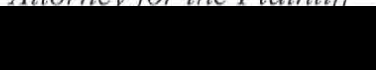


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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

ISOLD IT ON EBAY (001),
(Counts 1-3, 14-16, 23-25, 32-34, 39-41, 63-65, 81-83, 90-92)

CHARLES JUSTIN HUDSON, JR. (002),
(Counts 1-3, 14-16, 23-25, 32-34, 39-41, 63-65, 81-83, 90-92)

CHARLES D. HUDSON, SR. (003),
(Counts 1-3, 14-16, 23-25, 32-34, 39-41, 63-65, 81-83, 90-92)

SHERRY A. HUDSON (004),
(Counts 1-3, 14-16, 23-25, 32-34, 39-41, 63-65, 81-83, 90-92)

CARLOS FLORES (005),
(Counts 1-3, 14-16, 23-25, 32-34, 39-41, 63-65, 81-83, 90-92)

Cause No:



INDICTMENT

CHARGING VIOLATIONS OF:
**COUNTS 1, 14, 23, 32, 39, 63 and 81:
MONEY LAUNDERING IN THE
SECOND DEGREE**, a Class 3 Felony, in
violation of A.R.S. § 13-2317

**COUNTS 2, 15, 24, 33, 40, 64, 82:
FRAUDULENT SCHEMES AND
ARTIFICES \$100000 OR MORE**, a Class
2 Felony, in violation of A.R.S. § 13-2310(A)
and (C)

**COUNTS 3, 16, 25, 34, 41, 65 and 83:
TRAFFICKING IN STOLEN
PROPERTY, FIRST DEGREE**, a Class 2
Felony, in violation of A.R.S. § 13-2307(B)

[REDACTED] (006),
(Counts 1-2, 14-15, 17-22, 90-92)

[REDACTED] (007),
(Counts 1-2, 4-13, 90-92)

[REDACTED] (008),
(Counts 14-15, 23-24 26-27, 90-92)

[REDACTED] (009),
(Counts 14-15, 23-24, 32-33,
39-40, 90-92)

[REDACTED] (010),
(Counts 14-15, 23-24, 32-33, 39-40,
63-64, 81-82, 90-92)

[REDACTED] (011),
(Counts 23-24, 28-33, 35-36, 90-92)

[REDACTED] (012),
(Counts 32-33, 39-40, 45-46, 48-49,
90-92)

[REDACTED] (013),
(Counts 32-33, 39-40, 50-51, 63-64, 66,
68, 90-92)

[REDACTED] (014),
(Counts 39-40, 63-64, 71, 73, 90-92)

[REDACTED] (015),
(Counts 32-33, 39-40, 63-64, 81-82,
84-92)

[REDACTED] (016),
(Counts 32-33, 37-39, 40, 42-44, 46-47,
49, 53- 54, 90-92)

[REDACTED] (017),
(Counts 39, 40, 57-64, 76-77, 90-92)

[REDACTED] (018),
(Counts 39-40, 57-64, 76-77, 90-92)

[REDACTED] (019),
(Counts 39-40, 90-92)

COUNTS 4, 6, 8, 10, 12, 17, 19, 21, 26, 28,
30, 35, 37, 42, 44-45, 47-48, 50, 52-53, 55,
57, 59, 61, 66-67, 69, 71, 72, 74, 76, 78-79,
84, 86 and 88: **ORGANIZED RETAIL
THEFT**, a Class 4 Felony, in violation of
A.R.S. § 13-1819

COUNTS 5, 7, 9, 11, 13, 18, 20, 22, 27, 29,
31, 36, 38, 43, 46, 49, 51, 54, 56, 58, 60, 62,
68, 70, 73, 75, 77, 80, 85, 87 and 89:
**TRAFFICKING IN STOLEN
PROPERTY, SECOND DEGREE**, a Class
3 Felony, in violation of A.R.S. § 13-2307(A)

