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

THE STATE OF ARIZONA,

Plaintiff,

v.

CAROLINA CARRAZCO (001),

Defendant.

Case No:

88 SGJ 275

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: THEFT, a class 3 felony in violation of A.R.S. § 13-1802

COUNT 2: FRAUD SCHEMES, a class 2 felony in violation of A.R.S. § 13-2310

COUNT 3-6: COMPUTER TAMPERING, a class 5 felony in violation of A.R.S. § 13-2316(A)(1)

COUNT 7: VIOLATIONS OF DUTIES OF CUSTODIAN OF PUBLIC MONIES, a class 4 felony in violation of A.R.S. § 35-301

The Arizona Grand Jury accuses **CAROLINA CARRAZCO**, charging on this 9th day of August, 2021, that in or from Yuma County, Arizona:

COUNT 1

THEFT

On or between October 21, 2017 and August 14, 2019, **CAROLINA CARRAZCO** without lawful authority, knowingly controlled property of another with the intent to deprive the other of such property, with a value of four thousand dollars or more but less than twenty-five thousand dollars, in violation of A.R.S. §§13-1802(A)(1), 13-1801, 13-701, 13-702, and 13-801.

COUNT 2

FRAUDULENT SCHEMES AND PRACTICES

On or between October 21, 2017 and August 14, 2019, **CAROLINA CARRAZCO**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions; To Wit: **CAROLINA CARRAZCO** tampered with the payroll computer management system to avoid paying insurance premiums for her and her dependents' health care coverage and later tampered with the system to conceal her failure to pay premiums in violation of A.R.S. §§ 13-2310(A), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

COUNT 3

COMPUTER TAMPERING

On or between October 21, 2017 and November 3, 2017, **CAROLINA CARRAZCO**, without authority or exceeding authorization of use, by accessing, altering, damaging or destroying any computer, computer system or network with the intent to devise or execute any scheme or artifice to defraud or deceive or to control property or service by means of false or fraudulent pretenses, representations or promises; To Wit: **CAROLINA CARRAZCO** altered the Gadsden Elementary School

District #32's payroll system so health insurance premiums were not deducted from her pay, in violation of A.R.S. §§ 13-2316, 13-701, 13-702 and 13-801.

COUNT 4

COMPUTER TAMPERING

On or between November 3, 2017 and January 29, 2019, **CAROLINA CARRAZCO**, without authority or exceeding authorization of use, by accessing, altering, damaging or destroying any computer, computer system or network with the intent to devise or execute any scheme or artifice to defraud or deceive or to control property or service by means of false or fraudulent pretenses, representations or promises; To Wit: **CAROLINA CARRAZCO** altered the Gadsden Elementary School District #32's payroll system to provide proof of insurance coverage for taxes, in violation of A.R.S. §§ 13-2316, 13-701, 13-702 and 13-801.

COUNT 5

COMPUTER TAMPERING

On or ^{between}~~before~~ January 29, 2019, and August 14, 2019, **CAROLINA CARRAZCO**, without authority or exceeding authorization of use, by accessing, altering, damaging or destroying any computer, computer system or network with the intent to devise or execute any scheme or artifice to defraud or deceive or to control property or service by means of false or fraudulent pretenses, representations or promises; To Wit: **CAROLINA CARRAZCO** altered the Gadsden Elementary School District #32's payroll system so health insurance premiums were not deducted from her pay, in violation of A.R.S. §§ 13-2316, 13-701, 13-702 and 13-801.

COUNT 6

COMPUTER TAMPERING

On or about August 14, 2019, **CAROLINA CARRAZCO**, without authority or exceeding authorization of use, by accessing, altering, damaging or destroying any computer, computer system or network with the intent to devise or execute any scheme or artifice to defraud or deceive or to control property or service by means of false or fraudulent pretenses, representations or promises; To Wit: **CAROLINA CARRAZCO** altered the Gadsden Elementary School District #32's payroll system so health insurance premiums were deducted from her pay as a result of being questioned by her supervisor, in violation of A.R.S. §§ 13-2316, 13-701, 13-702 and 13-801.

COUNT 7

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between October 21, 2017 and January 29, 2019, **CAROLINA CARRAZCO**, while employed as a payroll specialist with the Gadsden Elementary School District #32, a public officer or other person who was 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; To Wit: **CAROLINA CARRAZCO** tampered with the payroll computer management system of Gadsden Elementary School District #32 to avoid paying insurance premiums for her and her dependents' health care coverage in violation of A.R.S. §§ 35-301(1), 35-302, 13-701, 13-702, 13-801, and 13-811.

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

A True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 08/09/2021



JOHN HUDSON
Assistant Attorney General



Foreperson of the Grand Jury

#9692232