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Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF COCHISE**

STATE OF ARIZONA,

Plaintiff,

vs.

ANGELINA MICHELLE LOPEZ (001),

Defendant.

Case No:

68 SGJ 5

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310

**COUNT 2: THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(1)

**COUNT 3: THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(2)

**COUNT 4: THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(3)

The Arizona State Grand Jury accuses ANGELINA LOPEZ (001) charging on this 14<sup>th</sup> day of December, 2010, that in or from Cochise County, Arizona

## **COUNT 1**

On or between August 1, 2005 and December 31, 2009, ANGELINA LOPEZ (001), pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§13-2310, 13-2310(C), 13-2301, 13-603, 13-701, 13-702, 13-801, and 13-804.

Said conduct occurred on or between August 1, 2005 and December 31, 2009 when Angelina Lopez (001) used monies belonging to Sierra Vista Internal Medicine for her own personal use and manipulated the bookkeeping for the company to hide this use.

## **COUNT 2**

On or between August 1, 2005 and December 31, 2009 ANGELINA LOPEZ (001), without lawful authority, controlled property of another, in an amount more than \$25,000, with the intent to deprive the other person of such property in violation of A.R.S. §§13-1802(A)(1), 13-1801, 13-1802(G), 13-1802(H), 13-603, 13-701, 13-702, 13-801, and 13-804.

Said conduct occurred on or between August 1, 2005 and December 31, 2009 when Angelina Lopez controlled the fund in the accounts of Sierra Vista Internal Medicine with the intent to deprive Sierra Vista Internal Medicine of the money in those accounts.

## **COUNT 3**

On or between August 1, 2005 and December 31, 2009 ANGELINA LOPEZ (001), without lawful authority, knowingly converted for an unauthorized term or use services or property of another, in an amount more than \$25,000, entrusted to her or placed in her possession for a limited, authorized term or use in violation of A.R.S. §§13-1802(A)(2), 13-1801, 13-1802(G), 13-1802(H), 13-603, 13-701, 13-702, 13-801, and 13-804.

Said conduct occurred on or between August 1, 2005 and December 31, 2009 when Angelina Lopez used monies entrusted to her in her employment as bookkeeper/manager at Sierra Vista Internal Medicine for her own, unauthorized, personal use.

**COUNT 4**

On or between August 1, 2005 and December 31, 2009 ANGELINA LOPEZ (001), without lawful authority, obtained services or the property of another, in an amount more than \$25,000, by means of any material misrepresentation with the intent to deprive the other person of such property or services in violation of A.R.S. §§13-1802(A)(2), 13-1801, 13-1802(G), 13-1802(H), 13-603, 13-701, 13-702, 13-801, and 13-804.

Said conduct occurred on or between August 1, 2005 and December 31, 2009 when Angelina Lopez obtained services and property by misrepresenting how she was spending the funds of Sierra Vista Internal Medicine and by misrepresenting that she was authorized to spend funds belonging to Sierra Vista Internal Medicine for her own personal use.

THOMAS C. HORNE  
ATTORNEY GENERAL  
STATE OF ARIZONA

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(A "True Bill")

Dated: \_\_\_\_\_

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Christina M. Vejar  
Assistant Attorney General

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Foreperson of the State Grand Jury