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

9
10 **THE STATE OF ARIZONA,**

11 *Plaintiff,*

12 **vs.**

13 **WILLIAM JOSEPH JOACHIM**
14 **(001),**

15 **FREDDIE LOPEZ SANCHEZ (002),**

16 **IGNACIO BOBADILLA GOMEZ**
17 **(003),**

18 *and*

19 **XXXXX XXXX XXXXXX (004),**

20 *Defendants.*

No. CR 2006-102357-001DT ____
CR2006-102357-002DT ____
CR2006-102357-003DT ____
CR2006-102357-004DT ____

INDICTMENT

58 SGJ 43

CHARGING VIOLATIONS OF:

COUNT 1 : FRAUDULENT SCHEMES
AND ARTIFICES, a Class 2 Felony, in
violation of A.R.S. § 13-2310
(Defendants 001 and 002 only)

COUNTS 2-3 : AGGRAVATED TAKING
THE IDENTITY OF ANOTHER PERSON
OR ENTUTY, Class 3 Felonies in violation
of A.R.S. § 13-2009 (Defendants 001 and
002 only)

COUNT 4 : THEFT, a Class 3 felony in
violation of A.R.S. § 13-1802 (Defendants
001 and 002 only)

COUNT 5 : MISCONDUCT INVOLVING
WEAPONS, a Class 4 felony in violation of
A.R.S. § 13-3102 (A)(4) (Defendant 001
only)

COUNT 6 : SOLICITATION OF
FORGERY, a Class 6 Felony, in violation
of A.R.S. §§ 13-2002, and 13-1002
(Defendant 003 only)

**COUNT 7 : FACILITATION OF
FRAUDULENT SCHEMES AND
ARTIFICES**, a Class 6 Felony, in violation
of A.R.S. §§ 13-2310, and 13-1004
(Defendant 004 only)

The 58th Arizona State Grand Jury accuses **WILLIAM JOSEPH JOACHIM (001)**,
FREDDIE LOPEZ SANCHEZ (002), **IGNACIO BOBADILLA GOMEZ (003)** and
XXXXX XXXX XXXXXXX (004), charging that in or from Maricopa County, Arizona:

COUNT 1
(FRAUDULENT SCHEMES AND ARTIFICES)

During a period of time beginning on or about October 10, 2005, and ending on or about
January 12, 2006, defendants **WILLIAM JOSEPH JOACHIM (001)** and **FREDDIE
LOPEZ SANCHEZ (002)** pursuant to a scheme or artifice to defraud, knowing obtained a
benefit by means of false or fraudulent pretenses, representations, promises or material
omissions, in violation of A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-
610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendants **WILLIAM JOSEPH JOACHIM (001)**
and FREDDIE LOPEZ SANCHEZ (002) obtained goods and services by misrepresenting
themselves as the cardholders of credit card accounts which they did not have authority to use.

COUNT 2
**(AGGRAVATED TAKING THE IDENTITY OF
ANOTHER PERSON OR ENTITY)**

On or about January 12, 2006, defendants **WILLIAM JOSEPH JOACHIM (001)** and
FREDDIE LOPEZ SANCHEZ (002) knowingly took, purchased, manufactured, recorded,

1 possessed or used any personal identifying information of five or more other persons or
2 entities, including real or fictitious persons or entities, without the consent of the other
3 person or entities, with the intent to obtain or use the other person's identity for any unlawful
4 purpose or to cause loss to the persons or entities whether or not the persons or entities
5 actually suffered any economic loss, in violation of A.R.S. §§13-2009 (A)(1), 13-2001, 13-
6 301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

7 Said conduct occurred when the defendants **WILLIAM JOSEPH JOACHIM (001)**
8 **and FREDDIE LOPEZ SANCHEZ (002)** knowingly possessed the credit card information
9 of more than five individuals at 10832 North 41st Avenue, Phoenix, Maricopa County Arizona.

