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T002-2019-000073  
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Attorneys for Plaintiff

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

**STATE OF ARIZONA,**

**Plaintiff,**

**v.**

**RANDI MARIE HARTJEN,**

**Defendant.**

Case No:

84 SGJ 327

**INDICTMENT**

**CHARGING VIOLATIONS OF:**

**COUNTS: 1, 5, 9, 13, 17, 21:  
FRAUDULENT SCHEMES AND  
ARTIFICES, a Class 2 Felony, in violation  
of A.R.S. § 13-2310**

**COUNTS: 2, 6, 18: TAKING THE  
IDENTITY OF ANOTHER, a Class 4  
Felony, in violation of A.R.S. § 13-2008**

**COUNTS: 3, 7, 11, 15, 19, 23: THEFT OF  
MEANS OF TRANSPORTATION, a Class  
3 Felony, in violation of A.R.S. § 13-1814**

**COUNTS: 4, 8, 12, 16, 20, 24: FORGERY,**  
a Class 4 Felony, in violation of A.R.S. § 13-2002

**COUNTS: 10, 14, 22: AGGRAVATED  
TAKING IDENTITY OF ANOTHER,** a  
Class 3 Felony, in violation of A.R.S. § 13-2009

The Arizona State Grand Jury accuses **RANDI MARIE HARTJEN**, charging on this 13<sup>th</sup> day of May, 2019 that in or from Pima County, Arizona:

**2018 Nissan Sentra**

**COUNT ONE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about July 27, 2018, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2018 Nissan Sentra vehicle from Enterprise Rent-A-Car and/or Lorena Vasquez, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT TWO**  
**TAKING THE IDENTITY OF ANOTHER, A CLASS FOUR FELONY**

On or about July 27, 2018, through May 6, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person, to wit: Lorena Vasquez, without the consent of that other person or entity, with the intent to obtain or use the other person's identity for any unlawful purpose or to cause loss to a person or entity, in violation of A.R.S. §§ 13-2008(a), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**COUNT THREE**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about July 27, 2018, through September 19, 2018, **RANDI MARIE HARTJEN**, without lawful authority, controlled another person's means of transportation, to wit: a 2018 Nissan Sentra vehicle from Enterprise Rent-A-Car, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT FOUR**  
**FORGERY, A CLASS FOUR FELONY**

On or about July 27, 2018, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: Enterprise Rent-A-Car rental agreement in the name of Lorena Vasquez, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**2018 Jaguar F-Pace**

**COUNT FIVE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about October 11, 2018, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2018 Jaguar F-Pace vehicle from Enterprise Rent-A-Car and/or Alamo Rent a Car and/or Lauren Fach, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT SIX**  
**TAKING THE IDENTITY OF ANOTHER, A CLASS FOUR FELONY**

On or about September 19, 2018, through May 6, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person, to wit: Lauren Fach, without the consent of that other person or entity, with the intent to obtain or use the other person's identity for any unlawful purpose or to cause loss to a person or entity, in violation of A.R.S. §§ 13-2008(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**COUNT SEVEN**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about October 11, 2018, through November 21, 2018, **RANDI MARIE HARTJEN**, without lawful authority, controlled another person's means of transportation, to wit: a 2018 Jaguar F-Pace vehicle from Enterprise Rent-A-Car and/or Alamo Rent a Car, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT EIGHT**  
**FORGERY, A CLASS FOUR FELONY**

On or about October 11, 2018, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: Enterprise Rent-A-Car and/or Alamo Rent a Car rental agreement in the name of Lauren Fach, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

2016 Cadillac ATS

**COUNT NINE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about January 24, 2019, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2016 Cadillac ATS vehicle from Carvana and/or Jennifer Dvoskin, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT TEN**  
**AGGRAVATED TAKING THE IDENTITY OF ANOTHER, A CLASS THREE FELONY**

On or about December 25, 2018, through May 6, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person or entity, to wit: Jennifer Dvoskin, without the consent of that other person, with the intent to obtain or use the other person's identity for any unlawful purpose and causes another person or entity to suffer an economic loss of one thousand dollars or more, to wit: \$23,623.00, in violation of A.R.S. §§ 13-2009(A)(2), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**COUNT ELEVEN**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about January 24, 2019, through March 18, 2019, **RANDI MARIE HARTJEN**, without lawful authority, controlled another person's means of transportation, to wit: a 2016 Cadillac ATS vehicle from Carvana, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT TWELVE**  
**FORGERY, A CLASS FOUR FELONY**

On or about January 24, 2019, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: Carvana vehicle purchase agreement in the name of Jennifer Dvoskin, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**2017 Lincoln MLC**

**COUNT THIRTEEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about February 14, 2019, through May 6, 2019, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2017 Lincoln MLC vehicle from Carvana and/or Linda Baumbach, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT FOURTEEN**  
**AGGRAVATED TAKING THE IDENTITY OF ANOTHER, A CLASS THREE**  
**FELONY**

