

KRISTIN K. MAYES
Attorney General
Firm Bar No. 14000

KRISTA WOOD
State Bar No. 025503
CATHERINE FERGUSON-GILBERT
State Bar No. 031326
Assistant Attorney General
2005 N. Central Avenue
Phoenix, Arizona 85004
Telephone 602-542-7926
crmfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

MICHAEL WHITING (001),
(Counts 1, 2, 3, 4, 5, 6, 7, 8, 10)

JOYCLYNN WHITING (002),
(Counts 4, 9)

DARYL GREER (003),
(Counts 1, 2, 3, & 5)

Defendants.

Case No:

94 SGJ 84

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: HARASSMENT, a Class 1
Misdemeanor, in violation of A.R.S. § 13-
2921;

**COUNT 2: SENDING
THREATENING OR ANONYMOUS
LETTER**, a Class 2 Misdemeanor, in
violation of A.R.S. § 13-3004;

**COUNT 3: MISUSE OF PUBLIC
MONIES**, a Class 4 Felony, in violation
of A.R.S. §35-301;

**COUNT 4: MISUSE OF PUBLIC
MONIES**, a Class 4 Felony, in violation
of A.R.S. §35-301;

**COUNT 5: MISUSE OF PUBLIC
MONIES**, a Class 4 Felony, in violation
of A.R.S. §35-301;

COUNT 6: THEFT, a Class 3 Felony, in violation of A.R.S. §13-1802;

COUNT 7: THEFT, a Class 1 Misdemeanor, in violation of A.R.S. § 13-1802;

COUNT 8: CONFLICT OF INTEREST, a Class 6 Felony, in violation of A.R.S. §§ 38-503, 38-510;

COUNT 9: CONFLICT OF INTEREST, a Class 6 Felony, in violation of A.R.S. §§ 38-503, 38-510.

COUNT 10: STEALING, DESTROYING, ALTERING OR SECRETING PUBLIC RECORD, a Class 6 Felony, in violation of A.R.S. §§ 38-421

The State Grand Jury for the State of Arizona accuses **MICHAEL WHITING (001), JOYCLYNN WHITING (002), AND DARYL GREER (003)**, charging on this 19th day of August, 2024, that in or from Maricopa County, Arizona:

COUNT 1
HARASSMENT

On or between March 7, 2024, and March 22, 2024, **MICHAEL WHITING (001), AND DARYL GREER (003)**, knowingly and repeatedly committed an act or acts that harass another person and/or knowingly contacted or caused a communication with another person by verbal or written means or surveilled or caused a person to surveil another person, to wit: Fernando Madrid, in violation of A.R.S. §§ 13-2921, 13-301, 13-302, 13-303, 13-304, 13-105, 13-702, 13-802.

MICHAEL WHITING (001) AND DARYL GREER (003), committed the above Harassment through, but not limited to, the following conduct:

(1) On March 7, 2024, **DARYL GREER (003)** drove to Fernando Madrid's residence at 5434 West Winston Drive, Laveen, Arizona, in Maricopa County, Arizona, and took a picture of his vehicle parked in his driveway;

(2) **DARYL GREER (003)** was employed at the Apache County Attorney's Office, worked directly for **MICHAEL WHITING (001)**, and took orders or assignments directly from him;

(3) On March 7, 2024, **MICHAEL WHITING (001)** made public records requests for voter information and recorded documents from the Maricopa County Recorder's Office for Fernando Madrid's wife Elva Madrid and for anyone at the residence located at 5434 West Winston Drive, Laveen, Arizona, and asked that he receive those documents by March 15, 2024, by email to michaelbwhiting@gmail, which is his known email address;

(4) Maricopa County Recorder's Office keeps official voter and property records;

(5) On March 17, 2024, while Fernando Madrid was in the area of Barth Hall at 203 E. Commercial Street, St. Johns, Arizona, in Apache County, Arizona, collecting signatures for his petition to be a candidate on the ballot for Apache County Superintendent of Schools, **DARYL GREER (003)** and Trent Jensen approached him acting like one of them was going to sign his petition, the other one hit the clipboard out of Fernando Madrid's hands and pushed him in the chest, telling Fernando Madrid that "Michael Whiting is just getting started with you;"

