

MARK BRNOVICH
Attorney General
Firm Bar No. 14000

Mary Harriss
State Bar No. 014462
Assistant Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926
Telephone 602-542-3881
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.

JULIE KENDALL (001),

Defendant.

Case No:

81 SGJ 108

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNTS 2-5 & 13: COMPUTER
TAMPERING**, a class 3 felony in violation
of A.R.S. §13-2316(A)(1)

**COUNT 6: VIOLATION OF DUTIES OF
A CUSTODIAN OF PUBLIC MONIES**, a
class 5 felony in violation of A.R.S. §35-
301(1)

COUNT 7 & 12: THEFT, a class 3 felony
in violation of A.R.S. §13-1802

**COUNTS 8-11: AID IN PREPARING A
FALSE TAX DOCUMENT**, a class 5
felony in violation of A.R.S. §42-1127(B)(2)

The Arizona State Grand Jury accuses **JULIE KENDALL**, charging on this 24th day of July, 2017, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 19, 2012 and January 2, 2016, Defendant, **JULIE KENDALL**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Phoenix Union High School District, the Arizona Department of Revenue and the Internal Revenue Service by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 2

COMPUTER TAMPERING

On or about December 19, 2012, **JULIE KENDALL**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 3

COMPUTER TAMPERING

On or about January 10, 2014, **JULIE KENDALL**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 4

COMPUTER TAMPERING

On or about November 24, 2014, **JULIE KENDALL**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 5

COMPUTER TAMPERING

On or about November 30, 2015, **JULIE KENDALL**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 6

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or about December 18, 2015, **JULIE KENDALL**, a public officer or other person charged with the receipt, safekeeping, transfer or disbursement of public money who, without authority of law, appropriates it, or any portion thereof, to her own use, or the use of another in violation of A.R.S. §§ 35-301(1), 35-302, 13-701, 13-702, 13-801, and 13-811.

COUNT 7

THEFT

On or about December 18, 2015, **JULIE KENDALL**, without lawful authority, knowingly obtained property with a value of a \$8,400 from Phoenix Union High School District by means of any material misrepresentation with the intent to deprive Phoenix Union High School District of such property in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 8

AID IN PREPARING A FALSE TAX DOCUMENT

On or about December 19, 2012, **JULIE KENDALL**, 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), 13-701, 13-702, 13-801, and 13-811.

COUNT 9

AID IN PREPARING A FALSE TAX DOCUMENT

On or about January 10, 2014, **JULIE KENDALL**, 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), 13-701, 13-702, 13-801, and 13-811.

COUNT 10

AID IN PREPARING A FALSE TAX DOCUMENT

On or about November 24, 2014, **JULIE KENDALL**, 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), 13-701, 13-702, 13-801, and 13-811.

COUNT 11

AID IN PREPARING A FALSE TAX DOCUMENT

On or about November 30, 2015, **JULIE KENDALL**, 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), 13-701, 13-702, 13-801, and 13-811.

COUNT 12

THEFT

On or about December 18, 2015, **JULIE KENDALL**, without lawful authority, knowingly obtained property with a value of a ~~\$8,251~~ ^{#19,716 VII} from the Internal Revenue Service and the Arizona Department of Revenue by means of any material misrepresentation with the intent to deprive Internal Revenue Service and the Arizona Department of Revenue of such property in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 13

COMPUTER TAMPERING


On or about January 2, 2016, **JULIE KENDALL**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

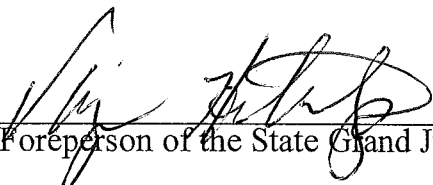
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

A TRUE BILL
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 7/24/2017


Mary Harriss
Assistant Attorney General


Foreperson of the State Grand Jury

#6056295v1