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

**THE STATE OF ARIZONA,**

Plaintiff,

v.

**GEORGE EMIL CONTRERAS (001),**

**STEVEN PAUL PECK (002),**

**BENJAMIN HUGH  
SYWARUNGSYMUN (003),**

and

**AARON J. LENTZ (004),**

Defendants.

Case No:

67 SGJ 154

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNTS 1 and 3: FRAUDULENT  
SCHEMES AND ARTIFICES, Class 2  
Felonies, in violation of A.R.S. § 13-2310  
(Defendant 001 only)**

**COUNT 2: ILLEGAL CONTROL OF  
AN ENTERPRISE, a Class 3 Felony, in  
violation of A.R.S. § 13-2312(A)  
(Defendant 001 only)**

**COUNT 4: THEFT, a Class 3 Felony, in  
violation of A.R.S. § 13-1802 (A) (3)  
(Defendant 001 only)**

**COUNT 5: THEFT, a Class 5 Felony, in  
violation of A.R.S. § 13-1802 (A) (3)  
(Defendant 004 only)**

**COUNTS 6-7: THEFT**, Class 6 Felonies,  
in violation of A.R.S. § 13-1802 (A) (3)  
(Count 6, Defendant 002 only)  
(Count 7, Defendant 003 only)

The 67<sup>th</sup> Arizona State Grand Jury accuses **GEORGE EMIL CONTRERAS, STEVEN PAUL PECK, BENJAMIN HUGH SYWARUNGSYMN** and **AARON J. LENTZ**, charging on this 17<sup>th</sup> day of November, 2010, that in or from Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

During the time period beginning on or about December 18, 2005, and ending on or about October 11, 2006, the defendant, **GEORGE EMIL CONTRERAS**, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **GEORGE EMIL CONTRERAS**, failed to inform the Cotton Center Townhomes that himself and individuals working under his company Raptor Services Inc. had not worked all of their scheduled hours, and as a result of this material omission obtained funds for hours not worked.

**COUNT 2**

**ILLEGAL CONTROL OF AN ENTERPRISE**

During the time period beginning on or about December 18, 2005, and ending on or about December 18, 2007, **GEORGE EMIL CONTRERAS**, through racketeering or its proceeds, knowingly acquired or maintained, by investment or otherwise, control of any enterprise, in violation of A.R.S. §§13-2312(A), 13-2301(D), 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

Said conduct occurred when the Defendant, **GEORGE EMIL CONTRERAS**, through Fraudulent Schemes and Artifices and Theft, controlled Raptor Services Inc.

**COUNT 3**

**FRAUDULENT SCHEMES AND ARTIFICES**

During the time period beginning on or about April 30, 2007, and ending on or about November 23, 2007, the defendant, **GEORGE EMIL CONTRERAS**, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **GEORGE EMIL CONTRERAS**, failed to inform Laron Inc., AZ Materials or Eisenberg that he had not worked all of their scheduled hours, and as a result of this material omission obtained funds for hours not worked.

**COUNT 4**

**THEFT**

During the time period beginning on or about December 18, 2005, and ending on or about November 23, 2007, the defendant, **GEORGE EMIL CONTRERAS**, without lawful authority, knowingly obtained the property of another by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802 (A) (3), 13-1802 (G), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **GEORGE EMIL CONTRERAS**, misrepresented the off-duty hours that he worked to the Cotton Center Townhomes, Laron Inc., AZ Materials and Eisenberg, and then accepted payment from those entities for a total value of \$9,185.40.

COUNT 5

THEFT

During the time period beginning on or about March 7, 2006, and ending on or about August 30, 2006, the defendant, **AARON J. LENTZ**, without lawful authority, knowingly obtained the property of another by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802 (A) (3), 13-1802 (G), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **AARON J. LENTZ**, misrepresented the off-duty hours that he worked to the Cotton Center Townhomes, and then accepted payment from the Cotton Center Townhomes for a total value of \$2,030.40.

COUNT 6

THEFT

During the time period beginning on or about December 24, 2005, and ending on or about September 11, 2006, the defendant, **STEVEN PAUL PECK**, without lawful authority, knowingly obtained the property of another by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802 (A) (3), 13-1802 (G), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **STEVEN PAUL PECK**, misrepresented the off-duty hours that he worked to the Cotton Center Townhomes, then accepted payment from the Cotton Center Townhomes in the amount of \$1,777.95.

COUNT 7

THEFT

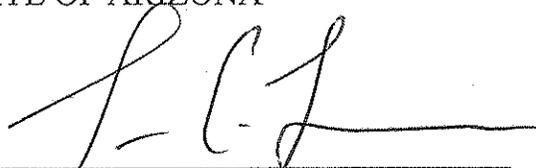
During the time period beginning on or about January 19, 2006, and ending on or about September 28, 2006, the defendant, **BENJAMIN HUGH SYWARUNGSYMNUN**, without lawful authority, knowingly obtained the property of another by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802 (A) (3), 13-1802 (G), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-610, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant, **BENJAMIN HUGH SYWARUNGSYMNUN**, misrepresented the off-duty hours that he worked to the Cotton Center Townhomes, then accepted payment from the Cotton Center Townhomes in the amount of \$1,858.50.

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  
(A "True Bill")

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA



TODD C. LAWSON  
Assistant Attorney General

Dated: 11/17/10



Foreperson of the State Grand Jury