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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.

EDWARD ANTHONY PURVIS (001)
AND GREGG LAWRENCE WOLFE
(002),

Defendants.

No:

60 SGJ 68

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: BRIBERY OF A PUBLIC
SERVANT OR PARTY OFFICER, a Class 4
Felony, in violation of A.R.S. § 13-
2602(A)(1)

COUNTS 2-5: HARASSMENT OF A
PUBLIC OFFICER OR EMPLOYEE, Class
5 Felonies, in violation of A.R.S. § 13-2921
(B)

The Arizona State Grand Jury accuses EDWARD ANTHONY PURVIS (001) AND
GREGG LAWRENCE WOLFE (002), charging on this 19th day of April, 2007 that in or from
Maricopa County, Arizona:

COUNT 1

(BRIBERY OF A PUBLIC SERVANT OR PARTY OFFICER)

Between January 1, 2005 and January 31, 2007, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with corrupt intent, offered, conferred, or agreed to confer a benefit upon a public servant or party officer, with the intent to influence his vote, opinion, judgment, exercise of discretion or other action in his official capacity as a public servant or party officer, in violation of A.R.S. §§ 13-2602(A)(1), 13-2601, 13-2604, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with corrupt intent, offered, conferred or agreed to confer a benefit upon Bradley Todd Forward, a sworn officer of the Chandler Police Department, with the intent to influence his exercise of discretion or other action in his official capacity as a public servant. To assist EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, Officer Forward falsely represented that the Chandler Police Department was investigating EDWARD ANTHONY PURVIS in order to obtain confidential investigative materials from the Arizona Corporation Commission. Officer Forward then knowingly caused portions of the Arizona Corporation Commission confidential investigative file relating to EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE to be removed from the Chandler Police Department and to be provided to EDWARD ANTHONY PURVIS and/or GREGG LAWRENCE WOLFE. In addition, in response to EDWARD ANTHONY PURVIS' request, Officer Forward knowingly caused criminal history record information and other background information relating to several individuals, including Jeffrey Howard, Mitchell Behm and Rachel Strachan, to be accessed and/or removed from the Chandler Police Department and to be provided to EDWARD ANTHONY PURVIS and/or GREGG LAWRENCE 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 was

available to Officer Forward for purposes of his official duties only. Officer Forward was without lawful authority to access and/or remove this information and to cause it to be provided to EDWARD ANTHONY PURVIS and/or GREGG LAWRENCE WOLFE.

COUNT 2

(HARASSMENT OF A PUBLIC OFFICER OR EMPLOYEE)

On or between July 1, 2006 and April 19, 2007, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass the Honorable Paul J. McMurdie, a public officer or employee, filed a nonconsensual lien against Judge McMurdie that was not accompanied by a valid court order authorizing the lien to be filed or was not issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property, in violation of A.R.S. §§ 13-2921, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed two Uniform Commercial Code ("UCC") Financing Statements, Filing Nos. 2006F111810 and 2006F120103, with the Colorado Secretary of State. The UCC Financing Statements, which were filed on November 16, 2006 and December 12, 2006, falsely described Judge McMurdie as a debtor and falsely represented that Judge McMurdie consented to the filing of a lien by EDWARD ANTHONY PURVIS in the amount of fifteen million dollars (\$15,000,000). In addition, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed with the Colorado Secretary of State a UCC Financing Statement Amendment on December 12, 2006 (Filing No. 2006F120270), which contained similar representations.

Judge McMurdie was at all relevant times a Judge of the Arizona Superior Court in Maricopa County. As part of his official duties, Judge McMurdie presided over a civil action entitled *State of Arizona v. Edward A. Purvis*, No. CV 2006-003023 (Maricopa County Super. Ct.), which arose from an Arizona Corporation Commission investigation into the activities of EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in connection with their alleged sale of securities.

Judge McMurdie is not personally acquainted with EDWARD ANTHONY PURVIS and has had no contact or relationship with EDWARD ANTHONY PURVIS outside the scope of his official duties. He has not entered into any contract or personal transaction with EDWARD ANTHONY PURVIS and does not owe money to EDWARD ANTHONY PURVIS. There is no legitimate reason for EDWARD ANTHONY PURVIS to file a lien on the property of Judge McMurdie.

The UCC Financing Statements were not accompanied by an order or judgment of a court of competent jurisdiction authorizing the filing of the lien, nor were they issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property. Instead, the UCC Financing Statements represented that the debt was based on International Commercial Claim within the Admiralty Administrative Remedy Agreement/Contract File # RB444462016 (the "McMurdie Admiralty Claim").