(6) On or about March 22, 2024, Fernando Madrid received a mailed USPS priority mail envelope containing over 190 pages of an anonymous letter threatening legal action, including criminal charges, claiming Fernando Madrid was not a resident of Apache County as defined by law, including photos of Fernando Madrid's vehicle parked in his driveway in Laveen and photos of the USPS box where Madrid receives mail, various property records, a form for him to complete withdrawing from candidacy by April 1, 2024, indicating if Fernando Madrid

withdrew from candidacy by April 1, 2024, no legal action would be taken, but also indicating if Fernando Madrid did not withdraw from candidacy by that time, he would face legal action;

(7) One of the photos included in the letter to Fernando Madrid appeared very similar to a photo taken by **DARYL GREER (003)** and located on an SD card in his possession;

(8) The letter Fernando Madrid received threatened that if he did not withdraw from candidacy by April 1, 2024, documentation attached to the letter would be forwarded to the Arizona Attorney General's Office, Arizona State Board of Education, Arizona Secretary of State's Office, FBI, Navajo Nation agencies, School Board Members of Apache County, and local newspapers, but did not mention the Apache County Attorney's Office;

(9) The letter Fernando Madrid received was labeled as being sent from Ranch LLC, which is not a registered agency with the Corporation Commission of Arizona;

(10) The letter Fernando Madrid received was marked as being sent from P.O. BOX 137, Overgaard, Arizona, which the USPS Inspector has indicated does not exist;

(11) A USPS inspector has verified that the letter and package sent to Fernando Madrid was mailed from America One Mail and Ship in Show Low, Arizona, on March 21, 2024;

(12) The shipping for the letter and package were paid by a credit card in the name of **MICHAEL WHITING (001)**; and

(13) Fernando Madrid withdrew from candidacy as of March 28, 2024, citing "coercive tactics" by **MICHAEL WHITING (001)** and not wanting to subject his family to further harassment, as the reasons for withdrawing.

COUNT 2

SENDING THREATENING OR ANONYMOUS LETTER

On or between March 7, 2024, and March 22, 2024, **MICHAEL WHITING (001) AND DARYL GREER (003)**, knowingly sent or delivered to another a letter or writing, whether subscribed or not, threatening to accuse Fernando Madrid of a crime, or to expose Fernando

Madrid's failings or infirmities, or knowing wrote or sent an anonymous letter calculated to create distrust of another or tending to impute dishonesty, or any crime or infirmity to the receiver of the letter or to any other person, to wit: accusing Fernando Madrid of legal violations and crimes, in violation of A.R.S. §§ 13-3004, 13-3001, 13-301, 13-302, 13-303, 13-304, 13-105, 13-702, 13-802.

MICHAEL WHITING (001) AND DARYL GREER (003), committed the above Sending Threatening or Anonymous Letter through, but not limited to, the conduct in allegations listed above in Count 1.

COUNT 3
MISUSE OF PUBLIC MONIES

On or between November 27, 2023, and January 3, 2024, **MICHAEL WHITING (001) AND DARYL GREER (003)**, a public officer or other person, charged with receiving, safekeeping, transferring or disbursing public monies, without authority of the law, appropriated public monies or any portion thereof to his own use or the use of another, and/or knowingly loaned public monies or any portion thereof, and/or knowing failed to keep the public monies in his possession until disbursed or paid by authority of law, and/or knowingly transferred the public monies when not authorized or directed by law, to wit: purchase of 4imprint items for Joy Whiting, in violation of A.R.S. §§ 35-301, 35-301(A), 35-301(A)(1), 35-301(A)(2), 35-301(A)(9), 35-302, 38-101, 13-105, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) AND DARYL GREER (003) committed the above Misuse of Public Monies through, but not limited to, the following conduct:

(1) **DARYL GREER (003)** was employed at the Apache County Attorney's Office, worked directly for **MICHAEL WHITING (001)**, and took orders or assignments directly from him;

(2) **DARYL GREER (003)** placed orders for **MICHAEL WHITING (001)** through 4imprint;

