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A. HIGUERA, DEP

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D. WANDELL, DEPUTY.

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

RAUL ALBERTO LOPEZ
RODRIGUEZ (001),

ANGEL CESAR CUJI-PATAJALO
(002),

Defendants.

Cause No: **CR20252648-001**

96 SGJ 106

INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1-2, 6: 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 DANGEROUS DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(7).

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 2 Felony, in violation of A.R.S. § 13-3408(A)(7).

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COUNTS 4-5: 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 IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(7).

COUNT 7: 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).

COUNT 8: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003.

COUNT 9: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) and (D).

The State Grand Jury accuses **RAUL ALBERTO LOPEZ RODRIGUEZ (001)**, and **ANGEL CESAR CUJI-PATAJALO (002)**, charging on this 2nd day of June, 2025, that in or from Pima 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 DANGEROUS DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about March 25, 2025, did knowingly 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 dangerous drug, to wit: approximately 1 pound methamphetamine, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3407(A)(7), (B)(7), (D), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 2

**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 DANGEROUS DRUG IN AN AMOUNT
OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about March 25, 2025, did knowingly 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 dangerous drug, to wit: approximately 2 pounds methamphetamine, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3407(A)(7), (B)(7), (D), (H), 13-3401(36), 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 2
FELONY**

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about March 27, 2025, did knowingly 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, to wit: fentanyl pills, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (H), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 4

**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 IN AN AMOUNT
OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about April 10, 2025, did knowingly 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, to wit: fentanyl pills and/or fentanyl mimetic substances, in an amount over the statutory threshold, in violation of

A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (F), (H), 13-3401, 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 IN AN AMOUNT
OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about April 23, 2025, did knowingly 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, to wit: fentanyl pills, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (F), (H), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 6

**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 DANGEROUS DRUG IN AN AMOUNT
OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about May 6, 2025, did knowingly 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 dangerous drug, to wit: methamphetamine, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3407(A)(7), (B)(7), (D), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 7

**POSSESSION OF A DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER
THE STATUTORY THRESHOLD, A CLASS 2 FELONY**

ANGEL CESAR CUJI-PATAJALO (002), on or about May 20, 2025, knowingly possessed a dangerous drug for sale, in an amount over the statutory threshold, to wit:

methamphetamine, in violation of A.R.S. §§ 13-3407(A)(2), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 8
CONSPIRACY, A CLASS 2 FELONY

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about March 25, 2025 through May 20, 2025, 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) 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 Dangerous Drug, in violation of A.R.S. § 13-3407(A)(7); and/or
- 2) 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, in violation of A.R.S. § 13-3408(A)(7)

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 1-5 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.

COUNT 9
ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

RAUL ALBERTO LOPEZ RODRIGUEZ (001), on or about March 25, 2025 through May 20, 2025, 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, 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 offered to be sold on WhatsApp, a Meta Platforms, Inc. company.

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.

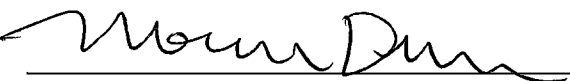
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 6-2-25


SABRINA LOCHNER
Assistant Attorney General


Foreperson of the Grand Jury