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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PINAL**

STATE OF ARIZONA,

Plaintiff,

v.

**AMANDA DAWN HOLCOMB aka
AMANDA DAWN KELLEY (001),**

Defendant.

Case No:

86 SGJ 29

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1 & 17: FRAUDULENT
SCHEMES AND ARTIFICES**, a class 2
felony in violation of A.R.S. §13-2310

COUNTS 2 & 18: THEFT, a class 3 felony
in violation of A.R.S. §13-1802

**COUNTS 3-15: COMPUTER
TAMPERING**, a class 3 felony in violation
of A.R.S. §13-2316

**COUNTS 16 & 19: VIOLATION OF
DUTIES OF A CUSTODIAN OF PUBLIC
MONIES**, a class 4 felony in violation of
A.R.S. §35-301

COUNTS 20 & 21: THEFT, a class 1
misdemeanor in violation of A.R.S. §13-
1802

The Arizona State Grand Jury accuses **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY**, charging on this 25th day of November 2019, that in or from Pinal County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between October 1, 2015 and November 27, 2017, Defendant, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Ray Unified School District by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-811.

To Wit: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** used her position to issue unauthorized Ray Unified School District checks to herself and conceal the issuance of those checks.

Between
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COUNT 2

THEFT

On or October 1, 2015 and November 27, 2017, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without lawful authority, knowingly obtained property with a value of \$4,000 or more but less than twenty-five thousand dollars from Ray Unified School District by means of any material misrepresentation with the intent to deprive Ray Unified School District of such property in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 3

COMPUTER TAMPERING

On or about October 1, 2015, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute

any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 024003.

COUNT 4

COMPUTER TAMPERING

On or about November 12, 2015, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 003645.

COUNT 5

COMPUTER TAMPERING

On or about November 12, 2015, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 003646.

COUNT 6

COMPUTER TAMPERING

On or about May 11, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003719.

COUNT 7

COMPUTER TAMPERING

On or about May 24, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003726.

COUNT 8

COMPUTER TAMPERING

On or about July 25, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or

fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 003737.

COUNT 9

COMPUTER TAMPERING

On or about July 25, 2106, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 003738.

COUNT 10

COMPUTER TAMPERING

On or about August 4, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**
falsified the transaction description for check number 003743.

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COUNT 11

COMPUTER TAMPERING

On or about September 12, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003752.

COUNT 12

COMPUTER TAMPERING

On or about November 8, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003765.

COUNT 13

COMPUTER TAMPERING

On or about June 6, 2017, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or

fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003825.

COUNT 14

COMPUTER TAMPERING

On or about August 14, 2017, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003843.

COUNT 15

COMPUTER TAMPERING

On or about November 27, 2017, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without authority or exceeding authorization of use accessed, altered, damaged or destroyed any computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or control property or services by means of false or fraudulent pretenses, representation or promises, in violation of A.R.S. §§ 13-2316(A)(1), 13-301, 13-302, 13-303, 13-304, 13-2301, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** falsified the transaction description for check number 003864.

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COUNT 16

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between October 1, 2015 and November 27, 2017, Defendant, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, a public officer or other person charged with the receipt, safekeeping, transfer or disbursement of public money who, without authority of law, appropriates it, or any portion thereof, to her own use, or the use of another in violation of A.R.S. §§ 35-301(1), 35-302, 13-701, 13-702, 13-801, and 13-811.

COUNT 17

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 21, 2015 and January 9, 2018, Defendant, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Ray Unified School District by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-801, and 13-811.

To Wit: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** used her position to conceal her diverting of checks issued to the Ray Unified School District for personal use.

COUNT 18

THEFT

On or between July 21, 2015 and January 9, 2018, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without lawful authority, knowingly controlled property of Ray Unified School District valued at \$4,000 or more but less than twenty-five thousand dollars with the intent to deprive Ray Unified School District of such property in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

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COUNT 19

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between July 21, 2015 and January 9, 2018, Defendant, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, a public officer or other person charged with the receipt, safekeeping, transfer or disbursement of public money who, without authority of law, appropriates it, or any portion thereof, to her own use, or the use of another in violation of A.R.S. §§ 35-301(1), 35-302, 13-701, 13-702, 13-801, and 13-811.

COUNT 20

THEFT

On or about October 26, 2015, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without lawful authority, knowingly controlled the property of American Youth Soccer Organization with the intent to deprive American Youth Soccer Organization of such property valued at less than \$1,000 in violation of A.R.S. §§13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, and 13-811.

To Wit: **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)** deposited a check issued by ACE Pipe Cleaning to the American Youth Soccer Organization into an account she controlled.

COUNT 21

THEFT

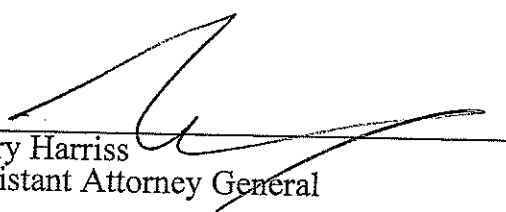
On or about September 27, 2016, **AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)**, without lawful authority, knowingly controlled the property of American Youth Soccer Organization with the intent to deprive American Youth Soccer Organization of such property valued at less than \$1,000 in violation of A.R.S. §§13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, and 13-811.

To Wit: AMANDA DAWN HOLCOMB aka AMANDA DAWN KELLEY (001)
deposited a check issued by Arizona Elks Major Projects, Inc. to the American Youth Soccer
Organization into an account she controlled.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described
above were committed in Pinal County, Arizona.

A True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA


Mary Harriss
Assistant Attorney General

#8296202

Dated: 11/25/2019


Foreperson of the State Grand Jury