



1 **COUNT ONE: ILLEGALLY CONDUCTING AN ENTERPRISE, A Class 3 Felony**

2 On or about August 2010 through November 15, 2010, **VICTOR MANUEL VERDUGO,**  
3 **RICARDO BALMACEDA, 003, 005, THOMAS JOSEPH PABLO, FRANCISCO GOMEZ, JR.,**  
4 **008, JUAN PEDRO KOONS, RAUL ERNESTOACOSTA, YVONNE VERDUGO, VERA**  
5 **CHAVEZ-ARAIZA, 013, 014, 015, 016, 004 and 017 and 018** knowingly committed illegally  
6 conducting an enterprise by being employed or  
7 associated in fact, and conducting or participating in the conduct of the affairs of such an enterprise  
8 through racketeering, as set forth in Counts 2-67, herein,

9 GOALS OF THE ENTERPRISE

10 The goals of the enterprise include:

11 Acquiring and maintaining sources of supply for hundreds of pounds of marijuana from suppliers in  
12 Mexico;

13 Selling marijuana and other illegal drugs in exchange for cash and/or vehicles, and transportation of  
14 marijuana throughout Arizona, Nevada and other surrounding States;

15 To use racketeering activity to provide marijuana and/or other illegal drugs to satiate additions, and  
16 provide financial gain for those participating in the enterprise.

17 METHODS AND MEANS

18 The enterprise required large amounts of marijuana and other illegal drugs to sustain illegal  
19 operations. VICTOR VERDUGO maintained numerous cell phones to remain in constant contact  
20 with numerous members of the organization at all times. He directed both money and marijuana,  
21 incoming and outgoing from both his residence in Tucson, Pima County, and the residence of other  
22 members of the organization in both Tucson and outlying areas in Sells, Pima County and San  
23 Miguel, Pima County.

24 Racketeer RICARDO BALMACEDA organized and participated in transporting money, vehicles  
25 and drugs to and from Mexico, throughout southern Arizona and the State of Nevada, to maintain the  
26 constant flow of these commodities for the organization. He assisted in directing other members of the  
27 organization to facilitate the uninterrupted and timely delivery of items to insure satisfaction of service  
28 to their customers.

Racketeer 018, a citizen of Mexico, organized the delivery of marijuana  
and money into the United States through unguarded and unrestricted corridors along the Mexico/US  
border located just south of San Miguel, AZ, as well as through regular ports of entry. His  
organization had secured numerous individuals living in or working for the Tohono O'Odham  
reservation and the military presence assigned to protect that border, who assisted in the transportation  
of illegal contraband through the Reservation and into Pima County.

STRUCTURE OF THE ENTERPRISE

The enterprise was maintained and supervised by VICTOR MANUEL VERDUGO and 018. 018's  
role was to secure, maintain or otherwise obtain marijuana from lands within Mexico, package that  
product and arrange for it's safe passage into the United States. Once within the United States,

1 VERDUGO directed and managed the sale and distribution of the drugs to established customers in southern Arizona and Nevada.

2 The remaining members of the organization all participated in the transportation, delivery or holding of drugs and/or money as it moved throughout the system. RICARDO BALMACEDA, YVONNE VERDUGO, VERA CHAVEZ-ARAIZA, 003, 005, 006, 013, 015, 016 and 'MRS. 018 all transported drugs and/or money to and from Mexico, Tucson and/or Las Vegas, NV.

4 JUAN PERDO KOONS bought large amounts of marijuana from VICTOR VERUGO and then used his son-in-law, FRANCISCO GOMEZ, JR., and his associates, 014, 008 and 010 to deal that product in Tucson, Pima County.

### 6 CONDUCT OF THE ENTERPRISE/RACKETEERING

7 The racketeers, in furtherance of illegally conducting an enterprise, committed one or more of the following acts of racketeering activity;

9 1) On or about August 11, 2010, GOMEZ, 010 and 008 negotiated a deal with an unknown person who was given a 16 lb. bale of marijuana, as a sample, to take to a buyer. The bale was returned to 008 after it was inspected by the buyer. (Counts 3 & 4 )

11 2) On or about August 20, 2010, GOMEZ sold 004 \$40 worth of cocaine. (Counts 5 - 7 )

12 3) On or about August 30, 2010, GOMEZ and 014 discussed how much is being ordered, how much is on hand and that the price per pound will be \$450, GOMEZ called KOONS and ask him to order a quarter to which KOONS agreed. The following day, KOONS obtained a load of marijuana from VERDUGO and gave it to GOMEZ and 014 so they could sell to their customers. (Counts 8 & 9)

14 4) On or about September 1-3, 2010, following calls from VERDUGO to hurry and pay, GOMEZ and/or 014 deposited money into VERDUGO's bank account, to cover the cost of the marijuana that had been delivered to KOONS. (calls 634, 637, 638, 650, 657, 662, 678 ) (Counts 10 & 11)

16 5) On or about September 28, 2010, 014 contacted GOMEZ and KOONS regarding getting samples of both marijuana and cocaine to offer to customers who were looking for suppliers for a larger market they had. GOMEZ and KOONS did supply 014 with the samples. (Counts 12 - 15)

18 6) On or about October 2-4, 2010, VERDUGO demanded that GOMEZ contact 'Julio' regarding paying the money he owed Verdugo. Verdugo was out \$1800 for drugs he had fronted 'Julio'. (calls 587, 591, 695) (Counts 16)

20 7) On or about October 2-3, 2010, GOMEZ sold a baggie of marijuana and/or other illegal drugs to "Mary" for \$15. (Count 17 & 18)

22 8) On or about October 4, 2010, VERDUGO and 'MARK' reach an agreement on price, \$450 a lb. for a load of marijuana that is scheduled to arrive in 1 ½ weeks. (calls 695, 721)

24 9) On or about October 5, 2010, at approx. 11:30am, VERDUGO was contacted by 003 regarding a load he was to bring to Verdugo per 018 and that the cost for the load would be \$25,500. VERDUGO then contacted 018 regarding the load and 018 commented that 003 was being slow about his deliveries. (calls 64, 69)

