

TERRY GODDARD
Attorney General
Firm Bar No. 14000

Kelly A. O'Connor
State Bar No. 012832
Assistant Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926
Telephone (602) 542-8507
crmfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

BRADLEY TODD FORWARD,

Defendant.

Case No:

59 SGJ 99

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: HINDERING PROSECUTION
IN THE FIRST DEGREE**, a Class 5 Felony,
in violation of A.R.S. § 13-2512

**COUNTS 2-3: STEALING,
DESTROYING, ALTERING OR
SECRETING PUBLIC RECORDS**, Class 6
Felonies, in violation of A.R.S. § 38-421

**COUNT 4: UNAUTHORIZED ACCESS
TO CRIMINAL HISTORY**, a Class 6
Felony, in violation of A.R.S. § 41-
1756(A)(2)

**COUNT 5: UNAUTHORIZED RELEASE
OF CRIMINAL HISTORY**, a Class 6
Felony, in violation of A.R.S. § 41-
1756(A)(3)

COUNT 6: COMPUTER TAMPERING, a
Class 6 Felony, in violation of A.R.S. § 13-
2316(A)(7)

COUNT 7: UNAUTHORIZED ACCESS
TO CRIMINAL HISTORY, a Class 6
Felony, in violation of A.R.S. § 41-
1756(A)(2)

COUNT 8: COMPUTER TAMPERING, a
Class 6 Felony, in violation of A.R.S. § 13-
2316(A)(7)

COUNT 9: UNAUTHORIZED ACCESS
TO CRIMINAL HISTORY, a Class 6
Felony, in violation of A.R.S. § 41-
1756(A)(2)

COUNT 10: COMPUTER TAMPERING, a
Class 6 Felony, in violation of A.R.S. § 13-
2316(A)(7)

The Arizona State Grand Jury accuses **BRADLEY TODD FORWARD**, charging on
this 12th day of December, 2006 that in or from Maricopa County, Arizona:

COUNT 1

(HINDERING PROSECUTION IN THE FIRST DEGREE)

Between January 1, 2005 and November 10, 2006, BRADLEY TODD FORWARD,
with intent to hinder the apprehension, prosecution, conviction or punishment of Edward Purvis
and Gregg Wolfe for Fraudulent Schemes and Artifices, a Class 2 Felony in violation of A.R.S.
§ 13-2310, rendered assistance to Edward Purvis and Gregg Wolfe by knowingly preventing or
obstructing by means of force, deception or intimidation, a person from performing an act that
might aid in the discovery, apprehension, prosecution or conviction of Edward Purvis and Gregg
Wolfe, in violation of A.R.S. §§ 13-2510, 13-2512, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD, a sworn officer of the
Chandler Police Department, rendered assistance to Edward Purvis and Gregg Wolfe, intending
to hinder their apprehension, prosecution, conviction or punishment. Specifically, BRADLEY

TODD FORWARD falsely represented that the Chandler Police Department was investigating Edward Purvis in order to obtain confidential investigative materials from the Arizona Corporation Commission. BRADLEY TODD FORWARD also falsely represented that a valid purpose related to the administration of criminal justice existed in order to obtain criminal history and background information relating to Jeffrey Dale Howard. BRADLEY TODD FORWARD then caused portions of the confidential Arizona Corporation Commission file and the referenced criminal history and background information to be provided to Edward Purvis and/or Gregg Wolfe. Said conduct obstructed or prevented the Arizona Corporation Commission from maintaining the confidentiality of an ongoing investigation in order to aid in the discovery, apprehension, prosecution or conviction of Edward Purvis and Gregg Wolfe. BRADLEY TODD FORWARD also provided false information to representatives of the Office of the Attorney General. Specifically, on November 9, 2006, BRADLEY TODD FORWARD stated, in an interview with representatives of the Office of the Attorney General, that he did not know Edward Purvis and had no prior contact with Edward Purvis. These statements, which were deceptive, obstructed the efforts of representatives of the Office of the Attorney General to perform acts in furtherance of its investigation that might aid in the discovery, apprehension, prosecution or conviction of Edward Purvis and Gregg Wolfe.

