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7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MARICOPA**
9

10 STATE OF ARIZONA,
11
12 Plaintiff,
13 v.
14 VICTORIA O. ROMERO (001),
15 Defendant.

No. 58 SGJ 164
INDICTMENT
CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEME AND
ARTIFICE, a Class 2 Felony,
A.R.S. § 13-2310

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

COUNT 3: MONEY LAUNDERING,
a Class 3 Felony,
A.R.S. § 13-2317(B)

19 The Arizona State Grand Jury accuses Defendant VICTORIA O. ROMERO (001),
20 charging on this 25th day of May, 2006, that in or from Maricopa County, Arizona:

21 **COUNT 1 - (FRAUDULENT SCHEME AND ARTIFICE)**

22 Between approximately June 2004 and May 2005, pursuant to a scheme or artifice
23 to defraud, Defendant VICTORIA O. ROMERO (001) aided or attempted to aid another
24 person in knowingly obtaining a benefit by means of false or fraudulent pretenses,
25 representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301,
26 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.
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28

1 This conduct occurred when Defendant VICTORIA O. ROMERO (001) knowingly
2 aided the fraud scheme in which Carmen Tolle falsely represented that she could obtain
3 legitimate resident alien identification cards for persons who paid her a fee and submitted
4 to an application process that included having their fingerprints taken. Defendant
5 VICTORIA O. ROMERO (001), knowing that Tolle was a convicted felon and that she
6 could not obtain legitimate resident alien identification cards for anyone, sometimes played
7 the role of the "official" who took the applicants' fingerprints, and she sometimes wore her
8 Arizona Department of Corrections uniform while doing so.

9 **COUNT 2 (CONSPIRACY)**

10 Between approximately June 2004 and May 2005, Defendant VICTORIA O.
11 ROMERO (001), with the intent to promote or aid the commission of an offense, namely,
12 the fraud scheme charged in Count 1 of this Indictment, agreed with one or more persons
13 both known and unknown to the State Grand Jury that at least one of those persons or
14 another person would engage in conduct constituting that offense, in violation of A.R.S. §§
15 13-1003, 13-2310, 13-2301, 13-305, 13-306, 13-701, 13-702, 13-702.01, and 13-801.

16 In furtherance of this conspiracy and to effect its objects, Defendant VICTORIA O.
17 ROMERO (001) and other persons committed overt acts, including the following:

- 18 1. On June 22, 2004, Defendant VICTORIA O. ROMERO used her credit card,
19 or knowingly allowed her credit card to be used, to make an internet purchase
20 from Sirchie Fingerprint Laboratories, Inc. of:
 - 21 a. 1 portable fingerprint stand mounted on a pedestal;
 - 22 b. 1 fingerprint roller and ink; and,
 - 23 c. 100 FBI fingerprint cards.
- 24 2. On July 21, 2004, Defendant VICTORIA O. ROMERO used her credit card,
25 or knowingly allowed her credit card to be used, to make an internet purchase
26 from Sirchie Fingerprint Laboratories, Inc. of 200 FBI fingerprint cards.
27

COUNT 3 (MONEY LAUNDERING)

Between approximately June 2004 and May 2005, Defendant VICTORIA O. ROMERO (001) knowingly received racketeering proceeds knowing or having reason to know that they were the proceeds of an offense, in violation of A.R.S. §§ 13-2317(B), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

This conduct occurred when Defendant VICTORIA O. ROMERO (001) received money from Carmen Tolle for fingerprinting persons at Tolle's residence, knowing that those payments were the proceeds of a fraud scheme that was based on false pretenses that Carmen Tolle, for a fee, could obtain legitimate resident alien identification cards for the persons whose fingerprints were being taken by Defendant VICTORIA O. ROMERO (001).

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

A True Bill
(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 5/25/06

E. G. NOYES, JR.
Assistant Attorney General

Foreperson of the Grand Jury