COUNT 90: THEFT, a Class 2 Felony, in
violation of A.R.S. § 13-1802

**COUNT 91: ILLEGALLY
CONDUCTING AN ENTERPRISE**, a
Class 3 Felony, in violation of A.R.S. § 13-
2312(B) and (D)

COUNT 92: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. § 13-1003

[REDACTED] (020),
(Counts 39-40, 63-64, 67-68, 90-92)

[REDACTED] (021),
(Counts 39-40, 52, 54, 90-92)

[REDACTED] (022),
(Counts 39-40, 63-64, 81-82, 90-92)

[REDACTED] (023),
(Counts 14-15, 23-24, 32-33, 39-40,
90-92)

[REDACTED] (024),
(Counts 39-40, 55-56, 63-64, 90-92)

[REDACTED] (025),
(Counts 63-64, 69-70, 72-75, 78, 80,
90-92)

[REDACTED] (026),
(Counts 63-64, 69-70, 72-75, 78,
80-82, 90-92)

[REDACTED] (027),
(Counts 63-64, 79-82, 90-92)

[REDACTED] (028),
(Counts 63-64, 79-80, 90-92)

[REDACTED]
(029),
(Counts 1-2, 14-15, 32-33, 39-40, 90-92)

Defendants.

The State Grand Jury accuses **ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),** [REDACTED]

[REDACTED]

[REDACTED] charging on this 23rd day of June that in or from Maricopa County, Arizona:

COUNT 1

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

and [REDACTED] on or about January 1, 2018, through December 31, 2018, knowing or having reason to know that Money was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

and [REDACTED] on or about January 1, 2018, through December 31, 2018, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 3

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2018 through December 31, 2018, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray Discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 4

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about June 25, 2018, 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 Target store # 1335 and/or Target store #2341, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about June 25, 2018, recklessly did traffic in the property of Target store # 1335 and/or Target store # 2341, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 6

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about July 23, 2018 through July 28, 2018, 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 Target store #0825 and/or Target store # 2354, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about July 23, 2018 through July 28, 2018, recklessly did traffic in the property of Target store # 0825 and/or Target store #2354, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 8

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about September 17, 2018 through September 25, 2018, 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

Target store #2341, 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 9

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about September 17, 2018 through September 25, 2018, recklessly did traffic in the property of Target store #2341, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 10

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about October 18, 2018, 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 Target store #2236, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about October 18, 2018, recklessly did traffic in the property of Target store #2236, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 12

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about November 1, 2018, 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 Target store #2236 and/or Target store #0851 and/or Target store # 1361, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about November 1, 2018 through November 19, 2018, recklessly did traffic in the property of Target store #2236 and/or Target store # 0851 and/or Target store #1361, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 14

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2019 through December 31, 2019, knowing or having reason to know that [REDACTED] was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 15

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED]
[REDACTED] on or about January 1, 2019 through December 31, 2019, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 16

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2019 through December 31, 2019, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 17

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 29, 2019, 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 Target store #1327, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about January 29, 2019, recklessly did traffic in the property of Target store #1327, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 19

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about February 12, 2019, 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 Target store # 1327, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about February 12, 2019, recklessly did traffic in the property of Target store # 1327, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 21

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about March 5, 2019, 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 Target store #1327, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about March 5, 2019, recklessly did traffic in the property of Target store # 1327, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 23

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005) [REDACTED]

[REDACTED] on or about January 1, 2020 through December 31, 2020, knowing or having reason to know that Money was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 24

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2020 through December 31, 2020, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises,

or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 25

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2020 through December 31, 2020, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 26

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 15, 2020 through January 23, 2020, 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 Target store #1141 and/or Target store #2236 and/or Target store #1327 and/or Target store #1360 and/or Target store #0825, 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

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about January 15, 2020 through January 23, 2020, recklessly did traffic in the property of Target store #1141 and/or Target store #2236 and/or Target store #1327 and/or Target store #1360 and/or Target store #0825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 28

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about October 26, 2020, 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 Target store #1335, 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 29

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about October 27, 2020, recklessly did traffic in the property of Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 30

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about November 9, 2020, 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 Target store #0825, 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 31

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about November 9, 2020, recklessly did traffic in the property of Target store #0825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 32

