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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,	Cause No:
Plaintiff,	96 SGJ 13
v.	INDICTMENT
VICTOR JOHN ZAHURANCE (001), (Counts 1-3, 5-9)	CHARGING VIOLATIONS OF: COUNT 1: TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER
ELVIRA VIELMA FELIX (002),	TO TRANSPORT FOR SALE OR
(Counts 4, 8-9)	IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR
Defendants	TRANSFER A NARCOTIC DRUG , a Class 2 Felony, in violation of A.R.S. § 13-3408(A)(7).

COUNTS 2, 6: TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR TRANSFER A DANGEROUS DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(7).

COUNTS 3-5: TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG 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 DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER THE STATUTORY THRESHOLD, a Class 2 Felony, in violation of A.R.S. § 13-3407(A)(2).

COUNT8:ILLEGALLYCONDUCTINGANENTERPRISE, aClass 3 Felony, in violation of A.R.S. § 13-2312(B) and (D).

COUNT 9: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003.

The State Grand Jury accuses VICTOR JOHN ZAHURANCE (001) and ELVIRA VIELMA FELIX (002), charging on this 10th day of March, 2025 that in or from PIMA County, Arizona:

<u>COUNT_1</u> <u>TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO</u> <u>TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER,</u> <u>OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG, A CLASS 2</u> <u>FELONY</u>

VICTOR JOHN ZAHURANCE (001), on or about December 4, 2024, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: heroin, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (H), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 2

TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER, OR OFFER TO SELL OR TRANSFER A DANGEROUS DRUG IN AN AMOUNT OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY

VICTOR JOHN ZAHURANCE (001), on or about December 9, 2024, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a dangerous drug, to wit: methamphetamine, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3407(A)(7), (B)(7), (D), (E), (F), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

<u>COUNT_3</u> <u>TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO</u> <u>TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER,</u> <u>OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG IN AN AMOUNT</u> OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY

VICTOR JOHN ZAHURANCE (001), on or about December 9, 2024, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: heroin, in an

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amount over the statutory threshold, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

COUNT 4

<u>TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO</u> <u>TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER,</u> <u>OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG IN AN AMOUNT</u> <u>OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY</u>

ELVIRA VIELMA FELIX (002), on or about December 18, 2024, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: heroin, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

<u>COUNT 5</u> <u>TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO</u> <u>TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER,</u> <u>OR OFFER TO SELL OR TRANSFER A NARCOTIC DRUG IN AN AMOUNT</u> OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY

VICTOR JOHN ZAHURANCE (001), on or about January 8, 2025, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a narcotic drug, to wit: heroin, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3408(A)(7), (B)(7), (D), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

<u>COUNT_6</u> <u>TRANSPORT FOR SALE, IMPORT INTO THIS STATE, OFFER TO</u> <u>TRANSPORT FOR SALE OR IMPORT INTO THIS STATE, SELL, TRANSFER,</u> <u>OR OFFER TO SELL OR TRANSFER A DANGEROUS DRUG IN AN AMOUNT</u> <u>OVER THE STATUTORY THRESHOLD, A CLASS 2 FELONY</u>

VICTOR JOHN ZAHURANCE (001), on or about March 4, 2025, did knowingly transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer a dangerous drug, to wit: methamphetamine, in an amount over the statutory threshold, in violation of A.R.S. §§ 13-3407(A)(7), (B)(7), (D), (E), (F), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

<u>COUNT 7</u> <u>POSSESSION OF A DANGEROUS DRUG FOR SALE, IN AN AMOUNT OVER</u> <u>THE STATUTORY THRESHOLD, A CLASS 2 FELONY</u>

VICTOR JOHN ZAHURANCE (001), on or about March 4, 2025, knowingly possessed a dangerous drug for sale, in an amount over the statutory threshold, to wit: methamphetamine, in violation of A.R.S. §§ 13-3407(A)(2), (B)(2), (D), (E), (F), (H), 13-3401(36), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, and 13-811.

<u>COUNT_8</u> <u>ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY</u>

VICTOR JOHN ZAHURANCE (001) AND ELVIRA VIELMA FELIX (002),

on or between December 4, 2024 and March 4, 2025, were employed by or associated with an enterprise and did knowingly conduct the enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which he knew was being conducted through racketeering. The enterprise(s) included, but were not limited to a group of persons associated in fact, including but not limited to **VICTOR JOHN ZAHURNCE (001) and ELVIRA VIELMA FELIX (002)**, and others known and/or unknown. The racketeering included: Prohibited drugs, marijuana or other prohibited chemicals or substances, in violation of A.R.S. § 13-2301(D)(4)(b)(xi); which were sold and/or offered to be sold on WhatsApp, a Meta Platforms, Inc. company.

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B) and (D), 13-2301, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

<u>COUNT 9</u> <u>CONSPIRACY, A CLASS 2 FELONY</u>

VICTOR JOHN ZAHURANCE (001) AND ELVIRA VIELMA FELIX (002),

on or between December 4, 2024 and March 4, 2025, 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) Transport for Sale, Import into this State, Offer to Transport for Sale or Import into This State, Sell, Transfer, or Offer to Sell or Transfer a Narcotic Drug, in violation of A.R.S. § 13-3408(A)(7);

2) Transport for Sale, Import into this State, Offer to Transport for Sale or Import into this State, Sell, Transfer or Offer to Sell or Transfer a Dangerous Drug, in violation of A.R.S. § 13-3407(A)(7);

3) Possession of Dangerous Drug for Sale, in violation of A.R.S. § 13-3407(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 1-7 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

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Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

True Bill")

KRISTIN K. MAYES ATTORNEY GENERAL STATE OF ARIZONA

Dated: bar. 10, 2035

SABRINA LOCHNER

Assistant Attorney General

nger Foreperson of the Grand Jury