

KM

SEP 27 11:11
CLERK

1 TERRY GODDARD
Attorney General
2 (Firm State Bar No. 14000)
3 Assigned Attorney
LAURA M. RECKART
4 State Bar No. 012557
Assistant Attorney General
5 Drug Enforcement & Violent Crimes Section
1275 West Washington Street
6 Phoenix, Arizona 85007-2926
(602) 542-3881
7 Attorneys for the State

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **IN AND FOR THE COUNTY OF MOHAVE**

13 STATE OF ARIZONA,
14 Plaintiff,
15 vs.
16
17 ORSON WILLIAM BLACK, JR.
18 Defendant.

No. CR 2003- 239
DIRECT COMPLAINT
CHARGING VIOLATIONS OF:

COUNTS 1 and 3: Conspiracy to Commit Sexual Conduct
With a Minor, in violation of A.R.S. §§ 13-1003, 13-1405,
Class 6 Felonies
COUNTS 2, 4 and 5 : Sexual Conduct With a Minor, in
violation of A.R.S. §§ 13-1003, 13-1405, a Class 6 Felonies

21 The complainant herein personally appears and, being duly sworn, complains on information and
22 belief against ORSON WILLIAM BLACK JR., charging that in Mohave County, Arizona:

23 **COUNT 1**

24 On or between May, 1998, and August, 1999, ORSON WILLIAM BLACK, JR., did conspire
25 to commit the offense of: Sexual Conduct with a Minor, Roberta LeAnn Stubbs, who was at least fifteen
26 (15) years of age, but under eighteen years of age.

1 In furtherance of this conspiracy and to the effect the objects thereof, defendant and Roberta
2 LeAnn Stubbs agreed that one of them would commit at least one overt act, including, but not limited
3 to: commission of an act of sexual intercourse as defined by A.R.S. § 13-1401.3, all in violation of
4 A.R.S. §§ 13-1003, 13-1405, 13-1401, 13-301, 13-302, 13-303, 13-304, 13-3821, 13-701, 13-702, 13-
5 702.02 and 13-801.

6 **COUNT 2**

7 On or about August 7, 1999, **ORSON WILLIAM BLACK, JR.**, intentionally or knowingly,
8 engaged in sexual intercourse or oral sexual contact with a minor, Roberta LeAnn Stubbs, who was at
9 least fifteen (15) years of age, but under eighteen years of age, in violation of A.R.S. §§ 13-1405, 13-
10 1401, 13-3821, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02, 13-801 and 13-902.

11 **COUNT 3**

12 On or between November, 1998, and July, 2001, **ORSON WILLIAM BLACK, JR.**, did
13 conspire to commit the offense of: Sexual Conduct with a Minor, Beth M. Stubbs, who was at least
14 fifteen (15) years of age, but under eighteen years of age.

15 In furtherance of this conspiracy and to the effect the objects thereof, defendant and Beth M.
16 Stubbs agreed that one of them would commit at least one overt act, including, but not limited to:
17 commission of an act of sexual intercourse as defined by A.R.S. §13-1401.3, all in violation of A.R.S.
18 §§ 13-1003, 13-1405, 13-1401, 13-3821, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02,
19 13-801 and 13-902.

20 **COUNT 4**

21 On or between June 1, 1999, and July 31, 1999, **ORSON WILLIAM BLACK, JR.**,
22 intentionally or knowingly, engaged in sexual intercourse or oral sexual contact with a minor, Beth M.
23 Stubbs, who was at least fifteen (15) years of age, but under eighteen years of age, in violation of A.R.S.
24 §§ 13-1405, 13-1401, 13-3821, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02, 13-801
25 and 13-902.

26
27
28

COUNT 5

On or about July, 2001, **ORSON WILLIAM BLACK, JR.**, intentionally or knowingly, engaged in sexual intercourse or oral sexual contact with a minor, Beth M. Stubbs, who was at least fifteen (15) years of age, but under eighteen years of age, in violation of A.R.S. §§ 13-1405, 13-1401, 13-3821, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.02, 13-801 and 13-902.

DATED this 27 day of February, 2003

TERRY GODDARD
Attorney General

~~LAURA M. RECKART
Assistant Attorney General
Criminal Division~~

Summons

Ronald G. Gibson
RONALD G. GIBSON
COMPLAINANT

AGENCY: ATTORNEY GENERAL'S OFFICE

SUBSCRIBED AND SWORN to before me this 27th day of February, 2003.

The Clerk of the Superior Court of Maricopa County, Arizona, is hereby directed to file this cause in the Superior Court pursuant to Rule 2.2(b) of the Arizona Rules of Criminal Procedure.

Steven F. Combs
Judge/Commissioner of the Superior Court