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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

V.

CHARLES RODRICK aka CHARLES GILSON (001), (Counts 1-5)

BRENT OESTERBLAD (002), (Counts 1-2, 4-5)

and

SARAH SHEA (003), (Counts 1-2, 4-5)

Defendants.

Case No:

88 SGJ 33

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. §13-2310(A);

COUNT 2: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of ARS §13-2312;

COUNT 3: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §13-2316(A)(1);

COUNTS 4-5: HARASSMENT, Class 1 Misdemeanors, in violation of A.R.S. §13-2921(A)(1).

The Arizona State Grand Jury accuses, CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002) and SARAH SHEA (003), charging on this 29th day of March, 2021 that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between August 11, 2011 and November 4, 2015 defendants CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002), and SARAH SHEA (003), pursuant to a scheme or artifice to defraud, knowingly obtained benefits by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Said conduct occurred when defendants CHARLES RODRICK aka CHARLES GILSON, BRENT OESTERBLAD, and SARAH SHEA, received benefits, specifically payments by victims in exchange for the removal of victims' profile from defendants' websites, but then failed to do so or otherwise republished the victim's profiles on other websites owned by CHARLES RODRICK.

COUNT 2

ILLEGALLY CONDUCTING AN ENTERPRISE

On or between August 11, 2011 and November 4, 2015, CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002), and SARAH SHEA

(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 or should have known 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, 13-305, 13-306, 13-701, 13-702 and 13-801.

The enterprise was a group of persons employed/associated in fact, including, but not limited to CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002), and SARAH SHEA (003), and other persons both known and unknown, engaged in the operation of an enterprise.

The racketeering included, but was not limited to, Fraudulent Schemes and Artifices in violation of A.R.S. §§ 13-2310.

COUNT 3

COMPUTER TAMPERING

On or between August 11, 2011 through August 30, 2011, defendant CHARLES RODRICK aka CHARLES GILSON (001), through commands to another person to commit the offense, acted without authority by accessing a computer system or network, with the intent to control property or services by means of false or fraudulent representations, in violation of A.R.S. §§ 13-2316(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Said conduct occurred when defendant CHARLES RODRICK aka CHARLES GILSON (001), solicited or commanded a person to access National Predator Database's website to "scrape" the sex offender profiles.

COUNT 4

HARASSMENT

On or between November 10, 2012 through December 17, 2020, defendants CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002), and SARAH SHEA (003), by anonymously, or otherwise contacting, communicating, or causing a communication with another person by electronic, telephonic, or written means in a manner that harasses and repeatedly committed an act or acts that harass another person, in violation of A.R.S. §§ 13-2921(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Said conduct occurred when defendants CHARLES RODRICK aka CHARLES
GILSON (001), BRENT OESTERBLAD (002), and SARAH SHEA (003), harassed
victim by posting a fraudulent sex offender profile on RODRICK-owned
SOR Archive website.

COUNT 5

HARASSMENT

On or between June 17, 2015 through December 17, 2020, defendants CHARLES RODRICK aka CHARLES GILSON (001), BRENT OESTERBLAD (002), AND SARAH SHEA (003), committed harassment by anonymously, or otherwise contacting,

communicating, or causing a communication with another person by electronic, telephonic, or written means in a manner that harasses and repeatedly committed an act or acts that harass another person, in violation of A.R.S. §§ 13-2921(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

Said conduct occurred when defendants CHARLES RODRICK aka CHARLES
GILSON (001), BRENT OESTERBLAD (002), AND SARAH SHEA (003), harassed
victim by posting a fraudulent sex offender profile on RODRICK-owned
SORArchive website.

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

(A "True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

NICOLE SHAKER

Assistant Attorney General

Dated: 03/29/2021

Foreperson of the State Grand Jury

#9168505