



R O M A N I A
PUBLIC MINISTRY
PROSECUTORS OFFICE ATTACHED TO
HIGH COURT OF CESSATION AND JUSTICE
DIRECTORATE FOR INVESTIGATION OF
ORGANIZED CRIME AND TERRORISM
CENTRAL STRUCTURE
SECTION FOR COMBATTING ORGANIZED CRIME



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EXTRACT

File nr.

.....

...

INDICTMENT

Year: 2023 Month: June Day: 15

.....

WE PRESENT THE FOLLOWING:

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IV. IN LAW:

1. On the defendant Andrew Tate, it has been established that:

1.1. The actions of the defendant Andrew Tate, consisting of the following: at the beginning of **2021**, on the territory of Romania, together with the defendant Tristan Tate and the defendants Luana Radu and Georgiana Naghel, they **formed an organized criminal group** with the purpose of committing, on the territory of Romania and other states such as the USA and UK, primarily the crime of human trafficking, through actions of recruiting victims carried out by the defendants Andrew Tate and Tristan Tate, and subsequently, under their coordination, through actions of sheltering and transporting the victims, carried out by involving the defendants Luana Radu and Georgiana Naghel, with the aim of obtaining

significant sums of money by **forcing the victims to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com for this purpose, and by **subjecting them to forced labor**, using the website www.tiktok.com, thus fulfilling the constitutive elements of the crime of **forming an organized criminal group**, as provided by **Article 367, paragraphs 1, 3, and 6 of the Criminal Code**.

1.2. The actions of the defendant Andrew Tate, consisting of the following:

1.2.1. In the period **2016** - **2017**, the defendant Andrew Tate, using the application, while in Romania, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a family/marriage relationship and the existence of false feelings. In the period 2017, the defendant **transported** her from the UK,, to Romania, as well as within the area of, where he provided **shelter** for her in a building located in ..., as well as in the territory of the United Kingdom,, in the period 2018 - 2018. During this time, together with a person named ..., they subjected the victim to physical violence and psychological coercion resulting from actions of intimidation, surveillance, and control, with **the aim of sexually exploiting her**. They **forced her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website (*Webcamming Site*). The victim activated this through the account with the username "... " during the period 2018 - 2018;

1.2.2. In the period from the end of **2022** to **2022**, the defendant Andrew Tate, through the Instagram application and following meetings in (.....2022), UK, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2022 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising physical violence and psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, They also **transported** her from the UK, to Romania and within the area of, together with the defendant Georgiana Naghel, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com (.... 2022), to attract over 1000 followers;

1.2.3. In the month **2021**, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts,

they provided **shelter** for the victim in a building located in ..., as well as in a building located in They also **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com for the purpose of attracting over 1000 followers;

1.2.4. In the month **2021**, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from **actions** of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in They also **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com (..... 2022), to attract over 1000 followers,

These actions fulfil the constitutive elements of the crime of **human trafficking** in a continuous form, as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letters a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (four material acts concerning the victims ..., during the period from the end of ... 2016 to 2018, ..., during the period from 2022 to 2022, and the victims ..., during the period from ... 2021 to ... 2022, and ..., during the period from 2021 to 2022);

1.3. The actions of the defendant Andrew Tate, consisting of the following:

1.3.1. On the date 2022, at, the defendant Andrew Tate coerced the victim ... by exerting psychological and verbal pressure, intensified by the entire factual context, to engage in normal and oral sexual relations

1.3.2 On the date ..., in a building located in ..., the defendant Andrew Tate coerced the victim ... by exerting physical violence and psychological and verbal pressure, intensified by the entire factual context, to engage in normal and oral sexual relations

These actions fulfil the constitutive elements of the crime of **rape** in a continuous form - two material acts (victim ... - material acts on 2022 and 2022), as provided by Article 218, paragraph 1 of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code.

All of the above are subject to the application of Article 38, paragraph 1 of the Criminal Code regarding the real concurrence of offenses.

2. Regarding the defendant Tristan Tate, it has been established that:

2.1. The action of the defendant Tristan Tate, who, on 2021, together with the defendant Andrew Tate, and the defendants Luana Radu and Georgiana Naghel, **formed an organized criminal group** on the territory of Romania with the purpose of committing primarily the crime of human trafficking, through actions of recruiting victims carried out by the defendants Andrew Tate and Tristan Tate, and subsequently, under their coordination, through actions of sheltering and transporting the victims, carried out by involving the defendants Georgiana Naghel and Luana Radu, with the aim of obtaining significant sums of money by **forcing the victims to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting them to forced labor**, using the website www.tiktok.com, fulfills the constitutive elements of the crime of **forming an organized criminal group**, as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code.

