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14 Attorneys for Plaintiff

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

17 **STATE OF ARIZONA,**

Case No. **CR20194435-001**

18 Plaintiff,

**287-GJ-1155**

19 v.

**DIRECT INDICTMENT**

20 **JUAN CARLOS HERNANDEZ SR. (001),**

**CHARGING VIOLATIONS OF:**

21 Defendant.

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

**COUNTS 2, 3, 4, and 5: COMPUTER TAMPERING, Class 3 Felonies, in violation of A.R.S. § 13-2316(A)(1).**

22  
23 The grand jurors of the County of Pima, in the name of the State of Arizona, and by its  
24 authority, accuse and charge that in Pima County:  
25  
26  
27  
28

**COUNT ONE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

1  
2 On or about May 1, 2019 through June 11, 2019, JUAN CARLOS HERNANDEZ (001),  
3 pursuant to a scheme to defraud, knowingly obtained any benefit by means of false or fraudulent  
4 pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-  
5 301 *et. seq.*, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

6  
7 **COUNT TWO**  
**COMPUTER TAMPERING, A CLASS 3 FELONY**

8 On or about May 1, 2019, through June 1, 2019, JUAN CARLOS HERNANDEZ (001),  
9 without authority or by exceeding authorization of use, accessed any computer, computer system  
10 or network, or any part of a computer, computer system or network, to wit: BANNER HEALTH  
11 CARE PATIENT RECORDS FOR R.S., with intent to devise or execute any scheme or artifice to  
12 defraud or deceive, or to control property or services by means of false or fraudulent pretenses,  
13 representations or promises, in violation of A.R.S. §§ 13-2316, 13-2301, 13-301 *et. seq.*, 13-603,  
14 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

15  
16 **COUNT THREE**  
**COMPUTER TAMPERING, A CLASS 3 FELONY**

17 On or about May 15, 2019, through May 29, 2019, JUAN CARLOS HERNANDEZ  
18 (001), without authority or by exceeding authorization of use, accessed any computer, computer  
19 system or network, or any part of a computer, computer system or network, to wit: BANNER  
20 HEALTH CARE PATIENT RECORDS FOR R.T., with intent to devise or execute any scheme or  
21 artifice to defraud or deceive, or to control property or services by means of false or fraudulent  
22 pretenses, representations or promises, in violation of A.R.S. §§ 13-2316, 13-2301, 13-301 *et. seq.*,  
23 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

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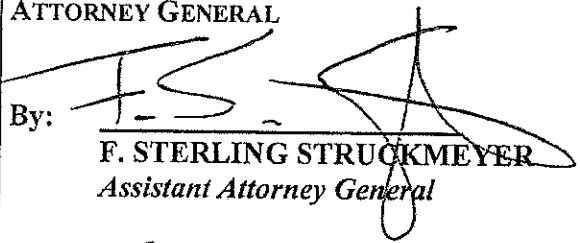
COUNT FOUR  
COMPUTER TAMPERING, A CLASS 3 FELONY

On or about May 16, 2019 through June 7, 2019, JUAN CARLOS HERNANDEZ (001), without authority or by exceeding authorization of use, accessed any computer, computer system or network, or any part of a computer, computer system or network, to wit: BANNER HEALTH CARE PATIENT RECORDS FOR J.H., with intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises, in violation of A.R.S. §§ 13-2316, 13-2301, 13-301 *et. seq.*, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT FIVE  
COMPUTER TAMPERING, A CLASS 3 FELONY


On or about June 6, 2019 through June 11, 2019, JUAN CARLOS HERNANDEZ (001), without authority or by exceeding authorization of use, accessed any computer, computer system or network, or any part of a computer, computer system or network, to wit: BANNER HEALTH CARE PATIENT RECORDS FOR K.B., with intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises, in violation of A.R.S. §§ 13-2316, 13-2301, 13-301 *et. seq.*, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

MARK BRNOVICH  
ATTORNEY GENERAL

By:   
F. STERLING STRUCKMEYER  
*Assistant Attorney General*

**TRUE BILL**  
\_\_\_\_\_  
(A "True Bill")

Dated: 9-17-19

By:   
\_\_\_\_\_  
Foreperson of the Grand Jury

PHX-#8030662