

TERRY GODDARD  
Attorney General  
Firm Bar No. 14000

THEODORE CAMPAGNOLO  
State Bar No. 017167  
Assistant Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007-2926  
Telephone 602-542-3881  
Facsimile: 602-542-5997  
[crmfraud@azag.gov](mailto:crmfraud@azag.gov)

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

**PATRICK CHORPENNING, SR. (001),**

Defendant.

Case No:

65 SGJ 158

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNTS 1 THROUGH 4: CONFLICT OF INTEREST**, Class 6 Felonies, in violation of A.R.S. §§ 38-503, 38-510

**COUNT 5: FRAUDULENT SCHEMES AND PRACTICES**, a Class 5 Felony, in violation of A.R.S. § 13-2311

**COUNTS 6 & 7: MISUSE OF PUBLIC MONIES**, Class 4 Felonies, in violation of A.R.S. §§ 35-301, 35-301

**COUNT 8: VIOLATION OF PROCUREMENT CODE**, a Class 4 Felony, in violation of A.R.S. § 41-2616

The Arizona State Grand Jury accuses **PATRICK CHORPENNING, SR.**, charging on this 18<sup>th</sup> day of November, 2009, that in or from Maricopa County, Arizona:

**COUNT 1**

**CONFLICT OF INTEREST**

On or between December 1, 2002 and August 1, 2003, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, who had a substantial interest in a decision of the Arizona Department of Veterans' Services to employ a person for the position of Assistant Administrator of the Arizona Department of Veterans' Services Nursing Home, intentionally or knowingly participated in the hiring and continued employment of his son Patrick Chorpenning, Jr. as the Assistant Administrator of the Arizona Department of Veterans' Services Nursing Home, in violation of A.R.S. §§ 38-501, 38-502, 38-503, 38-510, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

**COUNT 2**

**CONFLICT OF INTEREST**

On or between July 1, 2003 and April 30, 2005, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, intentionally or knowingly participated in the creation, approval and extension of an Interagency Service Agreement with Arizona State University for his son Patrick Chorpenning, Jr., which was a substantial interest in a contract, sale, purchase or service to the Arizona Department of Veterans' Services for both PATRICK CHORPENNING, SR. and Patrick Chorpenning, Jr., in violation of A.R.S. §§ 38-501, 38-502, 38-503, 38-510, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

**COUNT 3**

**CONFLICT OF INTEREST**

On or between July 1, 2003 and April 30, 2005, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, who had a substantial interest in a decision of the Arizona Department of Veterans' Services to create and approve a position funded by an Interagency Service Agreement with Arizona State University, intentionally or knowingly participated in the creation, approval and extension of an Interagency Service Agreement with Arizona State University for his son Patrick Chorpenning, Jr., in violation of A.R.S. §§ 38-501, 38-502, 38-503, 38-510, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

**COUNT 4**

**CONFLICT OF INTEREST**

On or between February 1, 2004 and March 30, 2007, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, who had a substantial interest in a decision of the Arizona Department of Veterans' Services to employ a person for positions at the Arizona Department of Veterans' Services, intentionally or knowingly participated in the hiring and continued employment of his wife Cornelia Chorpenning as the Strategic Planner of Special Projects and the In-House Design Coordinator for the Arizona Department of Veterans' Services, in violation of A.R.S. §§ 38-501, 38-502, 38-503, 38-510, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

## **COUNT 5**

### **FRAUDULENT SCHEMES AND PRACTICES**

On or about September 22, 2004, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, in a matter related to the business conducted by the Arizona Department of Veterans' Services, a state department or state agency, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up the employment of Patrick Chorpenning, Jr. by the Arizona Department of Veterans' Services, pursuant to an Interagency Service Agreement with Arizona State University, by stating in a memorandum to the Chief of Staff of the Governor's Office that Patrick Chorpenning had left the Arizona Department of Veterans' Services to start a public policy consulting firm, which was a material fact by trick scheme or device, in violation of A.R.S. §§ 13-2311, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

## **COUNT 6**

### **MISUSE OF PUBLIC MONIES**

On or between November 1, 2003 and March 31, 2007, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, who was charged with the receipt, safekeeping, transfer or disbursement of public money, without lawful authority, appropriated \$38,595 to the use of the Arizona Department of Veterans' Services Employee Recognition Fund, in violation of A.R.S. §§ 35-301, 35-302, 41-601, 41-603, 41-603.01, 41-604, 41-608, 41-608.01, 41-776, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

**COUNT 7**

**MISUSE OF PUBLIC MONIES**

On or between August 1, 2002 and November 30, 2003, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, who was charged with the receipt, safekeeping, transfer or disbursement of public money, without lawful authority, appropriated \$85,489 to the use of Go Media, a private company, for an alleged entity called Military Veterans for America, in violation of A.R.S. §§ 35-301, 35-302, 41-601, 41-603, 41-603.01, 41-604, 41-608, 41-608.01, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 13-811.

**COUNT 8**

**VIOLATION OF PROCUREMENT CODE**

On or between July 1, 2002 and April 30, 2005, PATRICK CHORPENNING, SR., the Director of the Arizona Department of Veterans' Services, a public agency, intentionally or knowingly contracted for or purchased materials, services or construction from Go Media, a private company, pursuant to a scheme or artifice to avoid the requirements of the Arizona Procurement Code in the total amount of \$382,757.00 in violation of A.R.S. §§ 41-2616, 41-2501, 41-2503, 41-2504, 41-2531, 41-2532, 41-2533, 41-2534, 41-2536, 41-2537, 41-2601, 41-601, 41-603, 41-603.01, 41-604, 41-608, 41-608.01, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801 & 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.

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(A "True Bill")

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: \_\_\_\_\_

\_\_\_\_\_  
Theodore Campagnolo  
Assistant Attorney General

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Foreperson of the State Grand Jury

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