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

STATE OF ARIZONA,

Plaintiff,

vs.

**ISAAC ABRAHAM SANTANA-RIOS,  
(001),**

Defendant.

Case No: **CR2009-116278-001 DT**

64 SGJ 117

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: ILLEGALLY CONDUCTING AN ENTERPRISE**, a Class 3 Felony in violation of A.R.S. § 13-2312;

**COUNT 2: MISCONDUCT INVOLVING WEAPONS**, a Class 4 Felony in violation of A.R.S § 13-3102(A)(4);

**COUNT 3: TRAFFICKING IN THE IDENTITY OF ANOTHER**, a Class 2 Felony in violation of A.R.S. § 13-2010;

**COUNTS 4 and 5: FORGERY**, Class 4 Felonies in violation of A.R.S. § 13-2002;

**COUNT 6: CRIMINAL POSSESSION OF A FORGERY DEVICE**, a Class 5 Felony, in violation of A.R.S. § 13-2003(A)(2).

**COUNT 7: ENDANGERMENT**, a Class 6 Felony, in violation of A.R.S. §13-1201 (A)

The 64<sup>th</sup> Arizona State Grand Jury accuses **ISAAC ABRAHAM SANTANA-RIOS**, charging on this 9<sup>th</sup> day of March , 2009, that in or from Maricopa County, Arizona:

### **COUNT 1: ILLEGALLY CONDUCTING AN ENTERPRISE**

Between February 2009 and March 5, 2009, Defendant, **ISAAC ABRAHAM SANTANA-RIOS**, was employed by or associated with any enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that he knew was being conducted through racketeering, in violation of A.R.S. §§13-2312 (B), 13-2301, 13-2002 (A) (1), 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** participated in an enterprise which manufactures and sells fraudulent Social Security cards, to various individuals.

### **COUNT 2: MISCONDUCT INVOLVING WEAPONS**

On or about March 5, 2009, Defendant **ISAAC ABRAHAM SANTANA-RIOS**, a prohibited possessor, knowingly possessed deadly weapons, namely: a Colt 45 caliber semi-automatic and an Astra .41 caliber magnum, in violation of A.R.S. §§ 13-3102(A)(4), 13-3101, 13-701, 13-702, 13-703 and 13-801.

### **COUNT 3: TRAFFICKING IN THE IDENTITY OF ANOTHER**

On or about February 27, 2009, Defendants, **ISAAC ABRAHAM SANTANA-RIOS**, knowingly sold, transferred or transmitted any personal identifying information of another person, including a real or fictitious person without the consent of the other person for any unlawful purpose or to cause loss to the person whether or not the other person actually suffered any

economic loss, in violation of A.R.S. §§13-2010, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** sold counterfeit identification documents bearing the name Jose Alfredo Barrera G .

#### **COUNT 4: FORGERY**

On or about February 27, 2009, Defendant, **ISAAC ABRAHAM SANTANA-RIOS** with the intent to defraud, falsely made, completed or altered a written instrument, in violation of A.R.S. §§13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** created a counterfeit Social Security card bearing the name Jose Alfredo Barrera G.

#### **COUNT 5: FORGERY**

On or about February 27, 2009, Defendant, **ISAAC ABRAHAM SANTANA-RIOS** with the intent to defraud, falsely made, completed or altered a written instrument, in violation of A.R.S. §§13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** created a counterfeit Permanent Resident Card bearing the name Jose Alfredo Barrera G.

#### **COUNT 6: CRIMINAL POSSESSION OF A FORGERY DEVICE**

Between February 2009 and March 5, 2009, Defendant, **ISAAC ABRAHAM SANTANA-RIOS** made or possessed a computer, scanner, camera, ink stamp and card stock specifically designed or adapted for use in forging written instruments, with intent to use them or

to aid or permit another to use them for purposes of forgery, in violation of A.R.S. §§13-2003(A)(2), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** possessed a “Estados Unidos Mexicanos” ink stamp; an HP printer/scanner; thumb drives; and blank card stock for Social Security and Mexican Identification cards.

**COUNT 7: ENDANGERMENT**

On or about March 5, 2009, **ISAAC ABRAHAM SANTANA RIOS** recklessly endangered, Minor Child Santana-Rios, with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201(A), 13-301, 13-302, 13-303, 13-304), 13-701, 13-702, 13-702.01 and 13-801.

This conduct occurred when Defendant, **ISAAC ABRAHAM SANTANA-RIOS** stored loaded guns under a dresser in his bedroom where Minor Child Santana-Rios could have access.

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

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA

\_\_\_\_\_  
(A "True Bill")

Dated: \_\_\_\_\_

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BEVERLY J. RUDNICK  
Assistant Attorney General

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Foreperson of the State Grand Jury

#413017