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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.

DELORES LASHAY SWEET (001),
*(Counts 1, 2, 3, 4, 5, 11, 13, 16, 18, 20, 24,
28, 30, 31, 32, 34, 36, 38, & 40)*

DORRIAN LAMARR JONES (002),
*(Counts 1, 2, 3, 4, 6, 16, 18, 20, 22, 24, 26,
28, 32, 34, 36, 38 & 40)*

JENNIFER LOPEZ (003),
*(Counts 1, 2, 3, 4, 7, 10, 12, 14, 15, ~~17~~ 19,
21, 23, 25, 27, 29, 33, 35, 37, & 39)*

JADAKAH CELESTE JOHNSON (004),
(Counts 1, 3, & 8)

**RAYMOND LAMONT JOHNSON JR.
(005),**
(Counts 1, 3, & 9)

Defendants.

Case No:

93 SGJ 75

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. § 13-1003;

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

**COUNT 3: ILLEGALLY CONDUCTING
AN ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312(b);

COUNT 4: COMPUTER TAMPERING, a
Class 3 Felony, in violation of A.R.S. § 13-
2316(A)(1)

**COUNT 5, 6 & 7: MONEY
LAUNDERING**, a Class 3 Felony, in
violation of A.R.S. § 13-2317(B)(1);

COUNTS 8 & 9: MONEY

LAUNDERING, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(3);

COUNTS 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, & 40:

FORGERY, a Class 4 Felony, in violation of A.R.S. § 13-2002(A)(3)

The State Grand Jury accuses **DELORES LASHAY SWEET (001)**, **DORRIAN LAMARR JONES (002)**, **JENNIFER LOPEZ (003)**, **JADAKAH CELESTE JOHNSON (004)**, and **RAYMOND LAMONT JOHNSON JR. (005)**, charging on this 26th day of February 2024 that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

During a period of time beginning on or about October 14, 2021, and ending on or about November 24, 2023, accuses **DELORES LASHAY SWEET (001)**, **DORRIAN LAMARR JONES (002)**, **JENNIFER LOPEZ (003)**, **JADAKAH CELESTE JOHNSON (004)**, and **RAYMOND LAMONT JOHNSON JR. (005)**, with the intent to promote or aid the commission of an offense, did agree with one or more persons, that at least one of them or another person would engage in conduct constituting the offense, including,

- 1) Fraud Schemes and Artifices, in violation of A.R.S. § 13-2310(A);
- 2) Forgery, in violation of A.R.S. § 13-2002(A)(3); and,
- 3) Money Laundering, in violation of A.R.S. §13-2317.

It was the goal of the conspiracy that the defendants obtain funds and/or property from the Empowerment Scholarship Account Program (“ESA Program”) for personal use. Defendants admitted minor students, real and fictitious, into the ESA Program by using false, forged, or

fraudulent documentation (i.e. birth certificates and special education evaluations), awarded said students funds from the ESA Program, and approved expenses for reimbursement or funds for distribution on behalf of said students for their own benefit.

In furtherance of this conspiracy and to effect the objects thereof, the defendants, with others not named herein, did commit numerous overt acts, including but not limited to, the overt acts described in Counts 2 through 40, in violation of A.R.S. §§ 13-1003, 13-2310, 13-2002, 13-2317, 12-2301, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.0, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 2

FRAUD SCHEMES AND ARTIFICES

During a period of time beginning on or about October 14, 2021 and ending on or about November 24, 2023, **DELORES LASHAY SWEET (001), DORRIAN JAMARR JONES (002), and JENNIFER LOPEZ (003)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 12-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

Said conduct occurred when **DELORES LASHAY SWEET (001), DORRIAN JAMARR JONES (002), and JENNIFER LOPEZ (003)**, knowingly obtained ESA funds in the amount of \$614,352.38 from the ESA Program for unauthorized personal use by approving student applications containing false, forged, or fraudulent information.

COUNT 3

ILLEGAL CONDUCTING AN ENTERPRISE

During a period of time beginning on or about October 14, 2021 and ending on or about November 23, 2023, **DELORES LASHAY SWEET (001), DORRIAN JAMARR JONES (002), JENNIFER LOPEZ (003), JADAKAH CELESTE JOHNSON (004), and RAYMOND LAMONT JOHNSON JR. (005)** without lawful authority, knowingly,

participated in the conduct of an enterprise that the Defendants knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312(b), 13-2310, 13-2317, 13-2002, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

Said conduct occurred when **DELORES LASHAY SWEET (001)**, **DORRIAN JAMARR JONES (002)**, and **JENNIFER LOPEZ (003)**, self-assigned, or re-assigned to another defendant, student applications to the ESA Program for review. Defendants approved student applications with false, forged, or fraudulent information to include applications for fictitious or non-qualifying students.

JENNIFER LOPEZ (003), modified the status of the student applicants' disability which resulted in a greater award of funds per quarter to the student.

DELORES LASHAY SWEET (001), **DORRIAN JAMARR JONES (002)**, and **JENNIFER LOPEZ (003)**, reviewed and approved reimbursement requests (transactions) on behalf the ESA program enrolled students real and fictitious of whom were described as related to other defendants, for supplies which were outside the scope of approved supplies in the ESA Program.

