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2020 OCT -5 PM 3: 55

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Filed  
Superior Court  
Greenlee County Arizona

OCT 13 2020

Madeline Montoya  
Clerk of the Superior Court  
By MM Time \_\_\_\_\_ a.m./p.m.

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

JACKIE MARIE NORTON (001),

Defendant.

Case No:

87 SGJ 119

**INDICTMENT**

CHARGING VIOLATIONS OF:

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

**COUNTS 2-13: FAILURE TO FILE TPT  
RETURN**, a class 5 felony in violation of  
A.R.S. § 42-1127(B)(4)

**COUNTS 14-17: FORGERY**, a class 4  
felony in violation of A.R.S. §13-2002(A)(1)

The Arizona Grand Jury accuses **JACKIE MARIE NORTON (001)**, charging on this  
5<sup>th</sup> day of October, 2020 that in or from Greenlee County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between April 27, 2012, and January 31, 2018, **JACKIE MARIE NORTON (001)**, pursuant to a scheme or artifice to defraud, knowingly obtains any benefit by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-801, and 13-811.

**COUNT 2**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about March 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on January 1, 2018, and ending on January 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 3**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about April 2, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on February 1, 2018, and

ending on February 28, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 4**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about May 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on March 1, 2018, and ending on March 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 5**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about June 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on April 1, 2018, and ending on April 30, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 6**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about July 2, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on May 1, 2018, and ending on May 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 7**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about August 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on June 1, 2018, and ending on June 30, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 8**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about September 3, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document

or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on July 1, 2018, and ending on July 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 9**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about October 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on August 1, 2018, and ending on August 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 10**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about November 1, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on September 1, 2018,

and ending on September 30, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 11**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about December 3, 2018, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on October 1, 2018, and ending on October 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 12**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about January 2, 2019, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on November 1, 2018, and ending on November 30, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 13**

**FAILURE TO FILE TRANSACTION PRIVILEGE TAX RETURN**

On or about February 1, 2019, **JACKIE MARIE NORTON (001)** knowingly failed to file a return or supply required information, or falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability under this article for the tax period beginning on December 1, 2018, and ending on December 31, 2018, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101.01, 42-5001, 42-5008, 42-5014, 42-5061, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 14**

**FORGERY**

On or between January 1, 2009, and February 9, 2009, **JACKIE MARIE NORTON (001)** with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2008 for J. Lawrence, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 15**

**FORGERY**

On or between January 1, 2017, and January 20, 2017, **JACKIE MARIE NORTON (001)** with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2016 for J. Romero, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 16**

**FORGERY**

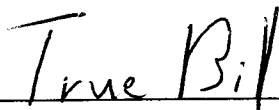
On or between January 1, 2018, and January 29, 2018, **JACKIE MARIE NORTON (001)** with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2017 for J. Romero, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801, and 13-811.

**COUNT 17**

**FORGERY**


On or between January 1, 2019, and January 30, 2019, **JACKIE MARIE NORTON (001)** with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2018 for J. Romero, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 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 Grand Jurors find that the offenses described above were committed in Greenlee County, Arizona.

  
\_\_\_\_\_  
(A "True Bill")

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 10-5-20

  
\_\_\_\_\_  
MARY HARRISS  
Assistant Attorney General

  
\_\_\_\_\_  
Foreperson of the Grand Jury