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Attorneys for Plaintiff

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

STATE OF ARIZONA,
Plaintiff,

v.

DENNIS FISCUS (001),
(counts 1, 2, 4-6)

LOIS LAMER (002),
(counts 1, 3, 4-6)

Defendants.

Case No:

89 SGJ 31

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNTS 2 & 3: VIOLATION OF
DUTIES OF A CUSTODIAN OF PUBLIC
MONIES**, class 4 felonies in violation of
A.R.S. §35-301

**COUNTS 4 - 6: FRAUDULENT
SCHEMES AND PRACTICES**, class 5
felonies in violation of A.R.S. §13-2311

The Arizona State Grand Jury accuses **DENNIS FISCUS (001) and LOIS LAMER (002)**, charging on this 14th day of September, 2021 that in or from Yavapai County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 19, 2013, and November 20, 2015, **DENNIS FISCUS (001)** and **LOIS LAMER (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, 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 2

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between December 19, 2013, and November 20, 2015, **DENNIS FISCUS (001)**, while employed as the Programs of Study Director for Career and Technical Education for the Arizona Department of Education, a public officer or other person 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 in violation of A.R.S. §§ 35-301(1), 35-302, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

COUNT 3

VIOLATION OF DUTIES OF A CUSTODIAN OF PUBLIC MONIES

On or between December 19, 2013, and November 20, 2015, **LOIS LAMER (002)**, while employed as the superintendent/CEO of the Valley Academy for Career and Technical Education, a public officer or other person 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 in violation of A.R.S. §§ 35-301(1), 35-302, 13-701, 13-702, 13-801, and 13-811.

TO WIT: **LOIS LAMER (002)** approved false purchase orders to obtain funds from Valley Academy of Career and Technical Education.

COUNT 4

FRAUDULENT SCHEMES AND PRACTICES

On or between December 19, 2013, and January 14, 2014, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, **DENNIS FISCUS (001) and LOIS LAMER (002)**, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

To Wit: **DENNIS FISCUS (001) and LOIS LAMER (002)** submitted falsified documentation to Valley Academy of Career and Technical Education, a department or agency of this state or any political subdivision thereof, related to purchase order 6125.

COUNT 5

FRAUDULENT SCHEMES AND PRACTICES

On or between March 19, 2014, and April 4, 2014, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, **DENNIS FISCUS (001) and LOIS LAMER (002)**, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

To Wit: **DENNIS FISCUS (001) and LOIS LAMER (002)** submitted falsified documentation to Valley Academy of Career and Technical Education, a department or agency of this state or any political subdivision thereof, related to purchase order 6166.

COUNT 6

FRAUDULENT SCHEMES AND PRACTICES

On or between June 3, 2014, and June 27, 2014, in any matter related to the business conducted by any department or agency of this state or any political subdivision thereof, **DENNIS FISCUS (001) and LOIS LAMER (002)**, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or uses any false writing or document knowing such writing or document contains any false, fictitious or fraudulent statement in violation of A.R.S. §§13-2311, 13-2301, 13-701, 13-702, 13-801, and 13-811.

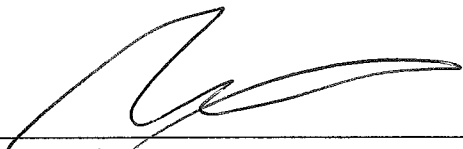
To Wit: **DENNIS FISCUS (001) and LOIS LAMER (002)** submitted falsified documentation to Valley Academy of Career and Technical Education, a department or agency of this state or any political subdivision thereof, related to purchase order 6120.

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


True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9/14/21



Mary Harriss
Assistant Attorney General



Foreperson of the Grand Jury