

1 **THOMAS C. HORNE**
Attorney General
Firm Bar No. 14000
2 **MICHAEL JETTE**
Assistant Attorney General
3 400 West Congress, Suite S-315
Tucson, Arizona 85701
4 Telephone No.: (520) 628-6504
Pima County Computer No.: 66110
5 State Bar No.: 021843
CRMTucson@azag.gov
6 T002-2012-000281

7
8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF PIMA**

10 **STATE OF ARIZONA,**

11
12 **Plaintiff,**

13 **v.**

14 **MELINDA CARPIO (001),**
All Counts

15 **ENRIQUE CARPIO (002),**
16 *All Counts*

17 **Defendants.**

Cause No.

238-GJ-1240

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1, 3, 5, and 7: FRAUDULENT
SCHEMES AND ARTIFICES,** a Class 2
Felony, in violation of A.R.S. § 13-2310

COUNTS 2 and 8: THEFT, a Class 3 Felony,
in violation of A.R.S. § 13-1802

COUNTS 4 and 6: THEFT, a Class 2 Felony,
in violation of A.R.S. § 13-1802

21
22 The grand jurors of the County of Pima, in the name of the State of Arizona, and by its
23 authority accuse and charge that in Pima County:

24 **COUNT 1**
25 **FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

26 Between December 1, 2009 and June 30, 2010, **MELINDA CARPIO (001) and**
27 **ENRIQUE CARPIO (002),** pursuant to a scheme or artifice to defraud, knowingly obtained any
28

benefit, to wit: \$22,710.27, from Joint Technical Education District (JTED), 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, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 2
THEFT, A CLASS 3 FELONY

Between December 1, 2009 and June 30, 2010, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)** committed theft by knowingly controlling property of Joint Technical Education District (JTED) with the intent to deprive Joint Technical Education District (JTED) of such property, to wit: \$22,710.27 in violation of A.R.S. §§ 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 3
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

Between July 1, 2010 and June 30, 2011, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: \$105,131.31, from the Joint Technical Education District (JTED), 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, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 4
THEFT, A CLASS 2 FELONY

Between July 1, 2010 and June 30, 2011, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)** committed theft by knowingly controlling property of Joint Technical Education District (JTED) with the intent to deprive Joint Technical Education District (JTED) of such property, to wit: \$105,131.31, in violation of A.R.S. §§ 13-1802(A)(1), 13-1802(H), 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 5
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

Between July 1, 2011 and June 30, 2012, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: \$132,456.28, from the Joint Technical Education District (JTED), 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, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 6
THEFT, A CLASS 2 FELONY

Between July 1, 2011 and June 30, 2012, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)** committed theft by knowingly controlling property of Joint Technical Education District (JTED) with the intent to deprive Joint Technical Education District (JTED) of such property, to wit: \$132,456.28, in violation of A.R.S. §§ 13-1802(A)(1), 13-1802(H), 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 7
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

Between July 1, 2012 and October 4, 2012, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit, to wit: \$35,260.19, from the Joint Technical Education District (JTED), by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314.

COUNT 8
THEFT, A CLASS 2 FELONY

Between July 1, 2012 and October 4, 2012, **MELINDA CARPIO (001) and ENRIQUE CARPIO (002)** committed theft by knowingly controlling property of Joint Technical Education District (JTED) with the intent to deprive Joint Technical Education District (JTED) of such property, to wit: \$35,260.19, in violation of A.R.S. §§ 13-1802(A)(1), 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313 and 13-2314..

BARBARA LaWALL
PIMA COUNTY ATTORNEY

By: _____
Michael P. Jette
Assistant Attorney General

By: _____
FOREPERSON OF THE GRAND JURY

Dated: _____
PHX-#3023858