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2021 through December 31, 2021, knowing or having reason to know that [REDACTED] was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 33

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,
A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2021 through December 31, 2021, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 34

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2021 through December 31, 2021, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 35

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about April 30, 2021, 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 Target store #2149, 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 36

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about April 30, 2021, recklessly did traffic in the property of Target store #2149, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 37

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about December 11, 2021 through December 30, 2021, 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

Target store #825 and/or Target store #936, 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 38

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about December 11, 2021 through December 30, 2021, recklessly did traffic in the property of Target store #825 and/or Target store #936, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 39

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2022 through December 31, 2022, knowing or having reason to know that [REDACTED] was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 40

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),

[REDACTED] on or about January 1, 2022 through December 31, 2022, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 41

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2022 through December 31, 2022, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 42

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 11, 2022 through January 25, 2022, 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 Target store #1360 and/or Target store #825, 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 43

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about January 11, 2022 through January 25, 2022, recklessly did traffic in the property of Target store #1360 and/or Target store #825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 44

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about February 8, 2022, 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 Target store #1360, 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 45

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about February 11, 2022 through February 20, 2022, 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 Target store

#1335 and/or Target store #1432, 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 46

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

[REDACTED] on or about February 8, 2022 through February 20, 2022, recklessly did traffic in the property of Target store #1360 and/or Target store #1335 and/or Target store #1432, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 47

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about March 17, 2022, 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 Target store #825, 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 48

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about March 21, 2022, 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 Target store #1335, 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 49

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about March 17, 2022 through March 21, 2022, recklessly did traffic in the property of Target store #825 and/or Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 50

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about June 14, 2022, 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 Target store #825, 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 51

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about June 14, 2022 and/or June 15, 2022, recklessly did traffic in the property of Target store #825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 52

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about July 1, 2022 through July 19, 2022, 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 Target store #1327 and or Target #825, 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 53

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about July 22, 2022, 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 Target store #1335, 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 54

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

[REDACTED]
on or about July 1, 2022 through July 22, 2022, recklessly did traffic in the property of Target store #1327 and/or Target store #825 and/or Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 55

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about August 25, 2022, 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 Target store #2341, 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 56

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about August 25, 2022, recklessly did traffic in the property of Target store #2341, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 57

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about September 14, 2022 through September 22, 2022, 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 Target store #2341 and/or Target store #2227 and/or Target store #825, 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 58

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about September 14, 2022 through September 22, 2022, recklessly did traffic in the property of Target store #2341 and/or Target store #2227 and/or Target store #825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 59

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about October 7, 2022 through October 15, 2022, 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 Target store #825 and/or Target store #2341, 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 60

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

[REDACTED] on or about October 7, 2022 through October 15, 2022, recklessly did traffic in the property of Target store #825 and/or Target store #2341, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 61

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about November 22, 2022, 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 Target store #2341, 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 62

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

[REDACTED] on or about November 22, 2022, recklessly did traffic in the property of Target store #2341, to-wit:

DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 63

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),

[REDACTED] on or about January 1, 2023 through December 31, 2023, knowing or having reason to know that [REDACTED] was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 64

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,
A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),

[REDACTED] on or about January 1, 2023 through December 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart,

by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 65

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2023 through December 31, 2023, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 66

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 4, 2023, 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 Target store #1327, 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 67

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 21, 2023 through January 29, 2023, 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 Target store #909 and/or Target store #1335, 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 68

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about January 4, 2023 through January 29, 2023, recklessly did traffic in the property of Target store #1327 and/or Target store #909 and/or Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 69

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about March 8, 2023, 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 store #1533, 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 70

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about March 8, 2023, recklessly did traffic in the property of Walmart store #1533, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 71

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about April 8, 2023, 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 #2112, 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 72

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about April 19, 2023 through April 20, 2023, 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 store #2671, 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 73

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] and [REDACTED] on or about April 8, 2023 through April 20, 2023, recklessly did traffic in the property of Walmart store #~~2671~~²¹¹² and/or Walmart store #2671, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 74

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about June 26, 2023, 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 store #1612, 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 75