26 10) On or about October 5, 018 contacted VERDUGO regarding a new load being transported up by "Jesus" and that the price for that load would be \$24,600, and that VERDUGO should give 'Jesus'

1 \$1,600. That evening, 'Jesus' arrived in Tucson and contacted VERDUGO at approx. 9:30pm.  
2 VERDUGO left his house and went to 409 W. Lincoln, where he briefly met a male, and then they  
3 parted. VERDUGO then called BALMACEDA and told him to come over to assist. ( calls 69, 120,  
4 124) (Counts 19-21)

5 11) On or about October 6, 2010 at approx. 9:30am, VERDUGO asked 018 where he should send  
6 BALMACEDA and 018 instructs him to go to 018's house. (call 141) (Count 22)

7 12) On or about October 6, 2010, in the early afternoon, 006, VERDUGO, CHAVEZ-ARAIZA and  
8 013, conspired to exchange vehicles in order to facilitate moving/exchanging money and drugs. After  
9 collecting money from VERDUGO, 006 met 005 at a shopping center, gave the money to 005 and  
10 then they drove separate vehicle to the Tohono O'Odham Reservation (calls 194, 200, 208, 210, 215,  
11 221) (Counts 23-25)

12 13) On or about October 6, 2010, in the late afternoon, VERDUGO, BALMACEDA and CHAVEZ-  
13 ARAIZA arrange a meeting to come up with a plan. Early the following morning, VERDUGO and  
14 CHAVEZ-ARAIZA confirm that BALMACEDA will go to VERA's residence that day and wrap the  
15 load that was delivered. (call 255) (call 230)

16 14) On or about October 7, 2010, VERDUGO and 018 discussed that the next delivery would  
17 not be until the next day because their couriers, the "active soldiers" (005) had training that day so  
18 would not be available until the day after. 018 reported to VERDUGO that the ranch located by  
19 the church in San Miguel, on the reservation, is "hot" therefore Martin is not delivering. (call 257)

20 15) On or about October 7, 2010, 'EDDIE', VERDUGO and BALMACEDA met in a parking lot on  
21 Valencia and exchanged \$17,800 which 'EDDIE' immediately took to Mexico for 018. (calls 257,  
22 286, 602, 316, 628, 637, 318, 354) (Counts 26 & 27)

23 16) On or about October 7, 2010, VERDUGO, 018 and 'TIO' discuss what weights should be for the  
24 load that had been and was being delivered by 013. They discussed that the number of packages may  
25 have been different due to breaking up the original packaging to be better able to pack (hide) it in the  
26 transport vehicle. (calls 322, 335)

27 17) On or about October 8, 2010, 003 delivered a load of marijuana from 018 to VERDUGO.  
28 BALMACEDA and VERDUGO then collect \$26,700 and deliver it to 003 at a Circle K parking lot.  
(calls 399, 401, 405, 412, 421, 426, 430) (Counts 28 - 30)

18) On or about October 8 2010, following the exchange of drugs and money with 003, VERDUGO  
and BALMACEDA went to a residence. Exchanges of packages of various kinds were observed there  
and then various furniture items and boxes were loaded into a truck, which then was driven south on I-  
19 and crossed into Mexico through the Nogales Port of Entry.

19) On or about October 8, 2010, in the evening, VERDUGO, 018 and 'TIO' discussed obtaining  
money to pay 013 so he would not get angry and would continue to make deliveries. During their  
calls, VERDUGO was having conversations with 013 regarding what 'product' he still had and that  
013 demanded payment at time of delivery. (calls 438, 443, 452, 454, 491, 518)

20) On or about, October 9, 2010, BALMACEDA and YVONNE VERDUGO took a load of  
marijuana to Las Vegas, NV. V. VERDUGO kept in contact with them during the trip, directing their  
actions and when to contact people in Las Vegas regarding when/where to meet. BALMACEDA and  
YVONNE made their delivery in Las Vegas, collected money and returned to Tucson the same day.

1 YVONNE took her two young daughters with her on the trip. (calls 533, 802, 811, 567, 822, 589, 599,  
2 606, 626, 648) (Counts 31 - 36)

3 21) On or about October 9, 2010, 018 sent his wife, "Mrs. 018 to Tucson with a delivery of money for  
4 VERDUGO to use to pay 013. Mrs. 018 utilized a shuttle service from the Nogales border to Tucson  
5 where she met VERDUGO, gave him the money and then immediately returned to Mexico on a  
6 shuttle. Prior to Mrs. 018 arriving, in an effort to obtain money to pay 013 with, VERDUGO called  
7 003 in attempt to borrow money back but when that was unsuccessful, VERDUGO called on  
8 CHAVEZ-ARAIZA to withdraw money from her bank accounts and then to deliver it to 013 because  
9 VERDUGO told 013 he was out of town. (calls 538, 545, 558, 582, 536, 551, 552, 553, 555, 579)  
10 (Counts 37-39)

11 22) On or about October 9, 2010, GOMEZ and 014 discussed customers who were wanting upwards  
12 of 170-200 pounds of marijuana and that they needed to look at the quality of what VERDUGO had  
13 and compare prices. (calls 1077, 1095, 1103, 1123, 1126)

14 23) On or about October 9, 2010, KOONS contacted GOMEZ requesting that GOMEZ come to his  
15 house to supply a customer with marijuana that he did not have on hand. GOMEZ delivered drugs to  
16 KOONS' house. (call 1085) (Counts 40 & 41)

17 24) On or about October 9, 2010, VERDUGO called CHAVEZ-ARAIZA and asked her to take a run  
18 by the stash house to verify that it was safe, which she did and let him know all was well. (call 649,  
19 650)

20 25) On or about October 10, 2010, VERDUGO and BALMACEDA divided the money from the Las  
21 Vegas sale, giving BALMACEDA \$10,000, setting aside \$3000 to pay 013 and BALMACEDA said  
22 he would drop off \$32,000 to 018 on his way down to Hermosillo that day. (calls 670, 684, 690, 692,  
23 693, 701 710) (Counts 42 & 43)

