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

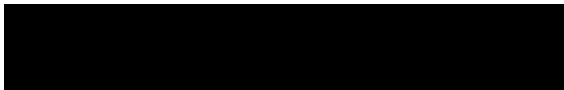
STATE OF ARIZONA,

Plaintiff,

v.

JORGE DARIO BURBOA AREVALO (001),
(Counts: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12,
13 & 14)

LUIS DOMINGO SANTILLAN (002),
(Counts: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12,
13 & 14)



Defendants.

Case No: **CR2020-131622-001 DT**
CR2020-131622-002 DT
CR2020-131622-003 DT

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INDICTMENT

CHARGING VIOLATIONS OF:

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

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

**COUNT 3: SALE OF A DANGEROUS
DRUG (METHAMPHETAMINE)**, 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)

**COUNTS 5, 6, 7, 8, 9, 10, 11, 12, 13 & 14:
MISCONDUCT INVOLVING
WEAPONS**, a Class 4 Felony, in violation
of A.R.S. § 13-3102(A)(8)

The Arizona Grand Jury accuses **JORGE DARIO BURBOA AREVALO, LUIS DOMINGO SANTILLAN** and [REDACTED] charging on this 25th day of August, 2020 that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between August 19, 2020 and continuing thereafter up to and including about the date of August 20, 2020, **JORGE DARIO BURBOA AREVALO, LUIS DOMINGO SANTILLAN** and [REDACTED] 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) **SALE OF A DANGEROUS DRUG (METHAMPHETAMINE)**, in violation of A.R.S. § 13-3407; and
- 2) **POSSESSION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE**, in violation of A.R.S. §13-3407.

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 Complaint (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-3407, 13-701, 13-702 and 13-801.

COUNT 2
ILLEGALLY CONDUCTING AN ENTERPRISE

A. On or between August 19, 2020 and continuing thereafter up to and including about the date of August 20, 2020, **JORGE DARIO BURBOA AREVALO, LUIS DOMINGO SANTILLAN** and [REDACTED] 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 **JORGE DARIO BURBOA AREVALO, LUIS DOMINGO SANTILLAN** and [REDACTED]

C. The racketeering included:

- 1) **SALE OF A DANGEROUS DRUG (METHAMPHETAMINE)**, in violation of A.R.S. § 13-3407; and
- 2) **POSSESSION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE**, in violation of A.R.S. § 13-3407.

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, 13-3407, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

SALE OF A DANGEROUS DRUG (METHAMPHETAMINE)

On or about August 19, 2020, **JORGE DARIO BURBOA AREVALO, LUIS DOMINGO SANTILLAN** and [REDACTED] knowingly sold or transferred a dangerous drug, namely: Methamphetamine, in violation of A.R.S. §§ 13-3407 (A)(7), 13-3401, 13-3401 (36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 4

POSSESSION OF A DANGEROUS DRUG (METHAMPHETAMINE) FOR SALE

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly possessed a dangerous

drug for sale, namely: Methamphetamine, in violation of A.R.S. §§ 13-3407(A)(2), 13-3401, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 5

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: CN Romarm AK-47, serial number GD-1741-84, 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.

COUNT 6

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Centry Arms VZ 2008 Sporter, serial number VZ08PM-007849, 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.

COUNT 7

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1131284, 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.

COUNT 8

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1131720, 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.

COUNT 9

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1124252, 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.

COUNT 10

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1124493, 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.

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COUNT 11

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1131169, 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.

COUNT 12

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Interarms Sporter AK-47, serial number PAC1131424, 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.

COUNT 13

MISCONDUCT INVOLVING WEAPONS

On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Zastava Serba AK-47, serial number N-PAP046996, 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.

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COUNT 14

MISCONDUCT INVOLVING WEAPONS

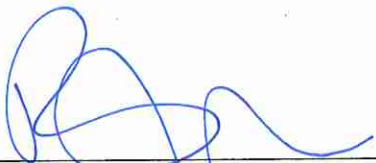
On or between August 19, 2020 and August 20, 2020, **JORGE DARIO BURBOA AREVALO** and **LUIS DOMINGO SANTILLAN** knowingly used or possessed a deadly weapon, namely: Century Arms RAS47, serial number RAS47057222, during the commission of a felony offense included in Chapter 34 of Title 13, Criminal Code, Arizona Revised Statutes, in violation of A.R.S. §§ 13-3102(A)(8), 13-3101, 13-701, 13-702 and 13-801.

Pursuant to A.R.S. § 21-425, the 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: 8-25-20



REBECCA JONES
Assistant Attorney General



Foreperson of the Grand Jury

#8911534