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11 T002-2022-000083

12 Attorneys for Plaintiff

13 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

14 **IN AND FOR THE COUNTY OF SANTA CRUZ**

15 **STATE OF ARIZONA,**
16 Plaintiff,

Case No. CR2022-00124

17 vs.

FELONY
INFORMATION

18 **JESUS ACOSTA-GANDARILLA (001),**
19 Defendant.

20 IN THE NAME AND BY THE AUTHORITY OF THE STATE OF ARIZONA, the
21 Attorney General of the State of Arizona by the Information filed with the Clerk of the
22 above entitled Court accuses **JESUS ACOSTA-GANDARILLA (001), EID Subject ID**
23 **377137421, D.O.B. [REDACTED] [REDACTED] [REDACTED], Nogales, Sonora,**
24 **Mexico,** that in Santa Cruz County, Arizona:
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COUNT ONE
MONEY LAUNDERING IN THE SECOND DEGREE,
A CLASS THREE FELONY

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From on or about September 28, 2017, continuing through November 1, 2017, **JESUS ACOSTA-GANDARILLA** did intentionally or knowingly falsify, conceal, cover up or misrepresent or attempt to falsify conceal, cover up or misrepresent the identity of any person in connection with any transaction with a financial institution or money transmitter, to wit: about \$55,252.02 in wire transfers from his Wells Fargo Bank account, in violation of A.R.S. §§ 13-2317(B)(7), (E), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-811, 13-2313, and 13-2314.

COUNT TWO
CONSPIRACY, A CLASS THREE FELONY

From on or about September 28, 2017, continuing through November 1, 2017, **JESUS ACOSTA-GANDARILLA**, with the intent to promote or aid in the commission of an offense, agreed with other persons **KNOWN** and/or **UNKNOWN**, that at least one of them or another person would engage in conduct constituting the offenses, in particular: **MONEY LAUNDERING IN THE SECOND DEGREE, A.R.S. § 13-2317(B)(7).**

In furtherance of this conspiracy and to effect the foregoing objects thereof, **JESUS ACOSTA-GANDARILLA** and her co-conspirators did commit overt acts, including but not limited to: the overt acts described in Count One of this Information (which is incorporated herein by reference as if set forth in full), in violation of A.R.S.

1 §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-811,
2 13-2313, and 13-2314.

3 **COUNT THREE**
4 **ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS THREE FELONY**

5 From on or about September 28, 2017, continuing through November 1, 2017,
6 **JESUS ACOSTA-GANDARILLA** was employed by or associated with an enterprise
7 and did knowingly conduct such enterprise's affairs through racketeering or did
8 knowingly participate directly or indirectly in the conduct of the enterprise which she
9 knew was being conducted through racketeering.
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11 The enterprise was a group of persons associated in fact, including but not limited
12 to **JESUS ACOSTA-GANDARILLA** as well as persons **KNOWN** and/or **UNKNOWN**,
13 and the racketeering included: **MONEY LAUNDERING**, A.R.S. §13-
14 2301(D)(4)(b)(xxvi); but is not limited to, the acts of racketeering described in Count One
15 of this Information (which are incorporated herein by reference as if set forth in full), in
16 violation of A.R.S. §§ 13-2312(B) and (D), 13-2301(D)(4)(b)(xi), 13-2313, 13-2314 et
17 seq., 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-811.
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21 RESPECTFULLY SUBMITTED this 4th day of May, 2022.

22
23 **MARK BRNOVICH**
24 **ATTORNEY GENERAL**

25 
26 **SABRINA A. LOCHNER**
27 Assistant Attorney General
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Original filed in the Santa Cruz County
Superior Court on 4th day of May, 2022:

Clerk of the Superior Court – Criminal

Copy of the foregoing document
e-mailed on 4th day of May, 2022 to:

Mark Williams, Esq.



Attorney for Defendant 001

By: Kali Jimenez

PHX-#10346694