24 26) On or about October 10, 2010, 018 and VERDUGO discussed what was available and what  
25 money VERDUGO had available to pay for the product and to pay 013 for transporting. A plan was  
26 made to send three bales up with 013 as soon as he was available that week. (call 701) (Count 44)

27 27) On or about October 11, 2010, VERDUGO met 013 and gave him money. They then made plans  
28 for a delivery of marijuana the following morning. On the morning of October 12, 2010, VERDUGO  
and CHAVEZ-ARAIZA met 013 and 005 and excepted a car loaded with marijuana which  
VERDUGO took to CHAVEZ-ARAIZA's residence, unloaded and then put the money for the load  
into the car and returned the car to 005. (calls 835, 836, 840, 841, 842, 844, 847, 848, 851) (Count  
45-47)

21 28) On or about October 14-15, 2010, GOMEZ ordered 100 lbs. of marijuana from VERDUGO and  
22 asked him to load it into a vehicle. VERDUGO told BALMACEDA to use his truck to load the  
23 marijuana in and then leave it at an agreed upon location for GOMEZ to pick up. The truck was  
24 picked up and taken to an unknown location, unloaded the marijuana and returned the truck to  
25 BALMACEDA however, didn't put money in it to pay for the load. VERDUGO demanded payment  
26 from GOMEZ who continued to put VERDUGO off saying he was waiting on his customer to pay him  
27 and as soon as he did, GOMEZ would pay VERDUGO. After more then 24 hours, VERDUGO began  
28 to threaten GOMEZ with death if the bill for the marijuana delivery was not paid. (calls 1065, 1073,  
1081, 1084, 1147, 1155, 1158, 1162, 1172, 1177, 1205, 1220, 1224, 1228, 1238, 1246, 1250, 1268,  
1289, 1291, 1306, 1311, 1316, 1321, 1377) (Counts 48-50)

1 29) On or about October 15, 2010, at 3:00am, 015 arrived at VERDUGO's house and assisted in  
loading approximately 280 lbs. of marijuana into his van. 015 then drove the load of marijuana to Las  
2 Vegas where it was confiscated by police. (calls 1348 ) (Counts 51-53)

3 30) On or about October 15, 2010, VERDUGO directed BALMACEDA to run to Mexico with  
\$29,300 to deliver to 018 and/or 'TIO' for payment for recent marijuana deliveries. (calls 1270, 1272,  
4 1273, 1285, 1307) (Counts 54 & 55)

5 31) On or about October 21, 2010, 013 had 017 send his courier to the hospital where 013 was to  
pick up an 8 lb. brick of marijuana that 013 took to the hospital with him. (calls 6, 14, 19, 20, 25 )  
6 (Counts 56 & 57)

7 32) On or about October 20-22, VERDUGO was actively looking for 014, by surveiling the school  
where his children had been attending and known apartment complexes where 014 had lived. 014 had  
8 failed to pay for a load of marijuana that had been fronted to GOMEZ on his behalf (see #28) and  
VERDUGO wanted to contact 014 to secure his money. GOMEZ and BALMECEDA also joined in  
9 the search at VERDUGO's demand. Gomez's wife assisted by contacting a relative at TEP in an  
attempt to obtain an address for 014's family members however, the relative refused to provide the  
10 information. On October 21, 2010, while VERDUGO was driving around a school watching for 014  
or his children, police stopped him for suspicious activity but let him go because he had his infant son  
11 in the vehicle. (calls 1477, 1899, 1900, 1905, 1495, 1943, 1949, 1512, 1953, 1531, 1986, 2007, 2018,  
2024, 1535, 1577, 2137, 2147, 2148, 2152, 1584, 2174 ) (Counts 58 & 59)

12 33) On or about October 26-27, 2010, VERDUGO drove to Buckeye, AZ to meet with a person,  
referred to as 'the dark guy', with connections to Calif. customers, at a \$400,000 home. During his  
13 travels, VERDUGO had discussions with his wife, YVONNE, regarding what monies were being  
discussed with the Calif. people and what he could be bringing home. VERDUGO took his infant son  
14 with him on his trip. (calls 2535, 2536, 2562, 2567, 2577, 2585)

15 34) On or about October 28, 2010, VERDUGO met and received money from his Las Vegas  
16 customer, Female, for a load of marijuana. (Counts 60)

17 35) On or about October 28, 2010, BALMACEDA drove to a parking lot where he met 013 and, 005.  
BALMACEDA received the keys to 005' vehicle, which he then drove away, leaving the others in the  
18 parking lot. BALMACEDA drove the car to CHAVEZ-ARAIZA's residence where VERDUGO met  
him and they unloaded the marijuana. Approx. 30 minutes later, BALMACEDA returned to the  
19 parking lot and returned the keys to 005, who then returned to his car, opened and checked the trunk,  
then drove to the Tohono O'Odham Reservation, followed by 013. (calls 1754, 1755. 1756, 1759,  
20 1764, 2661, 1785, 2686 ) (Counts 61-63)

21 36) On or about October 29, 2010, 013 delivered the remainder of the load that had not fit in his  
vehicle the day before. BALMACEDA and VERDUGO met him, took the load and paid 013. (calls  
22 1850, 1855, 1856, 1858, ) (Counts 64)

23 37) On or about October 29, 2010, 013 contacted 017 who then met 013 to pay him \$3000 for  
marijuana he had received. (calls 125, 149, 150, 158, 160) (Count 65)

24 38) On or about October 30-31, 2010, VERDUGO and CHAVEZ-ARAIZA went to Las Vegas to  
25 make a delivery and BALMACEDA was the companion vehicle. CHAVEZ-ARAIZA made the motel  
reservations for them. On the way back on October 31, 2010, VERDUGO told 018 that he had  
26 received \$20,000 and that BALMACEDA would be bringing that same amount down to him. (calls  
2813, 1864, 2828, 2830, 1911, 1919, 2945, `937, 1942, 2954) (Counts 66-67)

1 in violation of A.R.S. §§ 13-2312(B) & (D), 13-2301(D)(2) & (4), 13-3401(36), 13-33418,  
2 13-3420, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

