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Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff,

v.

ROMAN ROBAINA AKA ROMAN ROBAINA-CAMACHO AKA EL CUBANO AKA THE CUBAN (001),

XXXXX XXXXX XXXXX(002),

FLORIBERTO MARTINEZ-PACHECO AKA BETO AKA FLORI (003),

MARCELA MARTINEZ-PACHECO AKA CHELA (004),

ISAI ZUNIGA-MORALES AKA TAI AKA TROMPITAS AKA OSO (005),

XXXXX XXXXX XXXXX (006),

XXXXX XXXXX XXXXX (007),

XXXXX XXXXX XXXXX (008),

XXXXX XXXXX XXXXX (009),

XXXXX XXXXX XXXXX (010),

XXXXX XXXXX XXXXX (011),

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INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003 *(All Defendants)*

COUNT 2: PARTICIPATING IN A CRIMINAL SYNDICATE, a Class 2 Felony, in violation of A.R.S. § 13-2308(A)(1) *(Defendants 001, 002, 003, 004, 005, 006, 007, 009, 010, 015, 016, 018, 020, 025, 032, 034, 035, 038, 039, 041, 043 and 045)*

COUNT 3: ASSISTING A CRIMINAL SYNDICATE, a Class 4 Felony, in violation of A.R.S. § 13-2308(C) *(Defendants 008, 011, 012, 013, 014, 017, 019, 021, 022, 023, 024, 026, 027, 028, 029, 030, 031, 033, 036, 037, 040, 042, 044, 046, 047 and 048)*

XXXXX XXXXX XXXXX (012),

XXXXX XXXXX XXXXX (013),

XXXXX XXXXX XXXXX(014),

JESUS ORLANDO HERNANDEZ AKA CHUY (015),

XXXXXXXX XXXXXXX XXXXXXX (016),

MARCO ANTONIO LUNA-GONZALEZ AKA TONY (017),

SULEMA DEL CARMEN MARTINEZ PONCE AKA DOÑA NATI AKA NATI AKA NATHALY GUZMAN (018),

XXXXXXXX XXXXXXX XXXXXXX (019),

XXXXXXXX XXXXXXX XXXXXXX (020),

XXXXXXXX XXXXXXX XXXXXXX (021),

UBALDO RAMOS (022),

XXXXXXXX XXXXXXX XXXXXXX (023),

XXXXXXXX XXXXXXX XXXXXXX (024),

XXXXXXXX XXXXXXX XXXXXXX (025),

XXXXXXXX XXXXXXX XXXXXXX (026),

TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO (027),

XXXXXXXX XXXXXXX XXXXXXX (028),

ELVIA ZUNIGA-ALAVEZ (029),

XXXXXXXX XXXXXXX XXXXXXX (030),

XXXXXXXX XXXXXXX XXXXXXX (031),

XXXXXXXX XXXXXXX XXXXXXX (032),

XXXXXXXX XXXXXXX XXXXXXX (033),

XXXXXXXX XXXXXXX XXXXXXX (034),

XXXXXXXX XXXXXXX XXXXXXX (035),

XXXXXXXX XXXXXXX XXXXXXX (036),

COUNT 4: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) *(All Defendants)*

COUNT 5: SMUGGLING OF HUMAN BEINGS FOR PROFIT, a Class 4 Felony, in violation of A.R.S. § 13-2319 *(All Defendants)*

COUNT 6: MONEY LAUNDERING, a Class 3 Felony, in violation of A.R.S. § 13-2317 *(All Defendants)*

COUNT 7: ILLEGAL USE OF A WIRE OR ELECTRONIC COMMUNICATION, a Class 4 Felony, in violation of A.R.S. §13-3417 *(All Defendants)*

XXXXXXXX XXXXXXX XXXXXXX (037),

XXXXXXXX XXXXXXX XXXXXXX (038),

XXXXXXXX XXXXXXX XXXXXXX (039),

XXXXXXXX XXXXXXX XXXXXXX (040),

XXXXXXXX XXXXXXX XXXXXXX (041),

XXXXXXXX XXXXXXX XXXXXXX (042),

XXXXXXXX XXXXXXX XXXXXXX (043),

JANE DOE AKA PATRICIA (044),

XXXXXXXX XXXXXXX XXXXXXX (045),

XXXXXXXX XXXXXXX XXXXXXX (046),

XXXXXXXX XXXXXXX XXXXXXX (047),

XXXXXXXX XXXXXXX XXXXXXX (048),

Defendants.

The Arizona State Grand Jury accuses ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ aka CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ AKA TONY, SULEMA DEL CARMEN MARTINEZ PONCE AKA DOÑA NATI AKA NATI AKA NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX

XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX AND XXXXXXXX XXXXXXX XXXXXXX, charging on this 25th day of June 2007, that in or from Maricopa County, Yavapai County and/or Cochise County, Arizona:

COUNT_1

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ AKA TONY, SULEMA DEL CARMEN MARTINEZ PONCE AKA DOÑA NATI AKA NATI AKA NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX, defendants herein, 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 Syndicate, in violation of A.R.S. § 13-2308;
2) Assisting a Criminal Syndicate, in violation of A.R.S. § 13-2308;
3) Illegally Conducting an Enterprise, in violation of A.R.S. § 13-2312;
4) Smuggling of Human Beings for Profit, in violation of A.R.S. § 13-2319; and
5) Money Laundering, in violation of A.R.S. § 13-2317.

