

MARK BRNOVICH
Attorney General
Firm Bar No. 14000
GINA CUCUZELLA
State Bar No. 031218
Assistant Attorney General
2005 N. Central Avenue
Phoenix, Arizona 85004-1592
Telephone: 602-542-3881
crmdrug@azag.gov
Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

COUNTY OF MARICOPA, RCC - DOWNTOWN

STATE OF ARIZONA,

Plaintiff,

v.

SERGIO A. ORTIZ-GODINEZ (001),

Defendant.

Case No: **CR2020-112515-001 DT**

INFORMATION

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. § 13-1003

**COUNT 2: ILLEGALLY CONDUCTING
AN ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312(B)

**COUNT 3: TRANSPORTATION OF A
DANGEROUS DRUG
(METHAMPHETAMINE) FOR SALE**, a
Class 2 Felony, in violation of A.R.S. § 13-
3407(A)(7)

**COUNT 4: POSSESSION OF A
DANGEROUS DRUG
(METHAMPHETAMINE) FOR SALE**, a
Class 2 Felony, in violation of A.R.S. § 13-
3407 (A)(2)



COUNT 6: POSSESSION OF A NARCOTIC DRUG (HEROIN) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3408 (A)(2)

COUNT 7: MISCONDUCT INVOLVING WEAPONS, a Class 4 Felony, in violation of A.R.S. § 13-3102(A)(8)

IN CUSTODY

The Attorney General of the State of Arizona accuses, **SERGIO A. ORTIZ-GODINEZ**, charging that in Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ**, defendant 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 DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE**, in violation of A.R.S. § 13-3407;
- 2) **POSSESSION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE**, in violation of A.R.S. § 13-3407; and
- 3) **POSSESSION OF A NARCOTIC DRUG (FENTANYL) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A.R.S. § 13-3408;
- 4) **POSSESSION OF A NARCOTIC DRUG (HEROIN) FOR SALE 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, 4, ■ and 6 of this Information (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-3407, 13-3408, 13-701, 13-702 and 13-801.

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ**, defendant 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 **SERGIO A. ORTIZ-GODINEZ**.

C. The racketeering included:

1) **TRANSPORTATION OF A DANGEROUS DRUG**

(METHAMPHETAMINE) FOR SALE, in violation of A.R.S. § 13-3407;

2) **POSSESSION OF A DANGEROUS DRUG**

(METHAMPHETAMINE) FOR SALE, in violation of A.R.S. § 13-3407;

3) **POSSESSION OF A NARCOTIC DRUG (FENTANYL) FOR SALE**

IN AN AMOUNT OVER THE STATUTORY THRESHOLD, in violation of A.R.S. § 13-3408; and

4) POSSESSION OF A NARCOTIC DRUG (HEROIN) FOR SALE 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, 4, ■ and 6 of this Information (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-3407, 13-3408, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

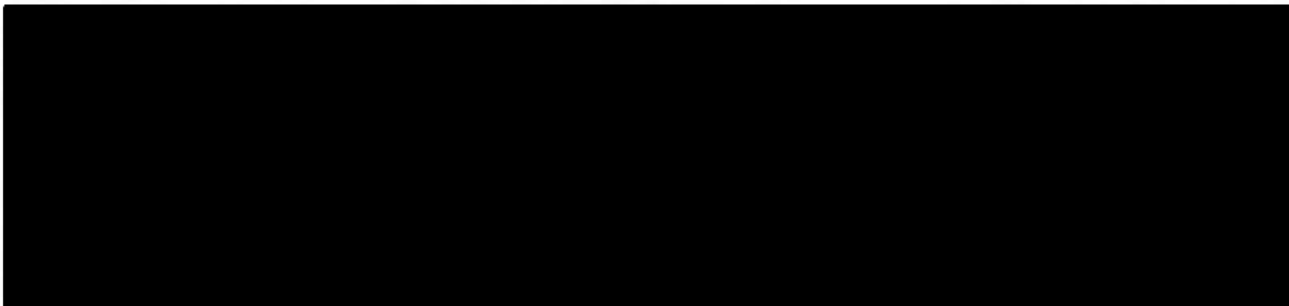
TRANSPORTATION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE

On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ** knowingly transported a dangerous drug for sale, namely: Methamphetamine, in violation of A.R.S. §§ 13-3407 (A)(7), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

COUNT 4

POSSESSION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE

On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ** knowingly possessed a dangerous drug for sale, namely: Methamphetamine, in violation of A.R.S. §§ 13-3407(A)(2), 13-3401, 13-701, 13-702 and 13-801.





COUNT 6

**POSSESSION OF A NARCOTIC DRUG (HEROIN) FOR SALE IN AN AMOUNT
OVER THE STATUTORY THRESHOLD**

On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ**, knowingly possessed a narcotic drug for sale, namely: Heroin, in an amount over the statutory threshold amount, in violation of A.R.S. §§ 13-3408 (A)(2), 13-3401, 13-3401 (36), 13-701, 13-702 and 13-801.

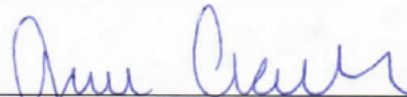
COUNT 7

MISCONDUCT INVOLVING WEAPONS

On or about March 18, 2020, **SERGIO A. ORTIZ-GODINEZ** knowingly used or possessed a deadly weapon, namely: a handgun, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

DATED this 30th day of March, 2020.

MARK BRNOVICH
ATTORNEY GENERAL



GINA CUCUZELLA
Assistant Attorney General
Criminal Division