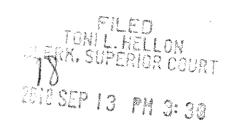
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#### MARK BRNOVICH

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CR20183972-001

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Attorneys for Plaintiff

### IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

#### IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

STEVE LESLIE MARSHALL, JR. (001),

V.

Defendant.

Case No:

277-GJ-1700

DIRECT INDICTMENT

**CHARGING VIOLATIONS OF:** 

**COUNTS 1 & 3: FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310.

**COUNT 2: THEFT**, a Class 3 Felony, in violation of A.R.S. § 13-1802.

**COUNTS 4 & 5: THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802.

**COUNTS 6, 7 & 8: FORGERY**, a Class 4 Felony, in violation of A.R.S. § 13-2002.

The Arizona State Grand Jury accuses **STEVE LESLIE MARSHALL**, **JR.** (001), charging on this 13<sup>th</sup> day of September, 2018 that in or from Pima County, Arizona:

# <u>COUNT ONE</u> FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

Between February 1, 2016 and February 27, 2017, STEVE LESLIE MARSHALL, JR. (001), pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Marana Broncos Youth Football organization by the means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. § 13-2310, 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

### COUNT TWO THEFT, A CLASS 3 FELONY

Between February 1, 2016 and February 27, 2017, STEVE LESLIE MARSHALL, JR. (001), knowingly converted for an unauthorized term or use services or property of another entrusted to him or placed in his possession for a limited, authorized term or use with a value of four thousand dollars or more but less than twenty-five thousand dollars, to wit: conducting unauthorized debit card transactions in the Marana Broncos bank account, in violation of A.R.S. §§ 13-1802(A)(2), 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

# COUNT THREE FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

Between March 12, 2014 and March 9, 2017, STEVE LESLIE MARSHALL, JR. (001), pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Marana Broncos Youth Football organization by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

# COUNT FOUR THEFT, A CLASS 2 FELONY

Between January 1, 2014 and December 31, 2014, STEVE LESLIE MARSHALL, JR. (001), knowingly converted for an unauthorized term or use services or property of another entrusted to him or placed in his possession for a limited, authorized term or use with a value of greater than twenty-five thousand dollars, to wit: by passing single signature checks, in violation of A.R.S. §§ 13-1802(A)(2), 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

#### COUNT FIVE THEFT, A CLASS 2 FELONY

Between January 1, 2015 and January 31, 2016, STEVE LESLIE MARSHALL, JR. (001), knowingly converted for an unauthorized term or use services or property of another entrusted to him or placed in his possession for a limited, authorized term or use with a value of greater than twenty-five thousand dollars, to wit: by passing single signature checks, in violation of A.R.S. §§ 13-1802(A)(2), 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

# COUNT SIX FORGERY, A CLASS 4 FELONY

On or about January 1, 2014 through December 31, 2014, STEVE LESLIE MARSHALL, JR. (001), with intent to defraud the Marana Broncos Youth Football organization and/or the Internal Revenue Service, falsely made, completed or altered a written instrument and/or knowingly possessed a forged instrument, in violation of A.R.S. §§ 13-2002, 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

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### COUNT SEVEN FORGERY, A CLASS 4 FELONY

On or about January 1, 2015 through December 31, 2015, STEVE LESLIE MARSHALL, JR. (001), with intent to defraud the Marana Broncos Youth Football organization and/or the Internal Revenue Service, falsely made, completed or altered a written instrument and/or knowingly possessed a forged instrument, in violation of A.R.S. §§ 13-2002, 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

### COUNT EIGHT FORGERY, A CLASS 4 FELONY

On or about January 1, 2016 through December 31, 2016, STEVE LESLIE MARSHALL, JR. (001), with intent to defraud the Marana Broncos Youth Football organization and/or the Internal Revenue Service, falsely made, completed or altered a written instrument and/or knowingly possessed a forged instrument, in violation of A.R.S. §§ 13-2002, 13-301, 13-302, 13-303, 13-601, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-811.

MARK BRNOVICH ATTORNEY GENERAL

By:

Jared Kreamer-Hope Assistant Attorney General

Dated:

9/13/18

A True Bill

(A "True Bill")

Foreperson of the Grand Jury

PHX-#7129037