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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.

LEAH ANN CHAVEZ,

Defendant.

Case No: *CR 2017-002426-001 DT*

81 SGJ 10

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: THEFT, a Class 3 Felony, in violation of A.R.S. §13-1802 (A)(1);

COUNTS 2-6: MISUSE OF PUBLIC MONIES, Class 4 Felonies, in violation of A.R.S. §35-301;

COUNTS 7-8: FORGERY, Class 4 Felonies, in violation of A.R.S. §13-2002 (A)(3);

COUNT 9: THEFT, a Class 3 Felony, in violation of A.R.S. §13-1802 (A)(1);

COUNT 10: MISUSE OF PUBLIC MONIES, a Class 4 Felony, in violation of A.R.S. §35-301

The 81st Arizona State Grand Jury accuses **LEAH ANN CHAVEZ**, charging on this 11th day of July, 2017, that in or from Maricopa County, Arizona:

COUNT 1

THEFT

During a period of time beginning on or about July 1, 2016, and ending on or about August 16, 2016, **LEAH ANN CHAVEZ**, without lawful authority, knowingly converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use, said property having a value of more than \$4,000.00 but less than \$25,000.00, in violation of A.R.S. §§13-1802(A)(2), 13-1801, 13-1802(G), 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ** converted for personal use \$8,825.00 in cash belonging to the Town of Pinetop-Lakeside and entrusted to her in her role as Town Clerk.

COUNT 2

MISUSE OF PUBLIC MONIES

On or about July 1, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly appropriate it, or any portion thereof, to her own use, or to the use of another, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$3,000.00 in funds belonging to the Town of Pinetop-Lakeside for her own personal use.

COUNT 3

MISUSE OF PUBLIC MONIES

On or about July 25, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly appropriate it, or any portion thereof, to her own use, or to the use of another, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$1,800.00 in funds belonging to the Town of Pinetop-Lakeside for her own personal use.

COUNT 4

MISUSE OF PUBLIC MONIES

On or about August 8, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly appropriate it, or any portion thereof, to her own use, or to the use of another, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$1,975.00 in funds belonging to the Town of Pinetop-Lakeside for her own personal use.

COUNT 5

MISUSE OF PUBLIC MONIES

On or about August 12, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly appropriate it, or any portion thereof, to her own use, or to the use of another, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$1,250.00 in funds belonging to the Town of Pinetop-Lakeside for her own personal use.

COUNT 6

MISUSE OF PUBLIC MONIES

On or about August 12, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly appropriate it, or any portion thereof, to her own use, or to the use of another, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$800.00 in funds belonging to the Town of Pinetop-Lakeside for her own personal use.

COUNT 7

FORGERY

On or about August 22, 2016, **LEAH ANN CHAVEZ**, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ** falsified disconnect notices from Arizona Water Company.

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COUNT 8

FORGERY

On or about August 22, 2016, **LEAH ANN CHAVEZ**, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ** submitted falsified disconnect notices from Arizona Water Company to Kevin Rodolph, Finance Director for the Town of Pinetop-Lakeside.

COUNT 9

THEFT

During a period of time beginning on or about April 25, 2016, and ending on or about September 7, 2016, **LEAH ANN CHAVEZ**, without lawful authority, knowingly converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use, said property having a value of more than \$4,000.00 but less than \$25,000.00, in violation of A.R.S. §§13-1802(A)(2), 13-1801, 13-1802(G), 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ** converted her for personal use approximately \$16,482.66 using a credit card belonging to the Town of Pinetop-Lakeside and entrusted to her in her role as Town Clerk.

COUNT 10

MISUSE OF PUBLIC MONIES

On or about August 16, 2016, **LEAH ANN CHAVEZ**, a person charged with the receipt, safekeeping, transfer or disbursement of public money, without authority of law, did knowingly

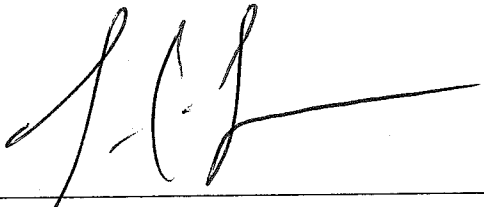
transfer money when not authorized or directed by law, in violation of A.R.S. §§35-301(1), 35-302, 13-701, 13-702 and 13-801.

Said conduct occurred when **LEAH ANN CHAVEZ**, the Town Clerk of Pinetop-Lakeside, knowingly withdrew \$9,940.00 in funds belonging to the Town of Pinetop-Lakeside to pay for personal purchases she had made on a credit card belonging to the Town of Pinetop-Lakeside.

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

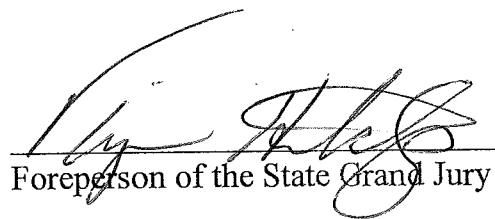
A TRUE BILL
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



TODD C. LAWSON
Assistant Attorney General
#5928004v1

Dated: 7/11/2017



Foreperson of the State Grand Jury