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Attorney for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v

**BRETT JAMES SMITH aka,
BJ SMITH aka,
BRETT JAMES ZAGORAC aka,
B.J. WILHELM aka,
BRETT WILHELM aka,
BJ THE EDUCATOR aka,
B.J. WILH aka,
BRETT J. WHITE aka,
BRETT ZAGR aka,
B.J. ZAGR aka,
BRETT ZAGOR aka,
B.J. ZAGOR aka,
MR. Z,**

Defendant

Case No **CR 2021-001283-001**

88 SGJ 46

INDICTMENT

**COUNTS 1-2: FORGERY, CLASS 4
FELONIES, in violation of A R S §13-
2002(A)(1)**

**COUNT 3: PERJURY, A CLASS 4
FELONY, in violation of A R S §13-
2702(A)(2)**

**COUNT 4: FRAUDULENT SCHEMES
AND PRACTICES, A CLASS 5
FELONY, in violation of A R S §13-2311**

**COUNTS 5-15: FRAUDULENT
SCHEMES AND ARTIFICES, CLASS 2
FELONIES, in violation of A R S §13-
2310**

The 88th Arizona State Grand Jury accuses **BRETT JAMES SMITH aka BJ SMITH
aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ
THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J.**

ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z, charging on this 5th day of April, 2021, that in or from Maricopa and Pinal Counties, Arizona

COUNT 1

FORGERY

On or about May 13, 2019, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, did, with intent to defraud, falsely make, complete or alter a written instrument, to wit, Application for Name Change filed in Maricopa County Superior Court CV2019-090514, in violation of A R S §§ 13-2002(A)(1), 13-2001, 13-701, 13-702, and 13-801

COUNT 2

FORGERY

On or about May 13, 2019, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, did, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contained false information, to wit, Application for Name Change filed in Maricopa County Superior Court CV2019-090514, in violation of A R S §§ 13-2002(A)(1), 13-2001, 13-701, 13-702, and 13-801

COUNT 3

PERJURY

On or about May 13, 2019, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, did make a false unsworn declaration, certificate, verification or statement in regard to a material issue that he subscribed as true under penalty of perjury, believing it to be false, to wit, oath or affirmation to the Deputy Clerk regarding the Application for Name Change CV2019-090514, in violation of A R S §13-2702(A)(2), 13-701, 13-702, and 13-801

COUNT 4

FRAUDULENT SCHEMES AND PRACTICES

On or about May 13, 2019, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, in a 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 a scheme or device or made or used a false writing or document knowing such writing or document contained a false, fictitious or fraudulent statement or entry, to wit, submission of false or forged Application for Name Change CV2019-090514, in violation of A R S §§13-2301, 13-2311, 13-701, 13-702, and 13-801

COUNT 5

FRAUDULENT SCHEMS AND ARTIFICES

On or between January 1, 2019 and July 3, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to JC through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811, 13-701, 13-702, and 13-801

COUNT 6

FRAUDULENT SCHEMES AND ARTIFICES

On or between April 2, 2020 and April 29, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to RG through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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COUNT 7

FRAUDULENT SCHEMES AND ARTIFICES

On or between April 27, 2020 and July 1, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to CK through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

COUNT 8

FRAUDULENT SCHEMES AND ARTIFICES

On or between August 1, 2019 and April 15, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to BR and GR through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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COUNT 9

FRAUDULENT SCHEMES AND ARTIFICES

On or between November 1, 2019 and July 4, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to EK and EK through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

COUNT 10

FRAUDULENT SCHEMES AND ARTIFICES

On or between August 1, 2019 and February 28, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to LS through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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COUNT 11

FRAUDULENT SCHEMES AND ARTIFICES

On or between March 1, 2019 and July 4, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to AC and MC through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

COUNT 12

FRAUDULENT SCHEMES AND ARTIFICES

On or between June 1, 2020 and July 3, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to BA and GA through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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COUNT 13

FRAUDULENT SCHEMES AND ARTIFICES

On or between June 1, 2019 to June 28, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to CE and FE through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

COUNT 14

FRAUDULENT SCHEMES AND ARTIFICES

On or between July 4, 2019 and July 3, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to JH and JH through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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COUNT 15

FRAUDULENT SCHEMES AND ARTIFICES

On or between January 28, 2019 and July 1, 2020, **BRETT JAMES SMITH aka BJ SMITH aka BRETT JAMES ZAGORAC aka B.J. WILHELM aka BRETT WILHELM aka BJ THE EDUCATOR aka B.J. WILH aka BRETT J. WHITE aka BRETT ZAGR aka B.J. ZAGR aka BRETT ZAGOR aka B.J. ZAGOR aka MR. Z**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises, or material omissions, to wit, access to EJ and CJ through tutoring position, in violation of A R S §§ 13-2310, 13-701, 13-702, 13-801, 13-811 13-701, 13-702, and 13-801

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

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA




Blaine Gadow
Assistant Attorney General

a True Bill

(A "True Bill")

Dated 04/05/2021



Foreperson of the State Grand Jury

IMPORTANT NOTICE

THIS IS A JUVENILE VICTIM SEX CRIME CASE

CR 2021-001283-001

RDOC

PURSUANT TO RULE 2.3(b) OF THE ARIZONA RULES OF CRIMINAL PROCEDURE, THE DEFENDANT IS CHARGED WITH ANY OFFENSE LISTED IN A.R.S. TITLE 13, CHAPTERS 14, 32, 35 OR 35.1 OR IN WHICH THE VICTIM WAS A JUVENILE AT THE TIME OF THE OFFENSE. THIS CASE IS SUBJECT TO THE PROVISIONS OF SUPREME COURT RULE 123(G)(1)(C)(ii)(H)