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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

(001) Counts 1, 2, 3, 4, 5, 6, 7

Counts: 1, 2, 3, 8, 9, 10 (002)

JUAN C. CESPEDES MARTINEZ (003)  
Counts: 1, 2, 3, 11, 12, 13

BLADIMIR THOMAS RODRIGUEZ  
(004)  
Counts: 1, 2, 3, 14, 15, 16, 17, 18

Counts: 1, 2, 3, 19, 20, 21, 22, 23, 24, 25,  
26, 27 (005)

JESUS A. CHAVEZ CESPEDES (006) ✓  
Counts: 1, 2, 3, 28, 29, 30, 31

RENE CHAVEZ VALDIVIA (007)  
Counts: 1, 2, 3, 32, 33, 34, 35, 36, 37, 38,  
39

DADIEL LOPEZ GARCIA (008)  
Counts: 1, 2, 3, 40, 41, 42, 43

Case No

CR 2019 - 001993 - 006 ✓  
84 SGJ 274

INDICTMENT

CHARGING VIOLATIONS OF

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

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

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

COUNTS 4, 5, 8, 11, 14, 15, 16, 19, 20, 21,  
22, 23, 24, 25, 28, 29, 32, 33, 34, 35, 36, 37,  
40, 41, 44, 45, 46, 47, 48, 49, 52:

COMPUTER TAMPERING, a Class 3  
Felony in violation of A.R.S. §13-  
2316(A)(1)

COUNTS 6, 9, 12, 17, 26, 30, 38, 42, 50,  
53: ORGANIZED RETAIL THEFT, a  
Class 4 Felony in violation of A.R.S. §13-  
1819

Counts: 1, 2, 3, 44, 45, 46, 47, 48, 49, 50, 51

(009)

Counts: 1, 2, 3, 52, 53, 54

(010)

Defendants

COUNTS 7, 10, 13, 31, 54: TAKING IDENTITY OF ANOTHER PERSON, a Class 4 Felony in violation of A.R.S. §13-2008

COUNTS 18, 27, 39, 43, 51: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON, a Class 3 Felony in violation of A.R.S. §13-2009

The Arizona State Grand Jury accuses

(001),

(002), JUAN C. CESPEDES MARTINEZ (003), BLADIMIR

THOMAS RODRIGUEZ(004)

(005), JESUS A. CHAVEZ

CESPEDES (006), RENE CHAVEZ VALDIVIA (007), DADIEL LOPEZ GARCIA (008),

(009)

(010), charging

on this 15<sup>th</sup> day of April, 2019, that in or from Maricopa County, Arizona

**COUNT 1**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between April 11, 2018 and December 20, 2018,

(001),

(002), JUAN C. CESPEDES MARTINEZ

(003), BLADIMIR THOMAS RODRIGUEZ (004),

(005),

JESUS A. CHAVEZ CESPEDES (006), RENE CHAVEZ VALDIVIA (007), DADIEL

LOPEZ GARCIA (008),

(009),

(010) pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A R S §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 2**  
**CONSPIRACY**

On or between April 11, 2018 and December 20, 2018,

(001), (002), JUAN C. CESPEDES MARTINEZ  
(003), BLADIMIR THOMAS RODRIGUEZ (004), (005),  
JESUS A. CHAVEZ CESPEDES (006), RENE CHAVEZ VALDIVIA (007), DADIEL  
LOPEZ GARCIA (008), (009),

(010) with the intent to promote or aid the commission of an offense, agreed with one or more persons that at least one of them or another person will engage in conduct constituting the offense, including but not limited to Fraudulent Schemes and Artifices, a class 2 felony, Illegally Conducting an Enterprise, a class 3 felony, Computer Tampering a class 3 felony, Organized Retail Theft, a class 4 felony, Taking the Identity of Another, a class 4 felony, and Aggravated Taking the Identity of Another, a class 3 felony, and one of the parties commits an overt act in furtherance of the offense, including but not limited to Fraudulent Schemes and Artifices, a class 2 felony, Illegally Conducting an Enterprise, a class 3 felony, Theft, a class 3 felony, Computer Tampering a class 3 felony, Organized Retail Theft, a class 4 felony, Taking the Identity of Another, a class 4 felony, and Aggravated Taking the Identity of Another, a class 3 felony in violation of §§13-1003, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 3**