COUNT 2

(STEALING, DESTROYING, ALTERING OR SECRETING PUBLIC RECORDS)

Between October 1, 2005 and October 4, 2006, BRADLEY TODD FORWARD, an officer having custody of any record, map, book, or of any paper or proceeding of any court, filed or deposited in any public office, or placed in his hands for any purpose, specifically, portions of an Arizona Corporation Commission confidential investigative file relating to Edward Purvis and Gregg Wolfe, knowingly and without lawful authority destroyed, mutilated, defaced, altered, falsified, removed or secreted the whole or any part of the Arizona Corporation Commission confidential investigative file relating to Edward Purvis and Gregg Wolfe, or

permitted another person to destroy, mutilate, deface, alter, falsify, remove or secrete the whole or any part of the investigative file relating to Edward Purvis and Gregg Wolfe, in violation of A.R.S. §§ 38-421, 38-101, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD knowingly caused portions of the Arizona Corporation Commission confidential investigative file relating to Edward Purvis and Gregg Wolfe to be removed from the Chandler Police Department and to be provided to Edward Purvis and/or Gregg Wolfe. The file materials were provided to the Chandler Police Department in furtherance of a confidential investigation of Edward Purvis and Gregg Wolfe and BRADLEY TODD FORWARD was without lawful authority to remove the records for this purpose.

COUNT 3

(STEALING, DESTROYING, ALTERING OR SECRETING PUBLIC RECORDS)

Between March 1, 2006 and October 4, 2006, BRADLEY TODD FORWARD, an officer having custody of any record, map, book, or of any paper or proceeding of any court, filed or deposited in any public office, or placed in his hands for any purpose, specifically, criminal history record information and other background information relating to Jeffrey Dale Howard, knowingly and without lawful authority destroyed, mutilated, defaced, altered, falsified, removed or secreted the whole or any part of the criminal history record information and other background information relating to Jeffrey Dale Howard, or permitted another person to destroy, mutilate, deface, alter, falsify, remove or secrete the whole or any part of the criminal history record information and other background information relating to Jeffrey Dale Howard, in violation of A.R.S. §§ 38-421, 38-101, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD knowingly caused criminal history record information and other background information relating to Jeffrey Dale Howard to be removed from the Chandler Police Department and to be provided to Edward Purvis and/or Gregg Wolfe. The criminal history record information was made available to the Chandler

Police Department by the Department of Public Safety for the purposes of the administration of criminal justice and BRADLEY TODD FORWARD was without lawful authority to remove criminal history record information and cause it to be provided to Edward Purvis and/or Gregg Wolfe. The background information regarding Jeffrey Dale Howard was available to BRADLEY TODD FORWARD for purposes of his official duties only and BRADLEY TODD FORWARD was without lawful authority to remove background information regarding Jeffrey Dale Howard and cause it to be provided to Edward Purvis and/or Gregg Wolfe.

COUNT 4

(UNAUTHORIZED ACCESS TO CRIMINAL HISTORY)

Between March 1, 2006 and March 10, 2006, BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system or criminal history record information for purposes other than those authorized by law, in violation of A.R.S. §§ 41-1756, 41-1750, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system and/or criminal history record information to access records relating to Jeffrey Dale Howard for purposes unrelated to his official duties. Such use was not authorized by law.

COUNT 5

(UNAUTHORIZED RELEASE OF CRIMINAL HISTORY)

Between March 1, 2006 and October 4, 2006, BRADLEY TODD FORWARD intentionally, knowingly or recklessly released or procured the release of criminal history information, in violation of A.R.S. §§ 41-1756, 41-1750, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD released or procured the release of criminal history information relating to Jeffery Dale Howard to Edward Purvis and/or Gregg Wolfe. The criminal history information regarding Jeffrey Dale Howard was made

available to the Chandler Police Department by the Department of Public Safety for the purposes of the administration of criminal justice and BRADLEY TODD FORWARD was without lawful authority to release or procure the release of criminal history information relating to Jeffery Dale Howard to Edward Purvis and/or Gregg Wolfe.

