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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.

X **BAY HORN (001),**
(Counts 1-11)

Defendants

Case No. **CR2023-008429-.001**

93 SGJ 88

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNTS 2 - 11: ORGANIZED RETAIL
THEFT**, a Class 4 Felony, in violation of
A.R.S. § 13-1819

The Arizona State Grand Jury accuses **BAY HORN (001)**

charging on this 13th day of November, 2023 that in or from Maricopa County, Arizona

COUNT 1
FRAUDULENT SCHEMES & ARTIFICES

On or between, March 25, 2023 and April 17, 2023, **BAY HORN (001)**

pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A R S §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 2
ORGANIZED RETAIL THEFT- HomeGoods Store #314

On or about March 25, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **HomeGoods Store #314** without paying the purchase price in violation of A.R.S. §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 3
ORGANIZED RETAIL THEFT- HomeGoods Store #517

On or about March 25, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **HomeGoods Store #517**, without paying the purchase price in violation of A.R.S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801.

COUNT 4

ORGANIZED RETAIL THEFT- Marshalls Store #1050

On or about March 25, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **Marshalls Store #1050**, without paying the purchase price in violation of A.R.S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 5

ORGANIZED RETAIL THEFT- TJMaxx Store #665

On or about March 25, 2023, **BAY HORN**

acting alone or

in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **TJMaxx Store #665**, without paying the purchase price in violation of A R.S. §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 6

ORGANIZED RETAIL THEFT- TJMaxx Store #1460

On or about March 25, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **TJMaxx Store #1460**, without paying the purchase price in violation of A.R S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 7

ORGANIZED RETAIL THEFT- Marshalls Store #457

On or about March 26, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **Marshalls Store #457**, without paying the purchase price in violation of A.R.S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 8

ORGANIZED RETAIL THEFT- Marshalls Store #1232

On or about March 26, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **Marshalls Store #1232**, without paying the purchase price in violation of A.R.S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 9

ORGANIZED RETAIL THEFT- Marshalls Store #707

On or about March 27, 2023, **BAY HORN (001)**

acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **Marshalls Store #707**, without paying the purchase price in violation of A.R.S. §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 10

ORGANIZED RETAIL THEFT- TJMaxx Store #049


On or about April 16, 2023, **BAY HORN (001)** acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **TJMaxx Store #049**, without paying the purchase price in violation of A.R.S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

COUNT 11

ORGANIZED RETAIL THEFT- TJMaxx Store #150

On or about April 17, 2023, **BAY HORN (001)** acting alone or in conjunction with another person(s), used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment, **TJMaxx Store #150**, without paying the purchase price in violation of A.R S §§ 13-1819(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701,13-702, 13-801

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



(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



BRIAN GUERRERO
Assistant Attorney General
Criminal Division

#11631572

Dated: _____

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11/13/23



Foreperson of the State Grand Jury