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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.

**LUIS MARIO ACEVEDO
MACHORRO (001),**

**[REDACTED]
(002),**

**JENNIFER ROJAS MADRIGAL
(003),**

**ANDRES ACEVEDO DOMINGUEZ
(004),**

JESUS GARCIA BARRALES (005),

Defendants

Cause No: **CR2025-105997-001**
CR2025-105997-002
CR2025-105997-003
CR2025-105997-004
CR2025-105997-005

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

**COUNT 3: POSSESSION OF A
NARCOTIC DRUG FOR SALE, IN AN
AMOUNT OVER THE STATUTORY
THRESHOLD**, a Class 2 Felony, in
violation of A.R.S. § 13-3408(A)(2)
All Defendants

COUNT 4: POSSESSION OF A DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(2)
Defendant 001

COUNT 5: MONEY LAUNDERING IN THE SECOND DEGREE, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)
Defendant 001

COUNT 6: MISCONDUCT INVOLVING WEAPONS, a Class 3 Felony, in violation of A.R.S. § 13-3102(A)(16)
Defendant 001

COUNT 7: MISCONDUCT INVOLVING WEAPONS, a Class 4 Felony, in violation of A.R.S. § 13-3102(A)(3)
Defendants 001 & 002

COUNT 8: MISCONDUCT INVOLVING WEAPONS, a Class 4 Felony, in violation of A.R.S. § 13-3102(A)(8)
All Defendants

COUNT 9: TAMPERING WITH PHYSICAL EVIDENCE, a Class 6 Felony, in violation of A.R.S. § 13-2809(A)(1)
Defendants 003, 004 & 005

The State Grand Jury accuses **LUIS MARIO ACEVEDO MACHORRO**,
[REDACTED] **JENNIFER ROJAS MADRIGAL, ANDRES
ACEVEDO DOMINGUEZ and JESUS GARCIA BARRALES**, charging on this 18th
day of February, 2025 that in or from MARICOPA County, Arizona:

COUNT 1
CONSPIRACY

On or between June 1, 2024, and February 6, 2025, **LUIS MARIO ACEVEDO
MACHORRO**, [REDACTED] **JENNIFER ROJAS
MADRIGAL, ANDRES ACEVEDO DOMINGUEZ and JESUS GARCIA
BARRALES**, 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) Possession of a Narcotic Drug for Sale, in violation of A.R.S. § 13-3408;
- 2) Possession of a Dangerous Drug for Sale, in violation of A.R.S. § 13-3407;
- 3) Misconduct Involving Weapons, in violation of A.R.S. § 13-3102; and
- 4) Money Laundering, in violation of A.R.S. § 13-2317.

In furtherance of this conspiracy and to effect the foregoing objects thereof, these
defendants and their co-conspirators did commit numerous overt acts, including but not
limited to the overt acts described in Count 3, 4, and 5 of this Indictment (which are
incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003,
13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

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COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

On or between June 1, 2024, and February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO**, [REDACTED] **JENNIFER ROJAS MADRIGAL**, **ANDRES ACEVEDO DOMINGUEZ** and **JESUS GARCIA BARRALES** were employed by or associated with an enterprise and did knowingly conduct the enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which he knew was being conducted through racketeering. The enterprise(s) included, but were not limited to a group of persons associated in fact, including but not limited to **LUIS MARIO ACEVEDO MACHORRO**, [REDACTED] **JENNIFER ROJAS MADRIGAL**, **ANDRES ACEVEDO DOMINGUEZ** and **JESUS GARCIA BARRALES**, and others known and/or unknown.

The racketeering included: Prohibited drugs, marijuana or other prohibited chemicals or substances, in violation of A.R.S. § 13-2301(D)(4)(b)(xi) which were sold and/or advertised to be sold on Instagram, a Meta Platforms, Inc.; Trafficking in explosives, weapons or stolen property, in violation of A.R.S. § 13-2301(D)(4)(b)(xii); and/or money laundering, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi).

The alleged racketeering includes, but is not limited to the acts of racketeering described in 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, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

COUNT 3

POSSESSION OF A NARCOTIC DRUG FOR SALE, IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO**, [REDACTED] **JENNIFER ROJAS MADRIGAL**, **ANDRES**

ACEVEDO DOMINGUEZ and JESUS GARCIA BARRALES, knowingly possessed a narcotic drug for sale, in an amount over the statutory threshold, to wit: fentanyl pills, in violation of A.R.S. §§ 13-3408(A)(2), 13-3401, 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 4

**POSSESSION OF A DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER
THE STATUTORY THRESHOLD**

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO** did knowingly possess a dangerous drug for sale, in an amount over the statutory threshold, to wit: 3, 4-Methylenedioxymethamphetamine (MDMA) AKA ecstasy, in violation of A.R.S. §§ 13-3407(A)(2), 13-3401, 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 5

MONEY LAUNDERING IN THE SECOND DEGREE

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO** knowing or having reason to know that the cash was the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2301, 13-2317, 13-2317(B)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 6

MISCONDUCT INVOLVING WEAPONS

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO**, did traffic in weapons or explosives, to wit: AR-15 12 inch barrel rifle affixed with a machine

gun conversion device (AKA M-16 style trigger group and/or selector switch), for financial gain to assist, promote or further the interests of a racketeering enterprise, in violation of A.R.S. §§ 13-3101, 13-3102, 13-3102(A)(16), 13-3105, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 7

MISCONDUCT INVOLVING WEAPONS

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO** knowingly did manufacture, possess, transport, sell, or transfer an AR-15 12 inch barrel rifle affixed with a machine gun conversion device (AKA M-16 style trigger group and/or selector switch), a prohibited weapon, in violation of A.R.S. §§ 13-3101, 13-3102, 13-3102(A)(3), 13-3105, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 8

MISCONDUCT INVOLVING WEAPONS

On or about February 6, 2025, **LUIS MARIO ACEVEDO MACHORRO**, did knowingly did use or possess a firearm, a deadly weapon, during the commission of a felony included in Chapter 34 of Title 13, Possession of Narcotic Drugs for Sale pursuant to A.R.S. 13-3408 and/or Possession of Dangerous Drugs for Sale in violation of A.R.S. 13-3407, a felony, in violation of A.R.S. §§ 13-3101, 13-3102, 13-3102(A)(8), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 9

TAMPERING WITH PHYSICAL EVIDENCE

On or about February 6, 2025, **JENNIFER ROJAS MADRIGAL, ANDRES ACEVEDO DOMINGUEZ and JESUS GARCIA BARRALES**, with intent that it be

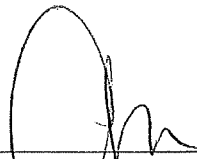
used, introduced, rejected or made unavailable in an official proceeding which was then pending or which **JENNIFER ROJAS MADRIGAL, ANDRES ACEVEDO DOMINGUEZ and JESUS GARCIA BARRALES** knew was about to be instituted, did destroy, mutilate, alter, conceal or remove physical evidence, to-wit: firearms, narcotic drugs and/or dangerous drugs, with the intent to impair its verity or availability, in violation of A.R.S. §§ 13-2809, 13-2801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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


A TRUE BILL
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 2-18-2025



ASHLEY N. MARSHALL
Assistant Attorney General



Foreperson of the Grand Jury