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about June 26, 2023, recklessly did traffic in the property of Walmart store #1612, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 76

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about August 4, 2023 through August 17, 2023, 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 Target store #825, 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 77

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about August 4, 2023 through August 17, 2023, recklessly did traffic in the property of Target store #825, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 78

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about December 1, 2023, 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 Target store #854, 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 79

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about December 7, 2023 through December 26, 2023, 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 Target store #1335 and/or Walmart store #3241 and/or Walmart store #5429 and/or Walmart store #2777, 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 80

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

[REDACTED] on or about December 1, 2023 through December 26, 2023, recklessly did traffic in the property of Target store #854 and/or Target store #1335 and/or Walmart store #3241 and/or Walmart store #5429 and/or Walmart store #2777, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 81

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2024 through December 31, 2024, knowing or having reason to know that Money was the proceeds of an offense, did acquire or maintain an interest in, transact,

transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-701, 13-702, and 13-801.

COUNT 82

FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED] on or about January 1, 2024 through December 31, 2024, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from Target and/or Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A) and (C), 13-701, 13-702, and 13-801.

COUNT 83

TRAFFICKING IN STOLEN PROPERTY, FIRST DEGREE,

A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), and CARLOS FLORES (005), on or about January 1, 2024 through December 31, 2024, knowingly did initiate, organize, plan, finance, direct, manage, or supervise the theft and trafficking in the property of Target and/or Walmart that had been stolen, to-wit: DVDs and/or Blu-Ray discs, in violation of A.R.S. §§ 13-2301, 13-2307(B), 13-701, 13-702, and 13-801.

COUNT 84

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about January 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 Target store #1335, 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 85

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about January 30, 2024, recklessly did traffic in the property of Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 86

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about February 1, 2024 through February 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 Target store #2747 and/or Target store #1335, 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 87

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about February 1, 2024 through February 29, 2024, recklessly did traffic in the property of Target store #2747 and/or Target store #1335, to-wit: DVDs and/or Blu-Ray discs that had been stolen, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 88

ORGANIZED RETAIL THEFT, A CLASS 4 FELONY

[REDACTED] on or about March 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 Target store #825, 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 89

TRAFFICKING IN STOLEN PROPERTY, SECOND DEGREE,

A CLASS 3 FELONY

[REDACTED] on or about March 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 Target store #825, a retail establishment, without paying the purchase price, in violation of A.R.S. §§ 13-2301, 13-2307(A), 13-701, 13-702, and 13-801.

COUNT 90

THEFT, A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED]

[REDACTED] on or about January 1, 2018 through December 31, 2024, without lawful authority, knowingly did control Target and/or Walmart's DVDs and/or Blu-Ray discs, of a value of \$100,000 or more, with the intent to deprive Target and/or 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 91

ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),

[REDACTED]

[REDACTED] on or about January 1, 2018 through December 31, 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, **CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005),**

[REDACTED]

[REDACTED] and others known and/or unknown.

The racketeering included:

- I. Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v),
- II. Trafficking in explosives, weapons or stolen property, in violation of A.R.S. § 13-2301(D)(4)(b)(xii);
- III. A scheme or artifice to defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx); and
- IV. Money Laundering, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi).

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 92

CONSPIRACY, A CLASS 2 FELONY

ISOLD IT ON EBAY (001), CHARLES JUSTIN HUDSON, JR. (002), CHARLES D. HUDSON, SR. (003), SHERRY A. HUDSON (004), CARLOS FLORES (005), [REDACTED]

[REDACTED]

[REDACTED] on or about January 1, 2018, through on or about December 31, 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) Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310;
- 2) Money Laundering, in violation of A.R.S. § 13-2317;
- 3) Organized Retail Theft, in violation of A.R.S. § 13-1819;
- 4) Theft, in violation of A.R.S. § 13-1802; and
- 5) Trafficking in Stolen Property, in violation of A.R.S. § 13-2307.

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 1-90 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 Maricopa, Arizona.

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 6-23-25


MATTHEW MCCRAY
Assistant Attorney General


Foreperson of the Grand Jury