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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.



BU REH (002),
Counts 1, 2, 14, 16, 18-20, 22, 25, and 26

JOSEPH HTEE (003),
Counts 1, 2, and 23

NEH REH A.K.A. KHU NEH REH (004),
Counts 1, 2, 6, 10, 14, 20, 23, 27, and 29

NGA REH A.K.A. ANA STO (005),
Counts 1, 2, 27, and 29

Case No:

94 SGJ 175

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 3
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(B)

COUNTS 3-8, 10-13 & 15-29: THEFT,
Class 3 Felonies, in violation of A.R.S. § 13-
1802(A)(1)

COUNT 9: THEFT, a Class 4 Felony, in
violation of A.R.S. § 13-1802(A)(1)

[REDACTED]

COUNT 14: THEFT, a Class 5 Felony, in violation of A.R.S. § 13-1802(A)(1)

[REDACTED]

COUNT 30: CRUELTY TO ANIMALS, a Class 6 Felony, in violation of A.R.S. § 13-2910(A)(9)

PRAY REH (008),
Counts 1, 2, and 24

[REDACTED]

REE REH (010),
Counts 1, 2, 28, and 30

SIMON C ZAM (011),
Counts 1, 2, and 16

TEE REH A.K.A. EH TI (012),
Counts 1, 2, 4, 11, 13, 18, 20, 27-29, and 30

TI REH (013),
Counts 1, 2, 9, 22, and 24

YUNG BAL CANGMAH (014),
Counts 1, 2, 16, 17, and 26

Defendants.

The 94th State Grand Jury accuses [REDACTED], **BU REH (002)**, **JOSEPH HTEE (003)**, **NEH REH A.K.A. KHU NEH REH (004)**, **NGA REH A.K.A. ANA STO (005)**, [REDACTED]

[REDACTED], **PRAY REH (008)**, [REDACTED]

[REDACTED], **REE REH (010)**, **SIMON C ZAM (011)**, **TEE REH A.K.A. EH TI (012)**,

TI REH (013), and **YUNG BAL CANGMAH (014)**, charging on this 15th day of July, 2024, that in or from Maricopa, Yavapai, and Coconino Counties, Arizona:

COUNT 1

CONSPIRACY

During a period of time beginning on or about April 7, 2018, and ending on or about October 9, 2021, [REDACTED], **BU REH (002)**, **JOSEPH HTEE (003)**, **NEH REH A.K.A. KHU NEH REH (004)**, **NGA REH A.K.A. ANA STO (005)**, [REDACTED], [REDACTED], **PRAY REH (008)**, [REDACTED], **REE REH (010)**, **SIMON C ZAM (011)**, **TEE REH A.K.A. EH TI (012)**, **TI REH (013)**, and **YUNG BAL CANGMAH (014)**, 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) **Illegally Conducting an Enterprise**, a Class 3 Felony in violation of A.R.S. §13-2312(B)
- 2) **Theft**, Class 3, 4, and 5 Felonies, in violation of A.R.S. § 13-1802(A)(1)

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the acts described within this document, in violation of A.R.S. §§ 13-1003, 13-

2301, 13-2312(B), 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702, and 13-801.

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

During a period of time beginning on or about April 7, 2018, and ending on or about October 9, 2021, [REDACTED], BU REH (002), JOSEPH HTEE (003), NEH REH A.K.A. KHU NEH REH (004), NGA REH A.K.A. ANA STO (005), [REDACTED], [REDACTED], PRAY REH (008), [REDACTED], REE REH (010), SIMON C ZAM (011), TEE REH A.K.A. EH TI (012), TI REH (013), and YUNG BAL CANGMAH (014), were employed by or associated with an enterprise and knowingly conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of the enterprise that they knew was being conducted through racketeering. The enterprise was bound by the shared activity of illegally hunting and eating animals belonging to the State of Arizona and consisted of a group of persons associated in fact, although not a legal entity, including, but not limited to, [REDACTED], [REDACTED], BU REH (002), JOSEPH HTEE (003), NEH REH A.K.A. KHU NEH REH (004), NGA REH A.K.A. ANA STO (005), [REDACTED], [REDACTED], [REDACTED], PRAY REH (008), [REDACTED], [REDACTED], REE REH (010), SIMON C ZAM (011), TEE REH A.K.A. EH TI (012), TI REH (013), and YUNG BAL CANGMAH (014).

The racketeering included:

1) **Theft**, in violation of A.R.S. §13-1802(A)(1)

The alleged racketeering includes, but is not limited to, the acts of Theft as described in this Indictment (which are incorporated by reference), in violation of A.R.S. §§ 13-1802(A)(1), 13-2301, 13-2312(B), 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

COUNT 3

THEFT

On or about April 13, 2018, [REDACTED], knowingly controlled the State of Arizona's Big Horn Sheep, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 4

THEFT

On or about April 7, 2018, **TEE REH A.K.A. EH TI (012)**, knowingly controlled the State of Arizona's Elk, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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COUNT 5

THEFT

On or about May 8, 2018, [REDACTED], knowingly controlled the State of Arizona's Pronghorn Antelope, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 6

THEFT

On or about June 13, 2018, NEH REH A.K.A. KHU NEH REH (004), and [REDACTED], knowingly controlled the State of Arizona's three (3) Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 7

