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

STATE OF ARIZONA,

Plaintiff,

v.

RANDOLPH EZRRE (001),

Defendant.

Case No:

86 SGJ 108

INDICTMENT

CHARGING VIOLATIONS OF:

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

**COUNTS 2-12: FILING FALSE
RETURN**, a class 5 felony in violation of
A.R.S. §42-1127(B)

The Arizona State Grand Jury accuses **RANDOLPH EZRRE**, charging on this
22nd day of January, 2020, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between September 1, 2017 and August 27, 2018, Defendant **RANDOLPH
EZRRE** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from
the Arizona Department of Revenue by means of false or fraudulent pretenses,

representations, promises or material omissions in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

COUNT 2

FILING FALSE RETURN

On or about January 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §§ 42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning September 1, 2017, and ending September 30, 2017.

COUNT 3

FILING FALSE RETURN

On or about January 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §§ 42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning October 1, 2017, and ending October 31, 2017.

COUNT 4

FILING FALSE RETURN

On or about January 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning November 1, 2017, and ending November 30, 2017.

COUNT 5

FILING FALSE RETURN

On or about January 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning December 1, 2017, and ending December 31, 2017.

COUNT 6

FILING FALSE RETURN

On or about March 30, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning January 1, 2018, and ending January 31, 2018.

COUNT 7

FILING FALSE RETURN

On or about March 30, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning February 1, 2018, and ending February 28, 2018.

COUNT 8

FILING FALSE RETURN

On or about May 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning March 1, 2018, and ending March 31, 2018.

COUNT 9

FILING FALSE RETURN

On or about May 24, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning April 1, 2018, and ending April 30, 2018.

COUNT 10

FILING FALSE RETURN

On or about July 20, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning May 1, 2018, and ending May 31, 2018.

COUNT 11

FILING FALSE RETURN

On or about July 20, 2018, defendant **RANDOLPH EZRRE**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning June 1, 2018, and ending June 30, 2018.

COUNT 12

FILING FALSE RETURN

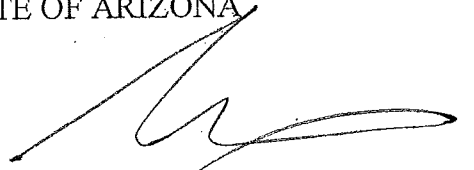
On or about August ⁷⁰24^{27th}, 2018, defendant RANDOLPH EZRRE, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document in violation of A.R.S. §42-1127(B)(2); 42-1101.01, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801 and 13-811.

To Wit: Arizona Transaction Privilege Tax Return for the period beginning July 1, 2018, and ending July 31, 2018.

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

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



MARY HARRISS
Assistant Attorney General

#8444430v1

Dated: 22 Jan 2020

Hector Gill
Foreperson of the State Grand Jury