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11 **COUNT 3**
12 **(AGGRAVATED TAKING THE IDENTITY OF**
13 **ANOTHER PERSON OR ENTITY)**

14 During a period of time beginning on or about October 10, 2005, and ending on or about
15 January 12, 2006, defendants **WILLIAM JOSEPH JOACHIM (001) and FREDDIE**
16 **LOPEZ SANCHEZ (002)** knowingly took, purchased, manufactured, recorded, possessed or
17 used any personal identifying information of another person or entity, including a real or
18 fictitious person or entity, without the consent of that other person or entity, with the intent to
19 obtain or use the other person's or entity's identity for any unlawful purpose and caused
20 another person or entity to suffer an economic loss of three thousand dollars or more, in
21 violation of A.R.S. §§13-2009 (A)(2), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-610,
22 13-701, 13-702, 13-702.01 and 13-801.

23 Said conduct occurred when the defendants **WILLIAM JOSEPH JOACHIM (001)**
24 **and FREDDIE LOPEZ SANCHEZ (002)** knowingly took, possessed, purchased,
25 manufactured or used the personal identifying information of Brett and Deanna Favre without
26

1 their consent, with the intent to cause a loss to Brett and Deanna Favre, Associated Bank or
2 Napa Auto Parts Stores of greater than three thousand dollars.

3 **COUNT 4**

4 **(THEFT)**

5 During a period of time beginning on or about October 10, 2005, and ending on or about
6 January 12, 2006, defendants **WILLIAM JOSEPH JOACHIM (001) and FREDDIE**
7 **LOPEZ SANCHEZ (002)** obtained the services or property of another by means of any
8 material misrepresentation with intent to deprive the other person of such property in an
9 amount greater than \$3,000.00 but less than \$25,000.00, in violation of A.R.S. §§13-1802,
10 13-2001, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-
11 801.

12 Said conduct occurred when the defendants **WILLIAM JOSEPH JOACHIM (001)**
13 **and FREDDIE LOPEZ SANCHEZ (002)** obtained services and property by misrepresenting
14 themselves to be authorized users of credit cards.

15
16 **COUNT 5**

17 **(MISCONDUCT INVOLVING WEAPONS)**

18 On or about January 12, 2006, defendant **WILLIAM JOSEPH JOACHIM (001)**
19 knowingly possessed a deadly weapon or prohibited weapon while he was a prohibited
20 possessor, in violation of A.R.S. §§13-3102 (A)(4), 13-3101 (A)(6)(d), 13-610, 13-701, 13-
21 702, 13-702.01 and 13-801.

22 Said conduct occurred when the defendant **WILLIAM JOSEPH JOACHIM (001)**
23 possessed a sawed-off Browning 12 gauge shotgun, serial number 142477.

24 **COUNT 6**

25 **(SOLICITATION TO COMMIT FORGERY)**

1 On or about January 12, 2006, defendant **IGNACIO BOBADILLA GOMEZ (003)**,
2 with the intent to promote or facilitate the commission of a felony, commanded, encouraged,
3 requested or solicited another person to engage in specific conduct which would constitute
4 the felony or which would establish the other's complicity in its commission, to wit: forgery
5 in violation of A.R.S. §§13-1002, 13-2002, 13-2001, 13-610, 13-701, 13-702, 13-702.01
6 and 13-801.

7 Said conduct occurred when the defendant **IGNACIO BOBADILLA GOMEZ (003)**
8 offered to perform maintenance work on a motorcycle in exchange for a forged Arizona
9 Driver's License.

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11 **COUNT 7**

12 **(FACILITATION OF FRAUDULENT SCHEMES AND ARTIFICES)**

13 On or about November 1, 2005, defendant **XXXXXX XXXX XXXXXXXX (004)**, acting
14 with knowledge that another person is committing or intends to commit an offense, knowingly
15 provided the other person with means or opportunity for the commission of an offense, to
16 wit: fraudulent schemes and artifices, in violation of A.R.S. §§13-2310, 13-1004, 13-2301,
17 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

18 Said conduct occurred when the defendant **XXXXXX XXXX XXXXXXXX (004)** knowingly
19 allowed others to use xxx MasterCard to accept a credit from Napa Auto Parts which was for
20 returned items that had been purchased fraudulently.

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

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TERRY GODDARD
Attorney General
State of Arizona

TODD C. LAWSON
Assistant Attorney General

("True Bill")

Date

FOREPERSON OF THE GRAND JURY