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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,

vs.

**INCITO SCHOOLS (001),
(All Counts)**

**APRIL BLACK AKA APRIL
CASTILLO (002),
(All Counts)**

**AMANDA JELLESON (003),
(All Counts)**

Defendants.

Case No:

87 SGJ 282

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNT 2: THEFT, a Class 2 Felony, in
violation of A.R.S. §13-1802(A)(2);

COUNT 3: THEFT, a Class 2 Felony, in
violation of A.R.S. §13-1802(A)(3);

COUNT 4: FORGERY, a Class 4 Felony,
in violation of A.R.S. §13-2002;

COUNT 5: CONSPIRACY, a Class 2
Felony, in violation of A.R.S. §13-1003.

The Arizona State Grand Jury accuses **INCITO SCHOOLS (001), APRIL BLACK aka APRIL CASTILLO (002), and AMANDA JELLESon (003)**, charging on this 20th day of January, 2021, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between November 16, 2016 to November 17, 2017, **INCITO SCHOOLS (001), APRIL BLACK aka APRIL CASTILLO (002), and AMANDA JELLESon (003)**, pursuant to a scheme or artifice to defraud, knowingly obtained or attempted to obtain a benefit from the Maricopa County Superintendent's Office, and the Maricopa County Education Service Agency 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 and 13-811.

COUNT 2

THEFT

On or between November 16, 2016 to November 17, 2017, **INCITO SCHOOLS (001), APRIL BLACK aka APRIL CASTILLO (002), and AMANDA JELLESon (003)**, without lawful authority, converted for an unauthorized term or use services or property of Laurel Shough, Desere Hockman, Sara Schaefer, and employees of Incito Schools entrusted to the defendant or placed in the defendant's possession for a limited, authorized term in violation of A.R.S. §§13-1802(A)(2), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

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COUNT 3

THEFT

On or between November 16, 2016 to November 17, 2017, **INCITO SCHOOLS (001), APRIL BLACK aka APRIL CASTILLO (002), and AMANDA JELLESON (003)**, without lawful authority, knowingly obtained over \$25,000 from the Maricopa County Superintendent's Office, and the Maricopa County Education Service Agency, by means of a material misrepresentation with the intent to deprive them of such investment in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

COUNT 4

FORGERY

On or between November 16, 2016 to November 17, 2017, **INCITO SCHOOLS (001), APRIL BLACK (002), and AMANDA JELLESON (003)**, with intent to defraud, falsely made, completed, or altered a written instrument, whether accepted or not, a forged instrument or one that contains false information, TO WIT: falsified paystubs, payroll sheets, and requisition forms, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

COUNT 5

CONSPIRACY

On or between November 16, 2016 to November 17, 2017, **INCITO SCHOOLS (001), APRIL BLACK (002), and AMANDA JELLESON (003)**, with intent to promote or aid the commission of an offense, agree with one or more persons that at least one of them or another person will engage in conduct constituting the offense and at least one of the parties committed an overt act in furtherance of the offense, to wit; falsifying

paystubs, payroll sheets, and requisition forms, in violation of A.R.S. §§ 13-1003, 13-1001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 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 or from Maricopa County, Arizona.

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 12-21-2021

Nicole Shaker
NICOLE SHAKER
Assistant Attorney General

[Signature]
Foreperson of the State Grand Jury

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