**ILLEGALLY CONDUCTING AN ENTERPRISE**

On or between April 11, 2018 and December 20, 2018,

(001), (002), JUAN C. CESPEDES MARTINEZ (003),  
BLADIMIR THOMAS RODRIGUEZ (004), (005), JESUS  
A. CHAVEZ CESPEDES (006), RENE CHAVEZ VALDIVIA (007), DADIEL LOPEZ  
GARCIA (008). (009),

(010) were employed by or associated with any enterprise and did knowingly conducted such

enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise that they knew was being conducted through racketeering

The enterprise was a group of persons associated in fact, including but not limited to,

The racketeering included

- 1) Scheme or Artifice to Defraud, in violation of A R S §13-2310, and
- 2) Organized Retail Theft, in violation of A R S §13-1819

Including, but not limited to, the acts of racketeering described in counts through of 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, 13-2310 13-1819, 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**  
**COMPUTER TAMPERING**

On or about May 2, 2018, (001), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit accessed the pay at the pump system at the Circle K located at 5881 W Cactus Road, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 5**  
**COMPUTER TAMPERING**

On or about October 30, 2018, (001), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer

system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (001) accessed the pay at the pump system at the Circle K located at 5101 W McDowell Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 6**

**ORGANIZED RETAIL THEFT**

On or between May 2, 2018 and October 30, 2018,

(001), acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 7**

**TAKING IDENTITY OF ANOTHER PERSON**

On or between May 2, 2018 and October 30, 2018,

(001), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (001), possessed the credit card information of [REDACTED] without consent

**COUNT 8**

**COMPUTER TAMPERING**

On or about April 11, 2018, (002), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (002) accessed the pay at the pump system at the Shell Gas Station located at 6705 W Bethany Home Road, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 9**

**ORGANIZED RETAIL THEFT**

On or about April 11, 2018, (002), acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 10**

**TAKING IDENTITY OF ANOTHER PERSON**

On or about April 11, 2018, (002), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or

entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit

(002) possessed the credit card information of

██████████ without consent

**COUNT 11**

**COMPUTER TAMPERING**

On or about November 1, 2018, **JUAN C. CESPEDES MARTINEZ (003)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **JUAN C. CESPEDES MARTINEZ (003)** accessed the pay at the pump system at the Fry's located at 4202 W Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 12**

**ORGANIZED RETAIL THEFT**

On or about November 1, 2018, **JUAN C. CESPEDES MARTINEZ (003)**, acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 13**

**TAKING IDENTITY OF ANOTHER PERSON**

On or about November 1, 2018, **JUAN C. CESPEDES MARTINEZ (003)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **JUAN C. CESPEDES MARTINEZ (003)** possessed the credit information of [REDACTED] without consent

**COUNT 14**

**COMPUTER TAMPERING**

On or about May 10, 2018, **BLADIMIR THOMAS RODRIGUEZ (004)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811



To Wit **BLADIMIR THOMAS RODRIGUEZ (004)**, accessed the pay at the pump system at the Fry's located at 4301 W Northern Ave, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 15**

**COMPUTER TAMPERING**

On or about May 10, 2018, **BLADIMIR THOMAS RODRIGUEZ (004)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **BLADIMIR THOMAS RODRIGUEZ (004)** accessed the pay at the pump system at the Circle K located at 6972 N 83rd, Ave Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 16**

**COMPUTER TAMPERING**

On or about October 31, 2018, **BLADIMIR THOMAS RODRIGUEZ (004)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **BLADIMIR THOMAS RODRIGUEZ (004)** accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 17**