Said conduct occurred when Defendants **JADAKAH CELESTE JOHNSON (004)** and/or **RAYMOND LAMONT JOHNSON JR. (005)** made deposits consisting of ESA Funds totaling \$196,526.42 into a checking account ending -9184 belonging to **RAYMOND LAMONT JOHNSON JR. (005)**

JADAKAH CELESTE JOHNSON (004) and/or **RAYMOND LAMONT JOHNSON JR (005)** distributed funds to and accounts ending in -7497 and -7504 belonging to **DELORES LASHAY SWEET (001)**, custodial accounts ending in -3210 and -3201 belonging to **JADAKAH CELESTE JOHNSON (004)** leaving the remaining ESA funds in custodial accounts ending in -9184 and -9175 belonging to **RAYMOND LAMONT JOHNSON JR (005)**

DELORES LASHAY SWEET (001), and/or JADAKAH CELESTE JOHNSON (004) RAYMOND LAMONT JOHNSON JR. (005) removed the funds from accounts ending -7497, -7504, -3210, -3201, and -9184 and -9175 prior to closing the accounts.

COUNT 4

COMPUTER TAMPERING

During a period of time beginning on or about October 14, 2021 and ending on or about November 24, 2023, **DELORES LASHAY SWEET (001), DORRIAN JAMARR JONES (002), and JENNIFER LOPEZ (003)**, knowingly without authority or exceeding his or her authority accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, and 13-801.

Said conduct, occurred when defendants **DELORES LASHAY SWEET (001), DORRIAN JAMARR JONES (002), and JENNIFER LOPEZ (003)**, exceeding the scope of his or her authority or without authority accessed the internal system of the Arizona Department of Education (“ADE”) to admit students to the ESA Program with false, forged, or fraudulent documentation, approved the reimbursement and/or distribution documentation for students whom the defendants knew should not have been admitted to the ESA Program, and modified the internal system at ADE to reflect fraudulent details.

COUNT 5

MONEY LAUNDERING

During a period of time beginning on or about October 14, 2021 and ending on or about November 23, 2023, **DELORES LASHAY SWEET (001)**, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of

racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense (to wit: obtaining cash from ESA Funds and merchandise via use of the ESA funds for students real and fictitious which were fraudulently admitted to the ESA Program) , in violation of A.R.S. §§ 13-2317(B), 15-2401, 15-2402, 15-2403, 15-2404, 15-2405, 15-2406, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-2301, 13-811, 13-701, and 13-702.

COUNT 6

MONEY LAUNDERING

During a period of time beginning on or about October 14, 2021 and ending on or about November 24, 2023, **DORRIAN JAMARR JONES (002)**, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, (to wit: obtaining merchandise via use of the ESA funds for students real and fictitious which were fraudulently admitted to the ESA Program) in violation of A.R.S. §§ 13-2317(B)(1), 15-2401, 15-2402, 15-2403, 15-2404, 15-2405, 15-2406, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-2301, 13-811, 13-701, and 13-702.

COUNT 7

MONEY LAUNDERING

During a period of time beginning on or about October 14, 2021 and ending on or about November 24, 2023, **JENNIFER LOPEZ (003)**, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, (to wit: obtaining merchandise via use of the ESA funds for students real and fictitious which were fraudulently admitted to the ESA Program) in violation of A.R.S. §§ 13-2317(B)(1), 15-2401, 15-2402, 15-2403, 15-2404, 15-2405, 15-2406, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-2301, 13-811, 13-701, and 13-702.

COUNT 8

MONEY LAUNDERING

On or about August 7, 2023 and August 25, 2023, **JADAKAH CELESTE JOHNSON (004)** conducted a transaction knowing or having reason to know that the property involved was the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering, (to wit: obtaining cash ESA funds in violation of the terms in the ESA program) in violation of A.R.S. §§ 13-2317(B)(3), 15-2401, 15-2402, 15-2403, 15-2404, 15-2405, 15-2406, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-2301, 13-811, 13-701, and 13-702.

COUNT 9

MONEY LAUNDERING

On or about August 7, 2023 and August 25, 2023, and ending on or about November 22, 2023, **RAYMOND LAMONT JOHNSON JR. (005)** conducted a transaction knowing or having reason to know that the property involved was the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering, (to wit: cash from ESA funds in violation of the terms in the ESA program) in violation of A.R.S. §§ 13-2317(B)(3), 15-2401, 15-2402, 15-2403, 15-2404, 15-2405, 15-2406, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-2301, 13-811, 13-701, and 13-702.

