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

STATE OF ARIZONA,
Plaintiff,

v.

**RAFAELA JUAREZ (001),
HUGO JUAREZ-ZARAGOZA (002),**
Defendants.

Case No:

79 SGJ 83

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2
Felony in violation of A.R.S. § 13-1003;

**COUNT 2: ILLEGALLY CONDUCTING
AN ENTERPRISE**, a Class 3 Felony in
violation of A.R.S. § 13-2312;

**COUNT 3: FRAUDULENT SCHEMES &
ARTIFICES**, a Class 2 Felony in violation
of A.R.S. § 13-2310;

COUNT 4: THEFT, a Class 3 Felony in
violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **RAFAELA JUAREZ (001)** and **HUGO JUAREZ-ZARAGOZA (002)**, charging on this 18th day of July, 2016, that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between January 20, 2016, and March 18, 2016, **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)** with the intent to promote or aid the commission of an offense, did agree with one or more persons that at least one of them or another person would engage in conduct constituting the offenses of:

- 1) **ILLEGALLY CONDUCTING AN ENTERPRISE**, a Class 3 Felony in violation of A.R.S. § 13-2312;
- 2) **FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony in violation of A.R.S. § 13-2310;
- 3) **THEFT**, a Class 3 Felony in violation of A.R.S. § 13-1802.

In furtherance of this conspiracy, **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)** committed numerous overt acts, including, but not limited to, those acts set forth in Counts 2 through 4 of this Indictment, which are incorporated by reference as if set out in full, in violation of A.R.S. §§ 13-1003, 13-1802, 13-2310, 13-2312, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

COUNT 2
ILLEGALLY CONDUCTING AN ENTERPRISE

On or between January 20, 2016, and March 18, 2016, **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)**, who were 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 any enterprise that the defendants knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2310, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

The enterprise consisted of a group of persons associated in fact, including but not limited to **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)**. The racketeering activities included a scheme or artifice to defraud and theft.

COUNT 3
FRAUDULENT SCHEMES AND ARTIFICES

On or between January 20, 2016, and March 18, 2016, **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit 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, 13-305, 13-306, 13-701, 13-702, and 13-801.

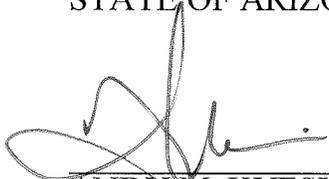
COUNT 4
THEFT

On or between January 20, 2016, and March 18, 2016, **RAFAELA JUAREZ (001) and HUGO JUAREZ-ZARAGOZA (002)**, without lawful authority, knowingly controlled Deborah & Norman Still's United States currency, of a value of \$4,000 or more but less than \$25,000, or obtained such property of Deborah & Norman Still by means of material misrepresentation, with the intent to deprive Deborah & Norman Still of such property, in violation of A.R.S. §§ 13-1802, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

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

True Bill
(A "True Bill")

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Dated: 7-18-2016


Foreperson of the State Grand Jury