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Attorneys for Plaintiff

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

STATE OF ARIZONA,
Plaintiff,

v.

ELIZABETH LANDEROS (001),
Defendant.

Case No:

87 SGJ 90

DIRECT INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-5: COMPUTER
TAMPERING, a Class Six Felony, in
violation of A.R.S. § 13-2316(A)(8)**

**COUNT 6: OBSTRUCTING
CRIMINAL INVESTIGATIONS OR
PROSECUTIONS, a Class Five Felony,
in violation of A.R.S. § 13-2409.**

**COUNT 7: CONSPIRACY, a Class
Five Felony, in violation of A.R.S. § 13-
1003.**

The Arizona Grand Jury accuses **ELIZABETH LANDEROS (001)**, charging on this 16th day of September, 2020 that in or from Pima County, Arizona:

COUNT ONE
COMPUTER TAMPERING, A CLASS SIX FELONY

On or about July 30, 2018, **ELIZABETH LANDEROS (001)**, acted without authority or exceeded authorization by knowingly accessing any computer, computer system or network or any computer software, program or data that is contained in a computer, to wit: searching the ATS-L database for G.G. with birth year of 2004, in violation of A.R.S. §§ 13-2316(A)(8), 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT TWO
COMPUTER TAMPERING, A CLASS SIX FELONY

On or about July 30, 2018, **ELIZABETH LANDEROS (001)**, acted without authority or exceeded authorization by knowingly accessing any computer, computer system or network or any computer software, program or data that is contained in a computer, to wit: searching the ATS-L database for G.G. with birth year of 2005, in violation of A.R.S. §§ 13-2316(A)(8), 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT THREE
COMPUTER TAMPERING, A CLASS SIX FELONY

On or about July 30, 2018, **ELIZABETH LANDEROS (001)**, acted without authority or exceeded authorization by knowingly accessing any computer, computer system or network or any computer software, program or data that is contained in a computer, to wit: searching the ATS-L database for G.G. with birth year of 2006, in violation of A.R.S. §§ 13-2316(A)(8), 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT FOUR
COMPUTER TAMPERING, A CLASS SIX FELONY

On or about July 30, 2018, **ELIZABETH LANDEROS (001)**, acted without authority or exceeded authorization by knowingly accessing any computer, computer system or network

or any computer software, program or data that is contained in a computer, to wit: searching the TECS database for G.G. with no birth year, in violation of A.R.S. §§ 13-2316(A)(8), 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT FIVE
COMPUTER TAMPERING, A CLASS SIX FELONY

On or about July 30, 2018, **ELIZABETH LANDEROS (001)**, acted without authority or exceeded authorization by knowingly accessing any computer, computer system or network or any computer software, program or data that is contained in a computer, to wit: searching the TECS database for G.G. with date range of April 10, 2004 to April 30, 2005, in violation of A.R.S. §§ 13-2316(A)(8), 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT SIX
OBSTRUCTING CRIMINAL INVESTIGATIONS OR PROSECUTIONS,
A CLASS FIVE FELONY

Between October 1, 2018 and December 5, 2018, **ELIZABETH LANDEROS (001)**, knowingly attempted to obstruct, delay, or prevent the communication of information or testimony related to a violation of any criminal statute to a peace officer, magistrate or prosecutor through bribery, misrepresentation, intimidation, force or threat of force, in violation of A.R.S. §§ 13-2409, 13-301 et seq, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT SEVEN
CONSPIRACY, A CLASS FIVE FELONY

Between October 1, 2018 and December 5, 2018, **ELIZABETH LANDEROS (001)**, with the intent to promote or aid the commission of an offense, did agree with one or more persons, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

1) **OBSTRUCTING CRIMINAL INVESTIGATIONS OR PROSECUTIONS**, in violation of A.R.S. § 13-2409

In furtherance of this conspiracy and to effect the foregoing objects thereof, the co-defendants and their co-conspirators did commit numerous overt acts, including but not limited to: the overt acts described in Counts 6 of this Indictment (which is incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2317(A)(1), 13-2312(B), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

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

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9-15-20


MATTHEW MCCRAY
Assistant Attorney General


Foreperson of the Grand Jury

PHX-#8949766