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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**DAYLON G. PIERCE AKA DAYLON  
JUNG (001),**

Defendant.

Case No: CR2016-124824-001

78 SGJ 318

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES**, a Class 2 Felony, in  
violation of A.R.S. § 13-2310;

**COUNT 2: ILLEGAL CONTROL OF  
AN ENTERPRISE**, a Class 3 Felony, in  
violation of A.R.S. § 13-2312(A);

**COUNT 3: THEFT**, a Class 2 Felony, in  
violation of A.R.S. § 13-1802;

**COUNT 4: TRANSACTIONS BY  
UNREGISTERED DEALER OR  
SALESPERSON**, a Class 4 Felony, in  
violation of A.R.S. § 44-1842;

**COUNT 5: THEFT**, a Class 2 Felony, in  
violation of A.R.S. § 13-1802;

**COUNT 6: TRANSACTIONS BY  
UNREGISTERED DEALER OR  
SALESPERSON, a Class 4 Felony, in  
violation of A.R.S. § 44-1842.**

The Arizona State Grand Jury accuses **DAYLON G. PIERCE AKA DAYLON JUNG**, charging on this 1<sup>st</sup> day of June, 2016 that in or from Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between February 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: U.S. currency, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, and 13-801.

**COUNT 2**

**ILLEGAL CONTROL OF AN ENTERPRISE**

On or between February 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly, through racketeering or its proceeds, acquired or maintained by investment or otherwise, control of an enterprise, to-wit: Credit Investment Group LLC, in violation of A.R.S. §§13-2312(A), 13-701, 13-702, and 13-801.

**COUNT 3**

**THEFT**

On or about March 1, 2015 and April 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of SARAH MICHELLE GARY, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive SARAH MICHELLE GARY of such property, in violation of A.R.S. §§13-1802, 13-701, 13-702, and 13-801.

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**COUNT 4**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between February 1, 2015 and April 30, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for **SARAH MICHELLE GARY**, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

**COUNT 5**

**THEFT**

On or between May 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, knowingly controlled property of **SARAH SCHROEDER**, to-wit: U.S. currency, of a value of \$25,000.00 or more, with the intent to deprive **SARAH SCHROEDER** of such property, in violation of A.R.S. §§13-1802, 13-701, 13-702, and 13-801.

**COUNT 6**

**TRANSACTIONS BY UNREGISTERED DEALER OR SALESPERSON**

On or between May 1, 2015 and November 1, 2015, **DAYLON G. PIERCE AKA DAYLON JUNG**, a dealer or salesperson, purchased or offered to buy securities, within or from the State of Arizona, for **SARAH SCHROEDER**, at a time when he was not registered pursuant to A.R.S. §§ 44-1941 through 44-1949, in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702, and 13-801.

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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  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: June 1, 2016

  
\_\_\_\_\_  
SCOTT W. BLAKE  
Assistant Attorney General

  
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Foreperson of the State Grand Jury

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