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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

CHARLES S. RIGGINS, JR. (001),
Counts 1, 2, 3, 5, 9, 13, 18, 22

RACHELLE RENEE WOODARD (002),
Counts 1, 2, 5, 7, 9, 12, 13, 14, 15, 18, 25

ROBERT TATE (003),
Counts 1, 2, 5

(004),
Counts 1, 2, 6

MOESHA REED (005),
Counts 1, 2, 7

(006),
Counts 1, 2, 8

(007),
Counts 1, 2, 8

(008),
Counts 1, 2

Case No

CR 2019 - 001269 - 001 ✓

84 SGJ 46

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)

COUNTS 3, 5, 9, 11, 15, 18, 24. SELL,
TRANSFER OR OFFER TO SELL OR
TRANSFER A NARCOTIC DRUG, a
Class 2 Felony, in violation of A R S § 13-
3408 (A)(7)

COUNTS 4, 6, 20, 23: POSSESSION OF
A NARCOTIC DRUG, a Class 4 Felony, in
violation of A R S § 13-3408 (A)(1)

GLEND A HACKWORTH (009),
Counts 1, 2, 11

Counts 1, 2, 15 (010),

Counts 1, 2, 15 (011),

DEITRA L. ISHOP (012),
Counts 1, 2, 25

ERIC BROWN (013),
Counts 1, 2, 16, 17, 25

DARRELL G. MELVIN (014),
Counts 1, 2, 18, 19

Counts 1, 2, 20, 21 (015),

Counts 1, 2, 3 (016),

Counts 1, 2, 4 (017),

Counts 1, 2, 10 (018)

Counts 1, 2, 23 (019),

Counts 1, 2, 24 (020),

TAZIO TATE (021),
Counts 1, 2, 26

REA'ANE BOWMAN (022),
Counts 1, 2, 27

ALLIE BOWMAN (023),
Counts 1, 2, 27

Defendants

COUNTS 7, 14, 22: SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A R S § 13-3408 (A)(7)

COUNTS 8, 10: POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A R S § 13-3408 (A)(2)

COUNTS 12, 17, 25: POSSESSION OF A NARCOTIC DRUG FOR SALE, a Class 2 Felony, in violation of A R S § 13-3408(A)(2)

COUNTS 13, 16: TRANSPORTATION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A R S § 13-3408 (A)(7)

COUNTS 19, 26: SELL, TRANSFER OR OFFER TO SELL OR TRANSFER MARIJUANA, a Class 3 Felony, in violation of A R S §§13-3405 (A)(7), 13-3401

COUNTS 21, 27: POSSESSION OF MARIJUANA, a Class 6 Felony, in violation of A R S § 13-3405 (A)(1) and (B) (1)

The Arizona State Grand Jury accuses **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD, ROBERT TATE,**

MOESHA REED,

GLEND A HACKWORTH,

DEITRA L. ISHOP, ERIC BROWN, DARRELL G. MELVIN,

TAZIO TATE, REA'ANE BOWMAN and ALLIE BOWMAN, charging on this 23rd day of January, 2019 that in or from Maricopa County, Arizona

COUNT 1

CONSPIRACY

On or between November 2, 2018 and January 14, 2019, **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD, ROBERT TATE,**

MOESHA REED,

GLEND A HACKWORTH,

DEITRA L. ISHOP, ERIC BROWN, DARRELL G.

MELVIN,

TAZIO TATE,

REA'ANE BOWMAN and ALLIE BOWMAN, defendants 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) **POSSESSION FOR SALE, TRANSPORTATION FOR SALE, SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG,** in violation of A R S § 13-3408, and
- 2) **SELL, TRANSFER OR OFFER TO SELL OR TRANSFER MARIJUANA,** in violation of A R S § 13-3405

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 Counts 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 22, 24, 25 and 26 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A R S §§ 13-1003, 13-3405, 13-3408, 13-701, 13-702 and 13-801

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

A On or between November 2, 2018 and January 14, 2019, **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD, ROBERT TATE, MOESHA REED, GLENDA HACKWORTH, DEITRA L. ISHOP, ERIC BROWN, DARRELL G. MELVIN,**

TAZIO TATE,
REA'ANE BOWMAN and **ALLIE BOWMAN**, defendants 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 **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD, ROBERT TATE, MOESHA REED, GLENDA HACKWORTH, DEITRA L. ISHOP, ERIC BROWN, DARRELL G. MELVIN.**

TAZIO TATE, REA'ANE BOWMAN and **ALLIE BOWMAN**

C The racketeering included

- 1) **POSSESSION FOR SALE, TRANSPORTATION FOR SALE, SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG**, in violation of A R S § 13-3408, and
- 2) **SELL, TRANSFER OR OFFER TO SELL OR TRANSFER MARIJUANA**, in violation of A R S § 13-3405

The racketeering included but was not limited to, the acts of racketeering described in Counts 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 22, 24, 25 and 26 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, 13-3405, 13-3408, 13-701, 13-702, 13-801 and 13-811

COUNT 3

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about November 2, 2018, **CHARLES S. RIGGINS, JR.**

transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 4

POSSESSION OF A NARCOTIC DRUG

On or about November 2, 2018 knowingly possessed a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801

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COUNT 5

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about November 19, 2018, CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD and ROBERT TATE transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 6

POSSESSION OF A NARCOTIC DRUG

On or about November 19, 2018, knowingly possessed a narcotic drug, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801

COUNT 7

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about November 23, 2018, RACHELLE RENEE WOODARD and MOESHA REED, transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer cocaine base, a narcotic drug, having a weight or value that exceeds the statutory threshold amount, in violation of A R S §§ 13-3401, 13-3408, 13-3418, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

