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

10 THE STATE OF ARIZONA,
11

12 *Plaintiff,*

13 vs.

14 ALLAN KENNETH MORGAL,
15

16 *Defendant.*

No. _____

INDICTMENT

57 SGJ 43

CHARGING VIOLATIONS OF:

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

COUNTS 2 & 3 : THEFT, Class 2
Felonies in violation of A.R.S. § 13-1802

COUNT 4 : MONEY LAUNDERING, a
Class 3 Felony, in violation of A.R.S. § 13-
2317

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19 The 57th Arizona State Grand Jury accuses ALLAN KENNETH MORGAL
20 charging that in or from Maricopa County, Arizona:
21

22 COUNT 1
23

24 (FRAUDULENT SCHEMES AND ARTIFICES)

25 During a period of time beginning on or about December 12, 2003, and ending on or
26 about August 9, 2004, defendant ALLAN KENNETH MORGAL knowingly obtained a
27 benefit by means of false or fraudulent pretenses, representations, promises or material
28

omissions, in violation of A.R.S. §§13-2310, 13-2301, 13-2310 (C), 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **ALLAN KENNETH MORGAL** obtained funds from Elliott Koidin by misrepresenting himself during transactions with Koidin, Jorge Arthur and Pepe Perez.

COUNT 2

(THEFT)

During a period of time beginning on or about December 12, 2003, and ending on or about August 9, 2004, defendant **ALLAN KENNETH MORGAL** knowingly converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use, in violation of A.R.S. §§13-1802 (A)(3), 13-1801, 13-1802 (F), 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when the defendant **ALLAN KENNETH MORGAL** converted funds entrusted to him by Elliott Koidin for the use in the manufacture, import and retail of pottery products, and used those funds to pay his attorneys and personal expenses.

COUNT 3

(THEFT)

During a period of time beginning on or about December 12, 2003, and ending on or about August 9, 2004, defendant **ALLAN KENNETH MORGAL** knowingly obtained services or property of another by means of any material misrepresentation with intent to deprive the other person of such property or services, in violation of A.R.S. §§13-1802 (A)(3), 13-1801, 13-1802 (F), 13-610, 13-701, 13-702, 13-702.01 and 13-801.

1 Said conduct occurred when the defendant **ALLAN KENNETH MORGAL**
2 obtained funds from Elliott Koidin by misrepresenting himself during transactions with
3 Koidin, Jorge Arthur and Pepe Perez.
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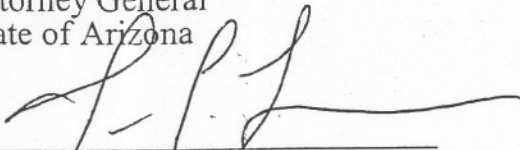
5 **COUNT 4**
6 **(MONEY LAUNDERING)**

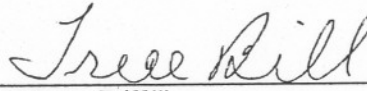
7 During a period of time beginning on or about December 12, 2003, and ending on or
8 about August 9, 2004, defendant **ALLAN KENNETH MORGAL** knowingly conducted
9 a transaction knowing or having reason to know that the property involved was the
10 proceeds of an offense and with the intent to conceal or disguise the nature, location,
11 source, ownership or control of the property or the intent to facilitate racketeering, in
12 violation of A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701,
13 13-702, 13-702.01 and 13-801.

14 Said conduct occurred when the defendant **ALLAN KENNETH MORGAL**
15 conducted transactions involving funds fraudulently obtained from Elliot Koidin, and
16 directed those funds to his attorneys, his girlfriend, personal spending money and other
17 personal purposes.
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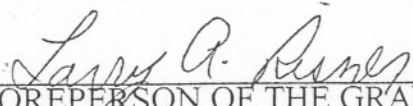
19 Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described
20 above were committed in Maricopa County, Arizona.
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1 TERRY GODDARD
2 Attorney General
3 State of Arizona

4 
TODD C. LAWSON
Assistant Attorney General


("True Bill")

5 8-16-05
6 Date

7 
8 FOREPERSON OF THE GRAND JURY

9 K:\CRM\OCF\USERS\TLAWSON\Cases 2005\Morgal CRP05-0081\indict.wpd