3 **COUNT TWO: CONSPIRACY TO COMMIT UNLAWFUL POSSESSION OF MARIJUANA,**  
4 **A Class 2 Felony**

5 On or about August 2010 through November 15, 2010, **VICTOR MANUEL VERDUGO,**  
6 **RICARDO BALMACEDA, 003, 005, THOMAS JOSEPH PABLO, FRANCISCO GOMEZ, JR.,**  
7 **008, JUAN PEDRO KOONS, RAUL ERNESTOACOSTA, YVONNE VERDUGO, VERA**  
8 **CHAVEZ-ARAIZA, 013, 014, 015, 016, 017 and 018,** conspired together to possess and/or transport  
9 marijuana for sale, and in furtherance thereof,  
10 committed various acts including, as set forth in the following Counts :

11 **FRANCSICO GOMEZ, JR. and 008** negotiated a deal on August 11, 2010 to sell a 100 lb. of  
12 marijuana to an undercover officer. (count 3 )

13 **JUAN PEDRO KOONS** ordered and received a load of marijuana from **VICTOR M. VERDUGO** on  
14 August 31, 2010, which was divided out to **FRANCSICO GOMEZ, JR. and 014** to sell to waiting  
15 customers. (Count 8)

16 **FRANCISCO GOMEZ, JR.** sold 'Mary' a small amount of marijuana and other illicit drugs on  
17 October 3, 2010. (Count 18)

18 **VICTOR VERDUGO** received a load of marijuana on October 5, 2010 from 006 and 013, which had  
19 been brought in through the Tohono O'Odham Reservation packed in 006's truck. (Count 19)

20 **VICTOR VERDUGO** received a load of marijuana on October 6, 2010 from 006 and 013 and took it  
21 to **VERA CHAVEZ-ARAIZA's** house for processing. (Count 24)

22 **003** delivered a load of marijuana to **VICTOR M. VERDUGO** on October 8, 2010, reported to have  
23 come from 018, for which **VERDUGO** gave \$26,700 to 003 to take back to 018. (Counts 29)

24 **RICARDO BALMACEDA and YVONNE VERDUGO** transported a load of marijuana to Las Vegas,  
25 NV on October 9, 2010 and delivered it to customers there. Those customers paid approx. \$45,000 in  
26 cash, which **BALMACEDA and VERDUGO** brought back to Tucson. (Counts 33)

27 **FRANCSICO GOMEZ, JR.** delivered drugs to **JUAN PEDRO KOONS** on October 9, 2010, to sell to  
28 a customer from whom **KOONS** had received an order. (Count 43)

**VICTOR VERDUGO** received a load of marijuana on October 12, 2010 from 006 and 013. (Count 48)

**FRANCSICO GOMEZ, JR.** order 100 lbs. of marijuana from **VICTOR VERDUGO** on October 14,  
2010. **VERDUGO** then utilized **RICARDO BALMACEDA'S** truck to pack the marijuana in to  
deliver to **GOMEZ.** (Count 51)

1 015 received 280 lbs. of marijuana from VICTOR VERDUGO, on October 15, 2010 at VERDUGO's  
2 house. 015 then drove the load of marijuana to Las Vegas, NV. (Count 54)

3 013 sold 8 lbs. of marijuana to 017 on October 21, 2010. (Count 58)

4 VICTOR VERDUGO and RICARDO BALMACEDA received a load of marijuana from 006, 005 and  
5 013 on October 28, 2010. (Count 64)

6 VICTOR VERDUGO received a load of marijuana from 006, and 013 on October 29, 2010. (Count  
7 66)

8 VICTOR MANUEL VERDUGO, VERA CHAVEZ-ARAIZA and RICARDO BALMACEDA  
9 delivered a load of marijuana to Las Vegas, NV on October 30, 2010. (Count 68)

10 In violation of A.R.S. §§ 13-1003, 13-3405, 13-3401(36), 13-3418, 13-3420, 13-301,  
11 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

12 SALE OF MARIJUANA TO UC OFFICER

13 **COUNT THREE: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

14 On or about August 11, 2010, FRANCISCO GOMEZ, JR., RAUL ERNESTOACOSTA and  
15 008, unlawfully possessed an amount of marijuana for sale weighing over four (4) pounds, in  
16 violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-301, 13-302, 13-  
17 303, 13-604, 13-701, 13-702, 13-801, 13-811;

18 **COUNT FOUR: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE  
19 A DRUG-RELATED TRANSACTION, A Class 4 Felony**

20 On or about August 11, 2010, FRANCISCO GOMEZ, JR. and 008 , unlawfully used a wire  
21 communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for the sale,  
22 transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-  
23 603, 13-604, 13-701, 13-702, 13-801;

24 GOMEZ SALE OF COCAINE

25 **COUNT FIVE: POSSESSION OF A NARCOTIC DRUG FOR SALE, A Class 2 Felony**

26 On or about August 20, 2010, FRANCISCO GOMEZ, JR., unlawfully possessed a  
27 narcotic drug, to wit: cocaine, for sale, in violation of A.R.S. §§ 13-3408(A)(2) & (B)(2), 13-  
28 3401(36), 13-3413, 13-3420, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

**COUNT SIX: POSSESSION OF A NARCOTIC DRUG FOR USE, A Class 4 Felony**

1 On or about August 20, 2010, 004 unlawfully possessed a narcotic drug, to wit: cocaine, for  
2 use, in violation of A.R.S. §§ 13-3408(A)(1) & (B)(1), 13-3401(36), 13-3413, 13-3420, 13-301,13-  
302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811

3  
4 **COUNT SEVEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE**  
5 **A DRUG-RELATED TRANSACTION, A Class 4 Felony**

6 On or about August 20, 2010, FRANCISCO GOMEZ, JR. and 004, unlawfully used a wire  
7 communication to facilitate a drug-related transaction to facilitate a violation of 13-3408 for the sale,  
8 transfer and/or sale of COCAINE, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-  
9 603, 13-604, 13-701, 13-702, 13-801;

