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

STATE OF ARIZONA,

Plaintiff,

v.

**TENNESSEE MAIRE JACKSON
Counts 1-19**

**DONALD LADEL JACKSON,
Counts 1-3, 16, 19**

Defendants.

Case No:

84 SGJ 156

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

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

**COUNTS 4-11: CHILD SEX
TRAFFICKING**, Class 2 Felonies, in
violation of A.R.S. §13-3212

COUNT 12: SEX TRAFFICKING, a Class
2 Felony, in violation of A.R.S. §13-1307

**COUNT 13: COMMERCIAL SEXUAL
EXPLOITATION OF A MINOR**, a Class
2 Felony, in violation of A.R.S. §13-3552

**COUNTS 14, 15: SEXUAL
EXPLOITATION OF A MINOR**, a Class
2 Felony, in violation of A.R.S. §13-3553

**COUNT 16: TRANSPORTATION OF
NARCOTIC DRUGS FOR SALE**, a Class
2 Felony, in violation of A.R.S. §13-3408

**COUNT 17: INVOLVING OR USING A
MINOR IN A DRUG OFFENSE**, a Class 2
Felony, in violation of A.R.S. §13-3409

**COUNTS 18, 19: MISCONDUCT
INVOLVING WEAPONS**, a Class 4
Felony, in violation of A.R.S. §13-3102

The Arizona State Grand Jury accuses **TENNESSEE MAIRE JACKSON (001)** and **DONALD LADEL JACKSON (002)**, charging on this 11th day of February, 2019, that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between September 1, 2018 and January 11, 2019, **TENNESSEE MAIRE JACKSON (001)** and **DONALD LADEL JACKSON (002)**, did conspire with others known and unknown to commit the offenses of:

- a. Illegally Conducting an Enterprise
- b. Money Laundering
- c. Pandering
- d. Employment in Prostitution
- e. Operating or Maintaining a House of Prostitution or Prostitution Enterprise
- f. Receiving the Earnings of a Prostitute and/or
- g. Prostitution
- h. Child Sex Trafficking
- i. Possession or Transportation of Narcotic Drugs for Sale

In conspiring to commit such offenses, the defendant and other conspirators, both known and unknown to the State, with the intent to promote or aid the commission of an offense, did agree with one or more other persons that at least one of them or another person would engage in conduct constituting the offense(s), in particular,

- a. Illegally Conducting an Enterprise
- b. Money Laundering
- c. Pandering
- d. Employment in Prostitution
- e. Operating or Maintaining a House of Prostitution
- f. Receiving the Earnings of a Prostitute and/or
- g. Prostitution
- h. Child Sex Trafficking
- i. Possession and Transportation of Narcotic Drugs for sale

in violation of A.R.S. §§ 13-1003, 13-2317, 13-3203, 13-3204, 13-3208, 13-3209, and 13-3212.

In furtherance of this conspiracy and to effect the objects thereof, defendants and other co-conspirators would commit numerous overt acts, including, but not limited to, those overt acts set forth in Counts 2 through 18 of this Indictment, in violation of A.R.S. §§ 13-1003, 13-2312, 13-2317, 13-3212, 13-3211, 13-3411, 13-3553, 13-3553, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-705, and 13-801.

COUNT 2

ILLEGAL CONTROL OF AN ENTERPRISE

On or between September 1, 2018 and January 11, 2019, **TENNESSEE MAIRE JACKSON (001) and DONALD LADEL JACKSON (002)** being 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 or should have known was being conducted through racketeering, to wit, child sex trafficking, sex

trafficking, prostitution, and/or drug sales and drug trafficking, in violation of A.R.S. §§13-2312(B), 13-2301(D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703 and 13-801.

The enterprise was a group of persons employed/associated in fact, including, but not limited to **TENNESSEE MAIRE JACKSON and DONALD LADEL JACKSON** and other persons both known and unknown, engaged in the operation of a prostitution enterprise and drug dealing.

