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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.

**DAYLON GAMELE PIERCE AKA  
DAYLON JUNG (001),**  
(Counts 3, 4, and 5)

and

**JASON W. SIEBERT-THOMAS (002),**  
(All counts)

Defendants.

Case No: **CR2017-102122**

**80 SGJ 77**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNTS 1 and 4: FRAUDULENT  
SCHEMES AND ARTIFICES, Class 2  
Felonies, in violation of A.R.S. § 13-2310;**

**COUNTS 2, 5, 6, 9, and 12:  
AGGRAVATED TAKING THE  
IDENTITY OF ANOTHER PERSON  
OR ENTITY, Class 3 Felonies, in violation  
of A.R.S. § 13-2009;**

**COUNT 3: CONSPIRACY, Class 2  
Felony, in violation of A.R.S. §13-1003;**

**COUNTS 7, 8, 10 and 11: TAKING THE  
IDENTITY OF ANOTHER PERSON OR  
ENTITY, Class 4 Felonies, in violation of  
A.R.S. §13-2008;**

**COUNT 13: FORGERY, a Class 4 Felony,  
in violation of A.R.S. § 13-2002;**

**COUNT 14: FAILURE TO UPDATE  
REGISTRATION AS A SEX  
OFFENDER**, a Class 4 Felony, in violation  
of A.R.S. 13-3824, 13-3822.

The Arizona State Grand Jury accuses **DAYLON GAMELE PIERCE AKA DAYLON JUNG (001) and JASON W. SIEBERT-THOMAS (002)**, charging on this 23<sup>rd</sup> day of January, 2017 that in or from Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between August 5, 2016 and January 12, 2017, **JASON W. SIEBERT-THOMAS (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: credit cards, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, and 13-801.

**COUNT 2**

**AGGRAVATED TAKING THE INDENTITY OF ANOTHER PERSON OR  
ENTITY**

On or between August 31, 2016 and September 2, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowing took, purchased, manufactured, recorded, possessed or used any person identifying information or entity identifying information of AUSTIN DAVIS, without consent of AUSTIN DAVIS OR HIS ESTATE, with the intent to obtain or use AUSTIN DAVIS' identity for any unlawful purpose or to cause loss to AUSTIN DAVIS, and causes AUSTIN DAVIS OR HIS ESTATEE to suffer an economic loss of \$1,000 or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

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**COUNT 3**  
**CONSPIRACY**

On or between September 22, 2016 and September 26, 2016, **DAYLON GAMELE PIERCE AKA DAYLON JUNG (001) and JASON W. SIEBERT-THOMAS (002)**, conspired to commit: Fraudulent Schemes and Artifices; Aggravated Taking the Identity of Another Person or Entity; and Receipt of Anything of Value Obtained by Fraudulent Use of a Credit Card, in violation of A.R.S. §§13-1003, 13-2310, 13-2009, 13-2103, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

Said offense occurred when on or between September 22, 2016 and September 26, 2016, **DAYLON GAMELE PIERCE AKA DAYLON JUNG (001) and JASON W. SIEBERT-THOMAS (002)** with the intent to promote or aid the commission of an offense, to wit: Fraudulent Schemes and Artifices; Aggravated Taking the Identity of Another Person or Entity; and Receipt of Anything of Value Obtained by Fraudulent Use of a Credit Card, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense, and one of the persons committed an overt act in furtherance of the conspiracy to wit: furnished a credit card in the name of PATRICK MCDUFFEE to Brittany Eaton to be used at the Sanctuary Resort and Spa in Paradise Valley, Arizona, in violation of A.R.S. §§ 13-1003, 13-2310, 13-2009, 13-2103, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

**COUNT 4**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between September 22, 2016 and September 26, 2016, **DAYLON GAMELE PIERCE AKA DAYLON JUNG (001) and JASON W. SIEBERT-THOMAS (002)**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit from the SANCTUARY RESORT AND SPA, Paradise Valley, Arizona, by means of fraudulent pretenses,

representations, promises or material omissions, in violation of A.R.S. §§13-2310(A), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 5**

**AGGRAVATED TAKING THE INDENTITY OF ANOTHER PERSON OR ENTITY**

On or between September 22, 2016 and September 26, 2016, **DAYLON GAMELE PIERCE AKA DAYLON JUNG (001) and JASON W. SIEBERT-THOMAS (002)**, knowing took, purchased, manufactured, recorded, possessed or used any person identifying information or entity identifying information of PATRICK MCDUFFEE, without consent of PATRICK MCDUFFEE OR HIS ESTATE, with the intent to obtain or use PATRICK MCDUFFEE'S identity for any unlawful purpose or to cause loss to PATRICK MCDUFFEE, and causes PATRICK MCDUFFEE OR HIS ESTATE to suffer an economic loss of \$1,000 or more, in violation of A.R.S. §§ 13-2008, 13-2001, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 6**