10 KOONS ORCHESTRATING SALE OF MARIJUANA

11 **COUNT EIGHT: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

12 On or about August 31, 2010, JUAN PEDRO KOONS, unlawfully possessed an amount of  
13 marijuana for sale weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6),  
14 13-3401(36), 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

15 **COUNT NINE: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE**  
16 **A DRUG-RELATED TRANSACTION, A Class 4 Felony**

17 On or about August 30, 2010, JUAN PEDRO KOONS, VICTOR MANUEL VERDUGO ,  
18 FRANCISCO GOMEZ, JR. and 014, unlawfully used a wire communication to facilitate a drug-  
19 related transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in  
20 violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

21 VERDUGO ORDERING PAYMENT OF DEBTS

22 **COUNT TEN: MONEY LAUNDERING in the FIRST DEGREE, A Class 2 Felony**

23 On or about September 1, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
24 organized, planned, directed and/or managed the business of money laundering , by ordering  
25 FRANCISCO GOMEZ, JR. to deposit the proceeds from their marijuana sale into his bank account,  
26 in violation of A.R.S. §§ 13-2317(A)(1), 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801,  
27 13-811;

28 **COUNT ELEVEN: MONEY LAUNDERING in the SECOND DEGREE, A Class 3 Felony**

On or about September 1-3, 2010, FRANCISCO GOMEZ, JR. and 014, knowingly  
transferred, transported, received and/or concealed money associated with the business of money  
laundering , in violation of A.R.S. §§ 13-2317(B), 13-301, 13-302, 13-303, 13-604, 13-701, 13-702,  
13-801, 13-811;

1  
2  
3 014 NEEDING SAMPLES OF MARIJUANA AND COCAINE

4 **COUNT TWELVE: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
5 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

6 On or about September 28, 2010, 014, FRANCISCO GOMEZ. JR. and JUAN PEDRO  
7 KOONS and VICTOR M. VERDUGO, unlawfully used a wire communication to facilitate a drug-  
8 related transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in  
violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

9 **COUNT THIRTEEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
10 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

11 On or about September 28, 2010, 014, FRANCISCO GOMEZ, JR. and JUAN PEDRO  
12 KOONS , unlawfully used a wire communication to facilitate a drug-related transaction to facilitate a  
13 violation of 13-3408, for the sale, transfer and/or sale of cocaine, in violation of A.R.S. §§ 13-  
3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

14 **COUNT FOURTEEN: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

15 On or about September 28, 2010, 014, unlawfully possessed an amount of marijuana for sale  
16 weighing more then four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36),  
13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

17 **COUNT FIFTEEN: POSSESSION OF A NARCOTIC DRUG FOR SALE, A Class 2 Felony**

18 On or about September 28, 2010, 014, unlawfully possessed a narcotic drug, to wit: cocaine,  
19 for sale, in violation of A.R.S. §§ 13-3408(A)(2) & (B)(2), 13-3401(36), 13-3413, 13-3420, 13-  
301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

20  
21 VERDUGO ORDERING PAYMENT OF DRUG DEBTS

22 **COUNT SIXTEEN: MONEY LAUNDERING in the FIRST DEGREE, A Class 2 Felony**

23 On or about October 2-4, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
24 organized, planned, directed and/or managed the business of money laundering , by ordering  
FRANCISCO GOMEZ, JR. to collect monies owed to him for drugs fronted for sale, in violation of  
A.R.S. §§ 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

1  
2  
3 GOMEZ SALE OF PERSONAL USE MARIJUANA

4 **COUNT SEVENTEEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
5 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

6 On or about October 2-3, 2010, FRANCISCO GOMEZ, JR. , unlawfully used a wire  
7 communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for the sale,  
8 transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-  
603, 13-604, 13-701, 13-702, 13-801;

9 **COUNT EIGHTEEN: POSSESSION OF MARIJUANA FOR SALE, A Class 4 Felony**

10 On or about October 3, 2010, FRANCISCO GOMEZ, JR., unlawfully possessed an  
11 amount of marijuana for sale weighing less than two (2) pounds, in violation of A.R.S. §§  
12 13-3405(A)(2) & (B)(4), 13-3401(36), 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-  
702, 13-801, 13-811;

13 VERDUGO RECEIVED MARIJUANA ORDER

14 **COUNT NINETEEN: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

15 On or about October 5, 2010, VICTOR MANUEL VERDUGO and RICARDO  
16 BALMACEDA, unlawfully received/possessed an amount of marijuana for sale weighing over four  
17 (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-  
301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

18 **COUNT TWENTY: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
19 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

20 On or about October 5, 2010, VICTOR MANUEL VERDUGO and 018, unlawfully used a  
21 wire communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for the  
22 sale, transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413,  
13-603, 13-604, 13-701, 13-702, 13-801;

23 **COUNT TWENTY-ONE: MONEY LAUNDERING in the SECOND DEGREE,**  
24 **A Class 3 Felony**

25 On or about October 5, 2010, VICTOR MANUEL VERDUGO, knowingly transferred,  
26 transported, received and/or concealed money associated with the business of money laundering , in  
27 violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702,  
28 13-801, 13-811;

1  
2  
3 VERDUGO DIRECTING DELIVERY OF PAYMENTS

4 **COUNT TWENTY-TWO: MONEY LAUNDERING in the FIRST DEGREE, A Class 2**

5 On or about October 6, 2010, VICTOR MANUEL VERDUGO and 018, knowingly initiated,  
6 organized, planned, directed and/or managed the business of money laundering , by directing  
7 RICARDO BALMACEDA to deliver drug transaction monies to 018 at his residence, in violation of  
8 A.R.S. §§ 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

9 VERDUGO RECEIVING AND PAYING FOR MARIJUANA ORDER

10 **COUNT TWENTY-THREE: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
11 FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

12 On or about October 6, 2010, VICTOR MANUEL VERDUGO, THOMAS JOSEPH PABLO,  
13 013 and VERA CHAVEZ-ARAIZA, unlawfully used a wire communication to facilitate a drug-  
14 related transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in  
15 violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

