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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.

**MARIA GUTIERREZ (001) and  
JALISCO CORP dba JALISCO AUTO  
SALES (002),**  
Defendant.

Case No:

**83 SGJ 126**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES, a class 2 felony in  
violation of A.R.S. §13-2310**

**COUNT 2: THEFT, a class 2 felony in  
violation of A.R.S. §13-1802**

**COUNTS 3-19: FILING FALSE  
RETURN, a class 5 felony in violation of  
A.R.S. §42-1127(B)**

The Arizona State Grand Jury accuses **MARIA GUTIERREZ (001) and JALISCO CORP  
dba JALISCO AUTO SALES (002)**, charging on this 7th day of August, 2018, that in or from  
Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between January 1, 2015, and July 26, 2016, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Arizona Department of Revenue by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 2**

**THEFT**

On or between January 1, 2015, and July 26, 2016, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, without lawful authority knowingly obtained property of another with a value of \$25,000 or more, by means of any material misrepresentation with the intent to deprive the other person of such property in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 3**

**FILING FALSE RETURN**

On or about February 26, 2015, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the

return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 4**

**FILING FALSE RETURN**

On or about March 24, 2015, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 5**

**FILING FALSE RETURN**

On or about April 24, 2015, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 6**

**FILING FALSE RETURN**

On or about May 20, 2015, defendants, **MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002)**, knowingly prepared, presented or aided, procured

or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 7**

**FILING FALSE RETURN**

On or about June 22, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 8**

**FILING FALSE RETURN**

On or about July 27, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 9**

**FILING FALSE RETURN**

On or about August 26, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 10**

**FILING FALSE RETURN**

On or about September 28, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 11**

**FILING FALSE RETURN**

On or about October 27, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit,

claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 12**

**FILING FALSE RETURN**

On or about November 24, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 13**

**FILING FALSE RETURN**

On or about December 22, 2015, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 14**

**FILING FALSE RETURN**

On or about February 24, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured

or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 15**

**FILING FALSE RETURN**

On or about March 29, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 16**

**FILING FALSE RETURN**

On or about April 26, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 17**

**FILING FALSE RETURN**

On or about May 26, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 18**

**FILING FALSE RETURN**

On or about June 28, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT 19**

**FILING FALSE RETURN**

On or about July 26, 2016, defendants, MARIA GUTIERREZ (001) and JALISCO CORP dba JALISCO AUTO SALES (002), knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit,




claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

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")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 8-7-18

  
\_\_\_\_\_  
MARY HARRISS  
Assistant Attorney General

  
\_\_\_\_\_  
Foreperson of the State Grand Jury

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