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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.

**BARBARA RAZO (001),**

*(COUNTS 1-7, 50)*

**SUSAN CAHO (002),**

*(COUNTS 1, 2, 5, 8-11, 50)*

**RONALD CAHO (003),**

*(COUNTS 1, 2, 5, 12, 50)*

**KHANOR SANFORD (004),**

aka "Macc"

*(COUNTS 1, 2, 5, 13, 50)*

**ANDRE SANFORD (005),**

*(COUNTS 1, 5, 14, 50)*

Case No:

**93 SGJ 173**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES, A CLASS 2 FELONY**

in violation of A.R.S. § 13-2310 (A)

**COUNT 2: PARTICIPATING IN A  
CRIMINAL SYNDICATE, A CLASS 2  
FELONY in violation of A.R.S. § 13-2308**

(A)

**COUNTS 3, 8, 15: TRAFFICKING IN  
STOLEN PROPERTY IN THE FIRST  
DEGREE, A CLASS 2 FELONY in**

violation of A.R.S. § 13-2307 (A)

**KAELONI GRAHAM (006),**  
(COUNTS 1, 2, 5, 15-17, 50)

████████████████████ (007),  
██████████  
████████████████████

**NELLIE GONZALEZ (008),**  
(COUNTS 1, 20, 50)

**DOMINIC MEDINA (009),**  
aka "Bubba"  
(COUNTS 1, 5, 21, 22, 35, 50)

**NICHOLE MEDINA (010),**  
(COUNTS 23 & 50)

**FERNANDO CORDOVA (011),**  
aka "Nando"  
(COUNTS 1, 5, 24, 25, 35, 50)

**ANGEL PADILLA (012),**  
aka "China"  
(COUNTS 1, 5, 26 35, 50)

████████████████████ (013),  
████████████████████

**KATI HICKEY (014),**  
(COUNTS 1, 31, 50)

**CHRISTIAN POSTGATE (015),**  
(COUNTS 1, 5, 50)

**ANTHONY MARIN (016),**  
(COUNTS 1 & 50)

**ALBERTO VALENCIA (017),**  
(COUNTS 1, 32, 50)

**COUNTS 4, 9, 12, 13, 14, 16, 19, 20, 22, 23, 25, 27, 28, 32, 34, 36, 38, 39, 41, 43, 45, 47, 49: MONEY LAUNDERING, A CLASS 3 FELONY in violation of A.R.S. § 13-2317 (B)(1)**

**COUNTS 5, 35: CONSPIRACY, A CLASS 2 FELONY in violation of A.R.S. § 13-1003**

**COUNTS 6, 7, 10, 11, 17, 31: FORGERY, A CLASS 4 FELONY in violation of A.R.S. § 13-2002 (A)(3)**

**COUNTS 18, 21, 24, 26, 33, 37, 44, 48: PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2 FELONY in violation of A.R.S. § 13-2321 (A)(1)**

**COUNTS 29, 40, 42, 46: ASSISTING A CRIMINAL STREET GANG, A CLASS 3 FELONY in violation of A.R.S. § 13-2321 (B)**

**COUNT 30: ASSISTING A CRIMINAL STREET GANG, A CLASS 4 FELONY in violation of A.R.S. § 13-3102 (A)(4)**

**COUNT 50: ILLEGAL CONTROL OF AN ENTERPRISE, A CLASS 3 FELONY in violation of A.R.S. § 13-2312(B)**

**LEANTHONY WILLIAMS (018),**  
(COUNTS 1 & 50)

**RAYMOND O'REILLY (019),**  
(COUNTS 1 & 50)

**WILLIAM DICKEY (020),**  
(COUNTS 1 & 50)

**GEORGE ORTIZ (021),**  
aka "Baby Shower"  
(COUNTS 5, 33-35, 50)

**VICTOR ORTIZ (022),**  
(COUNTS 36 & 50)

**FELIPE GONZALES (023),**  
aka "Faxum," "Fazm"  
(COUNTS 5, 35, 37, 38, 50)

**ELENA GONZALES (024),**  
(COUNTS 5, 35, 50)

**[REDACTED] (025),**  
[REDACTED]

**CLAUDIO MAYTORENA (026),**  
(COUNTS 5, 42, 50)

**ALYSSAH MACIAS (027),**  
(COUNTS 43 & 50)

**ADAM QUINTANA (028),**  
(COUNTS 5, 35, 44, 45, 50)

**CECELIA ALLEN (029),**  
aka "CeCe"  
(COUNTS 5, 35, 46, 47, 50)

██████████ (030),  
██████████  
██████████

Defendants.