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COUNT 8

**POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER
THE STATUTORY THRESHOLD**

On or about November 23, 2018,

knowingly possessed a narcotic drug for sale, namely cocaine base, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(2), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 9

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about December 2, 2018, CHARLES S. RIGGINS, JR. and RACHELLE RENEE WOODARD, transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 10

**POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER
THE STATUTORY THRESHOLD**

On or about December 2, 2018, knowingly possessed a narcotic drug for sale, namely cocaine base, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(2), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

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COUNT 11

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about December 9, 2018, **GLENDA HACKWORTH**, transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 12

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about December 9, 2018, **RACHELLE RENEE WOODARD**, knowingly possessed a narcotic drug for sale, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(2), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 13

**TRANSPORTATION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT
OVER THE STATUTORY THRESHOLD**

On or about December 16, 2018, **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD,** knowingly transported a narcotic drug for sale, namely cocaine, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

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COUNT 14

**SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG
IN AN AMOUNT OVER THE STATUTORY THRESHOLD**

On or about December 21, 2018, **RACHELLE RENEE WOODARD**, transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer cocaine base, a narcotic drug, having a weight or value that exceeds the statutory threshold amount, in violation of A R S §§ 13-3401, 13-3408 (A)(7), 13-3418, 13-701, 13-702 and 13-801

COUNT 15

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about December 21, 2018, **RACHELLE RENEE WOODARD** transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801

COUNT 16

**TRANSPORTATION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT
OVER THE STATUTORY THRESHOLD**

On or about December 21, 2018, **ERIC BROWN** knowingly transported a narcotic drug for sale, namely cocaine base, 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

COUNT 17

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about December 21, 2018, **ERIC BROWN**, knowingly possessed a narcotic drug for sale, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(2), 13-3401, 13-701, 13-702 and 13-801

COUNT 18

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about December 22, 2018, **CHARLES S. RIGGINS, JR., RACHELLE RENEE WOODARD** and **DARRELL G. MELVIN** transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 19

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER MARIJUANA

On or about December 22, 2018, **DARRELL G. MELVIN** transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer marijuana, having a weight of less than two pounds, in violation of A R S §§ 13-3405 (A)(7), 13-3401, 13-701, 13-702 and 13-801

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COUNT 20

POSSESSION OF A NARCOTIC DRUG

On or about December 22, 2018, knowingly possessed a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801

COUNT 21

POSSESSION OF MARIJUANA

On or about December 22, 2018, knowingly possessed marijuana having a weight of less than two pounds, in violation of A R S §§ 13-3405 (A) (1) and (B) (1), 13-3401, 13-701, 13-702 and 13-801

COUNT 22

**SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG
IN AN AMOUNT OVER THE STATUTORY THRESHOLD**

On or about December 23, 2018, CHARLES S. RIGGINS, JR. transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer cocaine base, a narcotic drug, having a weight or value that exceeds the statutory threshold amount, in violation of A R S §§ 13-3401, 13-3408 (A)(7), 13-3418, 13-701, 13-702 and 13-801

COUNT 23

POSSESSION OF A NARCOTIC DRUG

On or about December 23, 2018, knowingly possessed a narcotic drug, namely cocaine base, in violation of A R S §§ 13-3408 (A)(1), 13-3401, 13-701, 13-702 and 13-801

COUNT 24

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG

On or about December 26, 2018, transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer a narcotic drug, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801

COUNT 25

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or about December 26, 2018, RACHELLE RENEE WOODARD, DEITRA L. ISHOP and ERIC BROWN, knowingly possessed a narcotic drug for sale, namely Oxycodone, in violation of A R S §§ 13-3408 (A)(2), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 26

SELL, TRANSFER OR OFFER TO SELL OR TRANSFER MARIJUANA

On or about January 14, 2019, TAZIO TATE transported for sale, imported into this state or offered to transport for sale or import into this state, sold, transferred or offered to sell or transfer marijuana, having a weight of less than two pounds, in violation of A R S §§ 13-3405 (A)(7), 13-3401, 13-701, 13-702 and 13-801

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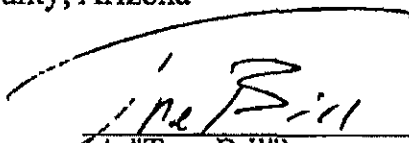
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COUNT 27

POSSESSION OF MARIJUANA

On or about January 14, 2019, REA'ANE BOWMAN and ALLIE BOWMAN knowingly possessed marijuana having a weight of less than two pounds, in violation of A R S §§ 13-3405 (A) (1) and (B) (1), 13-3401, 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

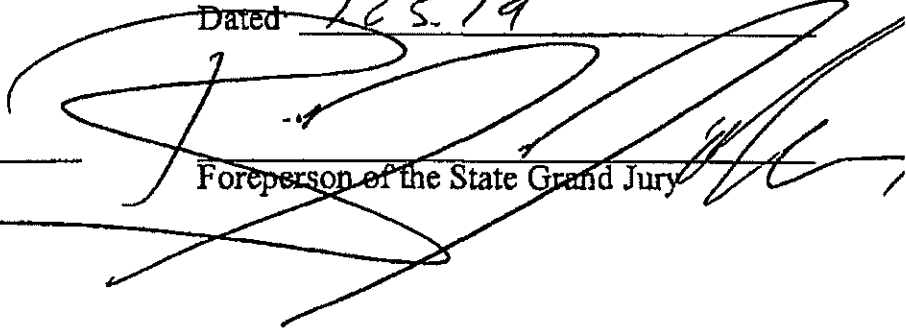


(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



Assistant Attorney General
#7601861

Dated 123.19


Foreperson of the State Grand Jury