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Attorney for the Plaintiff

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: 1-14, 16-18, 29, 39-46, 48-49,
51-58*

(002),

Counts: 15-16, 18-29, 30-36, 38, 54-58

**CHRISTOPHER CAMPOS-HENRY
(003),**

Counts: 18, 37, 47, 50, 54-58

(004),

Counts: 14, 17-18, 54-58

Defendants.

Cause No:

DIRECT INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-7, 11-12, 14, 16, 18-20, 22-25,
29-34, 36, 39-45, 47, 50, 52-53:
ORGANIZED RETAIL THEFT, a Class 4
Felony, in violation of A.R.S. § 13-1819(A)**

**COUNTS 13, 17, 21, 26-28, 35, 37-38, and
49: ATTEMPTED ORGANIZED
RETAIL THEFT, a Class 5 Felony, in
violation of A.R.S. §§ 13-1819(A) and 13-
1001**

**COUNT 8-10, 46, 48, 51: TRAFFICKING
IN STOLEN PROPERTY, FIRST
DEGREE, a Class 2 Felony, in violation of
A.R.S. § 13-2307(B)**

COUNT 15: TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE, a Class 3 Felony, in violation of A.R.S. § 13-2307(A)

COUNT 54: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)

COUNT 55-56: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

COUNT 57: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) and (D)

COUNT 58: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003

The State Grand Jury accuses **ALEXANDER MORENO DANTZLER (001)**,

██████████ (002), **CHRISTOPHER CAMPOS-HENRY (003)**, AND ██████████
██████████ (004), charging on this 17th day of June that in or from Pima County, Arizona:

COUNT 1

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about March 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1411, a retail establishment, to wit: an electric scooter, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1411, a retail establishment, to wit: a battery charger, cologne, noise cancelling headphones and/or work boots, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 10, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1411, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 17, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, to wit: a blue Nintendo Switch Lite, a turquoise Nintendo Switch Lite, and/or Legend of Zelda: Tears of the Kingdom video game, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 17, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, to wit: earbuds, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 18, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 March 24, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5799, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 8

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A CLASS 2

FELONY

ALEXANDER MORENO DANTZLER (001), on or about March 30, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store # 5858 that had been stolen, to-wit: Blue Colored Nintendo Switch Lite, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 9

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A CLASS 2

FELONY

ALEXANDER MORENO DANTZLER (001), on or about March 30, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store # 5858 that had been stolen, to-wit: Turquoise Colored Nintendo Switch Lite, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 10

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A CLASS 2

FELONY

ALEXANDER MORENO DANTZLER (001), on or about March 30, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store # 5858 that had been stolen, to-wit: Legend of Zelda: Tears of the Kingdom Video game, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 11

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about April 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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 May 31, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 3407, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 13

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

ALEXANDER MORENO DANTZLER (001), on or about May 31, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 2112, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 14

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001) AND [REDACTED] (004), on or about June 16, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1324, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 15

**TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE, A CLASS 3
FELONY**

[REDACTED] (002), on or about June 16, 2024, recklessly did traffic in the property of Walmart Store # 1324, to-wit: PlayStation VR2 that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 16

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001) AND/OR [REDACTED] (002), on or about June 16, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 3407, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 17

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

ALEXANDER MORENO DANTZLER (001) AND/OR [REDACTED] (004), on or about June 17, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 5369, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 18

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001) AND/OR [REDACTED] [REDACTED] (002) AND/OR CHRISTOPHER CAMPOS-HENRY (003) AND/OR [REDACTED] (004), on or about June 23, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1240, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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

[REDACTED] [REDACTED] (002), on or about July 5, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1291, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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

[REDACTED] [REDACTED] (002), on or about July 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 3379, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 21

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

██████ (002), on or about July 7, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 5031, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 22

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

██████ (002), on or about July 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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

██████ (002), on or about July 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5799, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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

██████ (002), on or about July 9, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 1411, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, 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

██████ (002), on or about July 9, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5626, a retail establishment, to wit: PlayStation 5 and Xbox gaming consoles, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 26

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

██████ (002), on or about July 9, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 5626, a retail establishment, to wit: gaming laptops, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 27

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

██████ (002), on or about July 9, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 2922, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 28

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

■■■■■ (002), on or about July 10, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store # 5626, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 29

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001) AND ■■■■■ (002), on or about July 26, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 3807, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 30

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

■■■■■ (002), on or about July 29, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 31

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

■■■■■ (002), on or about July 31, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store # 4430, a retail establishment, to wit: PlayStation 5 gaming consoles, without paying the purchase price

with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 32

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

██████ ■ ██████ (002), on or about July 31, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #4430, a retail establishment, to wit: a Samsung Soundbar, and/or an electric scooter and/or a LED Roku Smart TV, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 33

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

██████ ■ ██████ (002), on or about August 2, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #4430, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 34

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

██████ ■ ██████ (002), on or about August 8, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 35

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

██████ (002), on or about August 8, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store #5799, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 36

