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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

JOSE ANDREW MARTINEZ aka JOSE ANDRES MARTINEZ aka JOSE CANTU aka ANDRES CANTU (001),

(002),

Defendants.

Cause No. CR 2025-006585-001

96 SGJ 18

INDICTMENT

CHARGING VIOLATIONS OF COUNT 1: CONSPIRACY, a Class 2 Felony, in violation of A R S. § 13-1003 Defendants 001 & 002

COUNT 2: ILLEGALLY
CONDUCTING AN ENTERPRISE, a
Class 3 Felony, in violation of A R.S § 132312(B) and (D)
Defendants 001 & 002

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)
Defendants 001 & 002

COUNT 4: MONEY LAUNDERING IN THE SECOND DEGREE, a Class 3 Felony, in violation of A.R S § 13-2317(B)(1) Defendants 001 only

The State Grand Jury accuses JOSE ANDREW MARTINEZ and
, charging on this 24th day of March, 2025 that in or from
Maricopa County, Arizona.

COUNT 1 CONSPIRACY

On or between November 10, 2022, and September 12, 2024, JOSE ANDREW

MARTINEZ AND

, 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, and
- 2) Money Laundering, in violation of ARS. § 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 Counts 3 and 4 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A R S §§ 13-1003, 13-2317, 13-3408, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801

COUNT 2 ILLEGALLY CONDUCTING AN ENTERPRISE

On or between November 10, 2022, and September 12, 2024, **JOSE ANDREW**MARTINEZ AND

was/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 Jose Andrew Martinez and 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 Facebook, a Meta Platforms, Inc company; and 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 September 12, 2024, JOSE ANDREW MARTINEZ AND

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

MONEY LAUNDERING IN THE SECOND DEGREE

On or about September 12, 2024, JOSE ANDREW MARTINEZ, knowing or having reason to know that U S currency 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 §§ 13-2317, 13-2301, 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")

KRISTIN K. MAYES ATTORNEY GENERAL STATE OF ARIZONA

Dated. 3-24-25

ALEXANDRA E SWEENEY

Assistant Attorney General

Foreperson of the Grand Jury