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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.

ALINA NASHAE LIPSEY (001),

Defendant.

Case No:

76 SGJ 97

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: AGGRAVATED TAKING IDENTITY OF ANOTHER, a Class 3 Felony, in violation of A.R.S. § 13-2009

COUNT 4: FRAUDULENT SCHEMES AND PRACTICES, a Class 5 Felony, in violation of A.R.S. § 13-2311

COUNT 5: UNLAWFUL USE OF FOOD STAMPS, a Class 5 Felony, in violation of A.R.S. § 13-3701

COUNTS 6-15: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. § 13-2316

COUNTS 16-25: OBTAINING A CREDIT CARD BY FRAUDULENT MEANS, a Class 5 Felony, in violation of A.R.S. § 13-2102

The Arizona State Grand Jury accuses **ALINA NASHAE LIPSEY**, charging on this 27th day of May, 2015 that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or about October 29, 2010 through July 13, 2011, **ALINA NASHAE LIPSEY**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, creating fictitious clients in connection with EBT card numbers 5077-0600-3580-4021, 5077-0600-3624-6313, 5077-0600-3705-4120, 5077-0600-3723-1298, 5077-0600-3724-2485, 5077-0600-3725-1601, 5077-0600-3720-3859, 5077-0600-3722-0028, 5077-0600-3722-4129, 5077-0600-3753-2570, and approving those clients for benefits, in violation of A.R.S. §§ 13-2310(A), 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 2

THEFT

On or about October 29, 2010 through July 13, 2011, **ALINA NASHAE LIPSEY**, controlled property of another with the intent to deprive that other person of such property, or obtained property of another by means of any material misrepresentation with intent to deprive that other person of such property, all with a total

value in excess of twenty-five thousand dollars, to wit, by creating fictitious clients in connection with EBT card numbers 5077-0600-3580-4021, 5077-0600-3624-6313, 5077-0600-3705-4120, 5077-0600-3723-1298, 5077-0600-3724-2485, 5077-0600-3725-1601, 5077-0600-3720-3859, 5077-0600-3722-0028, 5077-0600-3722-4129, 5077-0600-3753-2570, and approving those clients for benefits, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 3

AGGRAVATED TAKING IDENTITY OF ANOTHER

On or about October 29, 2010 through July 13, 2011, **ALINA NASHAE LIPSEY**, knowingly took, manufactured, purchased, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss, to wit, by creating fictitious clients in connection with EBT card numbers 5077-0600-3580-4021, 5077-0600-3624-6313, 5077-0600-3705-4120, 5077-0600-3723-1298, 5077-0600-3724-2485, 5077-0600-3725-1601, 5077-0600-3720-3859, 5077-0600-3722-0028, 5077-0600-3722-4129, 5077-0600-3753-2570, and approving those clients for benefits, in violation of A.R.S. §§ 13-2009, 13-2001, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 4

FRAUDULENT SCHEMES AND PRACTICES

On or about October 29, 2010 through July 13, 2011, **ALINA NASHAE LIPSEY**, in a matter related to the business conducted by a department or agency of this

state, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed, or covered up a material fact by any trick, scheme or device, or made or used any false writing or document knowing such writing contained any false, fictitious, or fraudulent statement or entry, to wit, by creating fictitious clients in connection with EBT card numbers 5077-0600-3580-4021, 5077-0600-3624-6313, 5077-0600-3705-4120, 5077-0600-3723-1298, 5077-0600-3724-2485, 5077-0600-3725-1601, 5077-0600-3720-3859, 5077-0600-3722-0028, 5077-0600-3722-4129, 5077-0600-3753-2570, and approving those clients for benefits, in violation of A.R.S. §§ 13-2311, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 5

UNLAWFUL USE OF FOOD STAMPS

On or about October 29, 2010, **ALINA NASHAE LIPSEY**, knowingly appropriated food stamps with which she was entrusted or gained possession by virtue of a position as a public employee, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3580-4021, and approving those clients for benefits, in violation of A.R.S. §§ 13-3701, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 6

COMPUTER TAMPERING

On or about October 29, 2010, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-

0600-3580-4021, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 7

COMPUTER TAMPERING

On or about December 21, 2010, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3624-6313, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 8

COMPUTER TAMPERING

On or about March 26, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3705-4120, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 9

COMPUTER TAMPERING

On or about April 19, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3723-1298, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 10

COMPUTER TAMPERING

On or about April 20, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3724-2485, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 11

COMPUTER TAMPERING

On or about April 21, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3725-1601, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 12

COMPUTER TAMPERING

On or about April 25, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3720-3859, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 13

COMPUTER TAMPERING

On or about April 26, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-

0600-3722-0028, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 14

COMPUTER TAMPERING

On or about April 26, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3722-4129, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 15

COMPUTER TAMPERING

On or about June 7, 2011, **ALINA NASHAE LIPSEY**, without authority or exceeding 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 receive, or to control property or services by means of false or fraudulent pretenses, representations, or promises, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3753-2570, and approving those clients for benefits, in violation of A.R.S. §§ 13-2316, 13-2301, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 16

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about October 29, 2010, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3580-4021, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 17

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about December 21, 2010, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3624-6313, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 18

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about March 26, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3705-4120, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 19

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 19, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3723-1298, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 20

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 20, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3724-2485, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 21

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 21, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3725-1601, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 22

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 25, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3720-3859, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 23

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 26, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3722-0028, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 24

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about April 26, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3722-4129, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

COUNT 25

OBTAINING A CREDIT CARD BY FRAUDULENT MEANS

On or about June 07, 2011, **ALINA NASHAE LIPSEY**, sold, transferred or conveyed a credit card with the intent to defraud, to wit, by creating fictitious clients in connection with EBT card number 5077-0600-3753-2570, approving those clients for benefits, and conveying such card to herself without authorization, in violation of A.R.S. §§ 13-2102, 13-2101, 13-701, 13-702, 13-801, 13-811, and 13-3418.

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")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

Michael A. Powell
Assistant Attorney General
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Foreperson of the State Grand Jury