In furtherance of this conspiracy and to effect the objects thereof, defendants and co-conspirators did commit numerous overt acts, including but not limited to: (a) the overt acts described in Counts 2 through 7 of this Indictment (which are incorporated herein by reference as if set forth in full), (b) the renting of houses and vehicles, (c) the repairing and maintenance of vehicles, and/or (d) the use of bank accounts and/or money remitter services, in violation of A.R.S. §§ 13-1003, 13-2308, 13-2312, 13-2317, 13-2319, 13-2301, 13-3417, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 2

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, JESUS ORLANDO HERNANDEZ aka CHUY, XXXXXXXX XXXXXXX XXXXXXX, SULEMA DEL CARMEN MARTINEZ PONCE aka DOÑA NATI aka NATI aka NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX participated in a criminal syndicate, with the intent to promote or further the criminal objectives of the criminal syndicate, by intentionally organizing, managing, directing, supervising, or financing the criminal syndicate, and/or by furnishing advice or direction in the conduct, financing or management of the criminal syndicate, in violation of A.R.S. §§ 13-2308(A)(1) and/or (A)(3), 13-2301, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 3

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ AKA TONY, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE aka PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX 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 Counts 4 through 7 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2308(C), 13-2312, 13-2317, 13-2319, 13-2301, 13-3417, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 4

A. Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ AKA TONY, SULEMA DEL CARMEN MARTINEZ PONCE AKA DOÑA NATI AKA NATI AKA NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX, defendants herein, employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which they knew was being conducted through racketeering.

B. The enterprise was a group of persons associated in fact, including but not limited to ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX

XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ aka TONY, SULEMA DEL CARMEN MARTINEZ PONCE aka DOÑA NATI aka NATI aka NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX xxxxxxx, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX.

C. The racketeering included:

1) Participating in a Criminal Syndicate, in violation of A.R.S. § 13-2308;

2) Smuggling of Human Beings for Profit, in violation of A.R.S. § 13-2319; and

3) Money Laundering, in violation of A.R.S. § 13-2317;

including, but not limited to, the acts of racketeering described in Counts 2, 5 and 6 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2308, 13-2317, 13-2319, 13-2301, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 5

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ aka TONY, SULEMA DEL CARMEN MARTINEZ PONCE aka DOÑA NATI aka NATI aka NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL

CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX intentionally engaged in the smuggling of human beings for profit or commercial purpose, in violation of A.R.S. §§ 13-2319, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 6

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ aka TONY, SULEMA DEL CARMEN MARTINEZ PONCE aka DOÑA NATI aka NATI aka NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, AND/OR XXXXXXXX XXXXXXX XXXXXXX 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 or offenses, including, but not limited to, the racketeering offenses described in Counts

2 and 5 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2317(B)(1), 13-2308, 13-2319, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 7

Between about November 1, 2006 and continuing thereafter up to and including about the date of June 24, 2007, ROMAN ROBAINA aka ROMAN ROBAINA-CAMACHO aka EL CUBANO aka THE CUBAN, XXXXX XXXXX XXXXX, FLORIBERTO MARTINEZ-PACHECO aka BETO aka FLORI, MARCELA MARTINEZ-PACHECO aka CHELA, ISAI ZUNIGA-MORALES aka TAI aka TROMPITAS aka OSO, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXX XXXXX XXXXX, XXXXXXXX XXXXXXX XXXXXXX, JESUS ORLANDO HERNANDEZ AKA CHUY, XXXXXXXX XXXXXXX XXXXXXX, MARCO ANTONIO LUNA-GONZALEZ AKA TONY, SULEMA DEL CARMEN MARTINEZ PONCE AKA DOÑA NATI AKA NATI AKA NATHALY GUZMAN, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, UBALDO RAMOS, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, TONY DUC TRAN AKA EL CHINTO AKA EL MECANICO, XXXXXXXX XXXXXXX XXXXXXX, ELVIA ZUNIGA-ALAVEZ, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, JANE DOE AKA PATRICIA, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, XXXXXXXX XXXXXXX XXXXXXX, and/or XXXXXXXX XXXXXXX XXXXXXX used a wire communication, namely: a telephone or telephones, to facilitate a violation of a felony provision or to conspire to commit a felony provision of Chapter 23 of Title 13, including but not limited to the violations and/or conspiracy to commit such violations described in Counts 1 through 6 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-3417, 13-3401, 13-1003, 13-2308, 13-2312, 13-2317, 13-2319, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

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

(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: ______________________________

____
JANE E. MCLAUGHLIN
Assistant Attorney General

____
Foreperson of the State Grand Jury