

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

STATE OF ARIZONA,

)

INDICTMENT

)

PLAINTIFF,

)

)

vs.

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)

MUHAMMAD SAEED

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DEFENDANT.

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Count One: Fraudulent Schemes and Artifices

Between May 1, 2015, and November 30, 2018, Muhammed Saeed, pursuant to a scheme to defraud, knowingly obtained any benefit, to wit: touching and/or massaging V.G., by means of false or fraudulent pretenses, representations, promises or material omissions.

Count Two: Sexual Abuse:

Between June 1, 2015, and June 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Three: Sexual Abuse:

Between July 1, 2015, and July 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Four: Sexual Abuse:

Between August 1, 2015, and August 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Five: Sexual Abuse:

Between September 1, 2015, and September 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Six: Sexual Abuse:

Between October 1, 2015, and October 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Seven: Sexual Abuse:

Between November 1, 2015, and November 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Eight: Sexual Abuse:

Between December 1, 2015, and December 30, 2015, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Nine: Sexual Abuse:

Between January 1, 2016, and January 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Ten: Sexual Abuse:

Between February 1, 2016, and February 28, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of

V.G., without her consent.

Count Eleven: Sexual Abuse:

Between March 1, 2016, and March 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twelve: Sexual Abuse:

Between May 1, 2016, and May 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Thirteen: Sexual Abuse:

Between June 1, 2016, and June 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Fourteen: Sexual Abuse:

Between August 1, 2016, and August 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Fifteen: Sexual Abuse:

Between September 1, 2016, and September 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Sixteen: Sexual Abuse:

Between October 1, 2016, and October 30, 2016, Muhammed Saeed, committed sexual

abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Seventeen: Sexual Abuse:

Between December 1, 2016, and December 30, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Eighteen: Sexual Abuse:

Between January 1, 2017, and January 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Nineteen: Sexual Abuse:

Between February 1, 2017, and February 28, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty: Sexual Abuse:

Between March 1, 2017, and March 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-One: Sexual Abuse:

Between April 1, 2017, and April 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Two: Sexual Abuse:

Between May 1, 2017, and May 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Three: Sexual Abuse:

Between June 1, 2017, and June 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Four: Sexual Abuse:

Between July 1, 2017, and July 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Five: Sexual Abuse:

Between September 1, 2017, and September 30, 2017, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Six: Sexual Abuse:

Between October 1, 2018, and October 30, 2018, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Seven: Sexual Abuse:

Between November 1, 2018, and November 30, 2018, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the

breast(s) of V.G., without her consent.

Count Twenty-Eight: Sexual Abuse:

Between December 1, 2018, and December 30, 2018, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of V.G., without her consent.

Count Twenty-Nine: Fraudulent Schemes and Artifices:

Between September 9, 2015, and September 15, 2016, Muhammed Saeed, pursuant to a scheme to defraud, knowingly obtained any benefit, to wit: touching and/or massaging E.G., by means of false or fraudulent pretenses, representations, promises or material omissions.

Count Thirty: Sexual Assault:

Between September 9, 2015, and September 15, 2016, Muhammed Saeed, committed sexual assault by intentionally or knowingly engaging in an act of sexual intercourse, to wit: Digitally Penetrating the Vagina of E.G., without her consent.

Count Thirty-One: Sexual Abuse:

Between September 9, 2015, and September 15, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of E.G., without her consent.

Count Thirty- Two: Sexual Abuse:

Between September 9, 2015, and September 15, 2016, Muhammed Saeed, committed sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of E.G., without her consent.

Count Thirty- Three: Sexual Abuse:

Between September 9, 2015, and September 15, 2016, Muhammed Saeed, committed


sexual abuse by intentionally or knowingly engaging in sexual contact, to wit: touching the breast(s) of E.G., without her consent

Count Thirty-Four: Fraudulent Schemes and Artifices:

Between June 1, 2015, and December 12, 2019, Muhammed Saeed, pursuant to a scheme to defraud, knowingly obtained any benefit, to wit: touching and/or massaging L.V., by means of false or fraudulent pretenses, representations, promises or material omissions.

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