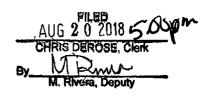
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Attorneys for Plaintiff



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

#### IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff.

v.

JON RICHARD RATTRAY,

Defendant.

Case No: CR2018-140431-001

83 SGJ 73

**INDICTMENT** 

**CHARGING VIOLATIONS OF:** 

**COUNT 1: FRAUD SCHEMES & ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310;

**COUNT 2: MONEY LAUNDERING,** a Class 2 Felony, in violation of A.R.S. 13-2317;

**COUNT 3: ILLEGALLY CONDUCTING AN ENTERPRISE**, a Class 3 Felony, in violation of A.R.S. § 13-2312;

**COUNT 4: AGGRAVATED IDENTITY THEFT**, a Class 3 Felony, in violation of A.R.S.§ 13-2009;

COUNTS 5 - 19: FORGERY, Class 4 Felonies, in violation of A.R.S. § 13-2002;

The Arizona State Grand Jury accuses, **JON RICHARD RATTRAY**, charging on this 20th day of August, 2018, that in or from Maricopa County, Arizona:

#### COUNT 1 FRAUD SCHEMES & ARTIFICES

On or between August 1, 2014 and March 1, 2018, **JON RICHARD RATTRAY**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses representations, promises or material omissions. A.R.S. §§ 13-2310; 13-2301; 13-701; 13-702; 13-801.

The value of the benefit involved in this count exceeds \$100,000. A.R.S. §§ 13-2310.

### COUNT 2 MONEY LAUNDERING

On or between August 1, 2014 and March 1, 2018, **JON RICHARD RATTRAY**, knowingly initiated, organized, planned, financed, directed, managed, supervised or was in the business of money laundering and acquired or maintained an interest in, transacted, transferred transported, or received racketeering proceeds knowing or having reason to know that they are the proceeds of an offense. A.R.S. §§ 13-2317; 13-2301; 13-701; 13-702; 13-801.

# COUNT 3 ILLEGALLY CONDUCTING AN ENTERPRISE

On or between August 1, 2014 and March 1, 2018, JON RICHARD RATTRAY, knowingly associated with an enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that JON

**RICHARD RATTRAY** knew was being conducted through racketeering. A.R.S. §§13-2312; 13-2301; 13-701; 13-702; 13-801.

# COUNT 4 AGGRAVATED IDENTITY THEFT

On or between August 1, 2014 and March 1, 2018, **JON RICHARD RATTRAY**, knowingly took, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of three or more persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities. A.R.S. §§13-2009; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 5 FORGERY

On approximately February 8, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160079822. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 6 FORGERY

On approximately February 8, 2016, **JON RICHARD RATTRAY**, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160079823. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

## COUNT 7 FORGERY

On approximately February 8, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160079824. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 8 FORGERY

On approximately February 8, 2016, **JON RICHARD RATTRAY**, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160079825. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 9 FORGERY

On approximately March 16, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160167543. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 10 FORGERY

On approximately March 16, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or

not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160167548. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 11 FORGERY

On approximately March 16, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160167545. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 12 FORGERY

On approximately March 16, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160167546. A.R.S. §§ 13-2002; 13-2001, 13-701; 13-702; 13-801.

## **COUNT 13 FORGERY**

On approximately March 16, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160167547. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 14 FORGERY

On approximately March 28, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160197359. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

## FORGERY

On approximately March 28, 2016, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160197360. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

## FORGERY

On approximately September 16, 2016, **JON RICHARD RATTRAY**, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20160674518. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

## **COUNT 17 FORGERY**

On approximately November 7, 2017, JON RICHARD RATTRAY, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or

not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20170828086. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 18 FORGERY

On approximately November 22, 2017, **JON RICHARD RATTRAY**, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20170872072. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 19 FORGERY

On approximately November 22, 2017, **JON RICHARD RATTRAY**, with the intent to defraud, knowingly possessed a forged instrument OR offered or presented, whether accepted or not, a forged instrument or one that contains false information. This Count relates to conduct in connection with Maricopa County Recorder's Office Recording Number #20170872045. A.R.S. §§ 13-2002; 13-2001; 13-701; 13-702; 13-801.

#### COUNT 20 COMPUTER TAMPERING

On approximately November 7, 2017, **JON RICHARD RATTRAY**, acted without authority or exceeded the authority of use by accessing or altering any computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises. A.R.S. §§ 13-2316; 13-2301; 13-701; 13-702; 13-801.

### COUNT 21 COMPUTER TAMPERING

On approximately November 22, 2017, **JON RICHARD RATTRAY**, acted without authority or exceeded the authority of use by accessing or altering any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises. A.R.S. §§ 13-2316; 13-2301; 13-701; 13-702; 13-801.

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")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated:

Margaet &

ADAM J SCHWARTZ
Assistant Attorney General

#7246786