

AUG 17 2020 5:00PM
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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.

MARIA GUADALUPE GALLARDO
(001),
(Counts 1, 2, 3, 4, 5, 6, 7)

MARCO ANTONIO SUAZO NERI
(002),
(Counts 1, 2, 3, 4, 5, 6, 7)

Defendants.

Case No: CR2020-130058-001DT ✓
CR2020-130058-002DT

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INDICTMENT

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
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)

COUNT 4: 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)

COUNT 5: TRANSPORTATION OF A NARCOTIC DRUG (COCAINE) FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3408 (A)(7)

COUNT 6: TRANSPORTATION 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)(7)

COUNT 7: POSSESSION 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)(2)

The Arizona Grand Jury accuses **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI**, charging on this 17th day of August, 2019 that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between April 15, 2020 August 9, 2020, **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI**, 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) **TRANSPORTATION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A.R.S. § 13-3408 (A)(7); and

2) **POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A.R.S. § 13-3408 (A)(2).

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, 5, 6 and 7 of this Indictment (which are incorporated herein by reference as if set forth in full), 13-3408, 13-701, 13-702 and 13-801.

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between April 15, 2020 August 9, 2020, **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI**, 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 **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI**.

C. The racketeering included:

- 1) **TRANSPORTATION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A.R.S. § 13-3408 (A)(7); and
- 2) **POSSESSION OF A NARCOTIC DRUG FOR SALE IN AN AMOUNT OVER THE STATUTORY THRESHOLD**, in violation of A.R.S. § 13-3408 (A)(2).

The racketeering included but was not limited to, the acts of racketeering described in Counts 3, 4, 5, 6 and 7 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

Heroin

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

On or about April 15, 2020, MARIA GUADALUPE GALLARDO and MARCO ANTONIO SUAZO NERI knowingly transported a narcotic drug for sale, namely: ~~Fentanyl~~ *Heroin*, 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.

COUNT 4

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

On or about August 9, 2020, MARIA GUADALUPE GALLARDO and MARCO ANTONIO SUAZO NERI 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), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 5

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

On or about August 9, 2020, MARIA GUADALUPE GALLARDO and MARCO ANTONIO SUAZO NERI knowingly transported a narcotic drug for sale, namely: Cocaine, 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.

COUNT 6

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

On or about August 9, 2020, **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI** knowingly transported a narcotic drug for sale, namely: Heroin, 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.

COUNT 7

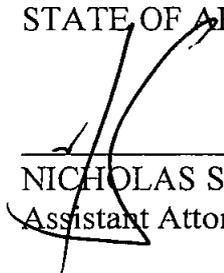
**POSSESSION OF A NARCOTIC DRUG (FENTANYL) FOR SALE
IN AN AMOUNT OVER THE STATUTORY THRESHOLD**

On or about August 9, 2020, **MARIA GUADALUPE GALLARDO** and **MARCO ANTONIO SUAZO NERI**, knowingly possessed a narcotic drug for sale, namely: Fentanyl, in an amount over the statutory threshold amount, to wit: at 220 N Horne, in violation of A.R.S. §§ 13-3408 (A)(2), 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 Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

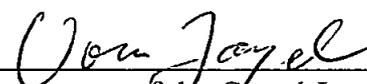
TRUE BILL
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



NICHOLAS SACCONI
Assistant Attorney General

Dated: 8-17-20



Foreperson of the Grand Jury

#8895422