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T002-2024-000057
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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.

LAURO GARCIA SALMON (001)

JOVANNY ALGANDAR (002)

Defendants.

Case No: CR2024-122265-001

94 SGJ 120 102 *See*

INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1, 3, 5: TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG, a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(7), (B)(7).

COUNTS 2, 4: MONEY LAUNDERING IN THE SECOND DEGREE, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1), (E).

COUNT 6: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003(A).

COUNT 7: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B), (D).

The State Grand Jury accuses **LAURO GARCIA SALMON (001) and JOVANNY ALGANDAR (002)** charging on this 14th day of May, 2024, that in or from Maricopa County, Arizona:

COUNT 1
TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG, A CLASS TWO FELONY

On or about April 3, 2024, **JOVANNY ALGANDAR (002)** did knowingly transport for sale, import into this state or offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: approximately 2.45 pounds of fentanyl pills, above the threshold amount, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), and (F), 13-3401(36)(i), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 2
MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS THREE FELONY

On or about April 3, 2024, **JOVANNY ALGANDAR (002)** did knowingly acquire or maintain an interest in, transact, transfer, transport, receive or conceal the existence or nature of racketeering proceeds knowing or having reason to know that they are the proceeds of an offense, to wit: about \$5,500 in drug transaction proceeds, in violation of A.R.S. §§ 13-

2317(B)(1) and (E), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 3
TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT
FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO
SELL OR TRANSFER A NARCOTIC DRUG, A CLASS TWO FELONY

On or about April 8, 2024, **JOVANNY ALGANDAR (002)** did knowingly transport for sale, import into this state or offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: approximately 2.45 pounds of fentanyl pills, above the threshold amount, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), and (F), 13-3401(36)(i), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 4
MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS THREE FELONY

On or April 8, 2024, **JOVANNY ALGANDAR (002)** did knowingly acquire or maintain an interest in, transact, transfer, transport, receive or conceal the existence or nature of racketeering proceeds knowing or having reason to know that they are the proceeds of an offense, to wit: about \$5,000 in drug transaction proceeds, in violation of A.R.S. §§ 13-2317(B)(1) and (E), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 5
TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT
FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO
SELL OR TRANSFER A NARCOTIC DRUG, A CLASS TWO FELONY

On or about May 8, 2024, LAURO GARCIA SALMON (001) did knowingly transport for sale, import into this state or offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: approximately 12.1 pounds of fentanyl pills, above the threshold amount, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), and (F), 13-3401(36)(i), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 6
CONSPIRACY, A CLASS TWO FELONY

On or about April 1, 2024 continuing through May 8, 2024, LAURO GARCIA SALMON (001) and JOVANNY ALGANDAR (002), defendants herein, with the intent to promote or aid in the commission of an offense, agreed with one and/or more persons KNOWN and/or UNKNOWN, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) TRANSPORT FOR SALE, IMPORT INTO THIS STATE OR OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG, in violation of A.R.S. § 13-3408(A)(7);
- 2) MONEY LAUNDERING IN THE SECOND DEGREE, in violation of A.R.S. § 13-2317(B).

In furtherance of this conspiracy and to effect the foregoing objects thereof, **LAURO GARCIA SALMON (001) and JOVANNY ALGANDAR (002)** and his co-conspirators did commit overt acts, including but not limited to: the overt acts described in Counts 1 through 5 of this Indictment (which is incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-3408, 13-2317, 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT 7
ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS THREE FELONY

On or about April 1, 2024 continuing through May 8, 2024, **LAURO GARCIA SALMON (001) and JOVANNY ALGANDAR (002)**, was employed by or associated with an enterprise and 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.

The enterprise was a group of persons associated in fact, including but not limited to **LAURO GARCIA SALMON (001) and JOVANNY ALGANDAR (002)** as well as persons **KNOWN** and/or **UNKNOWN**, and the racketeering included:

- 1) **PROHIBITED DRUGS, MARIJUANA OR OTHER PROHIBITED CHEMICALS OR SUBSTANCES**, A.R.S. § 13-2301(D)(4)(b)(xi);
- 2) **MONEY LAUNDERING**, A.R.S. § 13-2301(D)(4)(b)(xxvi);

The alleged racketeering includes, but is not limited to, the acts of racketeering described in Counts 1 through 5 of this Indictment (which are incorporated herein by reference as if set forth

in full), in violation of A.R.S. §§ 13-2312(B) and (D), 13-2301(D)(4)(b)(xi), 13-2301(D)(4)(b)(xxvi), 13-2313, 13-2314 et seq., 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

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

True Bill

(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 14 May 2024



SABRINA LOCHNER
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Foreperson of the Grand Jury