**ORGANIZED RETAIL THEFT**

On or between May 10, 2018 and October 31, 2018, **BLADIMIR THOMAS RODRIGUEZ (004)**, acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 18**

**AGGRAVATED TAKING IDENTITY THEFT**

On or between May 10, 2018 and October 31, 2018, **BLADIMIR THOMAS RODRIGUEZ (004)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of three or more other persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **BLADIMIR THOMAS RODRIGUEZ (004)**, possessed the credit card information of [REDACTED] without consent

**COUNT 19**

**COMPUTER TAMPERING**

On or about October 17, 2018, [REDACTED] (005), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any

computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4202 W Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 20**

**COMPUTER TAMPERING**

On or about October 17, 2018, (005) acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 21**

**COMPUTER TAMPERING**

On or about October 19, 2018, (005) acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 22**

**COMPUTER TAMPERING**

On or about October 19, 2018, (005), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4202 W Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 23**

**COMPUTER TAMPERING**

On or about October 20, 2018, (005), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 24**

**COMPUTER TAMPERING**

On or about October 21, 2018, (005), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the Fry's located at 4202 W Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 25**

**COMPUTER TAMPERING**

On or about December 20, 2018, (005), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (005) accessed the pay at the pump system at the QuickTrip located at 9229 E University Dr , Mesa Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 26**

**ORGANIZED RETAIL THEFT**

On or between October 17, 2018 and December 20, 2018,

(005), acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 27**

**AGGRAVATED TAKING IDENTITY THEFT**

On or between October 17, 2018 and December 20, 2018,

(005), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of three or more other persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit

(005) possessed the credit card information of

[REDACTED]

[REDACTED]

without consent

**COUNT 28**

**COMPUTER TAMPERING**

On or about October 15, 2018, **JESUS A. CHAVEZ CESPEDES (006)** acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **JESUS A. CHAVEZ CESPEDES (006)** accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 29**

**COMPUTER TAMPERING**

On or about October 21, 2018, **JESUS A. CHAVEZ CESPEDES (006)** acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **JESUS A. CHAVEZ CESPEDES (006)** accessed the pay at the pump system at the Fry's located at 4202 W Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 30**

**ORGANIZED RETAIL THEFT**

On or between October 15, 2018 and October 21, 2018, **JESUS A. CHAVEZ CESPEDES (006)** acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§§§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 31**

**TAKING IDENTITY OF ANOTHER PERSON**

On or between October 15, 2018 and October 21, 2018, **JESUS A. CHAVEZ CESPEDES (006)** knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **JESUS A. CHAVEZ CESPEDES (006)** possessed the credit card information of [REDACTED] without consent

**COUNT 32**

**COMPUTER TAMPERING**

On or about October 5, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4329 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 33**

**COMPUTER TAMPERING**

On or about October 5, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4349 W Northern, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 34**

**COMPUTER TAMPERING**

On or about October 18, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 35**

**COMPUTER TAMPERING**

On or about October 19, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4202 Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 36**

**COMPUTER TAMPERING**

On or about November 1, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 37**

**COMPUTER TAMPERING**

On or about November 1, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** accessed the pay at the pump system at the Fry's located at 4329 W Northern Ave , Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 38**

**ORGANIZED RETAIL THEFT**

On or between October 5, 2018 and November 1, 2018, **RENE CHAVEZ VALDIVIA (007)**, acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 39**

**AGGRAVATED TAKING IDENTITY THEFT**

On or between October 5, 2018 and November 1, 2018, **RENE CHAVEZ VALDIVIA (007)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal

identifying information or entity identifying information of three or more other persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **RENE CHAVEZ VALDIVIA (007)** possessed the credit card information of

without consent

**COUNT 40**

**COMPUTER TAMPERING**

On or about May 10, 2018, **DADIEL LOPEZ GARCIA (008)**, acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **DADIEL LOPEZ GARCIA (008)** accessed the pay at the pump system at the Fry's located at 4301 W Northern Ave , Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 41**

