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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.

**FARHAD KANKASH (001),**

Defendant.

Case No:

**87 SGJ 27**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNTS 1, 3, 5, 7, 9, 11, 13:**  
**FRAUDULENT SCHEMES AND**  
**ARTIFICES**, Class 2 Felonies, in violation  
of A.R.S. § 13-2310

**COUNTS 2 & 4: THEFT**, Class 5 Felonies,  
in violation of A.R.S. § 13-1802 (A)(1)

**COUNTS 6, 12, 14: THEFT**, Class 2  
Felonies, in violation of A.R.S. § 13-1802  
(A)(1)

**COUNTS 8 & 10: THEFT**, Class 3  
Felonies, in violation of A.R.S. § 13-1802  
(A)(1)

The Arizona State Grand Jury accuses **FARHAD KANKASH (001)**, charging on this 14<sup>th</sup> day of September, 2020, that in or from Maricopa County, Arizona:

**COUNT 1**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between April 17, 2018 and March 29, 2019, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

**COUNT 2**  
**THEFT**

On or between April 17, 2018 and March 29, 2019, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money from \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, and \_\_\_\_\_, with an aggregate value of more than \$2,000 but less than \$3,000, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

**COUNT 3**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between May 30, 2018 and October 17, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

...

**COUNT 4**  
**THEFT**

On or between May 30, 2018 and October 17, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from \_\_\_\_\_, with a value of more than \$2,000 but less than \$3,000, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

**COUNT 5**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between October 1, 2018 and October 25, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

**COUNT 6**  
**THEFT**

On or between October 1, 2018 and October 25, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from \_\_\_\_\_ and/or \_\_\_\_\_ with a value of \$25,000 or more in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

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**COUNT 7**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between September 27, 2018 and December 6, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

**COUNT 8**  
**THEFT**

On or between September 27, 2018 and December 6, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from \_\_\_\_\_ with a value of \$4,000 or more but less than \$25,000, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

**COUNT 9**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between August 27, 2018 and December 20, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

**COUNT 10**  
**THEFT**

On or between August 27, 2018 and December 20, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from \_\_\_\_\_

, with a value of \$4,000 or more but less than \$25,000, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

**COUNT 11**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between April 6, 2018 and July 13, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

**COUNT 12**  
**THEFT**

On or between April 6, 2018 and July 13, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from and/or \_\_\_\_\_, with a value of \$25,000 or more in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

**COUNT 13**  
**FRAUDULENT SCHEMES AND ARTIFICES**

On or between July 11, 2018 and December 21, 2018, **FARHAD KANKASH (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, 13-2314.01, 13-811.

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**COUNT 14**  
**THEFT**

On or between July 11, 2018 and December 21, 2018, **FARHAD KANKASH (001)**, without lawful authority, knowingly controlled property of another with the intent to deprive such person of the property TO WIT: money and/or vehicle from \_\_\_\_\_, with a value of \$25,000 or more in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-701, 13-702, 13-801, 13-811, 13-2314.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306.

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: \_\_\_\_\_

\_\_\_\_\_  
SHAWN L. STEINBERG  
Assistant Attorney General

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

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