2.2. The actions of the defendant Tristan Tate, which include:

2.2.1 In the period 2021 to 2022, through the applications and following meetings in ... (... 2021), USA, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period 2022 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, and control, they provided **shelter** for the victim in a building located in ..., as well as in a building located in ..., and **transported** her from the USA to Romania and within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

2.2.2. In the period 2021 to 2021, through the application and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by

forcing her to engage in pornographic activities for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor** for 12 hours live on TikTok, with only a 5-minute break, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

2.2.3. In 2021, through the witness ..., and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the conditions under which she would engage in activities and the existence of false feelings. In the period 2021 to 2021, together with the defendants Luana Radu and Georgiana Naghel, by exerting physical violence and psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by forcing her to engage in pornographic activities for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor** for 12 hours live on TikTok, with only a 5-minute break, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

These actions fulfil the constitutive elements of the crime of **human trafficking** committed in a continuous form (three material acts), as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letters a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (regarding the witness ..., in the period 2021 - 2022; regarding the victim ..., in the period 2021 - 2021; regarding the victim ..., in the period 2021 - 2022).

2.3. The action of the defendant Tristan Tate, who on 2021 instigated the defendant Georgiana Naghel, as well as the defendant Luana Radu, to commit acts of physical violence against the victim ..., in the same context, on the same day, around hours, while in, located on Street, instigated by the defendant Tristan Tate, the defendant Georgiana Naghel committed acts of physical violence against the victim ..., consisting of

These actions fulfil the constitutive elements of the crime of instigating assault or other acts of violence, as provided by Article 47 of the Criminal Code in relation to Article 193, paragraph 1 of the Criminal Code,

with the application of Article 38, paragraph 1 of the Criminal Code, regarding the real concurrence of offenses.

3. Regarding the defendant Georgiana Naghel, it has been established that:

3.1. The action of the defendant Georgiana Naghel, who, on 2021, together with the defendant Andrew Tate, and the defendants Tristan Tate and Luana Radu, **formed an organized criminal group** on the territory of Romania with the purpose of committing primarily the crime of human trafficking, through actions of recruiting victims carried out by the defendants Andrew Tate and Tristan Tate, and subsequently, under their coordination, through actions of sheltering and transporting the victims, carried out by involving the defendants Georgiana Naghel and Luana Radu, with the aim of obtaining significant sums of money by **forcing the victims to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting them to forced labor**, using the website www.tiktok.com, fulfills the constitutive elements of the crime of **forming an organized criminal group**, as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code.

3.2.1. In the period 2021 to 2022, through the applications and following meetings in ... (... 2021), USA, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period 2022 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, and control, they provided **shelter** for the victim in a building located in ..., as well as in a building located in ..., and **transported** her from the USA to Romania and within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

3.2.2. In the period from the end of 2022 to 2022, the defendant Andrew Tate, through the Instagram application and following meetings in (.....2022), UK, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2022 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising physical violence and psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, They also **transported** her from the UK, to Romania and within the area of, together with the

defendant Georgiana Naghel, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com (... 2022), to attract over 1000 followers;

3.2.3. In the period 2021 to 2021, through the application and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor** for 12 hours live on TikTok, with only a 5-minute break, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

3.2.4. In 2021, through the witness ..., and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the conditions under which she would engage in activities and the existence of false feelings. In the period 2021 to 2021, together with the defendants Luana Radu and Georgiana Naghel, by exerting physical violence and psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor** for 12 hours live on TikTok, with only a 5-minute break, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...).

3.2.5. In the month 2021, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, They also **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to**

forced labor, using the website www.tiktok.com for the purpose of attracting over 1000 followers;

3.2.6. In the month 2021, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in They also **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com (..... 2022), to attract over 1000 followers.

These actions fulfil the constitutive elements of the offense of **human trafficking** in a continued form - six material acts in relation to the number of victims (victims: ...), as provided by Article 210, paragraph 1, letter a of the Criminal Code, in conjunction with Article 182, letter a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code.

3.3. The act of the defendant Georgiana Naghel, consisting in the fact that on the date of ... **2021**, around ..., while being ..., using ..., and the navigation system ..., as well as while being ..., using ..., and the navigation system ..., **without authorization, accessed the account ... and the account of ...** belonging to the injured person ..., used with the username ... and secured by entering a password, meets the constitutive elements of the offense of **unauthorized access to a computer system**, as provided by Article 360, paragraphs 1 and 3 of the Criminal Code.