(3) **MICHAEL WHITING (001)** authorized Apache County to make payments for duplicate orders, which created a credit with 4imprints of \$4955.86 and \$499.14 respectively, for a total of \$5,495.00 credit, using funds from the Apache County Attorney's Office;

(4) On November 27, 2023, **DARYL GREER (003)** called 4imprint asking them to keep the credit of \$5,495.00;

(5) On December 6, 2023, **DARYL GREER (003)** placed an order with 4imprints for Joy Whiting, Apache County School Superintendent, Spelling for Success, Spellingbee.com shirts, totaling \$5,495.00;

(6) On December 6, 2023, 4imprints emailed **DARYL GREER (003)**, attached a copy of the Joy Whiting's t-shirt order, and indicated that accounting applied the credit on file for the Apache County Attorney's Office to Joy Whiting's order, and **DARYL GREER (003)** emailed back thanking her and requesting to change the sizes on the order but did not correct the payment method of the order;

(7) **DARYL GREER (003)** previously contacted 4imprint on September 21, 2023, about an order for Joy Whiting Spellingbee black bags, requesting a quote and invoice for such bags, and indicating he would pay by a credit card for that order; and

(8) On June 4, 2024, during the execution of a search warrant on the Apache County Attorney's Office, ten boxes from 4imprint were located and contained Joy Whiting, Apache County Superintendent of Schools, Spellingbee.com shirts.

COUNT 4
MISUSE OF PUBLIC MONIES

On or about May 17, 2023, **MICHAEL WHITING (001)** and **JOYCLYNN WHITING (002)**, a public officer or other person, charged with receiving, safekeeping, transferring or disbursing public monies, without authority of the law, appropriated public monies or any portion thereof to his own use or the use of another, and/or knowingly loaned public monies or any portion thereof, and/or knowing failed to keep the public monies in his possession until

disbursed or paid by authority of law, and/or knowingly transferred the public monies when not authorized or directed by law, to wit: purchase of a 2023 Ford Expedition for \$79,999.88 (which was then assigned to the Apache County Attorney's Office and used primarily by **MICHAEL WHITING (001)**) using Apache County Superintendent funds, in violation of A.R.S. §§ 35-301, 35-301(A), 35-301(A)(1), 35-301(A)(2), 35-301(A)(9), 35-302, 38-101, 13-105, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) and **JOYCLYNN WHITING (002)** committed the above Misuse of Public Funds through, but not limited to, the following conduct:

(1) **JOYCLYNN WHITING (002)**, as the Apache County Superintendent of Schools and head of her department, approved the authorization for payment by Apache County, using School Superintendent funds, for the purchase of a 2023 Ford Expedition for \$79,999.88 (which was then assigned to the Apache County Attorney's Office and used primarily by **MICHAEL WHITING (001)**);

(2) Tobie Overson signed the authorization for payment form on May 17, 2023;

(3) The purchase of the 2023 Ford Expedition from Larry H. Miller Ford Mesa included a trade-in of a 2017 Chevrolet Tahoe owned by the Apache County Board of Supervisors and assigned to the Apache County Attorney's Office; and

(4) Daryl Greer later obtained an undercover plate for this 2023 Ford Expedition assigned to the Apache County Attorney's Office and primarily driven by **MICHAEL WHITING (001)**.

COUNT 5

MISUSE OF PUBLIC MONIES

On or between February 7, 2024, and February 20, 2024, **MICHAEL WHITING (001)** **AND DARYL GREER (003)**, a public officer or other person, charged with receiving, safekeeping, transferring or disbursing public monies, without authority of the law, appropriated public monies or any portion thereof to his own use or the use of another, and/or knowingly loaned public monies or any portion thereof, and/or knowing failed to keep the public monies in

his possession until disbursed or paid by authority of law, and/or knowingly transferred the public monies when not authorized or directed by law, to wit: purchase of gym equipment from Rogue Fitness using a county credit card, in violation of A.R.S. §§ 35-301, 35-301(A), 35-301(A)(1), 35-301(A)(2), 35-301(A)(9), 35-302, 38-101, 13-105, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) AND DARYL GREER (003) committed the above Misuse of Public Monies through, but not limited to, the following conduct:

