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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA, Plaintiff, v. **JOHN FRANKLIN DANIEL (001),** Defendant.	Case No: **63 SGJ 190** **INDICTMENT** CHARGING VIOLATIONS OF: **COUNT 1:** a class 2 felony in violation of A.R.S. § 13-1802 **COUNTS 6 & 12: THEFT,** a class 3 felony in violation of A.R.S. § 13-1802 **COUNTS 2-5, 7-10, 11, 13-15, 16, & 17-19: THEFT,** a class 4 felony in violation of A.R.S. § 13-1802

The Arizona State Grand Jury accuses JOHN FRANKLIN DANIEL (001) , charging on this 1st day of December, 2008 that in or from MARICOPA County, Arizona:

COUNT 1

(FRAUDULENT SCHEMES AND ARTIFICES)

During the years 2003 through 2007, JOHN FRANKLIN DANIEL (001), acting pursuant to a scheme or artifice to defraud, knowingly obtained a benefit exceeding $100,000 by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-301 through -303, 13-701 through -702.02, and 13-801.

This conduct occurred when JOHN FRANKLIN DANIEL solicited and obtained investment funds for an unnamed company, later called Global Food Exports, that he purported to investors would facilitate the sale of bulk flour from flour mills located in the United States to a company located in Mexico. JOHN FRANKLIN DANIEL misrepresented to investors the existence of the company and how the funds invested were to be used. JOHN FRANKLIN DANIEL obtained a benefit of $148,950, as set forth in counts 2 through 19.

COUNTS 2 – 19

(THEFT)

During the years 2003 through 2007, JOHN FRANKLIN DANIEL knowingly and without legal authority: controlled the property of another with the intent to deprive the other person of such property; converted for an unauthorized term or use property of another entrusted to him or placed in his possession for a limited, authorized term or use; and/or obtained property of another by means of any material misrepresentation with the intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1801, 13-1802, 13-301 through -303, 13-701 through 702.02, and 13-801.

This conduct occurred when JOHN FRANKLIN DANIEL solicited and obtained investment funds for an unnamed company, later called Global Food Exports, that he purported to investors would facilitate the sale of bulk flour from companies located in

the United States to a company located in Mexico. JOHN FRANKLIN DANIEL made misrepresentations to investors, including but not limited to representations concerning the existence of the company and how the funds invested were to be used. JOHN FRANKLIN DANIEL used the invested funds for a purpose other than that conveyed to the investors. JOHN FRANKLIN DANIEL obtained the following investment funds from the following investors:

Count	Investor	Amount	Felony Class
2	Ehron Aragon	$3,500	4
3	William Batty	$3,500	4
4	Lonnie Brown	$3500	4
5	Jason Burlingame	$3500	4
6	Larry Colburn	$4,700	3
7	Tracy Tolby	$3,500	4
8	Eric Cota	$3,500	4
9	Edward Gonzales	$3,500	4
10	Randy Houser	$3,500	4
11	Ian Huggins	$30,000	2
12	Anna & Mark Kuperman	$5,250	3
13	Ramon Molina	$3,500	4
14	Edward Rees	$3,500	4
15	Cameron Smith	$3,500	4
16	Kent Staley	$3,500	4
17	Dean Vance	$60,000	2
18	Jeff Wheat	$3,500	4
19	Dell Wise	$3,500	4

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in MARICOPA County, Arizona.

True Bill
(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: December 1, 2008

Assistant Attorney General

Foreperson of the State Grand Jury