The Arizona State Grand Jury accuses **BARBARA RAZO (001), SUSAN CAHO (002), RONALD CAHO (003), KHANOR SANFORD (004), ANDRE SANFORD (005), KAELO NI GRAHAM (006), ██████████ (007), NELLIE GONZALEZ (008), DOMINIC MEDINA (009), NICHOLE MEDINA (010), FERNANDO CORDOVA (011), ANGEL PADILLA (012), ██████████ (013), KATI HICKEY (014), CHRISTIAN POSTGATE (015), ANTHONY MARIN (016), ALBERTO VALENCIA (017), LEANTHONY WILLIAMS (018), RAYMOND O'REILLY (019), WILLIAM DICKEY (020), GEORGE ORTIZ (021), VICTOR ORTIZ (022), FELIPE GONZALES (023), ELENA GONZALES (024), ██████████ (025), CLAUDIO MAYTORENA (026), ALYSSAH MACIAS (027), ADAM QUINTANA (028), CECELIA ALLEN (029), and ██████████ (030)**, charging on this 13<sup>th</sup> day of February, that in or from Maricopa County, Pinal County, and Pima County, Arizona:

**COUNT 1**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **BARBARA RAZO (001), SUSAN CAHO (002), RONALD CAHO (003), KHANOR SANFORD (004), ANDRE SANFORD (005), KAELO NI GRAHAM (006), ██████████ (007), NELLIE GONZALEZ (008), DOMINIC MEDINA (009), FERNANDO CORDOVA (011), ANGEL PADILLA (012), ██████████ (013), KATI HICKEY (014), CHRISTIAN POSTGATE (015), ANTHONY MARIN (016), ALBERTO VALENCIA (017), LEANTHONY WILLIAMS (018), RAYMOND O'REILLY (019), and WILLIAM DICKEY (020)**, pursuant to a scheme

or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, to wit: *including, but not limited to, providing false information in order to obtain Pandemic Unemployment Assistance funds from the Arizona Department of Economic Security on behalf of people she knew were not entitled to those benefits*, in violation of A.R.S. §§ 13-2310(A) and (D), 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-607, 13-610, 13-701, 13-702, 13-704, 13-711, 13-801, 13-811, and 13-821.

**COUNT 2**

**PARTICIPATING IN A CRIMINAL SYNDICATE, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **BARBARA RAZO (001), SUSAN CAHO (002), RONALD CAHO (003), KHANOR SANFORD (004), KAELONI GRAHAM (006), [REDACTED] (007), DOMINIC MEDINA (009)**, participated in a criminal syndicate by intentionally organizing, managing, directing, supervising, or financing a criminal syndicate with the intent to promote or further the objectives of the criminal syndicate, in violation of A.R.S. §§ 13-2308(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 3**

**TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **BARBARA RAZO (001)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in of the property of Arizona Department of Economic Security, that had been stolen, to wit: *Pandemic Unemployment Assistance (PUA) funds*, in violation of A.R.S. §§ 13-2307(A), 13-2301, 13-701, 13-702, and 13-801.

**COUNT 4**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **BARBARA RAZO (001)**, acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 5**  
**CONSPIRACY, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **BARBARA RAZO (001)**, **SUSAN CAHO (002)**, **RONALD CAHO (003)**, **KHANOR SANFORD (004)**, **ANDRE SANFORD (005)**, **KAELONI GRAHAM (006)**, [REDACTED] (007), **DOMINIC MEDINA (009)**, **FERNANDO CORDOVA (011)**, **ANGEL PADILLA (012)**, [REDACTED] (013), **CHRISTIAN POSTGATE (015)**, **GEORGE ORTIZ (021)**, **FELIPE GONZALES (023)**, **ELENA GONZALES (024)**, **CLAUDIO MAYTORENA (026)**, **ADAM QUINTANA (028)**, **CECELIA ALLEN (029)**, and [REDACTED] (030), did, 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** pursuant to A.R.S. §§ 13-2310
- 2) **Participating in a Criminal Syndicate** pursuant to A.R.S. §§ 13-2308(A)(1)
- 3) **Trafficking in Stolen Property** pursuant to A.R.S. §§13-2307(A),
- 4) **Money Laundering** pursuant to A.R.S. §13-2317(B)(1)

In furtherance of this conspiracy to commit Pandemic Unemployment Assistance (PUA) Fraud and provide the proceeds to inmates within the Arizona Department of Corrections, and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the acts described within this

document, in violation of A.R.S. §§ 13-1003, 13-2308, 13-2310, 13-2307, 13-701, 13-702 and 13-801, 13-301, 13-302, 13-303.