(1) **DARYL GREER (003)** was employed at the Apache County Attorney's Office, worked directly for **MICHAEL WHITING (001)**, and took orders or assignments directly from him;

(2) **DARYL GREER (003)** placed orders for **MICHAEL WHITING (001)**;

(3) On February 7, 2024, **DARYL GREER (003)** used an Apache County credit card without authorization from the finance department, to purchase \$1,661.84 in fitness equipment from Rogue Fitness;

(4) On February 7, 2024, Rogue Fitness sent **DARYL GREER (003)** an email to daryl310g@gmail.com confirming his order of \$1,661.84 in fitness equipment to be shipped to the address for the Apache County Attorney's Office;

(5) On February 14, 2024, **DARYL GREER (003)** used an Apache County credit card without authorization from the finance department, to purchase \$1,378.75 in fitness equipment from Rogue Fitness;

(6) On February 14, 2024, Rogue Fitness sent **DARYL GREER (003)** an email to daryl310g@gmail.com confirming his order of \$1,378.75 in fitness equipment to be shipped to the address for the Apache County Attorney's Office;

(7) On February 20, 2024, **DARYL GREER (003)** used an Apache County credit card without authorization from the finance department, to purchase \$7,035.55 in fitness equipment from Rogue Fitness;

(8) On February 20, 2024, Rogue Fitness sent **DARYL GREER (003)** an email to daryl310g@gmail.com confirming his order of \$7,035.55 in fitness equipment to be shipped to the address for the Apache County Attorney's Office;

(9) Witnesses observed that gym equipment was delivered to the Apache County Attorney's Office;

(10) When contacted by a witness, **MICHAEL WHITING (001)** told the witness that he, **DARYL GREER (003)**, and Trent Jensen were moving gym equipment from the Apache County Attorney's Office to the local gym that evening; and

(11) Gym equipment has to be preapproved by the insurance carrier, and those types of purchases are not authorized by the Apache County Finance Department without prior insurance approval.

COUNT 6

THEFT

On or about September 6, 2022, **MICHAEL WHITING (001)**, without lawful authority, knowingly controlled the property of another with the intent to deprive the other of such property, and/or converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use, to wit: \$9,999.00 from the National Bank of Arizona ACCENT Pending Forfeiture account ending in 4661, and paid to Hatch Toyota, in violation of A.R.S. §§13-1802(A)(1), 13-1802(A)(2), 13-1802, 13-1801, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) committed the above Theft through, but not limited to, the following conduct:

(1) On September 6, 2022, **MICHAEL WHITING (001)**, signed a purchase agreement to purchase a 2022 Toyota Camry from Hatch Toyota;

(2) **MICHAEL WHITING (001)** traded in a 2020 Toyota Camry assigned to the Apache County Attorney's Office, as part of the purchase agreement;

(3) The purchase price of the 2022 Toyota Camry from Hatch Toyota was \$9,999.00, after a trade-in allowance;

(4) On September 6, 2022, **MICHAEL WHITING (001)** signed check #1111 from the National Bank of Arizona ACCENT Pending Forfeiture account, withdrawing in the amount of \$9,999.00, payable to Hatch Toyota;

(5) National Bank of Arizona ACCENT Pending Forfeiture account records show the check was cashed on September 7, 2022;

(6) Money in the pending forfeiture account belongs to the owner of the seized funds until a court declares that the funds are to be forfeited;

(7) There is no record that these pending forfeiture funds of \$9999.00 were adjudicated;

(8) When money in the pending forfeiture account has been officially declared by the court to be forfeited, it is moved to another account;

(9) The money that is declared by the court to be officially forfeited must be split 20% to the Apache County Attorney's Office and 80% to the seizing agency;

(10) **MICHAEL WHITING (001)** signed the Hatch Toyota new delivery checklist for the purchased 2022 Toyota Camry, and included his email michaelbwhiting@gmail.com on the form;

(11) **MICHAEL WHITING (001)** signed the bill of sale for the purchase of the 2022 Toyota Camry;

(12) **MICHAEL WHITING (001)** signed the ADOT title and registration documents to title the vehicle in the name of Apache County Board of Supervisors;

(13) The 2022 Toyota Camry was assigned to the Apache County Attorney's Office; and

(14) When a witness asked **MICHAEL WHITING (001)** about this check from the forfeiture account, he had no legal explanation for it.