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

██████ (002), on or about August 9, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #5858, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 37

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

CHRISTOPHER CAMPOS-HENRY (003), on or about September 2, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store #4430, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 38

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

██████ (002), on or about September 2, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store #4430, a retail establishment, without paying the purchase price with the intent to resell or

trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 39

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 15, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1299, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 40

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 16, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1299, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 41

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 19, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #2051, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 42

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 19, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1370, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 43

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 19, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1364, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 44

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 19, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #4543, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 45

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 26, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #3730, a retail establishment, without paying the purchase price with the intent to

resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 46

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A

CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 26, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store #3730 that had been stolen, to-wit: Sony PlayStation5, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 47

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (003), on or about September 26, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #3730, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 48

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A

CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 26, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store #3730 that had been stolen, to-wit: MetaQuest 3, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 49

ATTEMPTED ORGANIZED RETAIL THEFT, A CLASS 5 FELONY

ALEXANDER MORENO DANTZLER (001), on or about September 26, 2024, acting alone or in conjunction with another person, attempted to remove merchandise from Walmart Store 3730, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-1001, 13-701, 13-702, and 13-801.

COUNT 50

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

CHRISTOPHER CAMPOS-HENRY (003), on or about October 7, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1159, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 51

**TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE, A
CLASS 2 FELONY**

ALEXANDER MORENO DANTZLER (001), on or about October 7, 2024 through October 8, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Walmart Store #1159 that had been stolen, to-wit: X-Box Video Game Console, in violation of A.R.S. §§ 13-2301, 13-2307, 13-701, 13-702, and 13-801.

COUNT 52

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about October 8, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #1149, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 53

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

ALEXANDER MORENO DANTZLER (001), on or about November 14, 2024, acting alone or in conjunction with another person, did remove merchandise from Walmart Store #4355, a retail establishment, without paying the purchase price with the intent to resell or trade the merchandise for money or other value, in violation of A.R.S. §§ 13-1801, 13-1819, 13-701, 13-702, and 13-801.

COUNT 54

THEFT, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) AND/OR [REDACTED] [REDACTED] (002) AND/OR CHRISTOPHER CAMPOS-HENRY (003) AND/OR [REDACTED] [REDACTED] (004), on or about March 7, 2024, without lawful authority, knowingly did control Walmart's property, to wit: various electronic property, of a value of \$25,000 or more, but less than \$100,000, with the intent to deprive Walmart of such property, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

COUNT 55

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001), AND/OR [REDACTED] [REDACTED] (002) AND/OR CHRISTOPHER CAMPOS-HENRY (003) AND/OR [REDACTED] [REDACTED] (004), on or about March 7, 2024 through on or about November 14, 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.

The scheme or artifice to defraud included using the Walmart Scan'n'Go application on their cellphones to give the appearance they were making purchases. This included taking pictures of UPC codes and using the Scan'n'Go application at self-checkout before cancelling the transactions and acting as though they had completed the purchase.

COUNT 56

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) AND/OR [REDACTED] [REDACTED] (002) AND/OR CHRISTOPHER CAMPOS-HENRY (003) AND/OR [REDACTED] [REDACTED] (004), on or about March 7, 2024 through November 14, 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.

The scheme or artifice to defraud included forged receipts to convince employees they had made legitimate purchases. These receipts were forged on cellphones and were provided to co-defendants in the store with fake dates, times, store numbers and items.

COUNT 57

ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

ALEXANDER MORENO DANTZLER (001), AND/OR [REDACTED] (002) AND/OR CHRISTOPHER CAMPOS-HENRY (003) AND/OR [REDACTED] (004), on or about March 7, 2024 through on or about November 14, 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, **ALEXANDER MORENO DANTZLER (001)**, and/or **[REDACTED] (002)**, and/or **CHRISTOPHER CAMPOS-HENRY (003)** and/or **[REDACTED] (004)**, and others known and/or unknown.

The racketeering included:

- Forgery, in violation of A.R.S. § 13-2301(D)(4)(b)(iv);
- Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v);
- Trafficking in explosives, weapons or stolen property, in violation of A.R.S. § 13-2301(D)(4)(b)(xii); 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 58

CONSPIRACY, A CLASS 2 FELONY

ALEXANDER MORENO DANTZLER (001) AND [REDACTED] (002) AND CHRISTOPHER CAMPOS-HENRY (003) AND [REDACTED] (004), on or about November 14, 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. Trafficking in Stolen Property in the First Degree, in violation of A.R.S. § 13-2307(B);
3. Trafficking in Stolen Property in the Second Degree, in violation of A.R.S. § 13-2307(A);
4. Theft, in violation of A.R.S. § 13-1802; and
5. Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310

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 1-56 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.

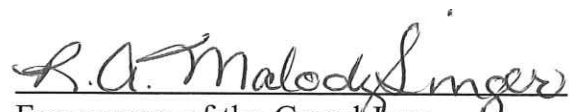
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 6/17/2025


MATTHEW MCCRAY
Assistant Attorney General


Foreperson of the Grand Jury