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T002-2019-000054

Attorneys for Plaintiff

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

**STATE OF ARIZONA,**

**Plaintiff,**

**v.**

**LLOYD MATTHEW JORGENSEN (001),  
PAUL JOSEPH LAMBERT (002),  
GUSTAVO G. CHAVEZ (003), and  
MELINDA STEWART (004),**

**Defendants.**

**Case No:**

**84 SGJ 351**

**INDICTMENT**

**CHARGING VIOLATIONS OF:**

**COUNT ONE: BURGLARY**, a class 4 felony, in violation of A.R.S. § 13-1506(A)(1)

**COUNT TWO: THEFT**, a class 2 felony, in violation of A.R.S. § 13-1802

**COUNT THREE: TRAFFICKING IN STOLEN PROPERTY**, a class 2 felony, in violation of A.R.S. § 13-2307(B)

**COUNT FOUR: CONSPIRACY**, a class 2 felony, in violation of A.R.S. § 13-1003

**COUNT FIVE: ILLEGALLY  
CONDUCTING AN ENTERPRISE, a  
class 3 felony, in violation of A.R.S. § 13-  
2312(B)**

The Arizona State Grand Jury accuses **LLOYD MATTHEW JORGENSEN (001), PAUL JOSEPH LAMBERT (002), GUSTAVO G. CHAVEZ (003), and MELINDA STEWART (004)**, charging on this 29<sup>th</sup> day of May, 2019 that in or from Pima County, Arizona:

**COUNT ONE  
BURGLARY, A CLASS 4 FELONY**

On or about May 2017, through on or about January 28, 2019, **LLOYD MATTHEW JORGENSEN (001)**, entered or remained in or on a nonresidential structure or in a fenced commercial or residential yard, to wit: McGee's Storage Facility in Hereford, Arizona, with the intent to commit any theft or felony therein, in violation of A.R.S. § 13-1506(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT TWO  
THEFT, A CLASS 2 FELONY**

On or about May 2017, through on or about May 21, 2019, **LLOYD MATTHEW JORGENSEN (001), PAUL JOSEPH LAMBERT (002), GUSTAVO G. CHAVEZ (003), and MELINDA STEWART (004)** knowingly committed theft of property of the Marine Corps League, Thunder Mountain Detachment and/or the Marine Corps Toys for Tots Foundation, to-wit: forty-two military-style footlockers containing a toy car collection, of a value of twenty-five thousand dollars or more, with the intent to deprive the Marine Corps Toys for Tots Foundation of such property, in violation of A.R.S. § 13-1802, 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT THREE**  
**TRAFFICKING IN STOLEN PROPERTY, A CLASS 2 FELONY**

On or about May 2017, through on or about May 21, 2019, **LLOYD MATHEW JORGENSON (001)** and **PAUL JOSEPH LAMBERT (002)**, knowingly initiated, organized, planned, financed, directed, managed, or supervised the theft and trafficking in the property of the Marine Corps League, Thunder Mountain Detachment and/or the Marine Corps Toys for Tots Foundation, to-wit: forty-two military-style footlockers containing a toy car collection, that had been stolen, in violation of A.R.S. § 13-2307(B), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT FOUR**  
**CONSPIRACY, A CLASS 2 FELONY**

On or about May 2017, through on or about May 21, 2019, **LLOYD MATTHEW JORGENSON (001)**, **PAUL JOSEPH LAMBERT (002)**, **GUSTAVO G. CHAVEZ (003)**, and **MELINDA STEWART (004)**, with the intent to promote or aid in the commission of an offense, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- (1) **BURGLARY**, in violation of A.R.S. § 13-1506(A)(1);
- (2) **THEFT**, in violation of A.R.S. § 13-1802; and
- (3) **TRAFFICKING IN STOLEN PROPERTY**, in violation of A.R.S. § 13-2307(B).

In furtherance of this conspiracy and to effect the foregoing objects thereof, the co-defendants and their co-conspirators did commit numerous overt acts, including but not limited to: the overt acts described in Counts 1-3 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, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT FIVE**  
**ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY**

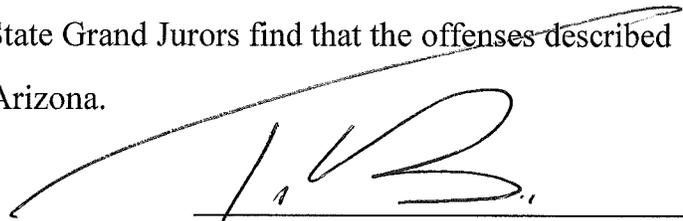
On or about May 2017, through on or about May 21, 2019, **LLOYD MATTHEW JORGENSON (001)**, **PAUL JOSEPH LAMBERT (002)**, **GUSTAVO G. CHAVEZ (003)**, and **MELINDA STEWART (004)**, were employed by or associated with an enterprise and conducted that enterprise's affairs through racketeering or participated directly or indirectly in the conduct of an enterprise they knew was being conducted through racketeering, to-wit: obtaining, soliciting locations to conceal, concealing, transporting, trafficking, negotiating the terms of a sale of, and the eventual attempted sale of the stolen toy car collection. The racketeering included:

(1) **THEFT**, in violation of A.R.S. § 13-2301(D)(4)(b)(v); and

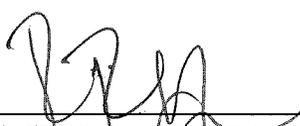
(2) **TRAFFICKING IN STOLEN PROPERTY**, in violation of A.R.S. § 13-2301(D)(4)(b)(xii);

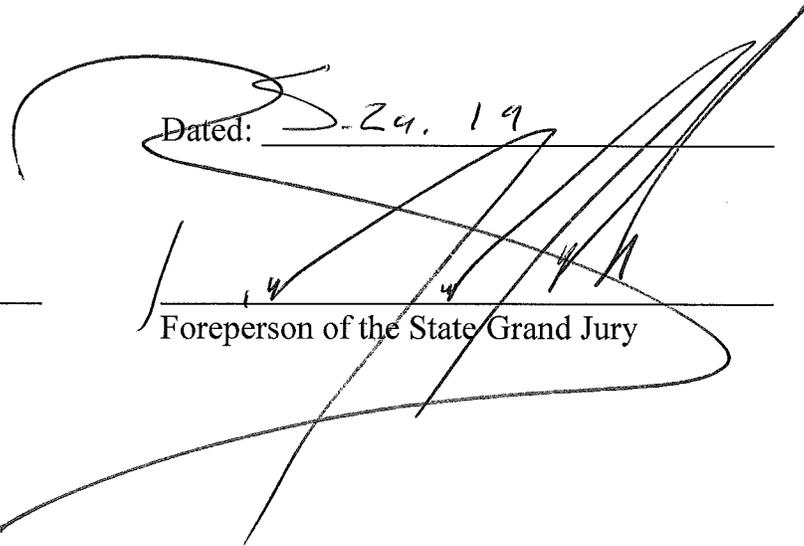
all in violation of A.R.S. § 13-2312(B), 13-2301, 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811.

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

  
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(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
\_\_\_\_\_  
RACHEL R. HEINTZ  
Assistant Attorney General

Dated: 5-29-19  
  
\_\_\_\_\_  
Foreperson of the State Grand Jury