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**IN THE KINGMAN/CERBAT JUSTICE COURT PRECINCT  
COUNTY OF MOHAVE STATE OF ARIZONA**

STATE OF ARIZONA,  
Plaintiff,

v.

ALBERT SZU SUN YEH (001),  
Defendant.

Case No: \_\_

**CRIMINAL COMPLAINT  
FELONY**

The complainant herein personally appears and, being duly sworn, complains on information and belief against **ALBERT SZU SUN YEH**, charging that in The Kingman/Cerbat Justice Court Precinct in Mohave County, Arizona:

**Count 1  
CONSPIRACY**

On or between March 25, 2008 to June 17, 2008, Defendant, **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, 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, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **ASSISTING A CRIMINAL SYNDICATE**, a Class 4 Felony, in violation of A.R.S. § 13-2308(C);
- 2) **MONEY LAUNDERING**, a Class 3 Felony, in violation of A.R.S. § 13-2317 and,
- 3) **ADMINISTERING A NARCOTIC DRUG**, a Class 2 Felony, in violation of A.R.S. § 13-3408

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants did commit numerous overt acts, including but not limited to: (a) the overt acts described in **Counts 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14** of this Complaint (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2308(C), 13-2317, 13-3408, 13-3412, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

### **Count 2**

#### **ASSISTING A CRIMINAL SYNDICATE**

On or between March 25, 2008 to June 17, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, assisted a criminal syndicate by committing a felony offense or offenses, whether completed or preparatory, with the intent to promote or further the criminal objectives of the criminal syndicate, including but not limited to those offenses described in the other counts of this Complaint, (which are incorporated herein by reference as if set forth in full,) in violation of A.R.S. §§ 13-2308(C), 13-2317, 13-3408, 13-3412, 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

**Count 3**

**MONEY LAUNDERING**

On or between March 25, 2008 to June 17, 2008, Defendants **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, in violation of A.R.S. §§ 13-2317, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-702.01.

**Count 4**

**ADMINISTERING A NARCOTIC DRUG**

On or about March 25, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 5**

**ADMINISTERING A NARCOTIC DRUG**

On or about April 22, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Oxycodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 6**

**ADMINISTERING A NARCOTIC DRUG**

On or about April 22, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 7**

**ADMINISTERING A NARCOTIC DRUG**

On or about May 6, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 8**

**ADMINISTERING A NARCOTIC DRUG**

On or about May 6, 2008, Defendant **ALBERT SZU SUN YEH** knowingly administered a narcotic drug, Oxycodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

**Count 9**

**ADMINISTERING A NARCOTIC DRUG**

On or about May 20, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 10**

**ADMINISTERING A NARCOTIC DRUG**

On or about May 20, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Oxycodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

**Count 11**

**ADMINISTERING A NARCOTIC DRUG**

On or about May 20, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

**Count 12**

**ADMINISTERING A NARCOTIC DRUG**

On or about June 17, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Hydrocodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 13**

**ADMINISTERING A NARCOTIC DRUG**

On or about June 17, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Oxycodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-701, 13-702, 13-702.01, and 13-801.

**Count 14**

**ADMINISTERING A NARCOTIC DRUG**

On or about June 17, 2008, Defendant **ALBERT SZU SUN YEH**, at the Golden Valley Medical Plaza, 4995 West Highway 68, Suite 1, Golden Valley, Arizona, knowingly administered a narcotic drug, Oxycodone, to another person in violation of A.R.S. §§ 13-3408, 13-3401, 13-3412, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

TERRY GODDARD  
ATTORNEY GENERAL

\_\_\_\_\_  
DOUGLAS LAU  
Assistant Attorney General  
Criminal Division  
PHX-#499612-v1

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
JUSTICE OF THE PEACE

Physical Description:

RACE: <>/SEX: Male/DOB: 01/02/1965 /SSN: 604-40-9041

HEIGHT: 5'8"/WEIGHT: 190/HAIR: Black/EYES: Brown

LKA: 300 N. Royal Ascot Dr., Las Vegas, Nevada, 89144

DL: Nevada, 1601256576

OFFICER: Erin Hager, AGENCY: Drug Enforcement Administration DR#: DEA MN-07-2034

**Review #: <>**

**VICTIM APPLICABLE:** NO X

**REQUEST: SUMMONS**

**DEFENDANT: OUT OF CUSTODY**