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# IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff,

v.

LAURA TENISON SMITH,

Defendant.

Case No:

82 SGJ 266

**INDICTMENT** 

CHARGING VIOLATIONS OF:

COUNTS 1-2: FRAUDULENT SCHEMES AND PRACTICES, Class 5 Felonies, in violation of A.R.S. § 13-2310

COUNTS 3-11: CONFLICT OF INTEREST, Class 6 Felonies, in violation of A.R.S. § 38-503

The Arizona State Grand Jury accuses, LAURA TENISON SMITH, charging on this XX<sup>th</sup> day of April, 2018, that in or from Maricopa County, Arizona:

#### COUNT 1 FRAUDULENT SCHEMES AND PRACTICES

On or about February 24, 2017, LAURA TENISON SMITH, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or

device or made or used any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement or entry, in violation of A.R.S. §§13-2311, 13-701, 13-702 and 13-801.

#### COUNT 2 FRAUDULENT SCHEMES AND PRACTICES

On or about May 3, 2017, **LAURA TENISON SMITH**, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or used any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement or entry, in violation of A.R.S. §§13-2311, 13-701, 13-702 and 13-801.

### COUNT 3 CONFLICT OF INTEREST

On or about March 30, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1703885, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

### COUNT 4 CONFLICT OF INTEREST

On or about April 13, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest

in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1704291, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

#### COUNT 5 CONFLICT OF INTEREST

On or about May 16, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1704119, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

### COUNT 6 CONFLICT OF INTEREST

On or about May 16, 2017, **LAURA TENISON SMITH**, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1704291, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

### COUNT 7 CONFLICT OF INTEREST

On or between May 16, 2017 and May 25, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a

substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1704841, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

# COUNT 8 CONFLICT OF INTEREST

On or about September 15, 2017, **LAURA TENISON SMITH**, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1801951, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

# CONFLICT OF INTEREST

On or about September 28, 2017, **LAURA TENISON SMITH**, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1802155, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

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#### COUNT 10 CONFLICT OF INTEREST

On or about October 4, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1802327, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

#### COUNT 11 CONFLICT OF INTEREST

On or about October 30, 2017, LAURA TENISON SMITH, a public officer or employee of a public agency, knowingly had, or whose relative had, a substantial interest in any decision of a public agency failed to make known such interest in the official records of such public agency and failed to refrain from participating in any manner as an officer or employee in such decision, to wit: Purchase Order #1802529, in violation of A.R.S. §§38-503, 38-502, 38-510, 13-701, 13-702, 13-703, 13-801, and 13-811.

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

JOSEPH W. WATERS Assistant Attorney General

Foreperson of the State Grand Jury