16 **COUNT TWENTY-FOUR: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

17 On or about October 6, 2010, VICTOR MANUEL VERDUGO, THOMAS JOSEPH PABLO,  
18 013 and VERA CHAVEZ-ARAIZA, unlawfully possessed an amount of marijuana for sale weighing  
19 over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-  
20 3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

21 **COUNT TWENTY-FIVE: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

22 On or about October 6, 2010, VICTOR MANUEL VERDUGO, THOMAS JOSEPH PABLO,  
23 013, VERA CHAVEZ-ARAIZA and 005, knowingly transferred, transported, received and/or  
24 concealed money associated with the business of money laundering , In violation of A.R.S. §§ 13-  
25 2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

26 VERDUGO MAKING PAYMENT

27 **COUNT TWENTY-SIX: MONEY LAUNDERING in the SECOND DEGREE, A Class 3 Felony**

28 On or about October 7, 2010, VICTOR MANUEL VERDUGO and RICARDO  
BALMACEDA, knowingly transferred, transported, received and/or concealed money associated  
with the business of money laundering, transferring \$17,800 to 'EDDIE', in violation of A.R.S. §§  
13-2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

1 **COUNT TWENTY-SEVEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
2 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

3 On or about October 7, 2010, VICTOR MANUEL VERDUGO, 018 and RICARDO  
4 BALMACEDA , unlawfully used a wire communication to facilitate a drug-related transaction to  
5 facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in violation of A.R.S.  
6 §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

7 VERDUGO RECIVES AND PAYS FOR LOAD OF MARIJUANA

8 **COUNT TWENTY-EIGHT: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

9 On or about October 8, 2010, 003, 018 and VICTOR MANUEL VERDUGO, unlawfully  
10 possessed an amount of marijuana for sale weighing over four (4) pounds, in violation of A.R.S. §§  
11 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-  
12 702, 13-801, 13-811;

13 **COUNT TWENTY-NINE: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
14 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

15 On or about October 8, 2010, 003, VICTOR MANUEL VERDUGO and RICARDO  
16 BALMACEDA, unlawfully used a wire communication to facilitate a drug-related transaction to  
17 facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in violation of A.R.S.  
18 §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

19 **COUNT THIRTY: MONEY LAUNDERING in the SECOND DEGREE, A Class 3 Felony**

20 On or about October 8, 2010, 003, VICTOR MANUEL VERDUGO, and RICARDO  
21 BALMACEDA, knowingly transferred, transported, received and/or concealed money associated with  
22 the business of money laundering , in violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302,  
23 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

24 VERDUGO DIRECTED LOAD OF MARIJUANA TO LAS VEGAS

25 **COUNT THIRTY-ONE: TRANSPORTATION OF MARIJUANA FOR SALE, A Class 2 Felony**

26 On or about October 9, 2010, RICARDO BALMACEDA and YVONNE VERDUGO,  
27 unlawfully possessed and/or transported an amount of marijuana for sale weighing over four (4)  
28 pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-301,  
13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

**COUNT THIRTY-TWO: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
**FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

On or about October 9, 2010, VICTOR MANUEL VERDUGO, YVONNE VERDUGO, and  
RICARDO BALMACEDA, unlawfully used a wire communication to facilitate a drug-related

1 transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in  
2 violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

3 **COUNT THIRTY-THREE: MONEY LAUNDERING in the FIRST DEGREE, Class 2 Felony**

4 On or about October 9, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
5 organized, planned, directed and/or managed the business of money laundering, in directing the  
6 delivery of marijuana and collection of monies for sale of same, in violation of A.R.S. §§  
7 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

8 **COUNT THIRTY-FOUR: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

9 On or about October 9, 2010, RICARDO BALMACEDA and YVONNE VERDUGO,  
10 knowingly transferred, transported, received and/or concealed money associated with the business of  
11 money laundering, in violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-303,  
12 13-604, 13-701, 13-702, 13-801, 13-811;

13 **COUNT THIRTY-FIVE: CHILD ABUSE A Class 4 Felony**

14 On or about October 9, 2010, YVONNE VERDUGO, intentionally and knowingly  
15 placed a child, Edith, in a situation where the child's person or health was endangered, in  
16 violation of A.R.S. §§ 13-3623(B)(1) & (C), 13-301, 13-302, 13-303, 13-604, 13-701, 13-702,  
17 13-801, 13-811;

18 **COUNT THIRTY-SIX: CHILD ABUSE A Class 4 Felony**

19 On or about October 9, 2010, YVONNE VERDUGO, intentionally and knowingly  
20 placed a child, Valeria, in a situation where the child's person or health was endangered, in  
21 violation of A.R.S. §§ 13-3623(B)(1) & (C), 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801,  
22 13-811;

23 VERDUGO ORCHESTRATING PAYMENT FOR 013

24 **COUNT THIRTY-SEVEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
25 FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

26 On or about October 9, 2010, VICTOR MANUEL VERDUGO and 018, unlawfully used a  
27 wire communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for the  
28 sale, transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413,  
13-603, 13-604, 13-701, 13-702, 13-801;

**COUNT THIRTY-EIGHT: MONEY LAUNDERING in the FIRST DEGREE, Class 2 Felony**

On or about October 9, 2010, VICTOR MANUEL VERDUGO and 018, knowingly initiated,  
organized, planned, directed and/or managed the business of money laundering, in violation of A.R.S.  
§§ 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

1 **COUNT THIRTY-NINE: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

2 On or about October 9, 2010, VICTOR MANUEL VERDUGO, VERA CHAVEZ-ARAIZA  
3 and 013, knowingly transferred, transported, received and/or concealed money associated with the  
4 business of money laundering , In violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-  
5 303, 13-604, 13-701, 13-702, 13-801, 13-811;

6 GOMEZ SALE OF DRUGS TO KOONS' CUSTOMER

7 **COUNT FORTY: UNLAWFUL USE OF A WIRE COMMUNICATION TO FACILITATE  
8 A DRUG-RELATED TRANSACTION, A Class 4 Felony**

9 On or about October 9, 2010, JUAN PEDRO KOONS and FRANCISCO GOMEZ, JR. ,  
10 unlawfully used a wire communication to facilitate a drug-related transaction to facilitate a violation of  
11 13-3405, for the sale, transfer and/or sale of marijuana in violation of A.R.S. §§ 13-3417(A)&(C), 13-  
12 3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