THEFT

On or about January 27, 2019, [REDACTED], knowingly controlled the State of Arizona's Mule Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801

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COUNT 8

THEFT

On or about September 23, 2019, [REDACTED], knowingly controlled the State of Arizona's Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 9

THEFT

On or about December 29, 2019, **TI REH (013)**, knowingly controlled the State of Arizona's Javelina, of a value of \$3,000 or more but less than \$4,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 10

THEFT

On or about March 7, 2020, [REDACTED], and **NEH REH A.K.A. KHU NEH REH (004)**, knowingly controlled the State of Arizona's Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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COUNT 11

THEFT

On or about May 21, 2020, [REDACTED], and TEE REH A.K.A. EH TI (012), knowingly controlled the State of Arizona's two (2) Mule Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 12

THEFT

On or about August 12, 2020, [REDACTED], [REDACTED], knowingly controlled the State of Arizona's Bighorn Sheep, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 13

THEFT

On or about August 22, 2020, TEE REH A.K.A. EH TI (012), knowingly controlled the State of Arizona's Pronghorn Antelope, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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COUNT 14

THEFT

On or about September 5, 2020, **NEH REH A.K.A. KHU NEH REH (004)**, and **BU REH (002)**, knowingly controlled the State of Arizona's Merriam's Turkey, of a value of \$2,000 or more but less than \$3,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 15

THEFT

On or about October 19, 2020, [REDACTED], knowingly controlled the State of Arizona's Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 16

THEFT

On or about October 25, 2020, **YUNG BAL CANGMAH (014)**, **BU REH (002)**, and **SIMON C ZAM (011)**, knowingly controlled the State of Arizona's Elk, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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COUNT 17

THEFT

On or about November 9, 2020, **YUNG BAL CANGMAH (014)**, knowingly controlled the State of Arizona's Elk, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 18

THEFT

On or about November 26, 2020, **BU REH (002)**, **TEE REH A.K.A. EH TI (012)**, and [REDACTED] knowingly controlled the State of Arizona's Elk, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 19

THEFT

On or about December 20, 2020, [REDACTED] and **BU REH (002)**, knowingly controlled the State of Arizona's Mule Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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COUNT 20

THEFT

On or about February 21, 2021, **TEE REH A.K.A. EH TI (012)**, [REDACTED], [REDACTED], **BU REH (002)**, and **NEH REH A.K.A. KHU NEH REH (004)**, knowingly controlled the State of Arizona's Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 21

THEFT

On or about April 3, 2021, [REDACTED], [REDACTED] knowingly controlled the State of Arizona's two (2) Pronghorn Antelope, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 22

THEFT

On or about April 26, 2021, **TI REH (013)**, and **BU REH (002)**, knowingly controlled the State of Arizona's Bighorn Sheep, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 23

THEFT

On or about June 5, 2021, **NEH REH A.K.A. KHU NEH REH (004)**, and **JOSEPH HTEE (003)**, knowingly controlled the State of Arizona's two (2) Whitetail Deer, and Merriam's Turkey, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 24

THEFT

On or about June 30, 2021, **TI REH (013)**, and **PRAY REH (008)**, knowingly controlled the State of Arizona's three (3) Javelinas, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 25

THEFT

On or about July 10, 2021, **BU REH (002)**, knowingly controlled the State of Arizona's Bighorn Ram, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 26

THEFT

On or about August 22, 2021, **YUNG BAL CANGMAH (014)**, and **BU REH (002)**, knowingly controlled the State of Arizona's Mule Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 27

THEFT

On or about August 28, 2021, **TEE REH A.K.A. EH TI (012)**, **NEH REH A.K.A. KHU NEH REH (004)**, and **NGA REH A.K.A. ANA STO (005)**, knowingly controlled the State of Arizona's Mule Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 28

THEFT

On or about September 4, 2021, **TEE REH A.K.A. EH TI (012)**, and **REE REH (010)**, knowingly controlled the State of Arizona's two (2) Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 29

THEFT

On or about October 9, 2021, **TEE REH A.K.A. EH TI (012)**, **NEH REH A.K.A. KHU NEH REH (004)**, and **NGA REH A.K.A. ANA STO (005)**, knowingly controlled the State of Arizona's two (2) Whitetail Deer, of a value of \$4,000 or more but less than \$25,000 with the intent to deprive the State of Arizona of such property, in violation of A.R.S. §§ 17-101, 17-102, 17-309, 13-1801, 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 30

CRUELTY TO ANIMALS

On or about September 4, 2021, **REE REH (010)**, and **TEE REH A.K.A. EH TI (012)**, intentionally or knowingly subjected any animal to cruel mistreatment (to wit: killing a deer by smashing it's head with a rock), in violation of A.R.S. §§ 13-2910(A)(9), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 17-102.

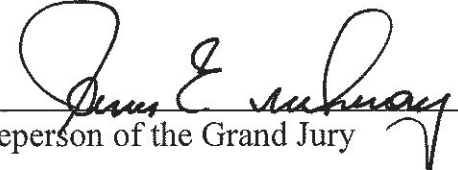
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa, Yavapai, and Coconino Counties, Arizona. Venue is assigned to Coconino County, Arizona.

14 True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 15 July 2024 AP
22 July 2024


ALONZO PRIVITT
Assistant Attorney General


Foreperson of the Grand Jury

#12111513