

TERRY GODDARD
Attorney General
(Firm State Bar No. 14000)

THEODORE CAMPAGNOLO
State Bar No. 017167
Assistant Attorney General
Criminal Prosecutions Section
1275 West Washington Street
Phoenix, Arizona 85007-2926
(602) 542-3881/Fax: (602) 542-5997
Email: CRMFraud@azag.gov
Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

THE STATE OF ARIZONA,

Plaintiff,

vs.

**ANDREAS AGUILAR
SANCHEZ (001),**

**MIGUEL GOMEZ aka MIGUEL
GOMEZ-SANTIS aka ARMANDO
GODINEZ DOMINGUEZ (002),**

**RODRIGUEZ BROWLIO
ALVARADO aka RODRIGUEZ
BRAULIO ALVARADO aka
ALVARADO RODRIGUEZ (003),**

MARIA LOPEZ (004),

CR2006-006640-001 DT
CR2006-006640-002 DT
CR2006-006640-003 DT
CR2006-006640-004 DT
CR2006-006640-005 DT
CR2006-006640-006 DT
CR2006-006640-007 DT
CR2006-006640-008 DT

INDICTMENT

58 SGJ 102

CHARGING VIOLATIONS OF:

**COUNT 1 (001, 002, 003, 004, 005, 006,
007, 008) : SMUGGLING OF HUMAN
BEINGS, a Class 4 Felony, in violation of
A.R.S. § 13-2319**

**ADOLFO GOMEZ-LOPEZ aka
Francisco Lopez (005),**

**ROBERTO SANTIS-LOPEZ aka
Roberto Lopez Aka Nolberto Gomez
Garcia (006),**

**REYNA AGUILAR-HERNANDEZ
(007), and**

**XXXXXXXX XXXXX XXXXXX aka
XXXXXXXX XXXX (008),**

Defendants.

**COUNT 2 (001, 002, 003, 004, 005, 006,
007, 008): Conspiracy to Commit
Smuggling of Human Beings, a Class 4
Felony in violation of A.R.S. §§ 13-2319,
13-1003**

**COUNT 3 (001, 002, 003, 004, 005, 006,
007, 008): Fraudulent Schemes and
Artifices, a Class 2 Felony in violation of
A.R.S. § 13-2310**

**COUNT 4 (006): Participating in a
Criminal Syndicate, a Class 2 Felony in
violation of A.R.S. § 13-2308**

**COUNT 5 (001, 002, 003, 004, 005, 006,
007, 008): Assisting a Criminal Syndicate,
a Class 4 Felony in violation of A.R.S. § 13-
2308**

**COUNT 6 (001, 002, 003, 004, 005, 006,
007, 008): Illegally Conducting an
Enterprise, a Class 3 Felony, in violation
of A.R.S. § 13-2312**

**COUNT 7 (001, 002, 003, 004, 005, 006,
007, 008): Money Laundering, a Class 3
Felony, in violation of A.R.S. § 13-2317**

**COUNT 8 (006): Aggravated Assault on
a Peace Officer, a Class 5 Felony in
violation of A.R.S. § 13-1204**

**COUNT 9 (006): Aggravated Assault on
a Peace Officer, a Class 5 Felony in
violation of A.R.S. § 13-1204**

**COUNT 10 (006): Resisting Arrest, a
Class 6 Felony in violation of A.R.S. § 13-
2508**

The 58th Arizona State Grand Jury accuses **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXX XXXX (008)** charging that in or from Maricopa County, Arizona:

COUNT 1

(SMUGGLING OF HUMAN BEINGS)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXX XXXX (008)** 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, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 2

(CONSPIRACY TO COMMIT SMUGGLING OF HUMAN BEINGS)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXXX XXXX (008)**, with the intent to promote or aid the commission of smuggling of human beings, agreed with each other or another person or persons to engage in conduct constituting the offense of smuggling in human beings, and one or more of the parties committed an overt act in furtherance of such offense. Such overt act or acts included, but are not limited to, the receipt of United States currency for the purpose of smuggling of human beings, the procurement of transportation for the purpose of smuggling of human beings, the actual smuggling of human beings, and the housing of human beings for the purpose of smuggling of human beings, in violation of A.R.S. §§13-2319, 13-2301, 13-1003, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 3

