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

STATE OF ARIZONA,

Plaintiff,

v.

CELESTIA ZIEMKOWSKI (001),

Defendant.

Case No:

85 SGJ 68

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNT 2: VIOLATION OF DUTIES OF
A CUSTODIAN OF PUBLIC MONIES**, a
class 4 felony in violation of A.R.S. §35-301

COUNTS 3, 8, 10, 18: THEFT, a class 3
felony in violation of A.R.S. §13-1802

COUNTS 4, 5, 6: FORGERY, a class 4
felony in violation of A.R.S. §13-2002,

**COUNT 7, 12, 15: FRAUDULENT
SCHEMES AND PRACTICES**, a class 5
felony in violation of A.R.S. §13-2311

COUNT 13: THEFT, a class 4 felony in
violation of A.R.S. §13-1802

COUNTS 9, 11, 14, 17, 19: COMPUTER

TAMPERING, a class 4 felony in violation of A.R.S. §13-2316

COUNT 16: THEFT, a class 6 felony in violation of A.R.S. §13-1802

The Arizona State Grand Jury accuses **CELESTIA ZIEMKOWSKI**, charging on this day of June 2006 that in or from Yavapai County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between June 9, 2015; and March 31, 2016, Defendant, **CELESTIA ZIEMKOWSKI**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the **Valley Academy For Career and Technical Education** 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.

COUNT 2

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between June 9, 2015, and March 31, 2016, **CELESTIA ZIEMKOWSKI**, 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 3

THEFT

On or between June 9, 2015, and February 11, 2016, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$4,000 or more but less than twenty-five thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley**

Academy For Career and Technical Education 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 4

FORGERY

On or between January 1, 2016, and January 31, 2016, **CELESTIA ZIEMKOWSKI**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contained false information, TO WIT: December 2015 **Valley Academy For Career and Technical Education** credit card statement ending 0166, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, 13-801, and 13-811.

COUNT 5

FORGERY

On or between March 1, 2016, and March 31, 2016, **CELESTIA ZIEMKOWSKI**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contained false information, TO WIT: January 2016 **Valley Academy For Career and Technical Education** credit card statement ending 0166 listing Tag Pest/Ben Bukowski as holder, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, 13-801, and 13-811.

COUNT 6

FORGERY

On or between March 1, 2016, and March 31, 2016, **CELESTIA ZIEMKOWSKI**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contained false information, TO WIT: January 2016 **Valley Academy For Career and Technical Education** credit card statement ending 0166, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, 13-801, and 13-811.

COUNT 7

FRAUDULENT SCHEMES AND PRACTICES

On or about July 19, 2015, **CELESTIA ZIEMKOWSKI**, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, any person who, pursuant to a scheme or artifice to defraud or deceive, knowingly falsifies, conceals or covers up a material fact by any trick, scheme or device or makes or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement or entry, TO WIT: Voucher 7000, in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 8

THEFT

On or about July 20, 2015, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$4,000 or more but less than twenty-five thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley Academy For Career and Technical Education** of such property, TO WIT: warrant number 531894, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 9

COMPUTER TAMPERING

On or about July 19, 2015, **CELESTIA ZIEMKOWSKI**, 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, TO WIT: **CELESTIA ZIEMKOWSKI** changed the payee for warrant number 531894, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 10

THEFT

On or about July 20, 2015, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$4,000 or more but less than twenty-five thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley Academy For Career and Technical Education** of such property, TO WIT: warrant number 531897, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 11

COMPUTER TAMPERING

On or about July 19, 2015, **CELESTIA ZIEMKOWSKI**, 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, TO WIT: **CELESTIA ZIEMKOWSKI** changed the payee for warrant number 531897, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 12

FRAUDULENT SCHEMES AND PRACTICES

On or about July 19, 2015, **CELESTIA ZIEMKOWSKI**, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, any person who, pursuant to a scheme or artifice to defraud or deceive, knowingly

falsifies, conceals or covers up a material fact by any trick, scheme or device or makes or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement or entry, TO WIT: Voucher 8001, in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 13

THEFT

On or about July 20, 2015, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$3,000 or more but less than \$4,000 thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley Academy For Career and Technical Education** of such property, TO WIT: warrant number 531892, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 14

COMPUTER TAMPERING

On or about July 19, 2015, **CELESTIA ZIEMKOWSKI**, 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, TO WIT: **CELESTIA ZIEMKOWSKI** concealed the payee for warrant number 531892, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 15

FRAUDULENT SCHEMES AND PRACTICES

On or about December 22, 2015, **CELESTIA ZIEMKOWSKI**, in any matter related to the business conducted by any department or agency of this state or any political subdivision

thereof, any person who, pursuant to a scheme or artifice to defraud or deceive, knowingly falsifies, conceals or covers up a material fact by any trick, scheme or device or makes or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement or entry, TO WIT: Voucher 8016, in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 16

THEFT

On or about December 22, 2015, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$1,000 or more but less than \$2,000 thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley Academy For Career and Technical Education** of such property, TO WIT: warrant number 552135, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 17

COMPUTER TAMPERING

On or about December 22, 2015, **CELESTIA ZIEMKOWSKI**, 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, TO WIT: **CELESTIA ZIEMKOWSKI** changed the payee for warrant number 552135, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 13-801, and 13-811.

COUNT 18

THEFT

On or about December 22, 2015, **CELESTIA ZIEMKOWSKI**, without lawful authority, knowingly obtained property with a value of \$1,000 or more but less than two thousand dollars from **Valley Academy For Career and Technical Education** by means of any material misrepresentation with the intent to deprive **Valley Academy For Career and Technical Education** of such property, TO WIT: warrant number 552136, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-801, and 13-811.

COUNT 19

COMPUTER TAMPERING


On or about December 22, 2015, **CELESTIA ZIEMKOWSKI**, 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, TO WIT: **CELESTIA ZIEMKOWSKI** changed the payee for warrant number 552136, in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702, 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 Yavapai County, Arizona.

A True Bill

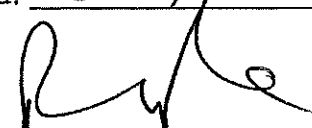
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



Mary Harriss
Assistant Attorney General

Dated: *6-27-19*



Foreperson of the State Grand Jury

#7964785