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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**TONY ANTHONY HATLEY, JR (001),
(Counts 1-5)**



Defendants.

Case No:

87 SGJ 127

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNT 2: THEFT, a Class 2 Felony in
violation of A.R.S. § 13-1802

COUNT 3: THEFT, a Class 2 Felony in
violation of A.R.S. § 13-1802

COUNT 4: FALSE RETURN, a Class 5
Felony, in violation of A.R.S. §42-
1127(B)(2)

COUNT 5: FALSE RETURN, a Class 5
Felony, in violation of A.R.S. §42-
1127(B)(2)

The Arizona State Grand Jury accuses **TONY ANTHONY HATLEY, JR and**

[REDACTED], charging on this 7th day of October 2020, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 10, 2017 to September 18, 2018, **TONY ANTHONY HATLEY, JR**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-2310(c), 13-701, 13-702, 13-801, and 13-811.

COUNT 2

THEFT

On or about August 15, 2017, **TONY ANTHONY HATLEY, JR**, without lawful authority, obtained property belonging to **[REDACTED]** to wit: currency, with a value of more than twenty-five thousand dollars (\$25,000), by means of any material misrepresentation with the intent to deprive **[REDACTED]** of such property in violation of A.R.S. §§ 13-1802(A)(3), 13-1802, 13-1801, 13-701, 13-702, 13-801, and 13-811.

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COUNT 3

THEFT

On or about August 16, 2017, **TONY ANTHONY HATLEY, JR**, without lawful authority, obtained property belonging to [REDACTED] to wit: currency, with a value of more than twenty-five thousand dollars (\$25,000), by means of any material misrepresentation with the intent to deprive [REDACTED] of such property in violation of A.R.S. §§ 13-1802(A)(3), 13-1802, 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 4
FALSE RETURN

On or about March 4, 2018, **TONY ANTHONY HATLEY, JR** [REDACTED]
[REDACTED], knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document, in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT 5
FALSE RETURN

On or about February 4, 2019, **TONY ANTHONY HATLEY, JR** [REDACTED]
[REDACTED], knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or

document, in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801 and 13-811.

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

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 10-7-20

Kimberly Nye
KIMBERLY NYE
Assistant Attorney General
#882767

[Signature]
Foreperson of the State Grand Jury