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Attorneys for Plaintiff

SIS-2018-0060 – Office of the Attorney General  
Agua Fria Justice Court

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
COUNTY OF MARICOPA**

**STATE OF ARIZONA,**

Plaintiff,

v.

**DANIEL K. HUGHES,**

Defendant.

Case No: 2018-006754-001

**DIRECT COMPLAINT**

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY**, a Class 2  
Felony in violation of A.R.S. § 13-1003

**COUNT 2: THEFT**, a Class 2 Felony in  
violation of A.R.S. § 13-1802

The complainant herein personally appears and, being duly sworn, complains on information and belief against **DANIEL K. HUGHES**, charging that in Maricopa County, Arizona:

**COUNT 1:**  
**CONSPIRACY**

On or between August 1, 2016 and January 30, 2018, **DANIEL K. HUGHES**, with intent to promote or aid the commission of an offense, agreed with one or more persons that at least one of them or another person will engage in conduct constituting an offense included but not limited to Fraudulent Schemes and Artifices, a class 2 felony, and Theft, as a class 2 felony, and one of the parties committed an overt act in furtherance of an offense, included but not limited to Fraudulent Schemes and Artifices, a class 2 felony, and Theft, as a class 2 felony, in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

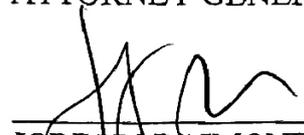
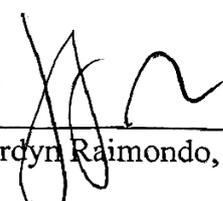
To Wit: **DANIEL K. HUGHES** agreed with other school officials and employees of the Bradley Academy of Excellence to create false student profiles and student information and to submit said profiles and information to the State of Arizona/Arizona Department of Education, the United States Department of Agriculture, and the United States Department of Education to fraudulently increase Bradley Academy funding.

**COUNT 2:**  
**THEFT**

On or between August 1, 2016 and January 30, 2018, **DANIEL K. HUGHES**, without lawful authority, knowingly obtained services or property of another by means of any material misrepresentation with the intent to deprive the other person of such property or services in an amount of \$25,000 or more, in violation of A.R.S. §§ 13-

1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702  
and 13-801.

MARK BRNOVICH  
ATTORNEY GENERAL

  
\_\_\_\_\_  
JORDYN RAIMONDO  
Assistant Attorney General  
Criminal Division  
\_\_\_\_\_  
Jordyn Raimondo, COMPLAINANT

AGENCY: AGO- Fraud & Special Prosecution

SUBSCRIBED AND SWORN upon information and belief this 7<sup>th</sup> day of NOVEMBER, 2018.

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