COUNT 10

FORGERY

On or about February 10, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit:

changing the disability status of Confidential Minor A from Developmentally Delayed to Multiple Disabilities – Severe Sensory Impairment without documentation supporting the change) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 11

FORGERY

On or about May 23, 2023 **DELORES LASHAY SWEET (001)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: approved purchase order #9847895 using an forged receipt for the purchase for a 16-inch MacBook, for Confidential Minor B) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 12

FORGERY

On or about February 23, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor B into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment without documentation supporting such status) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 13

FORGERY

During a period of time beginning on or about March 17, 2023 and ending on or about August 20, 2023 **DELORES LASHAY SWEET (001)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Confidential Minor C) in violation of A.R.S §§ 13-

2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 14

FORGERY

On or about February 23, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor C into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment without documentation supporting such status) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 15

FORGERY

On or about February 23, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor D into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment with forged, false, or fraudulent documentation to inaccurately support such status) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 16

FORGERY

During a period of time beginning on or about March 17, 2023 and ending on or about August 20, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (003)** knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Confidential

Minor D) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 17

FORGERY

On or about December 20, 2022 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor E into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment without documentation supporting such status) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 18

FORGERY

During a period of time beginning on or about January 18, 2023 and ending on or about November 24, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Confidential Minor E) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 19

FORGERY

On or about December 21, 2022 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor F into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment without documentation supporting such status) in

violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 20

FORGERY

During a period of time beginning on or about January 18, 2023 and ending on or about November 22, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved Class Wallet orders for Confidential Minor E) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 21

FORGERY

On or about March 27, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: approving the application of Juan Reyes Hernandez aka Juancarlito Hernandez, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 22

FORGERY

During a period of time beginning on or about May 1, 2023 and ending on or about July 28, 2023, **DORRIAN JAMARR JONES (002)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved reimbursements for Juan Reyes Hernandez aka Juancarlito Hernandez, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 23

FORGERY

December 21, 2022

On or about ~~February 10, 2023~~ **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: accepting Confidential Minor G into the ESA Program as a student with Multiple Disabilities – Severe Sensory Impairment without documentation supporting such status) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 24

FORGERY

During a period of time beginning on or about November 11, 2022 and ending on or about November 13, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMAAR JONES (002)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved reimbursements for Confidential Minor G) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 25

FORGERY

On or about March 27, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: approved the application of Jessuss Hernandez, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 26

FORGERY

During a period of time beginning on or about May 1, 2023 and ending on or about July 28, 2023, **DORRIAN JAMARR JONES (002)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved reimbursements for Jessuss Hernandez, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 27

FORGERY

On or about December 21, 2022 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: changing the disability status of Confidential Minor H without documentation supporting the change) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 28

FORGERY

During a period of time beginning on or about December 9, 2022 and ending on or about July 28, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Confidential Minor H) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 29

FORGERY

On or about March 27, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved the application of Ramon Deshion Johnson aka Rico Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 30

FORGERY

On or about April 13, 2023 **DELORES LASHAY SWEET (001)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: approved purchase order #10166457, using an forged receipt for the purchase for a 16-inch MacBook, for Ramon Deshion Johnson aka Rico Johnson, fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 31

FORGERY

On or about April 13, 2023 **DELORES LASHAY SWEET (001)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: approved purchase order #10166417 for Ramon Deshion Johnson aka Rico Johnson, fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 32

FORGERY

During a period of time beginning on or about April 12, 2023 and ending on or about August 21, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Ramon Deshion Johnson aka Rico Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 33

FORGERY

On or about March 27, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved the application of Ricky Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 34

FORGERY

During a period of time beginning on or about April 12, 2023 and ending on or about August 7, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Ricky Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 35

FORGERY

On or about November 23, 2022 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, offered or presented a forged instrument or one that contains false information (to wit: changing the disability status of Raymond Lamont Johnson Jr. without documentation supporting the change) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 36

FORGERY

During a period of time beginning on or about December 13, 2022 and ending on or about August 7, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, offered or presented a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Raymond Lamont Johnson Jr.) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 37

FORGERY

On or about March 9, 2023 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, offered or presented a forged instrument or one that contains false information (to wit: directly approved the application of Ramon Deshion Johnson aka Lamont Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 38

FORGERY

During a period of time beginning on or about March 27, 2023 and ending on or about August 8, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for of Ramon Deshion Johnson aka Lamont Johnson, a fictitious student) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 39

FORGERY

On or about November 23, 2022 **JENNIFER LOPEZ (003)**, knowingly with the intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contains false information (to wit: changing the disability status of Jadakah Celeste Johnson without documentation supporting the change) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 40

FORGERY

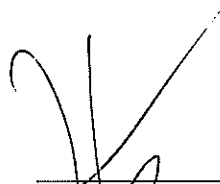
During a period of time beginning on or about December 9, 2022 and ending on or about August 4, 2023 **DELORES LASHAY SWEET (001) and DORRIAN JAMARR JONES (002)** knowingly with the intent to defraud offered or presented, whether accepted or not, a forged instrument or one that contains false information (to wit: directly approved all Class Wallet orders for Jadakah Celeste Johnson) in violation of A.R.S §§ 13-2002(A)(3), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

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

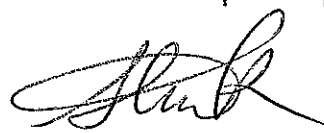
True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 2/26/24



Raleigh Farrelly
Assistant Attorney General



Foreperson of the Grand Jury

#11899430