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# IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

ALYSIA FRANCO aka Martha Orozco (001), All Counts

Defendant.

Case No: CR20185538-001

84 SGJ 27

DIRECT INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-2: THEFT,** a Class 2 Felony, in violation of A.R.S. § 13-1802.

COUNT 3: MONEY LAUNDERING IN THE SECOND DEGREE, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1).

COUNT 4: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B).

**COUNT 5: CONSPIRACY,** a Class 2 Felony, in violation of A.R.S. § 13-1003.

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The Arizona State Grand Jury accuses **ALYSIA FRANCO aka Martha Orozco (001)**, charging on this 10<sup>th</sup> day of December, 2018, that in or from Pima County, Arizona:

#### COUNT 1 THEFT, A CLASS 2 FELONY

On or about September 10, 2015, **ALYSIA FRANCO aka Martha Orozco (001)**, committed theft of property belonging to Gregory Patrick Sutor, with a value of twenty-five thousand dollars or more, to wit: \$202,000.00, in violation of A.R.S. §§13-1802, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

## COUNT 2 THEFT, A CLASS 2 FELONY

On or about September 14, 2015, **ALYSIA FRANCO aka Martha Orozco (001)**, committed theft of property belonging to Young Lee, Young Song Lee, Mike Lee, and Steven Lee, with a value of twenty-five thousand dollars or more, to wit: \$189,500.00, in violation of A.R.S. §\$13-1802, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

### COUNT 3 MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

From or about September 2013, and continuing through on or about September 2015, **ALYSIA FRANCO aka Martha Orozco (001),** acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, to wit: \$391,500.00, knowing or having reason to know that they were the proceeds of an offense, in violation of A.R.S. §§ 13-2317(B)(1), 13-108, 13-109, 13-301,

13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

### COUNT 4 ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

From on or about September 2013, and continuing through on or about September, 2015, **ALYSIA FRANCO aka Martha Orozco (001)**, employed by or associated with an enterprise and did knowingly participate directly or indirectly in the conduct of the enterprise which she knew was being conducted through racketeering.

The enterprise was a corporation and/or group of persons associated in fact, including, but not limited to, others KNOWN and/or UNKNOWN.

The racketeering included:

- FRAUDULENT SCHEMES AND ARTIFICES, in violation of A.R.S. § 13-2310
- MONEY LAUNDERING, in violation of A.R.S. § 13-2317
- THEFT, in violation of A.R.S. § 13-1802

but is not limited to, the acts of racketeering of Theft and Money Laundering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B), 13-2301(D)(4)(b), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

#### COUNT 5 CONSPIRACY, A CLASS 2 FELONY

From on or about September 2013, and continuing through on or about September 2015, ALYSIA FRANCO aka Martha Orozco (001), 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, in particular:

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- FRAUDULENT SCHEMES AND ARTIFICES, in violation of A.R.S. § 13-2310
- MONEY LAUNDERING, in violation of A.R.S. § 13-2317
- THEFT, in violation of A.R.S. § 13-1802

in furtherance of this conspiracy and to effect the forgoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to: the overt acts described in Counts 1 through 4 of this indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2310, 13-2317, 13-1802, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

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

(A "True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated: 17.10.18

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Foreperson of the State Grand Jury