUNT 2: DISORDERLY CONDUCT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, a Class 6 Felony, in violation of A.R.S. § 13-2904(A)(6).

COUNTS 3, 9, & 19: ASSISTING A CRIMINAL STREET GANG, a Class 3 Felony, in violation of A.R.S. § 13-2321(B).

COUNTS 5-7, 12, & 16-18: AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, a Class 3 Felony, in violation of A.R.S. § 13-1204(A)(2).

COUNTS 8 & 11: ATTEMPTED SECOND DEGREE MURDER, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, a Class 2 Felony, in violation of A.R.S. §§ 13-1001, 13-1104(A).

COUNTS 10 & 20-24: MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, a Class 4 Felony, in violation of A.R.S. § 13-3102(A)(4).

COUNT 13: AGGRAVATED ASSAULT, SERIOUS PHYSICAL INJURY, A DANGEROUS OFFENSE, a Class 3 Felony, in violation of A.R.S. § 13-1204(A)(1).

COUNT 15: DRIVE BY SHOOTING, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, a Class 2 Felony, in violation of A.R.S. § 13-1209(A).

COUNTS 25: PARTICIPATING IN A CRIMINAL STREET GANG, a Class 2 Felony, in violation of A.R.S. § 13-2321(A)(3).

COUNTS 26: MONEY LAUNDERING IN THE FIRST DEGREE, a Class 2 Felony, in violation of A.R.S. § 13-2317(A) & (B)(2).

COUNT 27: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003.

COUNT 28: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B).

The Arizona State Grand Jury accuses **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, **ISRAEL XAVIER MEZA (003)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)**, charging on this 20th day of May, 2019 that in or from Pima County, Arizona:

COUNT ONE
DISCHARGING A FIREARM AT A RESIDENTIAL STRUCTURE, DEADLY WEAPON/DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE,
A CLASS TWO FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** knowingly discharged a firearm at a residential structure, to wit: residence on Virginia Street, in violation of A.R.S. §§ 13-1211(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT TWO
DISORDERLY CONDUCT, DEADLY WEAPON OR DANGEROUS INSTRUMENT,
A DANGEROUS OFFENSE, A CLASS SIX FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** with the intent to disturb the peace or quiet of a neighborhood, to wit: Virginia Street neighborhood, or with knowledge of doing so, recklessly handled, displayed or discharged a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-2904(A)(6), (B), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT THREE
ASSISTING A CRIMINAL STREET GANG, A CLASS THREE FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** committed a felony offense, to wit: discharging a firearm at a residential structure and/or disorderly conduct, whether completed or preparatory for the benefit of, at the direction of or in association with any criminal street gang, to wit: Get Money Gang (GMG) and/or Young Hustlin Nation (YHN), in violation of A.R.S. §§ 13-2321(B), (D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT FOUR
DISCHARGING A FIREARM AT A RESIDENTIAL STRUCTURE, DEADLY WEAPON/DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS TWO FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** knowingly discharged a firearm at a residential structure, to wit: residence on Dakota Street, in violation of A.R.S. §§ 13-1211(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT FIVE
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** intentionally placed another person, J.M.R., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2),

(E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT SIX
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** intentionally placed another person, J.S.R., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT SEVEN
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** intentionally placed another person, M.L.R., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT EIGHT
ATTEMPTED SECOND DEGREE MURDER, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS TWO FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** attempted to intentionally cause

the death of another person, J.S.R., and/or attempted to knowingly engage in conduct that would result in the death of another person, J.S.R., by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1001, 13-1104(A)(1) & (2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT NINE
ASSISTING A CRIMINAL STREET GANG, A CLASS THREE FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ISRAEL XAVIER MEZA (003)** committed a felony offense, to wit: discharging a firearm at a residential structure and/or aggravated assault (and/or any lesser included offenses), whether completed or preparatory for the benefit of, at the direction of or in association with any criminal street gang, to wit: Get Money Gang (GMG) and/or Young Hustlin Nation (YHN), in violation of A.R.S. §§ 13-2321(B)(D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TEN
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS FOUR FELONY