The McMurdie Admiralty Claim and alleged fifteen million dollar (\$15,000,000) debt were part of a pattern of conduct engaged in by EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in Maricopa County, Arizona for the purpose of harassing Judge McMurdie. Beginning prior to November 16, 2006, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Judge McMurdie, caused a series of documents to be prepared and delivered to Judge McMurdie. In these documents, EDWARD

ANTHONY PURVIS purported to assert an "International Commercial Claim" against Judge McMurdie and contended that Judge McMurdie's failure to respond established a fifteen million dollar (\$15,000,000) debt by default. The claim was never validly adjudicated and the alleged debt did not exist.

COUNT 3

(HARASSMENT OF A PUBLIC OFFICER OR EMPLOYEE)

On or between July 1, 2006 and April 19, 2007, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Michael K. Jeanes, a public officer or employee, filed a nonconsensual lien against Mr. Jeanes that was not accompanied by a valid court order authorizing the lien to be filed or was not issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property, in violation of A.R.S. §§ 13-2921, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed two Uniform Commercial Code ("UCC") Financing Statements, Filing Nos. 2006F111813 and 2006F120111, with the Colorado Secretary of State. The UCC Financing Statements, which were filed on November 16, 2006 and December 12, 2006, falsely described Michael K. Jeanes as a debtor and falsely represented that Mr. Jeanes consented to the filing of a lien by EDWARD ANTHONY PURVIS in the amount of fifteen million dollars (\$15,000,000). In addition, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed with the Colorado Secretary of State a UCC Financing Statement Amendment on December 12, 2006 (Filing No. 2006F120277), which contained similar representations.

Michael K. Jeanes was at all relevant times the duly elected Clerk of the Arizona Superior Court in Maricopa County. As part of his official duties, Mr. Jeanes' office supports the Superior Court of Arizona in Maricopa County by maintaining court files, records, and exhibits, including those relating to the civil action entitled *State of Arizona v. Edward A. Purvis*, No. CV 2006-003023 (Maricopa County Super. Ct.), which arose from an Arizona Corporation Commission investigation into the activities of EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in connection with their alleged sale of securities.

Michael K. Jeanes is not personally acquainted with EDWARD ANTHONY PURVIS and has had no contact or relationship with EDWARD ANTHONY PURVIS outside the scope of his official duties. He has not entered into any contract or personal transaction with EDWARD ANTHONY PURVIS and does not owe money to EDWARD ANTHONY PURVIS. There is no legitimate reason for EDWARD ANTHONY PURVIS to file a lien on the property of Mr. Jeanes.

The UCC Financing Statements were not accompanied by an order or judgment of a court of competent jurisdiction authorizing the filing of the lien, nor were they issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property. Instead, the UCC Financing Statements represented that the debt was based on International Commercial Claim within the Admiralty Administrative Remedy Agreement/Contract File # RB444462016 (the "Jeanes Admiralty Claim").

The Jeanes Admiralty Claim and alleged fifteen million dollar (\$15,000,000) debt were part of a pattern of conduct engaged in by EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in Maricopa County, Arizona for the purpose of harassing Michael K. Jeanes. Beginning prior to November 16, 2006, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Mr. Jeanes, caused a series of documents to be

prepared and delivered to Mr. Jeanes. In these documents, EDWARD ANTHONY PURVIS purported to assert an "International Commercial Claim" against Mr. Jeanes and contended that Mr. Jeanes' failure to respond established a fifteen million dollar (\$15,000,000) debt by default. The claim was never validly adjudicated and the alleged debt did not exist.

COUNT 4

(HARASSMENT OF A PUBLIC OFFICER OR EMPLOYEE)

On or between July 1, 2006 and April 19, 2007, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Rachel Frazier Strachan, a public officer or employee, filed a nonconsensual lien against Ms. Strachan that was not accompanied by a valid court order authorizing the lien to be filed or was not issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property, in violation of A.R.S. §§ 13-2921, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed two Uniform Commercial Code ("UCC") Financing Statements, Filing Nos. 2006F111811 and 2006F120108, with the Colorado Secretary of State. The UCC Financing Statements, which were filed on November 16, 2006 and December 12, 2006, falsely described Rachel Frazier Strachan as a debtor and falsely represented that Ms. Strachan consented to the filing of a lien by EDWARD ANTHONY PURVIS in the amount of fifteen million dollars (\$15,000,000). In addition, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed with the Colorado Secretary of State a UCC Financing Statement Amendment on December 12, 2006 (Filing No. 2006F120281), which contained similar representations.

Rachel Frazier Strachan was at all relevant times an attorney employed by the Arizona Corporation Commission. As part of her official duties, Ms. Strachan works in the Securities Division and was assigned litigation responsibilities for the Arizona Corporation Commission investigation into the activities of EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in connection with their alleged sale of securities and the related administrative and civil proceedings, including the civil action entitled *State of Arizona v. Edward A. Purvis*, No. CV 2006-003023 (Maricopa County Super. Ct.).