3.4. The act of the defendant Georgiana Naghel, consisting in the fact that on the date of ..., around ..., while being ..., using a ..., and the navigation system ..., as well as while being ..., using ..., and the navigation system ..., after accessing, without authorization, the account ... and the account of ... belonging to the injured person ..., used with the username ... and secured by entering a password, **unlawfully modified the computer data attached to the account ...** by inserting ... photographs capturing the injured person engaged in pornographic activities, as well as by inserting the message "...", meets the constitutive elements of the offense of **data integrity alteration**, as provided by Article 362 of the Criminal Code.

3.5. The act of the defendant Georgiana Naghel, consisting in the fact that on the date of ..., around ..., while being at ..., located on ... Street, being instigated by the defendant ..., **committed acts of physical violence** against the injured person ..., meets the constitutive

elements of the offense of **assault or other acts of violence**, as provided by **Article 193, paragraph 1 of the Criminal Code**,

all with the application of Article 38, paragraph 1 of the Criminal Code, regarding the real concurrence of offenses.

4. Regarding the defendant Luana Radu, it has been established that:

4.1. The action of the defendant Luana Radu, who, on 2021, together with the defendant Andrew Tate, and the defendants Tristan Tate and Georgiana Naghel, **formed an organized criminal group** on the territory of Romania with the purpose of committing primarily the crime of human trafficking, through actions of recruiting victims carried out by the defendants Andrew Tate and Tristan Tate, and subsequently, under their coordination, through actions of sheltering and transporting the victims, carried out by involving the defendants Georgiana Naghel and Luana Radu, with the aim of obtaining significant sums of money by **forcing the victims to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting them to forced labor**, using the website www.tiktok.com, fulfills the constitutive elements of the crime of **forming an organized criminal group**, as provided by **Article 367, paragraphs 1, 3, and 6 of the Criminal Code**;

4.2. The actions of the defendant Luana Radu, which include:

4.2.1. In the period 2021 to 2022, through the applications and following meetings in ... (... 2021), USA, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period **2022 to 2022**, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, and control, they provided **shelter** for the victim in a building located in ..., as well as in a building located in ..., and **transported** her from the USA to Romania and within the area of, with **the aim of sexually exploiting** her by forcing her to engage in pornographic activities for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...);

4.2.2. In the period **2021 to 2021**, through the application and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period 2021

to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exerting psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor for 12 hours live on TikTok, with only a 5-minute break**, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...);

4.2.3. In 2021, through the witness ..., and following multiple meetings in the area of, the defendant Tristan Tate **recruited by deception** the victim ... by falsely inducing her about the conditions under which she would engage in activities and the existence of false feelings. In the period 2021 to 2021, together with the defendants Luana Radu and Georgiana Naghel, by exerting physical violence and psychological coercion resulting from actions of intimidation, surveillance, control, and invoking fictitious debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, and **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor for 12 hours live on TikTok, with only a 5-minute break**, using the website www.tiktok.com, for the purpose of attracting over 1000 followers (victim ...);

