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JUAN PABLO GUZMAN CLERK OF THE SUPERIOR CT. SANTA CRUZ COUNTY

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P002-2018-002173 AGO/SIS 2018-0256

Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF SANTA CRUZ

STATE OF ARIZONA,

Plaintiff,

٧.

RAUL HERNANDEZ LOPEZ,

Defendant.

Case No: CR-19-133

84 SGJ 343

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: VULNERABLE ADULT ABUSE, a Class 3 Felony, in violation of A.R.S. § 13-3623;

COUNT 2: VULNERABLE ADULT ABUSE, a Class 3 Felony, in violation of A.R.S. § 13-3623;

COUNT 3: VULNERABLE ADULT ABUSE, a Class 5 Felony, in violation of A.R.S. § 13-3623; and

COUNT 4: VULNERABLE ADULT ABUSE, a Class 5 Felony, in violation of A.R.S. § 13-3623.

The Arizona State Grand Jury accuses **RAUL LOPEZ** (001), charging on this 29th day of May, 2019, that in or from Santa Cruz County, Arizona:

COUNT ONE VULNERABLE ADULT ABUSE, A CLASS THREE FELONY

On or about December 20, 2017 through on or about February 13, 2018, RAUL LOPEZ (001), under circumstances likely to produce death or serious physical injury, recklessly caused a vulnerable adult, to suffer physical injury or having the care or custody of a vulnerable adult, caused or permits the person or health of the vulnerable adult to be injured, or caused the vulnerable adult to be placed in a situation where the person or health of the vulnerable adult was endangered, to wit: PRESSURE ULCER ON LEFT FOOT, in violation of A.R.S. §§ 13-3623, 13-303, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT TWO VULNERABLE ADULT ABUSE, A CLASS THREE FELONY

On or about December 20, 2017 through on or about February 13, 2018, RAUL LOPEZ (001), under circumstances likely to produce death or serious physical injury, recklessly caused a vulnerable adult, to suffer physical injury or having the care or custody of a vulnerable adult, caused or permits the person or health of the vulnerable adult to be injured, or caused the vulnerable adult to be placed in a situation where the person or health of the vulnerable adult was endangered, to wit: PRESSURE ULCER ON RIGHT FOOT, in violation of A.R.S. §§ 13-3623, 13-303, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT THREE VULNERABLE ADULT ABUSE, A CLASS FIVE FELONY

On or about December 20, 2017 through on or about February 13, 2018, RAUL LOPEZ (001), under circumstances other than those likely to produce death or serious physical injury, recklessly caused a vulnerable adult, to suffer physical injury or having the

care or custody of a vulnerable adult, caused or permits the person or health of the vulnerable adult to be injured, or caused the vulnerable adult to be placed in a situation where the person or health of the vulnerable adult was endangered, to wit: PRESSURE ULCER ON HIP, in violation of A.R.S. §§ 13-3623, 13-303, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT FOUR VULNERABLE ADULT ABUSE, A CLASS FIVE FELONY

On or about December 20, 2017 through on or about February 13, 2018, RAUL LOPEZ (001), under circumstances other than those likely to produce death or serious physical injury, recklessly caused a vulnerable adult, , to suffer physical injury or having the care or custody of a vulnerable adult, caused or permits the person or health of the vulnerable adult to be injured, or caused the vulnerable adult to be placed in a situation where the person or health of the vulnerable adult was endangered, to wit: PRESSURE ULCER ON BUTTOCKS, in violation of A.R.S. §§ 13-3623, 13-303, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

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

"True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated:

Foreperson of the State Grand Jury

STERLING STRUCKMEYER

Assistant Attorney Ganeral PHX-#7856996

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