COUNT 6
(COMPUTER TAMPERING)

Between March 1, 2006 and March 10, 2006, BRADLEY TODD FORWARD, acting without authority or exceeding authority for use, knowingly obtained information required by law to be kept confidential or any records that are not public records by accessing a computer, computer system or network that is operated by the State of Arizona, a political subdivision of the State of Arizona, or a medical institution, in violation of A.R.S. §§ 13-2301, 13-2316(A), 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD exceeded his authority for use of a computer, computer system or network that is operated by the State of Arizona or a political subdivision of the State of Arizona and knowingly obtained criminal history record information and other background information relating to Jeffrey Dale Howard. The information was required by law to be kept confidential and/or did not constitute public records. Criminal history record information was made available to the Chandler Police Department by the Department of Public Safety for the purposes of the administration of criminal justice and BRADLEY TODD FORWARD was without lawful authority to obtain criminal history record information for the purpose of causing it to be provided to Edward Purvis and/or Gregg Wolfe. The background information regarding Jeffrey Dale Howard was available to BRADLEY TODD FORWARD for purposes of his official duties only and BRADLEY TODD FORWARD was without lawful authority to obtain background information regarding Jeffrey Dale Howard for the purpose of causing it to be provided to Edward Purvis and/or Gregg Wolfe.

COUNT 7

(UNAUTHORIZED ACCESS TO CRIMINAL HISTORY)

On or about September 29, 2005, BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system or criminal history record information for purposes other than those authorized by law, in violation of A.R.S. §§ 41-1756, 41-1750, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system and/or criminal history record information to access vehicle registration information relating to Rachel Strachan, an attorney at the Arizona Corporation Commission, for purposes unrelated to his official duties. Such use was not authorized by law.

COUNT 8

(COMPUTER TAMPERING)

On or about September 29, 2005, BRADLEY TODD FORWARD, acting without authority or exceeding authority for use, knowingly obtained information required by law to be kept confidential or any records that are not public records by accessing a computer, computer system or network that is operated by the State of Arizona, a political subdivision of the State of Arizona, or a medical institution, in violation of A.R.S. §§ 13-2301, 13-2316(A), 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD exceeded his authority for use of a computer, computer system or network that is operated by the State of Arizona or a political subdivision of the State of Arizona and knowingly obtained vehicle registration information relating to Rachel Strachan, an attorney at the Arizona Corporation Commission. The information was required by law to be kept confidential and/or did not constitute public records. The information was accessed through the Arizona Criminal Justice Information System, which was made available to the Chandler Police Department by the Department of Public Safety for the purposes of the administration of criminal justice and BRADLEY TODD

FORWARD was without lawful authority to obtain this information for purposes unrelated to the administration of criminal justice.

COUNT 9

(UNAUTHORIZED ACCESS TO CRIMINAL HISTORY)

On or about October 18, 2005, BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system or criminal history record information for purposes other than those authorized by law, in violation of A.R.S. §§ 41-1756, 41-1750, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD intentionally, knowingly or recklessly used the Arizona criminal justice information system and/or criminal history record information to access driver's license information and warrant information relating to Mitchell Behm, an individual who had filed a complaint with the Arizona Corporation Commission regarding the activities of Edward Purvis and Gregg Wolfe. BRADLEY TODD FORWARD'S access of this information was for purposes unrelated to his official duties. Such use was not authorized by law.

COUNT 10

(COMPUTER TAMPERING)

On or about September 29, 2005, BRADLEY TODD FORWARD, acting without authority or exceeding authority for use, knowingly obtained information required by law to be kept confidential or any records that are not public records by accessing a computer, computer system or network that is operated by the State of Arizona, a political subdivision of the State of Arizona, or a medical institution, in violation of A.R.S. §§ 13-2301, 13-2316(A), 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when BRADLEY TODD FORWARD exceeded his authority for use of a computer, computer system or network that is operated by the State of Arizona or a political subdivision of the State of Arizona and knowingly obtained driver's license information and warrant information relating to Mitchell Behm, an individual who had filed a complaint

with the Arizona Corporation Commission regarding the activities of Edward Purvis and Gregg Wolfe. The information was required by law to be kept confidential and/or did not constitute public records. The information was accessed through the Arizona Criminal Justice Information System, which was made available to the Chandler Police Department by the Department of Public Safety for the purposes of the administration of criminal justice and BRADLEY TODD FORWARD was without lawful authority to obtain this information for purposes unrelated to the administration of criminal justice.

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

(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

Kelly A. O'Connor
Assistant Attorney General

Foreperson of the State Grand Jury