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[REDACTED]

Attorney for the Plaintiff

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

ALEXANDER MORENO

DANTZLER (001),

(Counts 1 - 16, 28 - 31)

CHRISTOPHER CAMPOS-HENRY

(002),

(Counts 17 - 31)

Defendants

Cause No:

[REDACTED]

DIRECT INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1-27: ORGANIZED RETAIL THEFT, a Class 4 Felony, in violation of A.R.S. § 13-1819(A)(2)

COUNT 28: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

COUNT 29: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)

COUNT 30: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) and (D)

COUNT 31: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. § 13-1003

The State Grand Jury accuses **ALEXANDER MORENO DANTZLER (001)** and **CHRISTOPHER CAMPOS-HENRY(002)**, charging on this 17th day of June, 2025, that in or from Pima County, Arizona:

COUNT 1

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 9, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 2

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 19, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 3

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 21, 2024 at approximately 1:50pm, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of

merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 4
ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 21, 2024 at approximately 7:45pm, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 5
ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 23, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 6
ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about June 1, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 7
ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about June 2, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container,

device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 8

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about June 3, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-8014

COUNT 9

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about June 4, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 10

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about June 7, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 11

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about July 11, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container,

device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 12

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about July 16, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 13

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about July 19, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 14

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about July 21, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 15

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about July 24, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 16

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about August 14, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 17

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 23, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 18

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 24, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail

establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 19

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 25, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 20

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 26, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 21

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 27, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 22

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 28, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container,

device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 23

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 29, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 24

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 30, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 25

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about August 31, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 26

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about September 1, 2024, acting alone or in conjunction with another person, did use an artifice, instrument,

container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 27

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (002), on or about September 2, 2024, acting alone or in conjunction with another person, did use an artifice, instrument, container, device or other article to facilitate the removal of merchandise from Walmart, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 28

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) and **CHRISTOPHER CAMPOS-HENRY (002)**, on or between May 9, 2024 and September 2, 2024, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit from Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

COUNT 29

THEFT, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) and **CHRISTOPHER CAMPOS-HENRY (002)**, on or between May 9, 2024 and September 2, 2024, without lawful authority, knowingly did control Walmart's merchandise, of a value of \$100,000 or more, with the intent to deprive Walmart of such property, in violation of A.R.S. §§ 13-1801, 13-1802, 13-1802(H), 13-701, 13-702, and 13-801.

COUNT 30

ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

ALEXANDER MORENO DANTZLER (001) and **CHRISTOPHER CAMPOS-HENRY (002)**, on or between May 9, 2024 and September 2, 2024, was/were employed by or associated with an enterprise and did knowingly conduct the enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which he knew was being conducted through racketeering. The enterprise(s) included, but were not limited to a group of persons associated in fact, including but not limited to **CHRISTOPHER CAMPOS-HENRY (002)**, and others known and/or unknown.

The racketeering included: Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v); and A scheme or artifice to defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx).

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B) and (D), 13-2301, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

COUNT 31

CONSPIRACY, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) and **CHRISTOPHER CAMPOS-HENRY (002)**, on or between May 9, 2024 and September 2, 2024, 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)Organized Retail Theft, in violation of A.R.S. § 13-1819;
- 2)Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310; and
- 3)Theft, in violation of A.R.S. § 13-1802.

In furtherance of this conspiracy and to affect 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 1-33 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

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

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 6/17/2025


MATTHEW MCCRAY
Assistant Attorney General

R. A. Malody-Singer
Foreperson of the Grand Jury