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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.

MICHELLE SCHAEFER (001),

Defendant.

Case No:

87 SGJ 240

INDICTMENT

CHARGING VIOLATIONS OF:

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

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

COUNTS 6-9: FORGERY, a class 4 felony
in violation of A.R.S. §13-2002(A)(1)

The Arizona Grand Jury accuses **MICHELLE SCHAEFER (001)** charging on this 21st
day of December 2020 that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between April 3, 2019 and September 10, 2019, **MICHELLE SCHAEFER (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

FILING A FALSE RETURN

On or about July 23, 2019, **MICHELLE SCHAEFER (001)**, 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, 13-701, 13-702, 13-703, and 13-801.

To Wit: **MICHELLE SCHAEFER (001)** knowingly prepared, presented or aided, procured or advised in preparing or presenting the 2018 Arizona income tax return of M. Schaefer.

COUNT 3

FILING A FALSE RETURN

On or about April 24, 2019, **MICHELLE SCHAEFER (001)**, 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, 13-701, 13-702, 13-703, and 13-801.

To Wit: **MICHELLE SCHAEFER (001)** knowingly prepared, presented or aided, procured or advised in preparing or presenting the 2018 Arizona income tax return of S. Othon.

COUNT 4

FILING A FALSE RETURN

On or about April 3, 2019, **MICHELLE SCHAEFER (001)**, 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, 13-701, 13-702, 13-703, and 13-801.

To Wit: **MICHELLE SCHAEFER (001)** knowingly prepared, presented or aided, procured or advised in preparing or presenting the 2018 Arizona income tax return of M. Watson.

COUNT 5

FILING A FALSE RETURN

On or about September 10, 2019, **MICHELLE SCHAEFER (001)**, 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, 13-701, 13-702, 13-703, and 13-801.

To Wit: **MICHELLE SCHAEFER (001)** knowingly prepared, presented or aided, procured or advised in preparing or presenting the 2018 Arizona income tax return of J. Pruitt.

COUNT 6

FORGERY

On or about July 23, 2019, **MICHELLE SCHAEFER (001)**, with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2018 for M. Schaefer, 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 7

FORGERY

On or about April 24, 2019, **MICHELLE SCHAEFER (001)**, with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2018 for S. Othon, 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 8

FORGERY

On or about April 3, 2019, **MICHELLE SCHAEFER (001)**, with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2018 for M. Watson, 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 9

FORGERY

On or about September 10, 2019, MICHELLE SCHAEFER (001), with intent to defraud falsely made, completed or altered a written instrument, a Form W-2 for tax year 2018 for J. Pruitt, 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 Maricopa County, Arizona.

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 12-21-20

Carmine Mediate
Carmine Mediate
Assistant Attorney General
#9017473

[Signature]
Foreperson of the Grand Jury