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MARK BRNOVICH Attorney General Firm Bar No 14000

HEATHER LIVINGSTONE
State Bar No 021392
Assistant Attorney General
2005 N Central Avenue
Phoenix, Arizona 85004-1592
Telephone 602-542-3881
crmdrug@azag gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

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SHANE DAWSON STEWART (001),

Defendant

Case No CR2019-118411-001 DT

84 SGJ 308

INDICTMENT

CHARGING VIOLATIONS OF

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

COUNT 2: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A R S § 13-2312(B)

COUNT 3: TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A R S § 13-3408 (A)(7)

The Arizona State Grand Jury accuses **SHANE DAWSON STEWART**, charging on this 29th day of April, 2019 that in or from Maricopa County, Arizona

COUNT 1

CONSPIRACY

On or about April 23, 2019, **SHANE DAWSON STEWART**, defendant 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) TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, in violation of A R S § 13-3408

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 Count 3 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A R S §§ 13-1003, 13-3408, 13-701, 13-702 and 13-801

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

- A On or about April 23, 2019, **SHANE DAWSON STEWART**, defendant 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 SHANE DAWSON STEWART
 - C The racketeering included
 - 1) TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, in violation of A R S § 13-3408

The racketeering included but was not limited to, the acts of racketeering described in Count 3 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, 13-3408, 13-701, 13-702, 13-801 and 13-811

COUNT 3

TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about April 23, 2019, **SHANE DAWSON STEWART** knowingly transported a narcotic drug for sale, namely Fentanyl, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801

Pursuant to ARS § 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

HEATHER LIVINGSTONE Assistant Attorney General

Assistant Attorney Gen

Poreperson of the State Grand Jury