Rachel Frazier Strachan is not personally acquainted with EDWARD ANTHONY PURVIS and has had no contact or relationship with EDWARD ANTHONY PURVIS outside the scope of her official duties. She has not entered into any contract or personal transaction with EDWARD ANTHONY PURVIS and does not owe money to EDWARD ANTHONY PURVIS. There is no legitimate reason for EDWARD ANTHONY PURVIS to file a lien on the property of Ms. Strachan.

The UCC Financing Statements were not accompanied by an order or judgment of a court of competent jurisdiction authorizing the filing of the lien, nor were they issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property. Instead, the UCC Financing Statements represented that the debt was based on International Commercial Claim within the Admiralty Administrative Remedy Agreement/Contract File # RB444462016 (the "Strachan Admiralty Claim").

The Strachan Admiralty Claim and alleged fifteen million dollar (\$15,000,000) debt were part of a pattern of conduct engaged in by EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in Maricopa County, Arizona for the purpose of harassing Rachel Frazier Strachan. Beginning prior to November 16, 2006, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Ms. Strachan, caused a series of

documents to be prepared and delivered to Ms. Strachan. In these documents, EDWARD ANTHONY PURVIS purported to assert an "International Commercial Claim" against Ms. Strachan and contended that Ms. Strachan's failure to respond established a fifteen million dollar (\$15,000,000) debt by default. The claim was never validly adjudicated and the alleged debt did not exist.

COUNT 5

(HARASSMENT OF A PUBLIC OFFICER OR EMPLOYEE)

On or between July 1, 2006 and April 19, 2007, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Mark Dinell, a public officer or employee, filed a nonconsensual lien against Mr. Dinell that was not accompanied by a valid court order authorizing the lien to be filed or was not issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property, in violation of A.R.S. §§ 13-2921, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass, filed or caused to be filed Uniform Commercial Code ("UCC") Financing Statements, Filing Nos. 2006F111800, 2006F120138, 2006F120197 and 2006F120199, with the Colorado Secretary of State. The UCC Financing Statements, which were filed on November 16, 2006 and December 12, 2006, falsely described Mark Dinell as a debtor and falsely represented that Mr. Dinell consented to the filing of a lien by EDWARD ANTHONY PURVIS in the amount of fifteen million dollars (\$15,000,000).

Mark Dinell was employed at all relevant times by the Arizona Corporation Commission. He has held two positions during that period, first serving as Assistant Chief Counsel of Enforcement, then as Assistant Director of Securities. As part of his official duties as Assistant Director of Securities, Mr. Dinell has oversight responsibility for the enforcement section, which

conducts investigations, including the Arizona Corporation Commission investigation into the activities of EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in connection with their alleged sale of securities. As part of his official duties, Mr. Dinell signed two subpoenas to EDWARD ANTHONY PURVIS requesting his appearance and/or the production of documents in connection with that investigation.

Mark Dinell is not personally acquainted with EDWARD ANTHONY PURVIS and has had no contact or relationship with EDWARD ANTHONY PURVIS outside the scope of his official duties. He has not entered into any contract or personal transaction with EDWARD ANTHONY PURVIS and does not owe money to EDWARD ANTHONY PURVIS. There is no legitimate reason for EDWARD ANTHONY PURVIS to file a lien on the property of Mr. Dinell.

The UCC Financing Statements were not accompanied by an order or judgment of a court of competent jurisdiction authorizing the filing of the lien, nor were they issued by a governmental entity, political subdivision or agency pursuant to its statutory authority, a validly licensed utility or water delivery company, a mechanics' lien claimant or an entity created under covenants, conditions, restrictions or declarations affecting real property. Instead, the UCC Financing Statements represented that the debt was based on International Commercial Claim within the Admiralty Administrative Remedy Agreement/Contract File # RB444462016 (the "Dinell Admiralty Claim").

The Dinell Admiralty Claim and alleged fifteen million dollar (\$15,000,000) debt were part of a pattern of conduct engaged in by EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE in Maricopa County, Arizona for the purpose of harassing Mark Dinell. Beginning prior to November 16, 2006, EDWARD ANTHONY PURVIS and GREGG LAWRENCE WOLFE, with intent to harass Mr. Dinell, caused a series of documents to be prepared and delivered to Mr. Dinell. In these documents, EDWARD ANTHONY PURVIS purported to assert an "International Commercial Claim" against Mr. Dinell and contended that

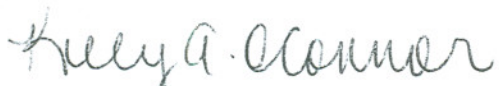
Mr. Dinell's failure to respond established a fifteen million dollar (\$15,000,000) debt by default. The claim was never validly adjudicated and the alleged debt did not exist.

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