

KRISTIN K. MAYES
Attorney General
Firm State Bar No. 14000

HALEIGH FARRELLY
State Bar No. 035247
CAROLINA M. LOPEZ
State Bar No. 035626
Assistant Attorney General
2005 N. Central Avenue
Phoenix, AZ 85004-1592
Telephone (602) 542-3881
CRMFraud@azag.gov
Attorneys for the Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

JOHNNY LEE BOWERS (001),
(Counts 1 through 60)

**ASHLEY MEREDITH HEWITT aka
ASHLEY HOPKINS (002),**
(Counts 1 through 60)

Defendants

Cause No:

95 SGJ 76

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 \$100,000 OR MORE**, a
Class 2 Felony, in violation of A.R.S. § 13-
2310(A);

COUNTS 3 – 60: FORGERY, a Class 4
Felony, in violation of A.R.S. § 13-
2002(A)(3);

The State Grand Jury accuses **JOHNNY LEE BOWERS (001), AND ASHLEY MEREDITH HEWITT (002)**, charging on this day of November 12, 2024 that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY, A CLASS 2 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), during a period beginning on or about December 4, 2022, and ending on or about May 3, 2024, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known to the State, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Fraud Schemes and Artifices, in violation of A.R.S. § 13-2310(A); and
- 2) Forgery, in violation of A.R.S. § 13-2002(A)(3); and
- 3) Money Laundering, in violation of A.R.S. § 13-2317(B)(1); and
- 4) Aggravated Taking Identity of Another Person or Entity, in violation of A.R.S. § 13-2009(A)(1).

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 2 through Counts 30 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

It was the goal of the conspiracy that the defendants, Colorado residents, obtain funds from the Arizona Empowerment Scholarship Account Program (“ESA Program”) by submitting applications for children, both real and fictitious, with false, forged, or fraudulent documentation (i.e. birth certificates, utility bills, and/or lease agreements). The defendants received payments from the ESA Program totaling approximately \$110,000. They used this money for their own personal living expenses while continuing to reside in Colorado.

COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), during a period beginning on or about December 4, 2022, and ending on or about May 3, 2024, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from the ESA Program by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

This conduct occurred when **JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002)**, knowingly obtained ESA Program funds in the amount of \$110,258.28 by submitting student applications with false, forged, or fraudulent information.

COUNT 3

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #85525, #85526, #85527, and/or #85529, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 4

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85522, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 5

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85523, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 6

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85524, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 7

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85525, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 8

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information,

with the ESA application #85526, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 9

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85527, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 10

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 4, 2022, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #85529, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 11

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 13, 2022, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #86388, #86389, #86390, and/or #86392, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 12

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about December 30, 2022, with intent to defraud, did offer or present to the State of Arizona a lease agreement, a forged instrument or one which contained false information, with the ESA applications #87619, #87620, #87621, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 13

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about July 12, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #117971, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 14

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about July 12, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with ESA application #117975, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 15

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with the ESA applications #133886, #133887, #133888, #133889, #133890, and/or #133891, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 16

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133886, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 17

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133887, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 18

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133888, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 19

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133889, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 20

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133890, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 21

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #133891, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 22

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with the ESA applications #136491, #136493, #136495, #136534, #136535, and/or #136536 for the “Gil Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 23

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA applications #136491, #136493, #136495, #136534, #136535, and/or #136536 for the “Gil Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 24

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND/OR ASHLEY MEREDITH HEWITT (002), on or about January 21, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #137980, #137981, and/or #137983 for the “Cole Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 25

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 26, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #138456, #138458, and/or #138459 for the “Cole Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 26

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #140338, 140339, 140341, 140342, 140343, and/or 140344 for the “Diaz Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 27

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona a birth certificate, a forged instrument or one which contained false information, with the ESA application #140338, 140339, 140341, 140342, 140343, and/or 140344 for the “Diaz Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 28

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or between March 6, 2024 and March 8, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #140977, 1470978, 140979, 140980, #141123, and #141125 for the “Dobbs Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 29

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or between March 6, 2024 and March 8, 2024, with intent to defraud, did offer or present to the State of Arizona submitting a birth certificate, a forged instrument or one which contained false information, with ESA applications #140977, 1470978, 140979, 140980, #141123, and #141125 for the “Dobbs Family,” in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 30

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about April 28, 2024, with intent to defraud, did offer or present to the State of Arizona a utility bill, a forged instrument or one which contained false information, with ESA applications #143784, #143785, and/or #143786, for the "Hewitt Family," in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 31

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133886, a forged instrument or one which contained false information, for Erin Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 32

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133887, a forged instrument or one which contained false information, for Poppy Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 33

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133888, a forged instrument or one which contained false information, for Penny Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 34

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133889, a forged instrument or one which contained false information, for Joyce Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 35

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133890, a forged instrument or one which contained false information, for Elizabeth Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 36

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about November 14, 2023, with intent to defraud, did offer or present to the State of Arizona ESA application #133891, a forged instrument or one which contained false information, for Grace Fox, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 37

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136491, a forged instrument or one which contained false information, for Tucker Gil, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 38

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136493, a forged instrument or one which contained false information, for Vance Gil, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 39

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136495, a forged instrument or one which contained false information, for Wyatt Gill, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 40

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136534, a forged instrument or one which contained false information, for Arlo Gil, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 41

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136535, a forged instrument or one which contained false information, for Rocky Gil, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 42

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 3, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #136536, a forged instrument or one which contained false information, for Mikey Gil, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 43

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 21, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #137980, a forged instrument or one which contained false information, for Micah Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 44

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 21, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #137981, a forged instrument or one which contained false information, for Sonny Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 45

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 21, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #137983, a forged instrument or one which contained false information, for Wilson Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 46

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #138456, a forged instrument or one which contained false information, for Ryder Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 47

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #138458, a forged instrument or one which contained false information, for Maverick Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 48

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about January 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #138459, a forged instrument or one which contained false information, for Jack Cole, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 49

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140338, a forged instrument or one which contained false information, for Antonia Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 50

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140339, a forged instrument or one which contained false information, for Juan Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 51

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140341, a forged instrument or one which contained false information, for Raul Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 52

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140342, a forged instrument or one which contained false information, for Crispian Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 53

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140343, a forged instrument or one which contained false information, for Jorge Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 54

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about February 26, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140344, a forged instrument or one which contained false information, for Arturo Diaz, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 55

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 6, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140977, a forged instrument or one which contained false information, for Briana Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 56

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 6, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140978, a forged instrument or one which contained false information, for Louis Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 57

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 6, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140979, a forged instrument or one which contained false information, for Tate Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 58

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 6, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #140980, a forged instrument or one which contained false information, for Matthew Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 59

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 8, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #141123, a forged instrument or one which contained false information, for Jon Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

COUNT 60

FORGERY, A CLASS 4 FELONY

JOHNNY LEE BOWERS (001) AND ASHLEY MEREDITH HEWITT (002), on or about March 8, 2024, with intent to defraud, did offer or present to the State of Arizona ESA application #141125, a forged instrument or one which contained false information, for Tucker Dobbs, a child who did not exist, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, 15-2401, 15-2401.01, 15-2402, 15-2403, 15-2404, 15-2405, and 15-2406.

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

A "True Bill"
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



HALEIGH FARRELLY
Assistant Attorney General



CAROLINA M. LOPEZ
Assistant Attorney General

Dated: 11/12/2024



Foreperson of the Grand Jury



Foreperson of the Grand Jury