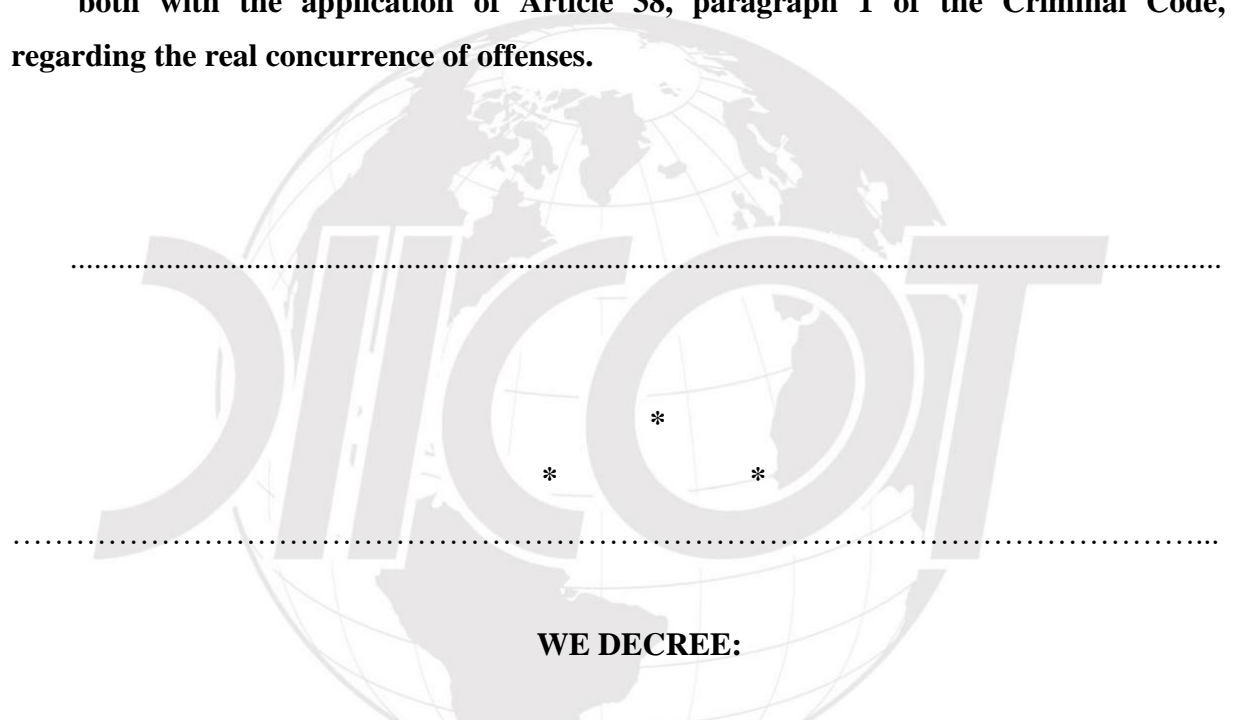
4.2.4. In the month 2021, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located in, They also **transported** her within the area of, with **the aim of sexually exploiting her** by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and **subjecting her to forced labor**, using the website www.tiktok.com for the purpose of attracting over 1000 followers;

4.2.5. In the month 2021, the defendant Andrew Tate, **recruited by deception** the victim ... by falsely inducing her about the intention to establish a marriage/cohabitation relationship and the existence of false feelings. In the period from 2021 to 2022, together with the defendants Luana Radu and Georgiana Naghel, by exercising psychological coercion resulting from actions of intimidation, surveillance, control, and invoking false debts, they provided **shelter** for the victim in a building located in ..., as well as in a building located

in They also **transported** her within the area of, with **the aim of sexually exploiting** her by **forcing her to engage in pornographic activities** for the production and distribution of pornographic materials, using the website www.onlyfans.com and subjecting her to forced labor, using the website www.tiktok.com (..... 2022), to attract over 1000 followers.

They meet the constitutive elements of the offense of **human trafficking** in a continued form - five material acts (victims: ..., ..., ..., ..., and ...), an offense provided by Article 210, paragraph 1, letter a of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code, in relation to Article 182, letter a and c of the Criminal Code,

both with the application of Article 38, paragraph 1 of the Criminal Code, regarding the real concurrence of offenses.



WE DECREE:

REFERRING TO TRIAL, UNDER HOUSE ARREST,

OF THE DEFENDANT Andrew Tate, for committing the offenses of:

1.1. **forming an organized criminal group**, as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code;

1.2. **human trafficking**, in a continued form, as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letter a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (four material acts concerning the injured persons ..., during the period ... 2016 - ... 2018, ..., during the period ... 2022 - ... 2022, and victims ..., during the period ... 2021 - ... 2022, and ..., during the period ... 2021 - ... 2022);

1.3. **rape**, in a continued form - two material acts, as provided by Article 218, paragraph 1 of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (injured person ..., acts from the dates ... and ... 2022);

all with the application of Article 38, paragraph 1 of the Criminal Code.

REFERRING TO TRIAL, UNDER HOUSE ARREST,

OF THE DEFENDANT Tristan Tate, for committing the offenses of:

- 2.1. **forming an organized criminal group**, as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code;
- 2.2. **human trafficking**, in a continued form, as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letter a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (three material acts concerning the victims: ..., during the period ... 2021 - ... 2022; ..., during the period ... 2021 - ... 2021; ..., during the period ... 2021 - ... 2022);
- 2.3. **instigation to assault or other acts of violence**, as provided by Article 47 of the Criminal Code, in relation to Article 193, paragraph 1 of the Criminal Code (injured person ..., offense dated October 28, 2021);

all with the application of Article 38, paragraph 1 of the Criminal Code.

