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

THE STATE OF ARIZONA,

Plaintiff,

vs.

ARLENA M WILLES,

Defendant.

CR2019-005397-001

STATE'S ALLEGATION OF AGGRAVATING
CIRCUMSTANCES

(Master Calendar)

The State of Arizona, by and through undersigned counsel, pursuant to A.R.S. § 13-701 and Rule 13.5, Arizona Rules of Criminal Procedure, amends the Information/Indictment in this matter to allege the following aggravating circumstances:

- The offense(s) caused physical, emotional or financial harm to the victim or, if the victim died as a result of the conduct of the defendant, caused emotional or financial harm to the victim's immediate family. A.R.S. §13-701(D)(9).

- Any other factor that is relevant to the defendant's character or background or to the nature or circumstances of the crime. A.R.S. §13-701(D)(25).
 - The offense(s) involved a betrayal of trust by a parental figure. State v. Long, 207 Ariz. 140 (App. 2004)
 - The victim was or some of the victims in this case were minors. State v. Aleman, 210 Ariz. 232 (App. 2005)
 - The Defendant's actions required the victim to have surgery shortly after the offense(s) had been committed. State v. Molina, 211 Ariz. 130 (App. 2005)
 - The way the Defendant assaulted or attacked the victim caused the victim severe or extreme -pain. State v. Molina, 211 Ariz. 130 (App. 2005)
 - The Defendant failed to act responsibly during this offense. State v. Ruggiero, 211 Ariz. 262 (App. 2005)

Finally, if the jury convicts the defendant of multiple felony counts or the defendant has felony convictions that are not within ten years immediately preceding the date of the offense, the State alleges these multiple convictions as an aggravating circumstance.

Submitted August 20th, 2019.

WILLIAM G MONTGOMERY
MARICOPA COUNTY ATTORNEY

BY: Tracey L Gleason
/s/ Tracey L Gleason
Deputy County Attorney

Copy mailed/delivered August 20th, 2019, to:

The Honorable Master Calendar
Judge of the Superior Court

Laura Anderson
620 W Jackson St Ste 4015
Phoenix, AZ 85003
Attorney for Defendant

BY: Tracey L Gleason
/s/ Tracey L Gleason
Deputy County Attorney

TG/mr