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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.

**MIKAL LEE SMITH (001),**  
(Counts 1-9)

**APREL MAY RASMUSSEN (002),**  
(Counts 1-4)

**[REDACTED] (003),**  
(Count 10)

**[REDACTED] (004),**  
(Count 11)

Defendants.

Case No:

**87 SGJ 4**

**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

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

**COUNTS 4 & 5: PANDERING**, Class 5  
Felonies, in violation of A.R.S. § 13-3209

**COUNTS 6 & 7: RECEIVING  
EARNINGS OF PROSTITUTE**, Class 5  
Felonies, in violation of A.R.S. § 13-3204

**COUNT 8: SEX TRAFFICKING**, a Class  
2 Felony, in violation of A.R.S. § 13-1307

**COUNT 9: THREATENING OR  
INTIMIDATING**, a Class 1 Misdemeanor,  
in violation of A.R.S. § 13-1202

**COUNTS 10 & 11: PROSTITUTION**,  
Class 1 Misdemeanors, in violation of  
A.R.S. § 13-3214

The Arizona State Grand Jury accuses **MIKAL LEE SMITH (001)**, **APREL MAY RASMUSSEN (002)**, [REDACTED] (003), and [REDACTED] (004), charging on this 24<sup>th</sup> day of August, 2020, that in or from Maricopa County, Arizona:

**COUNT 1**

**CONSPIRACY**

On or between December 1, 2018 and September 19, 2019, defendants, **MIKAL LEE SMITH (001)** and **APREL MAY RASMUSSEN (002)**, conspired to commit the offenses of:

- a. Illegally Conducting an Enterprise;
- b. Money Laundering;
- c. Employment in Prostitution;
- d. Receiving the Earnings of a Prostitute;
- e. Prostitution; and/or,
- f. Pandering.

In conspiring to commit such offenses, the defendants 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. Employment in Prostitution;
- d. Receiving the Earnings of a Prostitute;
- e. Prostitution; and/or,
- f. Pandering.

This was done in violation of A.R.S. §§ 13-1003, 13-2312, 13-2317, 13-3204, 13-3209, and 13-3214.

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 1 through 11 of this Indictment, in violation of A.R.S. §§ 13-1003, 13-2312,

13-2317, 13-3204, 13-3209, 13-3211, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

## COUNT 2

### ILLEGALLY CONDUCTING AN ENTERPRISE

On or between December 1, 2018 and September 19, 2019, defendants, **MIKAL LEE SMITH (001) and APREL MAY RASMUSSEN (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 was being conducted through racketeering, in violation of A.R.S. §§13-2312, 13-2301, 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, **MIKAL LEE SMITH (001) and APREL MAY RASMUSSEN (002)**, and other persons both known and unknown. The racketeering included, in particular:

- a. Receiving the Earnings of a Prostitute;
- b. Prostitution; and/or,
- c. Pandering.

This was done in violation of A.R.S. §§ 13-2312, 13-2301, 13-3204, 13-3209, 13-3211, 13-3214, 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 IN THE FIRST DEGREE

On or between December 1, 2018 and September 19, 2019, defendants, **MIKAL LEE SMITH (001) and APREL MAY RASMUSSEN (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: operating and/or engaging in a prostitution enterprise) 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, 13-701, 13-702, 13-703, and 13-801.

**COUNT 4**

**PANDERING**

On or between July 8, 2019 and September 19, 2019, defendants, **MIKAL LEE SMITH (001) and APREL MAY RASMUSSEN (002)**, knowingly compelled, induced, or encouraged [REDACTED] to become a prostitute or engage in an act of prostitution in violation of A.R.S. §§ 13-3209(4), 13-3211, 13-701, 13-702, 13-703, and 13-801.

**COUNT 5**

**PANDERING**

On or between December 1, 2018 and September 19, 2019, **MIKAL LEE SMITH (001)** knowingly compelled, induced, or encouraged **APREL MAY RASMUSSEN (002)** to become a prostitute or engage in an act of prostitution in violation of A.R.S. §§ 13-3209(4), 13-3211, 13-701, 13-702, 13-703, and 13-801.

**COUNT 6**

**RECEIVING EARNINGS OF PROSTITUTE**

On or between December 1, 2018 and September 19, 2019, **MIKAL LEE SMITH (001)** knowingly received money or other valuable thing from the earnings of **APREL MAE RASMUSSEN**, who was engaged in prostitution in violation of A.R.S. §§ 13-3204, 13-3211, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

**COUNT 7**

**RECEIVING EARNINGS OF PROSTITUTE**

On or between July 8, 2019 and September 19, 2019, **MIKAL LEE SMITH (001)** knowingly received money or other valuable thing from the earnings of [REDACTED] [REDACTED] who was engaged in prostitution in violation of A.R.S. §§ 13-3204, 13-3211, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

**COUNT 8**

**SEX TRAFFICKING**

On or between July 8, 2019 and September 19, 2019, **MIKAL LEE SMITH (001)** knowingly trafficked [REDACTED] who is eighteen years of age or older, with the knowledge that [REDACTED] would engage in any prostitution or sexually explicit performance by deception, coercion, or force in violation of A.R.S. §§ 13-1307(A)(2), 1301, 13-3211, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

**COUNT 9**

**THREATENING OR INTIMIDATING**

On or between December 1, 2018 and September 19, 2019, **MIKAL LEE SMITH (001)** threatened or intimidated, by word or conduct, to cause physical injury to or damage to the property of **APREL MAY RASMUSSEN (002)** and [REDACTED] in violation of A.R.S. §§ 13-1202, 13-707, and 13-802.

**COUNT 10**

**PROSTITUTION**

On or between July 8, 2019 and September 19, 2019, [REDACTED] (003) knowingly engaged in, agreed to, or offered to engage in sexual conduct with [REDACTED] under a fee arrangement for money in violation of A.R.S. §§ 13-3214, 13-3211, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-707, and 13-802.

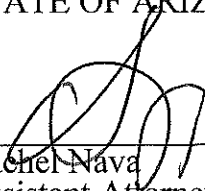
**COUNT 11**

**PROSTITUTION**

On or between August 26, 2019 and September 19, 2019, [REDACTED] (004) knowingly engaged in, agreed to, or offered to engage in sexual conduct with [REDACTED] under a fee arrangement for money in violation of A.R.S. §§ 13-3214, 13-3211, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-707, and 13-802.

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

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA



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Rachel Nava  
Assistant Attorney General

#8579109

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(A "True Bill")

Dated: \_\_\_\_\_



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Foreperson of the State Grand Jury