The racketeering included illegal drug sales and transportation, Prostitution, Receiving the Earnings of a Prostitute, Money Laundering, Operation of a House of Prostitution or Prostitution Enterprise, Child Sex Trafficking and Pandering in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-3208, 13-3204, 13-3209, 13-3214, 13-3211, 13-1308, 13-3212, and 13-2317, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

COUNT 3

MONEY LAUNDERING

On or between September 1, 2018 and January 11, 2019, **TENNESSEE MAIRE JACKSON (001) and DONALD LADEL JACKSON (002)** knowingly initiated, organized, planned, financed, directed, managed, or supervised a money laundering business in which they would acquire or maintain an interest, transact, transfer, transport, receive or conceal the existence or nature of racketeering proceeds knowing or having reason to know that they were the proceeds of an offense or offenses, to wit: drug sales and transportation and prostitution activities, in violation of A.R.S. §§ 13-2317(A)(1), 13-2317(B)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-703 and 13-801.

COUNT 4

CHILD SEX TRAFFICKING

On or between December 27, 2018 and January 2, 2019, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available

to another, or otherwise obtained a minor, A.S., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit, trafficking incident involving sex buyer “Glen,” in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 5

CHILD SEX TRAFFICKING

On or between September 1, 2018 and December 11, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available to another, or otherwise obtained a minor, A.S., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit first incident of pole dancing in lingerie at the condominium, in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 6

CHILD SEX TRAFFICKING

On or between September 1, 2018 and December 11, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available to another, or otherwise obtained a minor, A.S., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit last incident of pole dancing in lingerie at the condominium, in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 7

CHILD SEX TRAFFICKING

On or between September 1, 2018 and December 11, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available

to another, or otherwise obtained a minor, K.M.H., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit first incident of pole dancing in lingerie at the condominium, in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 8

CHILD SEX TRAFFICKING

On or between September 1, 2018 and December 11, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available to another, or otherwise obtained a minor, K.M.H., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit last incident of pole dancing in lingerie at the condominium, in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 9

CHILD SEX TRAFFICKING

On or between December 29, 2018 and January 4, 2019, **TENNESSEE MAIRE JACKSON (001)** knowingly enticed, recruited, harbored, provided, transported, made available to another, or otherwise obtained a minor, A.S., with the intent to cause the minor to engage in prostitution or any sexually explicit performance, to wit, incident involving sex buyer “CJ King,” in violation of A.R.S. §§ 13-3212(A)(10)(D)(H), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 10

CHILD SEX TRAFFICKING

On or between September 1, 2018 and January 11, 2019, **TENNESSEE MAIRE JACKSON (001)** knowingly financed, managed, supervised, controlled, or owned, alone or in

association with another, prostitution activity involving a minor, A.S., to wit, notes in phone regarding prostitution activity and prices regarding "House of Dimez" and communicating with customers about similar prices and activities, in violation of A.R.S. §§ 13-3212(A)(5)(D)(H)(I), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 11

CHILD SEX TRAFFICKING

On or between November 1, 2018 and November 22, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly financed, managed, supervised, controlled, or owned, alone or in association with another, prostitution activity involving a minor, ^{A.S.} ~~K.M.H.~~, to wit, communicating with sex buyer "James" during November, 2018 about similar prices and desired sexual activities, in violation of A.R.S. §§ 13-3212(A)(5)(D)(H)(I), 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 12

SEX TRAFFICKING

On or between November 6, 2018 and November 22, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly trafficked [REDACTED] a person eighteen years of age or older, with the knowledge that [REDACTED] would engage in any prostitution or sexually explicit performance by deception, force, or coercion, in violation of A.R.S. §§ 13-1307, 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

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COUNT 13

COMMERCIAL SEXUAL EXPLOITATION OF A MINOR

On or between November 1, 2018 and December 27, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly used, employed, persuaded, enticed, induced or coerced a minor to expose the genitals or anus or the areola or nipple of the female breast for financial or commercial gain, to wit: topless photograph of A.S. depicting her in an outdoor setting and sent on December 27, 2018 to “Glen” to facilitate or arrange a prostitution deal, in violation of A.R.S. §§ 13-3552, 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306 13-701, 13-702, and 13-801.

