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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

**TODD COLSTON WHITTARD,**  
Defendant

Case No **CR2019-005060-001**

**INDICTMENT**

**748 GJ 586**

**CHARGING VIOLATIONS OF**

**COUNT 1; FRAUDULENT SCHEMES & ARTIFICES**, a Class 2 Felony, in violation of A R S §§ 13-2310, 13-2301

**COUNT 2; THEFT**, a Class 1 misdemeanor, in violation of A R S §§ 13-1802, 13-1801

**COUNT 3; ATTEMPT TO COMMIT THEFT**, a Class 2 Misdemeanor, in violation of A R S §§ 13-1802, 13-1801, 13-1001

The County Grand Jury of Maricopa County accuses **TODD COLSTON WHITTARD**, on this 14<sup>th</sup> day of May, 2019, charging that in or from Maricopa County, Arizona

**COUNT 1; FRAUDULENT SCHEMES & ARTIFICES**

On or between January 17, 2019 and April 29, 2019, **TODD COLSTON WHITTARD**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the Arizona Department of Public Safety, 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 and 13-801

**COUNT 2; THEFT**

On or about April 29, 2019, **TODD COLSTON WHITTARD**, without lawful authority, 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, in violation of A R S §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801

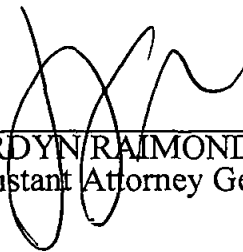
**COUNT 3; ATTEMPT TO COMMIT THEFT**

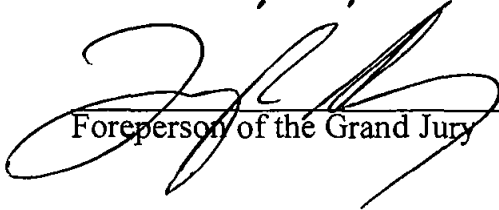
On or about April 29, 2019, **TODD COLSTON WHITTARD**, without lawful authority, attempted to knowingly convert for an unauthorized term or use services or property of another entrusted to him or placed in his possession for a limited authorized term or use, in violation of A R S §§ 13-1802, 13-1801, 13-1001, 13-701, 13-702 and 13-801

A TRUE BILL  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated 5/14/2019

  
\_\_\_\_\_  
JORDYN RAIMONDO  
Assistant Attorney General

  
\_\_\_\_\_  
Foreperson of the Grand Jury

PHX#7860976v1