**AGGRAVATED TAKING THE INDENTITY OF ANOTHER PERSON OR ENTITY**

On or between October 8, 2016 and October 11, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowing took, purchased, manufactured, recorded, possessed or used any person identifying information or entity identifying information of MICHAEL KENDALL, without consent of MICHAEL KENDALL OR HIS ESTATE, with the intent to obtain or use MICHAEL KENDALL'S identity for any unlawful purpose or to cause loss to MICHAEL KENDALL, and causes MICHAEL KENDAL OR HIS ESTATE to suffer an economic loss of \$1,000 or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 7**

**TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY**

On or between November 12, 2016 and November 13, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of MARY MCCLASKEY, without consent of MARY MCCLASKEY OR HER ESTATE, with the intent to obtain or use MARY MCCLASKEY'S identity for any unlawful purpose or to cause loss to MARY MCCLASKEY OR HER ESTATE, in violation of A.R.S. §§13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 8**

**TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY**

On or about November 18, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of DONALD QUINN, without consent of DONALD QUINN OR HIS ESTATE, with the intent to obtain or use DONALD QUINN'S identity for any unlawful purpose or to cause loss to DONALD QUINN OR HIS ESTATE, in violation of A.R.S. §§13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 9**

**AGGRAVATED TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY**

On or between December 2, 2016 and January 12, 2017, **JASON W. SIEBERT-THOMAS (002)**, knowing took, purchased, manufactured, recorded, possessed or used any person identifying information or entity identifying information of MARYLOU SHADIACK, without consent of MARYLOU SHADIACK OR HER ESTATE, with the intent to obtain or use MARYLOU SHADIACK identity for any unlawful purpose or to cause loss to MARYLOU

SHADIACK, and causes MARYLOU SHADIACK OR HER ESTATE to suffer an economic loss of \$1,000 or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 10**

**TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY**

On or about December 20, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of GUILLERMO DURON, without consent of GUILLERMO DURON OR HIS ESTATE, with the intent to obtain or use GUILLERMO DURON'S identity for any unlawful purpose or to cause loss to GUILLERMO DURON OR HIS ESTATE, in violation of A.R.S. §§13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 11**

**TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY**

On or about December 19, 2016 and December 20, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of HEMSLEY AND FLORITA LEE, without consent of HEMSLEY AND FLORITA LEE, with the intent to obtain or use HEMSLEY AND FLORITA LEE'S identity for any unlawful purpose or to cause loss to HEMSLEY AND FLORITA LEE'S, in violation of A.R.S. §§13-2008, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 12**

**AGGRAVATED TAKING THE INDENTITY OF ANOTHER PERSON OR ENTITY**

On or between August 31, 2016 and September 2, 2016, **JASON W. SIEBERT-THOMAS (002)**, knowing took, purchased, manufactured, recorded, possessed or used any

person identifying information or entity identifying information of AUSTIN DAVIS, without consent of AUSTIN DAVIS OR HIS ESTATE, with the intent to obtain or use AUSTIN DAVIS' identity for any unlawful purpose or to cause loss to AUSTIN DAVIS, and causes AUSTIN DAVIS OR HIS ESTATE to suffer an economic loss of \$1,000 or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 13**

**FORGERY**

On or about January 12, 2017, **JASON W. SIEBERT-THOMAS (002)**, with intent to defraud, knowingly possessed a forged instrument, to wit: counterfeit U.S. currency, in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702, and 13-801.

**COUNT 14**

**FAILURE TO UPDATE REGISTRATION AS A SEX OFFENDER**

On or between August 5, 2016 and January 12, 2017, **JASON W. SIEBERT-THOMAS (002)**, being a person required to register as a sex offender, failed to inform the sheriff of a change of residence, address or new name, within seventy-two hours, in violation of A.R.S. §§ 13-3824, 13-3822, 13-701, 13-702, and 13-801.

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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*

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(A "True Bill")

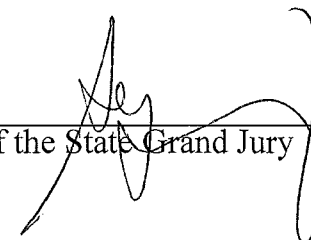
MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: Jan 23, 2017



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SCOTT W. BLAKE  
Assistant Attorney General

#5572105

  
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Foreperson of the State Grand Jury