**COUNT 6**  
**FORGERY, A CLASS 4 FELONY**

On or about June 9, 2020, **BARBARA RAZO (001)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Khanor Sanford*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 7**  
**FORGERY, A CLASS 4 FELONY**

On or about June 12, 2020, **BARBARA RAZO (001)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Maurice Soto*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 8**  
**TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **SUSAN CAHO (002)**, knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in of the property of Arizona Department of Economic Security, that had been stolen, to wit: *Pandemic Unemployment Assistance (PUA) funds*, in violation of A.R.S. §§ 13-2307(A), 13-2301, 13-701, 13-702, and 13-801.

**COUNT 9**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or September 30, 2021, **SUSAN CAHO (002)**, acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 10**  
**FORGERY, A CLASS 4 FELONY**

On or about June 3, 2020, **SUSAN CAHO (002)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Ronald Kaho*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 11**  
**FORGERY, A CLASS 4 FELONY**

On or about July 17, 2020, **SUSAN CAHO (002)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Christian Postgate*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 12**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **RONALD CAHO (003)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.



**COUNT 13**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **KHANOR SANFORD (004)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 14**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ANDRE SANFORD (005)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 15**  
**TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **KAELONI GRAHAM (006)** knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in of the property of Arizona Department of Economic Security, that had been stolen, to wit: *Pandemic Unemployment Assistance (PUA) funds*, in violation of A.R.S. §§ 13-2307(A),13-2301,13-701,13-702, and13-801.

**COUNT 16**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **KAELONI GRAHAM (006)**, acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds,

knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801

**COUNT 17**  
**FORGERY, A CLASS 4 FELONY**

On or about June 15, 2020, **KAELONI GRAHAM (006)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Leanthony Williams*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 18**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, [REDACTED] **(007)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 19**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, [REDACTED] **(007)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 20**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **NELLIE GONZALEZ (008)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 21**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **DOMINIC MEDINA (009)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 22**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **DOMINIC MEDINA (009)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 23**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **NICHOLE MEDINA (010)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds,

knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 24**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about November, 11, 2022, **FERNANDO CORDOVA (011)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 25**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about December 28, 2022, **FERNANDO CORDOVA (011)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 26**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ANGEL PADILLA (012)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 27**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ANGEL PADILLA (012)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 28**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, [REDACTED] **(013)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 29**  
**ASSISTING A CRIMINAL STREET GANG, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, [REDACTED] **(013)** assisted a criminal street gang by committing any felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(B), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 30**  
**MISCONDUCT INVOLVING WEAPONS, A CLASS 4 FELONY**

On or about November 17, 2022, [REDACTED] **(013)**, knowingly possessed a deadly weapon or prohibited weapon; *to wit: a handgun*, while being a prohibited possessor, in violation of A.R.S. §§ 13-3102 (A)(4), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 31**  
**FORGERY, A CLASS 4 FELONY**

On or about June 28, 2020, **KATI HICKEY (014)**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, to wit: *Pandemic Unemployment Assistance application – Alfonso Serna*, in violation of A.R.S. §§ 13-2002(A)(3), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 32**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ALBERTO VALENCIA (017)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 33**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **GEORGE ORTIZ (021)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 34**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **GEORGE ORTIZ (021)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or

having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 35**  
**CONSPIRACY, A CLASS 2 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, [REDACTED] (007), DOMINIC MEDINA (009), FERNANDO CORDOVA (011), ANGEL PADILLA (012), [REDACTED] (013), GEORGE ORTIZ (021), FELIPE GONZALES (023), ELENA GONZALES (024), ADAM QUINTANA (028), CECELIA ALLEN (029), and [REDACTED] (030) did, 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) **Participating in a Criminal Street Gang** pursuant to A.R.S. §§ 13-2321(A)(1)

In furtherance of this conspiracy to provide racketeering funds to members and associates of the Arizona Mexican Mafia, and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the acts described within this document, in violation of A.R.S. §§ 13-1003, 13-2308, 13-2310, 13-2307, 13-701, 13-702 and 13-801, 13-301, 13-302, 13-303.