On or about December 15, 2018, **MARC ANTHONY HATTER (001)** and **ISRAEL XAVIER MEZA (003)** knowingly possessed a deadly weapon or prohibited weapon, to wit: firearms, and were prohibited possessors who have been adjudicated delinquent for a felony offense and whose civil right to possess or carry a gun or firearm have not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT ELEVEN
ATTEMPTED SECOND DEGREE MURDER, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS TWO FELONY

On or about December 28, 2018, **ISAIAH NIKKO MEZA (002)** and **ISRAEL XAVIER MEZA (003)** attempted to intentionally cause the death of another person, D.A., and/or attempted to knowingly engage in conduct that would result in the death of another person, J.S.R., by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1001, 13-1104(A)(1) & (2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT TWELVE
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 28, 2018, **ISAIAH NIKKO MEZA (002)** and **ISRAEL XAVIER MEZA (003)** intentionally placed another person, D.A., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT THIRTEEN
AGGRAVATED ASSAULT, SERIOUS PHYSICAL INJURY, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 28, 2018, **ISAIAH NIKKO MEZA (002)** and **ISRAEL XAVIER MEZA (003)** intentionally, knowingly or recklessly caused a serious physical injury to another person, D.A., in violation of A.R.S. §§ 13-1204(A)(1), (E), 13-1203(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (13) & (39), 13-801 and 13-811.

COUNT FOURTEEN
DISCHARGING A FIREARM AT A RESIDENTIAL STRUCTURE, DEADLY WEAPON/DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS TWO FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** knowingly discharged a firearm at a residential structure, to wit: residence on South 17th Street, in violation of A.R.S. §§ 13-1211(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT FIFTEEN
DRIVE BY SHOOTING, DEADLY WEAPON/DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS TWO FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** intentionally discharged a weapon from a motor vehicle at a person, another occupied vehicle or an occupied structure, to wit: residence on South 17th Street, in violation of A.R.S. §§ 13-1209(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT SIXTEEN
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISIAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** intentionally placed another person, A.A., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT SEVENTEEN
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** intentionally placed another person, S.R., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT EIGHTEEN
AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT, A DANGEROUS OFFENSE, A CLASS THREE FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** intentionally placed another person, A.R., in reasonable apprehension of imminent physical injury by use of a deadly weapon or dangerous instrument, to wit: firearm(s), in violation of A.R.S. §§ 13-1204(A)(2), (E), 13-1203(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-704, 13-105 (12), (13), & (15), 13-801 and 13-811.

COUNT NINETEEN
ASSISTING A CRIMINAL STREET GANG, A CLASS THREE FELONY

On or about December 29, 2018, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)** committed a felony offense, to wit: discharging a firearm at a residential structure and/or aggravated assault (and/or any lesser included offenses), whether completed or preparatory for the benefit of, at the direction of or in association with any criminal street gang, to wit: Get Money Gang (GMG)

and/or Young Hustlin Nation (YHN), in violation of A.R.S. §§ 13-2321(B)(D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS
FOUR FELONY

On or about December 28 continuing through December 29, 2019, **MARC ANTHONY HATTER (001)** and **ISRAEL XAVIER MEZA (003)** knowingly possessed a deadly weapon or prohibited weapon, to wit: firearms, and were prohibited possessors who have been adjudicated delinquent for a felony offense and whose civil right to possess or carry a gun or firearm have not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY ONE
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS
FOUR FELONY

On or about January 28, 2019, **MARC ANTHONY HATTER (001)** knowingly possessed a deadly weapon or prohibited weapon, to wit: Smith and Wesson M & P, and was a prohibited possessor who has been adjudicated delinquent for a felony offense and whose civil right to possess or carry a gun or firearm has not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY TWO
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS
FOUR FELONY

On or about January 28, 2019, **MARC ANTHONY HATTER (001)** knowingly possessed a deadly weapon or prohibited weapon, to wit: Glock 26, and was a prohibited possessor who has been adjudicated delinquent for a felony offense and whose civil right to

possess or carry a gun or firearm has not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY THREE
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS
FOUR FELONY

On or about January 28, 2019, **MARC ANTHONY HATTER (001)** knowingly possessed a deadly weapon or prohibited weapon, to wit: Intratec .22 caliber pistol, and was a prohibited possessor who has been adjudicated delinquent for a felony offense and whose civil right to possess or carry a gun or firearm has not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY FOUR
MISCONDUCT INVOLVING WEAPONS, PROHIBITED POSSESSOR, A CLASS
FOUR FELONY