//

//

COUNT 7

THEFT

On or about August 22, 2022, **MICHAEL WHITING (001)**, without lawful authority, knowingly controlled the property of another with the intent to deprive the other of such property, and/or converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant's possession for a limited, authorized term or use, to wit: \$500.00 from the National Bank of Arizona ACCENT Pending Forfeiture account ending in 4661, and paid to Ford Country, Henderson, Nevada, in violation of A.R.S. §§13-1802(A)(1), 13-1802(A)(2), 13-1802, 13-1801, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) committed the above Theft through, but not limited to, the following conduct:

(1) On August 22, 2022, **MICHAEL WHITING (001)** signed check #1110 from the National Bank of Arizona ACCENT Pending Forfeiture account, withdrawing in the amount of \$500.00, payable to Ford Country (Henderson, Nevada);

(2) The memo line of the check reflects this payment was for a 2021 Expedition Deposit;

(3) The Vehicle Buyer's Order dated August 19, 2022, for the 2021 Ford Expedition from Ford Country in Henderson, Nevada, indicates the vehicle was purchased for \$39,950.00, after a trade-in allowance of \$41,000 (for a 2019 Ford Expedition);

(4) The Apache County Board of Supervisors, on June 28, 2022, approved the purchase of two new vehicles for the Apache County Attorney's Office using existing RICO funds;

(5) Ford Country, Henderson, Nevada, records show the \$500.00 payment using check number #1110;

(6) National Bank of Arizona ACCENT Pending Forfeiture account records show the check was cashed on September 2, 2022;

(7) Money in the pending forfeiture account belongs to the owner of the seized funds until a court declares that the funds are to be forfeited;

(8) There is no record that these pending forfeiture funds of \$500.00 were adjudicated;

(9) When money in the pending forfeiture account has been officially declared by the court to be forfeited, it is moved to another account;

(10) The money that is declared by the court to be officially forfeited must be split 20% to the Apache County Attorney's Office and 80% to the seizing agency;

(11) **MICHAEL WHITING (001)** signed an Agreement to Furnish Insurance to Ford Country on September 12, 2022, for the 2021 Ford Expedition;

(12) Ford Country issued a refund check for the \$500.00 deposit on September 30, 2022;

(13) This refund check was not deposited back into the forfeiture account but was instead deposited into the RICO account for the Apache County Attorney's Office;

(14) The 2021 Ford Expedition was assigned to the Apache County Attorney's Office;
and

(15) When a witness asked **MICHAEL WHITING (001)** about this check from the forfeiture account, he had no legal explanation for it.

COUNT 8 **CONFLICT OF INTEREST**

On or between November 27, 2023, and January 3, 2024, **MICHAEL WHITING (001)**, a public officer or employee of a public agency who has, or whose relative has, a substantial interest in any contract, sale, purchase or service to such public agency, intentionally or knowingly failed to make known that interest in the official records of such public agency and failed to refrain from otherwise participating in any manner as an officer or employee in such contract, sale or purchase, to wit: the purchase of 4imprint items for Joy Whiting, in violation of A.R.S. §§ 38-503, 38-501, 38-502, 38-508, 38-509, 38-510, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

MICHAEL WHITING (001) committed the above Conflict of Interest through, but not limited to, the following conduct:

(1) **MICHAEL WHITING (001)** has not made known his conflicting interest in the official records of the public agency, to wit: the Apache County Board of Supervisors;

(2) **MICHAEL WHITING (001)** has failed to refrain from otherwise participating in any manner as an officer in the contract or purchase of 4imprint items for his wife, Joyclynn Whiting, the Apache County Superintendent of Schools;

(3) Daryl Greer was employed at the Apache County Attorney's Office, worked directly for **MICHAEL WHITING (001)**, and took orders or assignments directly from him;

(4) Daryl Greer placed orders for **MICHAEL WHITING (001)** through 4imprint;

(5) **MICHAEL WHITING (001)** (authorized Apache County to make payments for duplicate orders, which created a credit with 4imprints of \$4955.86 and \$499.14 respectively, for a total of \$5,495.00 credit, using funds from the Apache County Attorney's Office;