COUNT 14

SEXUAL EXPLOITATION OF A MINOR

On or about November 21, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly possessed a visual depiction in which a minor is engaged in exploitive exhibition or other sexual conduct, to wit image taken in a kitchen setting where A.S. is topless and a male is engaging in sexual activity with another unknown female in the photo, in violation of A.R.S. §§ 13-3553, 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 15

SEXUAL EXPLOITATION OF A MINOR

On or about November 11, 2018, **TENNESSEE MAIRE JACKSON (001)** knowingly possessed a visual depiction in which a minor is engaged in exploitive exhibition or other sexual conduct, to wit image of K.M.H. who is topless and with other known and unknown females, standing in a hot tub posed in sexual manner with 3 other topless females, in violation of A.R.S. §§ 13-3553, 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 16

TRANSPORTATION OF NARCOTIC DRUGS FOR SALE

On or about January 7, 2019, **TENNESEE MAIRE JACKSON (001)** and **DONALD LADEL JACKSON (002)** knowingly transported for sale or offered to transport for sale, a narcotic drug, to wit heroin, in violation of A.R.S. §§ 13-3401, 13-3408(A)(7), 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 17

INVOLVING OR USING A MINOR IN A DRUG OFFENSE

On or about December 27, 2018, **TENNESEE MAIRE JACKSON (001)** knowingly hired, employed or used a minor to engage in sales of dangerous drugs, to wit delivery of ^{percept} ecstasy pills to sex buyer "Glen," in violation of A.R.S. §§ 13-3401, 13-3407, 13-3409, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 18

MISCONDUCT INVOLVING WEAPONS

On or about January 11, 2019, **TENNESEE MAIRE JACKSON (001)** knowingly used or possessed a firearm during commission of a drug offense, in violation of A.R.S. §§ 13-3401, 13-3408(A)(2), 13-3102, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 19

MISCONDUCT INVOLVING WEAPONS

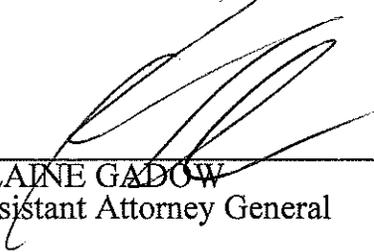
On or about January 11, 2019, **DONALD LADEL JACKSON (002)**, knowingly used or possessed a firearm while being a prohibited possessor, in violation of A.R.S. §§ 13-3401, 13-3408(A)(2), 13-3102, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

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

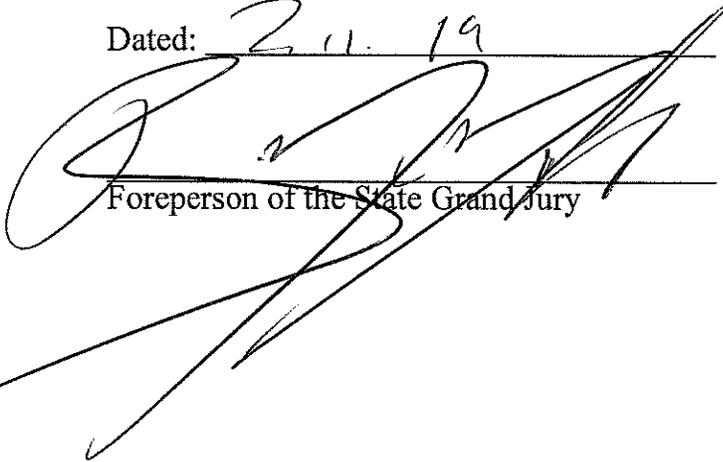


(A "True Bill")

MARK BRNOVICH
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STATE OF ARIZONA



BLAINE GADOW
Assistant Attorney General

Dated: 2.11.19


Foreperson of the State Grand Jury

#7642142