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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.

**FRANCISCO JAVIER
ESPINOZA-HERNANDEZ,**

Defendant.

Case No:

64 SGJ 99

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNTS 2-6: TRAFFICKING IN THE
IDENTITY OF ANOTHER**, Class 2 Felonies
in violation of A.R.S. § 13-2010;

COUNTS 7-17: FORGERY, Class 4 Felonies
in violation of A.R.S. § 13-2002.

The 64th Arizona State Grand Jury accuses **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, charging on this 2nd day of March, 2009, that in or from Maricopa County, Arizona:

COUNT 1: ILLEGALLY CONDUCTING AN ENTERPRISE

Between February 11, 2009 and February 18, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant participated in an enterprise which sold forged identification documents.

COUNT 2: TRAFFICKING IN THE IDENTITY OF ANOTHER

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant sold counterfeit identification documents bearing the name Lorena Ochoa Perez.

COUNT 3: TRAFFICKING IN THE IDENTITY OF ANOTHER

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant sold counterfeit identification documents bearing the name Carlos Chavez Ruiz.

COUNT 4: TRAFFICKING IN THE IDENTITY OF ANOTHER

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant sold counterfeit identification documents bearing the name Maxino Ortega Vargas.

COUNT 5: TRAFFICKING IN THE IDENTITY OF ANOTHER

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant sold counterfeit identification documents bearing the name Geraldo Perez Ramos.

COUNT 6: TRAFFICKING IN THE IDENTITY OF ANOTHER

On or about February 18, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant sold counterfeit identification documents bearing the name Rolando P. Vazquez.

COUNT 7: FORGERY

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Social Security card bearing the name Lorena Ochoa Perez.

COUNT 8: FORGERY

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Social Security card bearing the name Carlos Chavez Ruiz.

COUNT 9: FORGERY

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Social Security card bearing the name Maxino Ortega Vargas.

COUNT 10: FORGERY

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Social Security card bearing the name Gerardo Perez Ramos.

COUNT 11: FORGERY

On or about February 18, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Social Security card bearing the name Rolando P. Vazquez.

COUNT 12: FORGERY

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Arizona Driver's License bearing the name Lorena Ochoa Perez.

COUNT 13: FORGERY

On or about February 11, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Arizona Driver's License bearing the name Carlos Chavez Ruiz.

COUNT 14: FORGERY

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Arizona Driver's License bearing the name Gerardo Perez Ramos.

COUNT 15: FORGERY

On or about February 18, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Arizona Driver's License bearing the name Rolando P. Vazquez.

COUNT 16: FORGERY

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Permanent Resident Card bearing the name Maximo Vargas Ortega.

COUNT 17: FORGERY

On or about February 13, 2009, Defendant, **FRANCISCO JAVIER ESPINOZA-HERNANDEZ**, 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.

Said conduct occurred when the Defendant created a counterfeit Permanent Resident Card bearing the name Gerardo Ramos Perez.

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")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

BEVERLY J. RUDNICK
Assistant Attorney General

Foreperson of the State Grand Jury

#403694