(6) On November 27, 2023, Daryl Greer called 4imprint asking them to keep the credit of \$5,495.00;

(7) On December 6, 2023, Daryl Greer placed an order with 4imprints for Joy Whiting, Apache County School Superintendent, Spelling for Success, Spellingbee.com shirts, totaling \$5495.00;

(8) On December 6, 2023, 4imprints emailed Daryl Greer, attached a copy of the Joy Whiting t-shirt order, and indicated that accounting applied the credit on file for the Apache County Attorney's Office to Joy Whiting's order, and Daryl Greer emailed back thanking her and requesting to change the sizes on the order but did not correct the payment method of the order;

(9) Daryl Greer previously contacted 4imprint on September 21, 2023, about an order for Joy Whiting Spellingbee black bags, requesting a quote and invoice for such bags, and indicating he would pay by a credit card for that order; and

(10) On June 4, 2024, during the execution of a search warrant on the Apache County Attorney's Office, ten boxes from 4imprint were located and contained Joy Whiting, Apache County Superintendent of Schools, Spellingbee.com shirts.

//

//

COUNT 9
CONFLICT OF INTEREST

On or about May 17, 2023, **JOYCLYNN WHITING (002)**, a public officer or employee of a public agency who has, or whose relative has, a substantial interest in any contract, sale, purchase or service to such public agency, intentionally or knowingly failed to make known that interest in the official records of such public agency and failed to refrain from otherwise participating in any manner as an officer or employee in such contract, sale or purchase, to wit: purchase of a 2023 Ford Expedition (assigned to the Apache County Attorney's Office and used primarily by **MICHAEL WHITING (001)**) using Apache County Superintendent funds, in violation of A.R.S. §§ 38-503, 38-501, 38-502, 38-508, 38-509 38-510, 13-701, 13-702, and 13-801.

JOYCLYNN WHITING (002) committed the above Conflict of Interest through, but not limited to, the following conduct:

(1) **JOYCLYNN WHITING (002)** has not made known her conflicting interest in the official records of the public agency, to wit: the Apache County Board of Supervisors;

(2) **JOYCLYNN WHITING (002)** has failed to refrain from otherwise participating in any manner as an officer in the contract or purchase of a 2023 Ford Expedition (assigned to the Apache County Attorney's Office and used primarily by **MICHAEL WHITING (001)**) using Apache County Superintendent funds;

(3) **JOYCLYNN WHITING (002)**, as the Apache County Superintendent of Schools and head of her department, approved the authorization for payment by Apache County, using School Superintendent funds, for the purchase of a 2023 Ford Expedition for \$79,999.88 (which was then assigned to the Apache County Attorney's Office and used primarily by **MICHAEL WHITING (001)**);

(4) Tobie Overson signed the authorization for payment form on May 17, 2023;

(5) The purchase of the 2023 Ford Expedition from Larry H. Miller Ford Mesa included a trade-in of a 2017 Chevrolet Tahoe owned by the Apache County Board of Supervisors and assigned to the Apache County Attorney's Office; and

(6) Daryl Greer later obtained an undercover plate for this 2023 Ford Expedition assigned to the Apache County Attorney's Office and primarily driven by **MICHAEL WHITING (001)**.

COUNT 10
STEALING, DESTROYING, ALTERING OR SECRETING PUBLIC RECORD


On or between September 6, 2022, and June 4, 2024, **MICHAEL WHITING (001)**, an officer having custody of any record, or of any paper or proceeding of any court, filed or deposited in any public office, or placed in his hands for any purpose, knowingly and without lawful authority destroyed, removed, or secreted a record in whole or in part, or permitted another person to do so, to wit: use of michaelbwhiting@gmail.com account for Apache County Attorney's Office business, in violation of A.R.S. §§ 38-421, 38-421(A), 38-101, 39-121, 39-121.01, 39-121.01(B), 41-151, 41-151(2), 41-151.16, 13-105, 13-701, 13-702, and 13-801.

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

A True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 19 Aug 2024


Catherine Ferguson-Gilbert
Assistant Attorney General


Foreperson of the State Grand Jury