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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.

LANCE E. WILLS,

Defendant.

Case No:

79 SGJ 258

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNTS 2, 3, and 4: THEFT, Class 2
Felonies, in violation of A.R.S. § 13-1802

COUNTS 5 and 6: THEFT, Class 3
Felonies, in violation of A.R.S. § 13-1802

The Arizona State Grand Jury accuses **LANCE E. WILLS**, charging on this 18th day of October, 2016, that in or from Maricopa County, Arizona:

COUNT 1:
FRAUDULENT SCHEMES & ARTIFICES

On or between approximately May 15, 2012 and May 12, 2015, **LANCE E. WILLS**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or

fraudulent pretenses, representation, promises, or material omissions. This conduct occurred when **LANCE E. WILLS** obtained funds from Anande Siyabalagoda, Lisa Molina, Jon and Karen Halgren, Brett and Maureen Grebe, and/or Jon Anderson, in violation of A.R.S. §§ 13-2310, 13-701, 13-702 and 13-801.

COUNT 2:
THEFT

On or between approximately May 29, 2012 and October 5, 2012, **LANCE E. WILLS**, without lawful authority, knowingly controlled the property of another with the intent to deprive that person of such property; or, knowingly converted for an unauthorized term or use the property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; or obtained property of another by means of material misrepresentation with the intent to deprive that person of the property. This conduct occurred when **LANCE E. WILLS** obtained more than \$25,000 from Anande Siyabalagoda, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

COUNT 3:
THEFT

On or between approximately December 15, 2014 and March 25, 2015, **LANCE E. WILLS**, without lawful authority, knowingly controlled the property of another with the intent to deprive that person of such property; or, knowingly converted for an unauthorized term or use the property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; or obtained property of another by means of material misrepresentation with the intent to deprive that person of the property. This conduct occurred when **LANCE E. WILLS** obtained more than \$25,000 from Lisa Molina, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

COUNT 4:
THEFT

On or between approximately February 18, 2015 and May 12, 2015, **LANCE E. WILLS**, without lawful authority, knowingly controlled the property of another with the intent to deprive that person of such property; or, knowingly converted for an unauthorized term or use the property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; or obtained property of another by means of material misrepresentation with the intent to deprive that person of the property. This conduct occurred when **LANCE E. WILLS** obtained more than \$25,000 from Brett and Maureen Grebe, and Jon Anderson, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

COUNT 5:
THEFT

On or between approximately December 5, 2014 and March 6, 2015, **LANCE E. WILLS**, without lawful authority, knowingly controlled the property of another with the intent to deprive that person of such property; or, knowingly converted for an unauthorized term or use the property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; or obtained property of another by means of material misrepresentation with the intent to deprive that person of the property. This conduct occurred when **LANCE E. WILLS** obtained more than \$3,000 but less than \$25,000 from Elena Ehlert, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

COUNT 6:
THEFT


On or between approximately December 23, 2013 and January 17, 2014, **LANCE E. WILLS**, without lawful authority, knowingly controlled the property of another with the intent to deprive that person of such property; or, knowingly converted for an unauthorized term or use

the property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use; or obtained property of another by means of material misrepresentation with the intent to deprive that person of the property. This conduct occurred when **LANCE E. WILLS** obtained more than \$3,000 but less than \$25,000 from Jon and Karen Halgren, in violation of A.R.S. §§ 13-1801, 13-1802, 13-701, 13-702, and 13-801.

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


SHEILA A. MADDEN
Assistant Attorney General

Dated: 10-18-2016


Foreperson of the State Grand Jury

#5322948v1