(FRAUDULENT SCHEMES AND ARTIFICES)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXX XXXX (008)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, by accepting United States currency through money transmitters in their own names or fictitious names without disclosing to the money transmitters that the true use of the money will be for the purpose of smuggling of human beings, in violation of A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 4

(PARTICIPATING IN A CRIMINAL SYNDICATE)

On or between March 19, 2004 and March 3, 2006, defendant **ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006)** participated in a criminal syndicate by intentionally organizing, managing, directing, supervising or financing a criminal syndicate with the intent to promote or further the

criminal objectives of the syndicate, in violation of A.R.S. §§13-2308, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 5

(ASSISTING A CRIMINAL SYNDICATE)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXX XXXX (008)**, assisted a criminal syndicate by committing any felony offense, whether completed or preparatory, with the intent to promote or further the criminal objectives of the syndicate, in violation of A.R.S. §§13-2308, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The “felony offense” in this count includes smuggling of human beings, conspiracy to commit smuggling of human beings, fraudulent schemes and artifices, illegally conducting an enterprise and money laundering, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporated by reference.

COUNT 6

(ILLEGALLY CONDUCTING AN ENTERPRISE)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXXX XXXX (008)** knowingly were employed by or associated with an enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that the person knew was being conducted through racketeering, in violation of A.R.S. §§13-2312, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The enterprise was a group of persons associated in fact, including, but not limited to, **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXXX XXXX (008)**

The racketeering included smuggling of human beings, participating in a criminal

syndicate, fraudulent schemes and artifices and money laundering, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporated by reference.

COUNT 7

(MONEY LAUNDERING)

On or between March 19, 2004 and March 3, 2006, defendants **ANDREAS AGUILAR SANCHEZ (001), MIGUEL GOMEZ aka MIGUEL GOMEZ-SANTIS aka ARMANDO GODINEZ DOMINGUEZ (002), RODRIGUEZ BROWLIO ALVARADO aka RODRIGUEZ BRAULIO ALVARADO aka ALVARADO RODRIGUEZ (003), MARIA LOPEZ (004), ADOLFO GOMEZ-LOPEZ aka FRANCISCO LOPEZ (005), ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), REYNA AGUILAR-HERNANDEZ (007), and XXXXXXXX XXXXX XXXXXX aka XXXXXXX XXXX (008)** acquired, maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds knowing or having reason to know that they were the proceeds of an offense, in violation of A.R.S. §§13-2317 (B)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The racketeering included smuggling of human beings, participating in a criminal syndicate, fraudulent schemes and artifices and illegally conducting an enterprise, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporated by reference.

COUNT 8

(AGGRAVATED ASSAULT ON A PEACE OFFICER)

On or about March 3, 2006, **DEFENDANT ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006)**, intentionally, knowingly or recklessly caused physical injury to Arizona Department of Public Safety Detective Timothy Mason, #4937, a peace officer engaged in the execution of official duties, with the intent to injure, insult or provoke him, knowing or having reason to know that Detective Timothy Mason was a peace officer, in violation of A.R.S. §§ 13-1204, 13-1203, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 9

(AGGRAVATED ASSAULT ON A PEACE OFFICER)

On or about March 3, 2006, **DEFENDANT ROBERTO SANTIS-LOPEZ aka ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006)**, intentionally, knowingly or recklessly caused physical injury to Arizona Department of Public Safety Sergeant David Wright, #2050, a peace officer engaged in the execution of official duties, with the intent to injure, insult or provoke him, knowing or having reason to know that Sergeant David Wright was a peace officer, in violation of A.R.S. §§ 13-1204, 13-1203, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 10

(RESISTING ARREST)

On or about March 3, 2006, **DEFENDANT ROBERTO SANTIS-LOPEZ aka**

ROBERTO LOPEZ aka NOLBERTO GOMEZ GARCIA (006), intentionally prevented or attempted to prevent a person reasonably known to him to be a peace officer, acting under color of such peace officer's authority, from effecting an arrest by using or threatening to use physical force against the peace officer or another person, in violation of A.R.S. §§ 13-2508, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

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

TERRY GODDARD
Attorney General
State of Arizona

THEODORE CAMPAGNOLO
Assistant Attorney General

("True Bill")

Date _____

FOREPERSON OF THE GRAND JURY