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T002-2020-000114  
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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.**

**HECTOR ANDRES ALEMAN (001),**

**Defendant.**

Case No:

**88 SGJ 92**

**DIRECT INDICTMENT**

**CHARGING VIOLATIONS OF:**

**COUNTS 1, 4, 15, 17: FORGERY, a Class 4 Felony, in violation of A.R.S. § 13-2002(A)(3).**

**COUNTS 2, 5, 18: TAKING THE IDENTITY OF ANOTHER, a Class 4 Felony, in violation of A.R.S. § 13-2008(A).**

**COUNTS 3, 6-12, 16, 19: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310(A).**

**COUNTS 13-14: COMPUTER TAMPERING**, a Class 3 Felony, in violation of A.R.S. § 13-2316(A)(1).

**COUNT 20: THEFT** a Class 2 Felony, in violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **HECTOR ANDRES ALEMAN (001)**, charging on this 12<sup>th</sup> day of April, 2021 that in or from Pima County, Arizona:

**COUNT ONE**  
**FORGERY, A CLASS 4 FELONY**

On or about March 2, 2018, **HECTOR ANDRES ALEMAN (001)**, with intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contained false information to wit: an application for a loan with Pima Federal Credit Union, in violation of A.R.S. §§ 13-2002(A)(3), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT TWO**  
**TAKING IDENTITY OF ANOTHER PERSON, A CLASS 4 FELONY**

On or about March 2, 2018, **HECTOR ANDRES ALEMAN (001)**, knowingly takes, purchases, manufactures, records, possesses or uses 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. To wit: identifying information for [REDACTED] on a loan application, in violation of A.R.S. §§ 13-2008(A), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT THREE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about March 2, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from a Pima Federal Credit Union loan payout in [REDACTED]'s name by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT FOUR**  
**FORGERY, A CLASS 4 FELONY**

On or about November 6, 2018, **HECTOR ANDRES ALEMAN (001)**, with intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contained false information to wit: an application for a loan with Pima Federal Credit Union, in violation of A.R.S. §§ 13-2002(A)(3), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT FIVE**  
**TAKING IDENTITY OF ANOTHER PERSON, A CLASS 4 FELONY**

On or about November 6, 2018, **HECTOR ANDRES ALEMAN (001)**, knowingly takes, purchases, manufactures, records, possesses or uses 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. To wit: identifying information for [REDACTED] on a loan application, in violation of A.R.S. §§ 13-2008(A), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT SIX**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

From about March 7, 2018 until March 15, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Pima Federal Credit Union Money Market account by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT SEVEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about March 29, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Pima Federal Credit Union Savings account by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT EIGHT**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

From about April 20, 2018 until May 12, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Pima Federal Credit Union IRA account by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT NINE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

From about June 29, 2018 until October 13, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Pima Federal Credit Union Savings account by means of false or

fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT TEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about November 6, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Pima Federal Credit Union loan payout by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT ELEVEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

From about May 14, 2018 until April 25, 2019, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Bank of America Credit card account by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT TWELVE**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

From about June 7, 2018 until May, 2019, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED]'s Bank of America savings and checking accounts by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT THIRTEEN**  
**COMPUTER TAMPERING, A CLASS 3 FELONY**

On or about May 31, 2018, **HECTOR ANDRES ALEMAN (001)**, without authority accessed any computer system or network or any part of a part of a computer system or network with the intent to execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representations or promises, to wit: Pima Federal Credit Union account belonging to [REDACTED], in violation of A.R.S. §§ 13-2316 (A)(1), 13-2103, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT FOURTEEN**  
**COMPUTER TAMPERING, A CLASS 3 FELONY**

On or about June 6, 2018, **HECTOR ANDRES ALEMAN (001)**, without authority accessed any computer system or network or any part of a part of a computer system or network with the intent to execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representations or promises, to wit: Pima Federal Credit Union account belonging to [REDACTED], in violation of A.R.S. §§ 13-2316 (A)(1), 13-2103, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT FIFTEEN**  
**FORGERY, A CLASS 4 FELONY**

On or about June 28, 2018, **HECTOR ANDRES ALEMAN (001)**, with intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contained false information to wit: Notarized Affidavit presented to Pima Federal Credit Union, in violation of A.R.S. §§ 13-2002(A)(3), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT SIXTEEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about June 28, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED] by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT SEVENTEEN**  
**FORGERY, A CLASS 4 FELONY**

On or about November 3, 2018, **HECTOR ANDRES ALEMAN (001)**, with intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contained false information to wit: an application for a loan with Pima Federal Credit Union, in violation of A.R.S. §§ 13-2002(A)(3), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT EIGHTEEN**  
**TAKING IDENTITY OF ANOTHER PERSON, A CLASS 4 FELONY**

On or about November 3, 2018, **HECTOR ANDRES ALEMAN (001)**, knowingly takes, purchases, manufactures, records, possesses or uses 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. To wit: identifying information for [REDACTED] on a loan application, in violation of A.R.S. §§ 13-2008(A), 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

**COUNT NINETEEN**  
**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or about November 3, 2018, **HECTOR ANDRES ALEMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from [REDACTED] by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, 13-703, 13-801 and 13-811.

**COUNT TWENTY**  
**THEFT, A CLASS 2 FELONY**

From about March 2018 until July 2019, **HECTOR ANDRES ALEMAN (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive the other person of such property; and/or converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; and/or obtained services or property of another by means of any material misrepresentation with intent to deprive the other person of such property or services, to wit: money from [REDACTED] [REDACTED] greater than \$25,000, in violation of A.R.S. §§ 13-1802, 13-701, 13-702, 13-703, 13-801 and 13-811.

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

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



MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 4/12/21



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Foreperson of the Grand Jury