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SUPERIOR COURT
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T. MCCALVIN, DEP

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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

EDWIN RADAMES VELIZ-FLORES ✓
(001)

INES HELENA ACOSTA (002)

ROBERTO YESCAS (003),

Defendants

Case No CR2019-126286-001 DT ✓
CR2019-126286-002 DT
CR2019-126286-003 DT

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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)
All Defendants

**COUNT 3: TRANSPORTATION OF A
NARCOTIC DRUG (FENTANYL) FOR
SALE IN AN AMOUNT OVER THE
STATUTORY THRESHOLD**, a Class 2
Felony, in violation of A R S § 13-3408
(A)(7)
(Defendant 001)

**COUNT 4: OFFER TO SELL OR
TRANSFER A NARCOTIC DRUG
(FENTANYL) IN AN AMOUNT OVER
THE STATUTORY THRESHOLD**, a
Class 2 Felony, in violation of A R S § 13-
3408 (A)(7)
(Defendants 002 & 003)

The Arizona State Grand Jury accuses **EDWIN RADAMES VELIZ-FLORES, INES HELENA ACOSTA AND ROBERTO YESCAS**, charging on this 11th day of June, 2019 that in Maricopa County, Arizona

COUNT 1
CONSPIRACY

On or about June 5, 2019, **EDWIN RADAMES VELIZ-FLORES, INES HELENA ACOSTA** and **ROBERTO YESCAS**, 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, that at least one of them or another person would engage in conduct constituting the offenses, in particular

- 1) **TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A R S § 13-3408, and
- 2) **OFFER TO SELL OR TRANSFER A NARCOTIC DRUG (FENTANYL) IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A R S §13-3408

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), 13-701, 13-3408, 13-702 and 13-801

COUNT 2
ILLEGALLY CONDUCTING AN ENTERPRISE

A On or about June 5, 2019, **EDWIN RADAMES VELIZ-FLORES, INES HELENA ACOSTA** and **ROBERTO YESCAS**, defendants herein, employed by or associated with an enterprise, 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

B The enterprise was a group of persons associated in fact, including but not limited to **EDWIN RADAMES VELIZ-FLORES, INES HELENA ACOSTA and ROBERTO YESCAS**

C The racketeering included

- 1) **TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A R S § 13-3408, and
- 2) **OFFER TO SELL OR TRANSFER A NARCOTIC DRUG (FENTANYL) IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A R S §13-3408

The racketeering included but was not limited to, the acts of racketeering 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 §§ 13-2312(B), 13-2301, 13-3408, 13-701, 13-702, 13-801 and 13-811

COUNT 3

TRANSPORTATION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD

On or about June 5, 2019, **EDWIN RADAMES VELIZ-FLORES** knowingly transported a narcotic drug for sale, namely Fentanyl, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801

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COUNT 4

OFFER TO SELL OR TRANSFER A NARCOTIC DRUG (FENTANYL) IN AN
AMOUNT OVER THE STATUTORY THRESHOLD

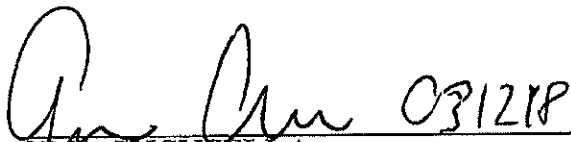
On or about June 5, 2019, INES HELENA ACOSTA and ROBERTO YESCAS, knowingly offered to sell or transfer a narcotic drug, namely Fentanyl, in an amount over the statutory threshold amount, in violation of A R S §§ 13-3408 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 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

A True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated 6-11-18


GINA CUCUZELLA
Assistant Attorney General
#7955662


Foreperson of the State Grand Jury