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MARICOPA COUNTY ATTORNEY

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1801177

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

THE STATE OF ARIZONA,

Plaintiff,

vs.

RAFAEL STUART VASQUEZ,

Defendants.

INDICTMENT

785 GJ 251

COUNT 1: NEGLIGENT HOMICIDE, A
CLASS 4 FELONY Dangerous (Rafael
Stuart Vasquez)

The Grand Jurors of Maricopa County, Arizona, accuse RAFAEL STUART VASQUEZ,
on August 27, 2020, charging that in Maricopa County, Arizona:

COUNT 1:

RAFAEL STUART VASQUEZ, on or about March 18, 2018, with criminal negligence,
did cause the death of ELAINE MARIE HERZBERG in violation of A.R.S. §§ 13-1101, 13-
1102, 28-3001, 28-3004, 28-3005, 28-3315, 13-701, 13-702, and 13-801.

The State further alleges that the offense charged in this count is a dangerous felony because the offense involved the discharge, use, or threatening exhibition of a motor vehicle, a deadly weapon or dangerous instrument and/or the intentional or knowing infliction of serious physical injury upon ELAINE MARIE HERZBERG, in violation of A.R.S. §§ 13-105 and 13-704.

("A True Bill")

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Date: August 27, 2020

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FOREPERSON OF THE GRAND JURY