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DR# 2019-037  
T002-2020-000142

Attorneys for Plaintiff

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

**STATE OF ARIZONA,**

**Plaintiff,**

**v.**

**JOAN KATZ (001),**

**Defendant.**

Case No:

**89 SGJ 35**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNTS 1, 4: FRAUDULENT  
SCHEMES AND PRACTICES, a Class 5  
Felony, in violation of A.R.S. § 13-2311 (A) .**

**COUNTS 2, 5: PRESENTMENT OF  
FALSE INSTRUMENT FOR FILING, a  
Class 6 Felony, in violation of A.R.S. § 39-  
161.**

**COUNT 3: CONFLICT OF INTEREST, a  
Class 6 Felony, in violation of A.R.S. §§ 38-  
503 and 38-510.**

The Arizona State Grand Jury accuses **JOAN KATZ (001)**, charging on this 20<sup>th</sup>  
day of September, 2021, that in or from Pima County, Arizona:

**COUNT ONE**  
**FRAUDULENT SCHEMES AND PRACTICES, A CLASS 5 FELONY**

Between on or about January 8, 2019 and April 2, 2019, **JOAN KATZ (001)**, in a matter related to the business conducted by a department or agency of this state, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed, or covered up material facts by any trick, scheme or device or made or used any false writing, knowing that such writing contained a false, fictitious or fraudulent statement, to wit: failing to disclose her conflict of interest, failing to obtain competitive bids before awarding a contract to her daughter's company, The Souls Nest, LLC, and then falsifying documents afterward in order to comply with district policies, in violation of A.R.S. §§ 13-2311(A), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, 13-2314, and 38-502.

**COUNT TWO**  
**PRESENTMENT OF FALSE INSTRUMENT FOR FILING, A CLASS 6 FELONY**

Between on or about January 8, 2019 and April 2, 2019, **JOAN KATZ (001)** acknowledged, certified, notarized, procured or offered to be filed, registered or recorded in a public office of this state an instrument, which she knew to be false or forged, which, if genuine, could have been filed, registered or recorded under any law of this state or the United States, or in compliance with established procedure, to wit: falsifying documents to show a competitive bid process after hiring her daughter's company, The Souls Nest, LLC., in order to comply with district policies, in violation of A.R.S. §§ 39-161, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2001, 13-2313, 13-2314, and 38-101.

**COUNT THREE**  
**CONFLICT OF INTEREST, A CLASS 6 FELONY**

Between on or about January 8, 2019 and April 2, 2019, **JOAN KATZ (001)** intentionally or knowingly, as a public officer or employee of a public agency, failed to make known in official records of the public entity her daughter's substantial interest in A Souls Nest and the contract, sale, purchase, or service provided by A Souls Nest to the Sunnyside Unified School District, and did not refrain from voting upon or otherwise participating in any manner as an officer or employee in the contract, sale or purchase, in violation of A.R.S. §§ 38-503, 38-510, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2001, 13-2313, 13-2314, and 38-101.

**COUNT FOUR**  
**FRAUDULENT SCHEMES AND PRACTICES, A CLASS 5 FELONY**

Between on or about January 17, 2019, and April 2, 2019, **JOAN KATZ (001)**, in a matter related to the business conducted by a department or agency of this state, pursuant to a scheme or artifice to defraud or deceive, by knowingly falsified, concealed, or covered up material facts by any trick, scheme or device or made or used any false writing, knowing that such writing contained a false, fictitious or fraudulent statement, to wit: failing to obtain competitive bids before awarding a contract to a district employee's company G&H Educational Services, and then falsifying documents afterward in order to comply with district policies, in violation of A.R.S. §§ 13-2311 (A), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2313, 13-2314, and 38-502.

**COUNT FIVE**  
**PRESENTMENT OF FALSE INSTRUMENT FOR FILING, A CLASS 6 FELONY**

Between on or about January 17, 2019, and April 2, 2019, **JOAN KATZ (001)** acknowledged, certified, notarized, procured or offered to be filed, registered or recorded an instrument in a public office of this state, which she knew to be false or forged, which, if genuine, could have been filed, registered or recorded under any law of this state or the United States, or in compliance with established procedure, to wit: falsifying documents to show a competitive bid process after hiring a district employee's company G&H Educational Services, in order to comply with district policies, in violation of A.R.S. §§ 39-161, 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, 13-2001, 13-2313, 13-2314, and 38-101.

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

True Bill  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 9/20/21

Lindsay St. John  
LINDSAY ST. JOHN  
Assistant Attorney General

Jeresa Prosenbach  
Foreperson of the Grand Jury