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MAY 04 2022

CLERK DISTRICT COURT

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

STATE OF NEW MEXICO,

Plaintiff,

v.

No. D 0202 CR 2022 00887
NMAGO#: 202109-00463

CHARMAINE E. SANCHEZ,
DOB: X/XX/1986
SSN: XXX-XX-4729
ADDRESS: MDC

CLARA MORAN

Defendant.

GRAND JURY INDICTMENT

THE GRAND JURY CHARGES:

September 1, 2021 (Kohl's on Ellison Drive)

COUNT 1: SHOPLIFTING (UNDER \$250) (4614)

T

That on or about the 1st day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of under \$250, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 2: SHOPLIFTING (OVER \$500) (4616)

T

That on or about the 1st day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Athena Padilla to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 3: SHOPLIFTING (OVER \$500) (4616)

T

That on or about the 1st day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Victoria Martinez to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 4: SHOPLIFTING (UNDER \$250) (4614)

T

That on or about the 1st day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Gabriel Herrera to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of under \$250, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 5: CONSPIRACY TO COMMIT SHOPLIFTING (OVER \$500) (4618)

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That on or about the 1st day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did by words or acts agree together with another person(s) to commit Shoplifting (Over \$500) and they intended to commit Shoplifting (Over \$500), contrary to NMSA 1978, Section 30-16-20 and Section 30-28-2.

September 10, 2021 (Kohl's on Ellison Drive)

COUNT 6: SHOPLIFTING (UNDER \$250) (4614)

T

That on or about the 10th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of under \$250, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 7: SHOPLIFTING (OVER \$250) (4615) T

That on or about the 10th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Victoria Martinez to take possession of or conceal merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$250, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

September 15, 2021 (Kohl's on Holly Avenue)

COUNT 8: SHOPLIFTING (UNDER \$250) (4614) T

025 That on or about the 15th day of September, 2021, in Bernalillo County, New Mexico, ~~New Mexico~~, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Holly Avenue, which had a market value of under \$250, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 9: SHOPLIFTING (OVER \$250) (4615) T

That on or about the 15th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Gabriel Herrera to take possession of or conceal various merchandise belonging to Kohl's, located on Holly Avenue, which had a market value of over \$250, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 10: CONSPIRACY TO COMMIT SHOPLIFTING (OVER \$500) (4618) T

That on or about the 15th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did by words or acts agree together with another person(s) to commit Shoplifting (Over \$500) and they intended to commit Shoplifting (Over \$500), contrary to NMSA 1978, Section 30-16-20 and Section 30-28-2.

September 18, 2021 (Kohl's on Ellison Drive)

COUNT 11: SHOPLIFTING (OVER \$500) (4616) T

That on or about the 18th day of September, 2021, in Bernalillo County, New Mexico, ~~New Mexico~~, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of under \$250, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 12: SHOPLIFTING (UNDER \$250) (4614) T

That on or about the 18th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Gabriel Herrera to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 13: CONSPIRACY TO COMMIT SHOPLIFTING (OVER \$500) (4618) T

That on or about the 18th day of September, 2021, in Bernalillo County, New Mexico, the above-named defendant did by words or acts agree together with another person(s) to commit Shoplifting (Over \$500) and they intended to commit Shoplifting (Over \$500), contrary to NMSA 1978, Section 30-16-20 and Section 30-28-2.

October 26, 2021 (Kohl's on Ellison Drive)

COUNT 14: SHOPLIFTING (OVER \$500) (4616) T

That on or about the 26th day of October, 2021, in Bernalillo County, New Mexico, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 15: SHOPLIFTING (OVER \$500) (4616)

That on or about the 26th day of October, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Athena Padilla to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 16: SHOPLIFTING (OVER \$500) (4616)

That on or about the 26th day of October, 2021, in Bernalillo County, New Mexico, the above-named defendant did aid or abet Victoria Martinez to take possession of or conceal various merchandise belonging to Kohl's, located on Ellison Drive, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended it to be taken without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 17: CONSPIRACY TO COMMIT SHOPLIFTING (OVER \$2,500) (1154)

That on or about the 26th day of October, 2021, in Bernalillo County, New Mexico, the above-named defendant did by words or acts agree together with another person(s) to commit Shoplifting (Over \$2,500) and they intended to commit Shoplifting (Over \$2,500), contrary to NMSA 1978, Section 30-16-20 and Section 30-28-2.

November 12, 2021 (Kohl's on Holly Avenue)

COUNT 18: SHOPLIFTING (OVER \$500) (4616)

That on or about the 12th day of November, 2021, in Bernalillo County, New Mexico, the above-named defendant did take possession of or conceal various merchandise belonging to Kohl's, located on Holly Avenue, which had a market value of over \$500, and at the time the merchandise was taken, the defendant intended to take it without paying, contrary to NMSA 1978, Section 30-16-20.

COUNT 19: CONSPIRACY TO COMMIT SHOPLIFTING (OVER \$500) (4618) T


That on or about the 12th day of November, 2021, in Bernalillo County, New Mexico, the above-named defendant did by words or acts agree together with another person(s) to commit Shoplifting (Over \$500) and they intended to commit Shoplifting (Over \$500), contrary to NMSA 1978, Section 30-16-20 and Section 30-28-2.

The name of the witness upon whose testimony this Indictment is based is as follows:

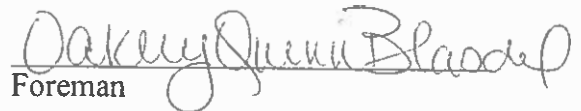
SPECIAL AGENT JACOB TRUJILLO
NEW MEXICO OFFICE OF THE ATTORNEY GENERAL

I hereby certify that the foregoing Indictment is a True Bill.

APPROVED:



Jonathan Gardner
Assistant Attorney General



Foreman

5.4.2022
Date

5/4/22
Date