**COUNT 36**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about October 31, 2022, VICTOR ORTIZ (022) acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 37**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about October 31, 2022, **FELIPE GONZALES (023)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 38**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about October 31, 2022, **FELIPE GONZALES (023)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 39**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ELENA GONZALES (024)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 40**  
**ASSISTING A CRIMINAL STREET GANG, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ELENA GONZALES (024)** assisted a criminal street gang by committing any felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in



association with any criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(B) 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 41**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **MARIANA SOLANO (025)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 42**  
**ASSISTING A CRIMINAL STREET GANG, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **CLAUDIO MAYTORENA (026)** assisted a criminal street gang by committing any felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(B), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 43**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ALYSSAH MACIAS (027)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 44**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ADAM QUINTANA (028)** participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 45**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **ADAM QUINTANA (028)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 46**  
**ASSISTING A CRIMINAL STREET GANG, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **CECELIA ALLEN (029)** assisted a criminal street gang by committing any felony offense, whether completed or preparatory, for the benefit of, at the direction of, or in association with any criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(B), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 47**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or about June 1, 2020 and continuing through on or about September 30, 2021, **CECELIA ALLEN (029)** acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or

having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.

**COUNT 48**  
**PARTICIPATING IN A CRIMINAL STREET GANG, A CLASS 2**  
**FELONY**

On or about June 1, 2020 and continuing through on or about December 31, 2022, [REDACTED] (030) participated in a criminal street gang by intentionally organizing, managing, directing, supervising, or financing a criminal street gang with the intent to promote or further the objectives of the criminal street gang; *to wit: Arizona Mexican Mafia*, in violation of A.R.S. §§ 13-2321(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 49**  
**MONEY LAUNDERING, A CLASS 3 FELONY**

On or between about June 1, 2020 and continuing through on or about December 31, 2022, [REDACTED] (030) acquired or maintained an interest in, transacted, transferred, transported, received, or concealed the existence of racketeering proceeds, knowing or having reason to know that they were proceeds of on offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-3211, 13-701, 13-702, and 13-801.


**COUNT 50**  
**ILLEGAL CONTROL OF AN ENTERPRISE, A CLASS 3 FELONY**

On or between about June 1, 2020 and continuing through on or about December 31, 2022, **BARBARA RAZO (001), SUSAN CAHO (002), RONALD CAHO (003), KHANOR SANFORD (004), ANDRE SANFORD (005), KAELO NI GRAHAM (006), [REDACTED] (007), NELLIE GONZALEZ (008), DOMINIC MEDINA (009), NICHOLE MEDINA (010), FERNANDO CORDOVA (011), ANGEL PADILLA (012), [REDACTED] (013), KATI HICKEY (014), CHRISTIAN POSTGATE (015), ANTHONY MARIN (016), ALBERTO VALENCIA (017), LEANTHONY WILLIAMS (018), RAYMOND O'REILLY**

(019), WILLIAM DICKEY (020), GEORGE ORTIZ (021), VICTOR ORTIZ (022), FELIPE GONZALES (023), ELENA GONZALES (024), [REDACTED] (025), CLAUDIO MAYTORENA (026), ALYSSAH MACIAS (027), ADAM QUINTANA (028), CECELIA ALLEN (029), and [REDACTED] (030), were employed by or associated with an enterprise, and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that they knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-105, 13-601, 13-602, 13-603, 13-607, 13-610, 13-701, 13-702, 13-704, 13-711, 13-801, 13-811, and 13-821.

Pursuant to A.R.S. 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Pinal County, and Pima County, Arizona. Venue is assigned to Maricopa County, Arizona.

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
\_\_\_\_\_  
AMY DIEDERICH  
Assistant Attorney General  
#11892014

  
\_\_\_\_\_  
(A "True Bill")

Dated: 2/13/24  
  
\_\_\_\_\_  
Foreperson of the State Grand Jury