**COMPUTER TAMPERING**

On or about May 10, 2018, **DADIEL LOPEZ GARCIA (008)** acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the

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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **DADIEL LOPEZ GARCIA (008)** accessed the pay at the pump system at the Circle K located at 1834 W Grand Ave , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 42**

**ORGANIZED RETAIL THEFT**

On or about May 10, 2018, **DADIEL LOPEZ GARCIA (008)**, acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

**COUNT 43**

**AGGRAVATED TAKING IDENTITY THEFT**

On or about May 10, 2018, **DADIEL LOPEZ GARCIA (008)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of three or more other persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit **DADIEL LOPEZ GARCIA (008)** possessed the credit card information of [REDACTED] without consent

**COUNT 44**

**COMPUTER TAMPERING**

On or about May 2, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Circle K located at 5881 W Cactus Rd , Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 45**

**COMPUTER TAMPERING**

On or about October 8, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 46**

**COMPUTER TAMPERING**

On or about October 21, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Fry's located at 4202 Cactus Rd , Phoenix, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 47**

**COMPUTER TAMPERING**

On or about October 26, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 48**

**COMPUTER TAMPERING**

On or about October 28, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 49**

**COMPUTER TAMPERING**

On or about October 30, 2018, (009), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (009) accessed the pay at the pump system at the Fry's located at 4353 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud



**COUNT 50**

**ORGANIZED RETAIL THEFT**

On or between May 2, 2018 and October 30, 2018, (009), acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

**COUNT 51**

**AGGRAVATED TAKING IDENTITY THEFT**

On or between May 2, 2018 and October 30, 2018, (009), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of three or more other persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit

(009) possessed the credit card information of



without

consent

**COUNT 52**

**COMPUTER TAMPERING**

On or about August 2, 2018, (010), acting without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network,

with the 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(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

To Wit (010) accessed the pay at the pump system at the Fry's located at 4349 W Bethany Home, Glendale, Arizona, with the intent to execute a scheme or artifice to defraud

**COUNT 53**

**ORGANIZED RETAIL THEFT**

On or about August 2, 2018 (010), acting alone or in conjunction with another person, used an artifice, instrument, container, device or other article to facilitate the removal of merchandise from a retail establishment without paying the purchase price in violation of A R S §§13-1819, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811


**COUNT 54**

**TAKING IDENTITY OF ANOTHER PERSON**

On or about August 2, 2018 (010), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that other person or entity, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment in violation of A R S §§ 13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811


To Wit (010), possessed the credit card information of [REDACTED] without consent

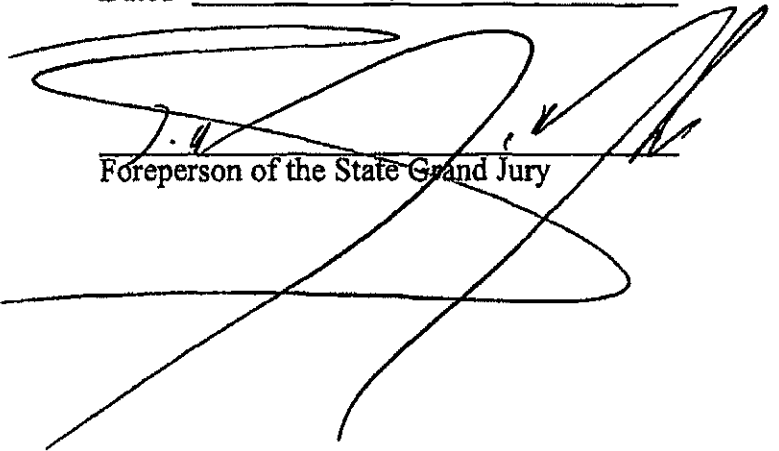
Pursuant to A R S § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona

  
\_\_\_\_\_  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated 4.15.19

  
\_\_\_\_\_  
Mary Harriss  
Assistant Attorney General

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