REFERRING TO TRIAL, UNDER HOUSE ARREST,

OF THE DEFENDANT Georgiana Naghel, for committing the offenses of:

- 3.1. **forming an organized criminal group**, as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code;
- 3.2. **human trafficking**, in a continued form, as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letter a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (six material acts concerning the victims: ..., during the period ... 2022 - ... 2022; ..., during the period ... 2022 - ... 2022; ..., during the period ... 2021 - ... 2022; ..., during the period ... 2021 - ... 2021; ..., during the period ... 2021 - ... 2022);
- 3.3. **unauthorized access to a computer system**, as provided by Article 360, paragraphs 1 and 3 of the Criminal Code (injured person ..., offense dated ... 2021);
- 3.4. **alteration of the integrity of computer data**, as provided by Article 362 of the Criminal Code (injured person ..., offense dated 2021);
- 3.5. **assault or other acts of violence**, as provided by Article 193, paragraph 1 of the Criminal Code (injured person ..., offense dated 2021);

all with the application of Article 38, paragraph 1 of the Criminal Code.

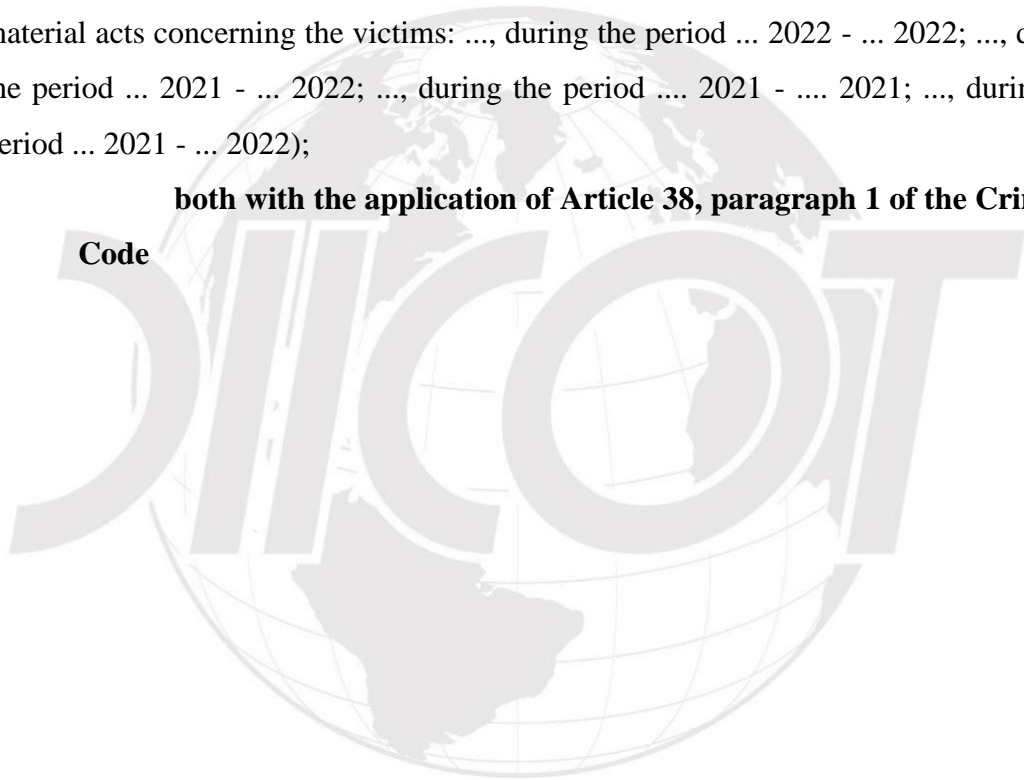
REFERRING TO TRIAL, UNDER HOUSE ARREST,

OF THE DEFENDANT Luana Radu, for committing the offenses of:

4.1. **forming an organized criminal group,** as provided by Article 367, paragraphs 1, 3, and 6 of the Criminal Code;

4.2. **human trafficking,** in a continued form, as provided by Article 210, paragraph 1, letter a of the Criminal Code, in relation to Article 182, letter a and c of the Criminal Code, with the application of Article 35, paragraph 1 of the Criminal Code (five material acts concerning the victims: ..., during the period ... 2022 - ... 2022; ..., during the period ... 2021 - ... 2022; ..., during the period ... 2021 - ... 2021; ..., during the period ... 2021 - ... 2022);

both with the application of Article 38, paragraph 1 of the Criminal Code



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CHIEF PROSECUTOR

...

PROSECUTOR

...