On or about January 11, 2019, through May 6, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person, to wit: Linda Baumbach, without the consent of that other person or entity, with the intent to obtain or use the other person's identity for any unlawful purpose and causes another person or entity to suffer an economic loss of one thousand dollars or more, to wit: \$28,203.20, in violation of A.R.S. §§ 13-2009(A)(2), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**COUNT FIFTEEN**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about February 14, 2019, through May 6, 2019, **RANDI MARIE HARTJEN**, without lawful authority, controls another person's means of transportation, to wit: a 2017 Lincoln MLC vehicle from Carvana, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT SIXTEEN**  
**FORGERY, A CLASS FOUR FELONY**

On or about February 14, 2019, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: Carvana vehicle purchase agreement in the name of Linda Baumbach, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**2019 Buick Enclave**

**COUNT SEVENTEEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about March 20, 2019, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2019 Buick Enclave vehicle from The Hertz Corporation and/or Ashley Steele, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT EIGHTEEN**  
**TAKING THE IDENTITY OF ANOTHER, A CLASS FOUR FELONY**

On or about March 7, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person or entity, to wit: Ashley Steele, without the consent of that other person or entity, with the intent to obtain or use the other person's identity for any unlawful purpose or to cause loss to a person or entity, in violation of A.R.S. §§ 13-2008(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.

**COUNT NINETEEN**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about March 20, 2019, through April 25, 2019, **RANDI MARIE HARTJEN**, without lawful authority, controls another person's means of transportation, to wit: a 2019 Buick Enclave vehicle from The Hertz Corporation, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT TWENTY**  
**FORGERY, A CLASS FOUR FELONY**

On or about March 20, 2019, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: The Hertz Corporation rental agreement in the name of Ashley Steele, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.



**2014 GMC Acadia Denali**

**COUNT TWENTY ONE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS TWO FELONY**

On or about April 14, 2019, **RANDI MARIE HARTJEN**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: a 2014 GMC Acadia Denali vehicle from Carvana and/or Chandra Chase, by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

**COUNT TWENTY TWO**  
**AGGRAVATED TAKING THE IDENTITY OF ANOTHER, A CLASS THREE**  
**FELONY**

On or about March 8, 2019, through May 6, 2019, **RANDI MARIE HARTJEN** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person, to wit: Chandra Chase, without the consent of that other person, with the intent to obtain or use the other person's identity for any unlawful purpose and causes another person or entity to suffer an economic loss of one thousand dollars or more, to wit: \$23,100.00, in violation of A.R.S. §§ 13-2009(A)(2), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.


**COUNT TWENTY THREE**  
**THEFT OF MEANS OF TRANSPORTATION, A CLASS THREE FELONY**

On or about April 14, 2019, through May 6, 2019, **RANDI MARIE HARTJEN**, without lawful authority, controlled another person's means of transportation, to wit: a 2014 GMC Acadia Denali vehicle from Carvana, with the intent to permanently deprive the person of the means of transportation, in violation of A.R.S. §§ 13-1814(A)(3), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

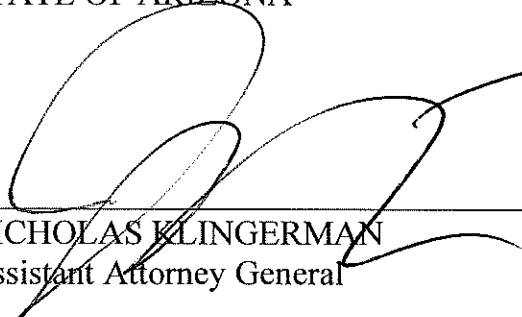
**COUNT TWENTY FOUR**  
**FORGERY, A CLASS FOUR FELONY**

On or about April 14, 2019, **RANDI MARIE HARTJEN**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: Carvana purchase agreement in the name of Chandra Chase, in violation of A.R.S. §§ 13-2002(A)(1), 13-301, 13-302, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2312, and 13-2314.


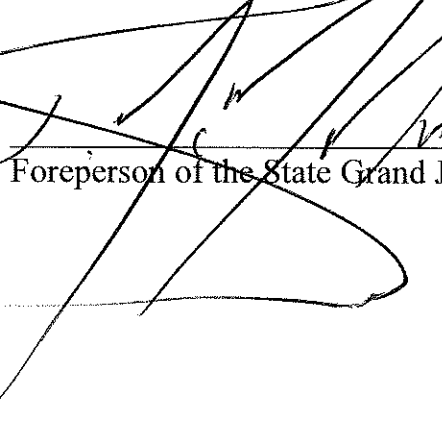
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

  
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(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
\_\_\_\_\_  
NICHOLAS KLINGERMAN  
Assistant Attorney General

PHX-#7880858

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