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Dreamy Draw Northeast Phoenix Precinct
VACATE

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA, RCC - DOWNTOWN**

STATE OF ARIZONA,

Plaintiff,

v.

GEORGE IKNADOSIAN (001),

HUGO MIGUEL GAMEZ (002),

CESAR BOJORGUEZ-GAMEZ (003),

Defendants.

Case No:

DIRECT COMPLAINT

CHARGING VIOLATIONS OF:

COUNT 1: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) (001, 002, 003)

COUNT 2: FRAUDULENT SCHEMES & ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310 (001, 002, 003)

COUNT 3: FORGERY, a Class 4 Felony, in violation of A.R.S. § 13-2002(A)(2) (001)

COUNT 4: ASSISTING A CRIMINAL SYNDICATE, a Class 3 Felony in violation of A.R.S. § 13-2308 (Defendant 001)

COUNTS 5: MONEY LAUNDERING, Class 3 Felony in violation of A.R.S. § 13-2317 (001)

IN CUSTODY –

The complainant herein personally appears and, being duly sworn, complains on information and belief against **GEORGE IKNADOSIAN, HUGO MIGUEL GAMEZ, CESAR BOJORGUEZ-GAMEZ (003)** charging that in Maricopa County, Arizona:

COUNT 1

(Illegally Conducting an Enterprise)

Between December 1, 2007, and May 6, 2008, **GEORGE IKNADOSIAN (001), HUGO MIGUEL GAMEZ, CESAR BOJORGUEZ-GAMEZ (003)**, being 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, in violation of A.R.S. §§13-2312(B), 13-2301(D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

The enterprise was a group of persons associated in fact, including, but not limited to, **GEORGE IKNADOSIAN**, and other persons both known and unknown.

The racketeering included Forgery, Trafficking in Weapons, and Scheme or Artifice to Defraud, in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2002, 13-2001, 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, and 13-801.

COUNT 2

(Fraudulent Schemes and Artifices)

Between December 1, 2007, and May 6, 2008, **GEORGE IKNADOSIAN (001), HUGO MIGUEL GAMEZ, CESAR BOJORGUEZ-GAMEZ (003)**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 3

(Forgery)

On or about February 19, 2008, **GEORGE IKNADOSIAN** with intent to defraud, knowingly possessed a Firearms Transaction Record, a forged instrument. A.R.S. §§13-2001, 13-2002, 13-610, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 4

(ASSISTING A CRIMINAL SYNDICATE)

Between December 1, 2007, and May 6, 2008, defendant, **GEORGE IKNADOSIAN**, assisted a criminal syndicate by committing any felony offense, whether completed or preparatory, with the intent to promote or further the objectives of a criminal syndicate, in violation of A.R.S. §§13-2308, 13-2301, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant, **GEORGE IKNADOSIAN**, committed the felony offense of Forgery, Trafficking in Weapons, and Scheme or Artifice to Defraud, to promote or further the objectives of the criminal syndicate.

COUNT 5

(MONEY LAUNDERING)

On or about December 1, 2007, and May 6, 2008, defendant, **GEORGE IKNADOSIAN**, made property available to another by transacting knowing that it was intended to be used to facilitate racketeering, in violation of A.R.S. §§13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

DATED this ___ day of May, 2008.

TERRY GODDARD
ATTORNEY GENERAL

Patrick Zinicola
Assistant Attorney General
Criminal Division

IN-CUSTODY-BOOKING ## P

_____AGENCY: ATF, Agent Hope MacAllister,
COMPLAINANT

SUBSCRIBED AND SWORN upon information and belief this ____ day of May, 2008.