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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.

JASON MICHAEL VANGUNDY (001),
Defendant.

Case No: CR2020-138313-001DT

87 SGJ 160

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CHILD SEX TRAFFICKING,
a Class 2 Felony, in violation of A.R.S. § 13-3212

COUNT 2: CHILD SEX TRAFFICKING,
a Class 2 Felony, in violation of A.R.S. § 13-3212

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

**COUNT 4: MONEY LAUNDERING IN
THE SECOND DEGREE,** a Class 3
Felony, in violation of A.R.S. § 13-2317

**COUNT 5: SEXUAL CONDUCT WITH
A MINOR,** a Class 6 Felony, in violation of
A.R.S. § 13-1405

The Arizona State Grand Jury accuses **JASON MICHAEL VANGUNDY (001)**, charging on this 19th day of October 2020, that in or from Maricopa County, Arizona:

COUNT 1

CHILD SEX TRAFFICKING

On or between April 1, 2020 and June 30, 2020, **JASON MICHAEL VANGUNDY (001)** knowingly caused a minor, VICTIM A, to engage in prostitution, in violation of A.R.S. §§ 13-3212(A)(1), 13-3211, 13-701, 13-702, and 13-801.

For the purpose of this offense, prostitution means engaging in or agreeing or offering to engage in sexual conduct under a fee arrangement with any person for money or any other valuable consideration pursuant to A.R.S. § 13-3211(5).

COUNT 2

CHILD SEX TRAFFICKING

On or between April 1, 2020 and June 30, 2020, **JASON MICHAEL VANGUNDY (001)** knowingly caused a minor, VICTIM B, to engage in prostitution, in violation of A.R.S. §§ 13-3212(A)(1), 13-3211, 13-701, 13-702, and 13-801.

For the purpose of this offense, prostitution means engaging in or agreeing or offering to engage in sexual conduct under a fee arrangement with any person for money or any other valuable consideration pursuant to A.R.S. § 13-3211(5).

COUNT 3

ILLEGALLY CONDUCTING AN ENTERPRISE

On or between April 1, 2020 and June 30, 2020, **JASON MICHAEL VANGUNDY (001)**, 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, **JASON MICHAEL VANGUNDY (001)**, and other persons both known and unknown. The racketeering included, in particular:

- a. Child Sex Trafficking;
- b. Receiving Earnings from Prostitution;
- c. Transporting Individuals for the Purpose of Prostitution;
- d. Prostitution; and/or,
- e. Pandering.

This was done in violation of A.R.S. §§ 13-2312, 13-2301, 13-3204, 13-3209, 13-3210, 13-3211, 13-3212, 13-3214, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

COUNT 4

MONEY LAUNDERING IN THE SECOND DEGREE

On or between April 1, 2020 and June 30, 2020, **JASON MICHAEL VANGUNDY (001)** knowingly acquired or maintained an interest in, transacted, transferred, transported, received or concealed 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: prostitution), in violation of A.R.S. §§ 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 5

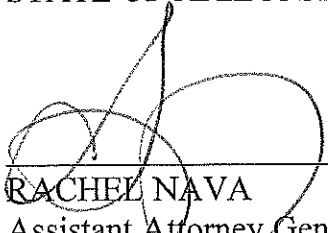
SEXUAL CONDUCT WITH A MINOR

On or between April 1, 2020 and June 30, 2020, **JASON MICHAEL VANGUNDY (001)** knowingly engaged in sexual intercourse or oral sexual contact with VICTIM B, a person he knew or had reason to know was 16 years of age (to wit: masturbatory contact with the penis), in violation of A.R.S. §§ 13-1405, 13-1401, 13-701, 13-702, 13-703, 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.

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



RACHEL NAVA
Assistant Attorney General

Dated: 10-19-20



Foreperson of the State Grand Jury

#9030619