On or about January 28, 2019, **MARC ANTHONY HATTER (001)** knowingly possessed a deadly weapon or prohibited weapon, to wit: Taurus 9mm, and was a prohibited possessor who has been adjudicated delinquent for a felony offense and whose civil right to possess or carry a gun or firearm has not been restored, in violation of A.R.S. §§ 13-3102(A)(4), (M), 13-3101(A)(7)(b), 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY FIVE
PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS TWO FELONY

On or about February 12, 2019, **MARC ANTHONY HATTER (001)** and **ISRAEL XAVIER MEZA (003)** intentionally organized, managed, directed, supervised or financed a criminal street gang with the intent to promote or further the criminal objectives of the criminal street gang, to wit: Get Money Gang (GMG) and/or Young Hustlin Nation (YHN), in violation

of A.R.S. §§ 13-2321(A)(1) & (C), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY SIX
MONEY LAUNDERING IN THE FIRST DEGREE, A CLASS TWO FELONY

On or about February 12, 2019, **MARC ANTHONY HATTER (001)** and **ISRAEL XAVIER MEZA (003)** knowingly initiated, organized, planed, financed, directed, managed, supervised or was in the business of money laundering and made property available, to wit: approximately \$2,400, to another by transaction, transportation or otherwise knowing that it is intended to be used to facilitate racketeering, to wit: participating in a criminal syndicate (A.R.S. § 13-2301(D)(4)(b)(xiii)), in violation of A.R.S. §§ 13-2317(A)(1), (B)(2), & (E), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT TWENTY SEVEN
CONSPIRACY, A CLASS TWO FELONY

On or about December 15, 2018 continuing through February 12, 2019, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, **ISRAEL XAVIER MEZA (003)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)**, with the intent to promote or aid the commission of an offense, did agree with each other or one or more other persons, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **DISCHARGING A FIREARM AT A RESIDENTIAL STRUCTURE**, in violation of A.R.S. § 13-1211(A); and/or
- 2) **ASSISTING A CRIMINAL STREET GANG**, in violation of A.R.S. § 13-2321(B); and/or
- 3) **AGGRAVATED ASSAULT, DEADLY WEAPON OR DANGEROUS INSTRUMENT**, in violation of A.R.S. § 13-1204(A)(2); and/or

- 4) **AGGRAVATED ASSAULT, SERIOUS PHYSICAL INJURY**, in violation of A.R.S. § 13-1204(A)(1); and/or
- 5) **DRIVE BY SHOOTING**, in violation of A.R.S. § 13-1209(A).

In furtherance of this conspiracy and to effect the forgoing objects thereof, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, **ISRAEL XAVIER MEZA (003)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)**, and others known and/or unknown did commit numerous overt acts, including, but not limited to: the overt acts described in Counts 1 through 20 of this Complaint (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-1211(A), 13-2321(B), 13-1204(A)(2), 13-1204(A)(1), 13-1209(A), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT TWENTY EIGHT
ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS THREE FELONY

On or about December 15, 2018 continuing through February 12, 2019, **MARC ANTHONY HATTER (001)**, **ISAIAH NIKKO MEZA (002)**, **ISRAEL XAVIER MEZA (003)**, and **ERUBIEL ALEXIS BOJORQUEZ (004)**, were employed by or associated with an enterprise and 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.

The enterprise was a group of persons associated in fact, including but not limited to, others **KNOWN** and/or **UNKNOWN** and the racketeering included:

- 1) **PROHIBITED DRUGS, MARIJUANA OR OTHER PROHIBITED CHEMICALS OR SUBSTANCES**, A.R.S. § 13-2301(D)(4)(b)(xi);
- 2) **PARTICIPATING IN A CRIMINAL SYNDICATE**, A.R.S. § 13-2301(D)(4)(b)(xiii); and/or
- 3) **MONEY LAUNDERING**, A.R.S. § 13-2301(D)(4)(b)(xxvi);

but is not limited to, the acts of racketeering described in Counts 1-20 of this Complaint (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-811, 13-2313 and 13-2314.

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

(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

JOSHUA S. MOSER
Assistant Attorney General

Foreperson of the State Grand Jury

PHX-#7908660