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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

JOSEPH AOANAN SOMERA (001),

and

LOLITA BAUTISTA SOMERA (002),

Defendants.

Case No:

85 SGJ 151

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: VULNERABLE ADULT
ABUSE**, a Class 3 Felony, in violation of
A.R.S. § 13-3623(A)(2)

The Arizona State Grand Jury accuses, **JOSEPH AOANAN SOMERA (001)** and **LOLITA BAUTISTA SOMERA (002)**, charging on this 12th day of August, 2019, that in or from Maricopa County, Arizona:

COUNT 1
VULNERABLE ADULT ABUSE

On or between August 16, 2018 and August 18, 2018, **JOSEPH AOANAN SOMERA (001)** and **LOLITA BAUTISTA SOMERA (002)**, under circumstances

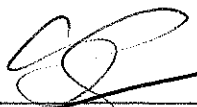
likely to produce death or serious physical injury, recklessly causes a vulnerable adult, to wit: Jon Rader, to suffer serious physical injury or, having the care or custody of a vulnerable adult, to wit: Jon Rader, recklessly causes or permits the person or health of the vulnerable adult, to wit: Jon Rader, to be injured, or who recklessly causes or permits a vulnerable adult, to wit: Jon Rader, to be placed in a situation where the person or health of the vulnerable adult is endangered, in violation of A.R.S. §§ 13-3623(A)(2), 13-3623, 13-701, 13-702, 13-801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

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
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 8-12-19



SHAWN STEINBERG
Assistant Attorney General



Foreperson of the State Grand Jury

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