### MARK BRNOVICH

Attorney General Firm Bar No. 14000

### JARED KREAMER HOPE

Assistant Attorney General

State Bar No.: 025575

Pima County Computer No.: 66053 400 West Congress, Suite S-315

Tucson, Arizona 85701

Telephone No.: (520) 209-4310

CRMTucson@azag.gov T002-2019-000144 DR#SIS-2019-0368

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Case No:

Plaintiff,

85 SGJ 159

v.

**INDICTMENT** 

**VLADIMIR RODRIGUEZ (001),** 

CHARGING VIOLATIONS OF:

Defendant.

COUNT 1: LURING A MINOR FOR SEXUAL EXPLOITATION, a Class 3 Felony, in violation of A.R.S. § 13-3554

**COUNT 2: PREPATORY SEXUAL CONDUCT WITH A MINOR**, a Class 3
Felony, in violation of A.R.S. §§ 13-1001,
13-1405

The Arizona State Grand Jury accuses **VLADIMIR RODRIGUEZ** (001), charging on this 12<sup>th</sup> day of August, 2019 that in or from Pima County, Arizona:

## **COUNT ONE** LURING A MINOR FOR SEXUAL EXPLOITATION, A CLASS 3 FELONY

On or about July 31, 2019 through August 1, 2019, VLADIMIR RODRIGUEZ (001) offered or solicited sexual conduct, knowing or having reason to know the person was a minor, in violation of A.R.S. §§ 13-3554, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

## COUNT TWO PREPATORY SEXUAL CONDUCT WITH A MINOR, A CLASS 3 FELONY

On or about, July 31, 2019 through August 1, 2019, VLADIMIR RODRIGUEZ (001) attempted to knowingly or intentionally engage in sexual intercourse or oral sexual conduct with a child under fifteen years of age, in violation of A.R.S. §§ 13-1001, 13-1405, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 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 Pima County, Arizona.

(A "True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Foreperson of the State Grand Jury

Assistant Attorney General