13 **COUNT FORTY-ONE: TRANSPORTATION OF MARIJUANA FOR SALE, A Class 2 Felony**

14 On or about October 9, 2010, FRANCISCO GOMEZ, JR. , unlawfully transported marijuana  
15 for sale, in violation of A.R.S. §§ 13-3405, 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801

16 VERDUGO ORGANIZING DISTRIBUTION OF SALES PROCEEDS

17 **COUNT FORTY-TWO: MONEY LAUNDERING in the FIRST DEGREE, A Class 2 Felony**

18 On or about October 10, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
19 organized, planned, directed and/or managed the business of money laundering , In  
20 violation of A.R.S. §§ 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701,  
21 13-702, 13-801, 13-811;

22 **COUNT FORTY-THREE: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

23 On or about October 10, 2010, RICARDO BALMACEDA, knowingly transferred,  
24 transported, received and/or concealed money associated with the business of money laundering , in  
25 violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702,  
26 13-801, 13-811;

27 VERDUGO & RAFA PLAN NEXT LOAD OF MARIJUANA

28 **COUNT FORTY-FOUR: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

On or about October 10, 2010, VICTOR MANUEL VERDUGO and 018 , unlawfully used a  
wire communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for the

1 sale, transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413,  
2 13-603, 13-604, 13-701, 13-702, 13-801;

3 VERDUGO PAYMENT TO 006, 013 & 005 FOR SERVICES AND MARIJUANA

4 **COUNT FORTY-FIVE: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

5 On or about October 11, 2010, VICTOR MANUEL VERDUGO and 013, knowingly  
6 transferred, transported, received and/or concealed money associated with the  
7 business of money laundering , In violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302,  
8 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

8 **COUNT FORTY-SIX: TRANSPORTATION OF MARIJUANA FOR SALE, Class 2 Felony**

9 On or about October 12, 2010, VICTOR MANUEL VERDUGO, 013, 005 and VERA  
10 CHAVEZ-ARAIZA, unlawfully possessed an amount of marijuana for sale weighing over four (4)  
11 pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-301, 13-  
12 302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

12 **COUNT FORTY-SEVEN: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

13 On or about October 12, 2010, VICTOR MANUEL VERDUGO, 013, VERA CHAVEZ-  
14 ARAIZA and 005, knowingly transferred, transported, received and/or concealed money associated  
15 with the business of money laundering , In violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-  
16 302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

16 GOMEZ ORDERED MARIJUANA FROM VERDUGO

17 **COUNT FORTY-EIGHT: UNLAWFUL USE OF A WIRE COMMUNICATION TO  
18 FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

19 On or about October 14, 2010, VICTOR MANUEL VERDUGO , FRANCISCO GOMEZ, JR.  
20 and RICARDO BALMACEDA, unlawfully used a wire communication to facilitate a drug-related  
21 transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in  
22 violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

22 **COUNT FORTY-NINE: TRANSPORTATION OF MARIJUANA FOR SALE, A Class 2 Felony**

23 On or about October 14, 2010, VICTOR MANUEL VERDUGO, FRANCISCO  
24 GOMEZ, JR. and RICARDO BALMACEDA, unlawfully possessed an amount of marijuana for sale  
25 weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36),  
26 13-3413, 13-3420, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

26 **COUNT FIFTY: MONEY LAUNDERING in the FIRST DEGREE, A Class 2 Felony**

1 On or about October 14-16, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
2 organized, planned, directed and/or managed the business of money laundering, by ordering  
3 FRANCISCO GOMEZ. JR. to pay for the marijuana that had been delivered to him in violation of  
4 A.R.S. §§ 13-2317(A)(1), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

5 VERDUGO SENDS LOAD OF MARIJUANA TO LAS VEGAS W/ SEDANO

6 **COUNT FIFTY-ONE: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
7 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

8 On or about October 14-15, 2010, VICTOR MANUEL VERDUGO and 015, unlawfully used  
9 a wire communication to facilitate a drug-related transaction to facilitate a violation of 13-3405, for  
10 the sale, transfer and/or sale of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-  
11 3413, 13-603, 13-604, 13-701, 13-702, 13-801;

12 **COUNT FIFTY-TWO: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

13 On or about October 15, 2010, VICTOR MANUEL VERDUGO, unlawfully possessed an  
14 amount of marijuana for sale weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2)  
15 & (B)(6), 13-3401(36), 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801,  
16 13-811;

17 **COUNT FIFTY-THREE: TRANSPORTATION OF MARIJUANA FOR SALE, Class 2 Felony**

18 On or about October 15, 2010, 015 unlawfully possessed and transported an amount of  
19 marijuana for sale weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6),  
20 13-3401(36), 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

21 VERDUGO SENT MONEY TO MEXICO WITH BALMACEDA

22 **COUNT FIFTY-FOUR: MONEY LAUNDERING in the FIRST DEGREE, A Class 2 Felony**

23 On or about October 15, 2010, VICTOR MANUEL VERDUGO, knowingly initiated,  
24 organized, planned, directed and/or managed the business of money laundering, by sending money to  
25 Mexico to pay to 018 and others, in violation of A.R.S. §§ 13-2317(A)(1), 13-3413, 13-301, 13-302,  
26 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

27 **COUNT FIFTY-FIVE: MONEY LAUNDERING in the SECOND DEGREE, A Class 3 Felony**

28 On or about October 15, 2010, RICARDO BALMACEDA, knowingly transferred,  
transported, received and/or concealed money associated with the business of money laundering by  
carrying monies into Mexico, in violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-303,  
13-604, 13-701, 13-702, 13-801, 13-811;

1  
2 013 SELLS TO 017

3 **COUNT FIFTY-SIX: POSSESSION OF MARIJUANA FOR SALE, A Class 2 Felony**

4  
5 On or about October 21, 2010, 013 and 017,unlawfully possessed an amount of marijuana for  
6 sale weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36),  
13-3413, 13-3420, 13-301,13-302, 13-303, 13-604,13-701, 13-702, 13-801, 13-811;

7 **COUNT FIFTY-SEVEN: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
8 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

9 On or about October 21, 2010, 013 and 017, unlawfully used a wire communication to  
10 facilitate a drug-related transaction to facilitate a violation of 13-3405, for the sale, transfer and/or sale  
11 of marijuana, in violation of A.R.S. §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701,  
12 13-702, 13-801;

13 VERDUGO LOOKED FOR 014 TO COLLECT DEBTS

14 **COUNT FIFTY-EIGHT: STALKING, A Class 3 Felony**

15 On or about October 20-22, 2010, VICTOR MANUEL VERDUGO, FRANCISCO GOMEZ,  
16 JR. and RICARDO BALMACEDA, intentionally sought to locate 014 and/or his children, in an  
17 manner that put 014 in fear for his life and/or the lives of his family, in violation or  
18 A.R.S. §§ 13-2923(A)(2) & (B), 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811

19 **COUNT FIFTY-NINE: CHILD ABUSE A Class 4 Felony**

20 On or about October 21, 2010, VICTOR MANUEL VERDUGO, intentionally and  
21 knowingly placed a child, (INFANT SON, 'Junior'), in a situation where the child's person or health  
22 was endangered, in violation of A.R.S. §§ 13-3623(B)(1) & (C), 13-301,13-302, 13-303, 13-604,  
23 13-701, 13-702, 13-801, 13-811;

24 VERDUGO RECEIVED PAYMENT FOR AN ORDER FOR LAS VEGAS

25 **COUNT SIXTY: MONEY LAUNDERING in the SECOND DEGREE, Class 3 Felony**

26 On or about October 28, 2010, VICTOR MANUEL VERDUGO and 016, knowingly  
27 transferred, transported, received and/or concealed money associated with the business of money  
28 laundering, in violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604,  
13-701, 13-702, 13-801, 13-811;

1  
2 VERDUGO RECEIVES AND PAYS FOR MARIJUANA ORDER

3 **COUNT SIXTY-ONE: UNLAWFUL USE OF A WIRE COMMUNICATION TO**  
4 **FACILITATE A DRUG-RELATED TRANSACTION, A Class 4 Felony**

5 On or about October 28, 2010, VICTOR MANUEL VERDUGO, 013, 005, and RICARDO  
6 BALMACEDA, unlawfully used a wire communication to facilitate a drug-related transaction to  
7 facilitate a violation of 13-3405, for the sale, transfer and/or sale of marijuana, in violation of A.R.S.  
8 §§ 13-3417(A)&(C), 13-3419, 13-3413, 13-603, 13-604, 13-701, 13-702, 13-801;

9 **COUNT SIXTY-TWO: TRANSPORTATION OF MARIJUANA FOR SALE, A Class 2 Felony**

10 On or about October 28, 2010, VICTOR MANUEL VERDUGO, 005 and RICARDO  
11 BALMACEDA, unlawfully possessed and/or transported an amount of marijuana for sale weighing  
12 over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-  
13 3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

14 **COUNT SIXTY-THREE: MONEY LAUNDERING in the SECOND DEGREE,**  
15 **A Class 3 Felony**

16 On or about October 28, 2010, VICTOR MANUEL VERDUGO, 013, 005 and RICARDO  
17 BALMACEDA, knowingly transferred, transported, received and/or concealed money associated with  
18 the business of money laundering, in violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302,  
19 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

20 VERDUGO RECEIVED SECOND PART OF MARIJUANA LOAD FROM 013

21 **COUNT SIXTY-FOUR: TRANSPORTATION OF MARIJUANA FOR SALE,**  
22 **A Class 2 Felony**

23 On or about October 29, 2010, THOMAS JOSEPH PABLO, 013, and RICARDO  
24 BALMACEDA, unlawfully possessed and/or transported an amount of marijuana for sale weighing  
25 over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36), 13-3413, 13-  
26 3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

27 013 AND 017 SQUARE UP

28 **COUNT SIXTY-FIVE: MONEY LAUNDERING in the SECOND DEGREE, A Class 3 Felony**

On or about October 29, 2010, 013 and 017, knowingly transferred, transported, received  
and/or concealed money associated with the business of money laundering, in violation of A.R.S. §§  
13-2317(B), 13-3413, 13-301, 13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

1  
2 VERDUGO AND CHAVEZ-ARAZIA DELIVER TO LAS VEGAS

3 **COUNT SIXTY-SIX: TRANSPORTATION OF MARIJUANA FOR SALE** , Class 2 Felony

4  
5 On or about October 30-31, 2010, VICTOR MANUEL VERDUGO, VERA CHAVEZ-  
6 ARAIZA and RICARDO BALMACEDA, unlawfully possessed an amount of marijuana for sale  
7 weighing over four (4) pounds, in violation of A.R.S. §§ 13-3405(A)(2) & (B)(6), 13-3401(36),  
8 13-3413, 13-3420, 13-301,13-302, 13-303, 13-604, 13-701, 13-702, 13-801, 13-811;

9 **COUNT SIXTY-SEVEN: MONEY LAUNDERING in the SECOND DEGREE,**  
10 A Class 3 Felony

11 On or about October 30-31, 2010, VICTOR MANUEL VERDUGO, 018 and RICARDO  
12 BALMACEDA, knowingly transferred, transported, received and/or concealed money associated with  
13 the business of money laundering , In violation of A.R.S. §§ 13-2317(B), 13-3413, 13-301, 13-302,  
14 13-303, 13-604, 13-701, 13-702, 13-801, 13-811.

15 **BARBARA LaWALL**  
16 **PIMA COUNTY ATTORNEY**

17 By: \_\_\_\_\_  
18 [Attorney Name]  
19 *Assistant Attorney General*

20 By: \_\_\_\_\_  
21 **FOREPERSON OF THE GRAND JURY**

22 **Dated** \_\_\_\_\_

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