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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

DIANE MAXINE RICHARDS,

Defendant.

Case No:

78 SGJ 26

INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1-11: THEFT, a Class 2 Felony,
in violation of A.R.S. § 13-1802

COUNTS 12-16: THEFT, a Class 3 Felony,
in violation of A.R.S. § 13-1802

COUNTS 17-18: THEFT, a Class 4 Felony,
in violation of A.R.S. § 13-1802

COUNTS 19-21: FORGERY, a Class 4
Felony, in violation of A.R.S. § 13-2002

**COUNTS 22-23: MISUSE OF PUBLIC
MONIES**, a Class 4 Felony, in violation of
A.R.S. § 35-301

The Arizona State Grand Jury accuses **DIANE MAXINE RICHARDS**, charging
on this 12th day of January, 2016 that in or from Mohave County, Arizona:

COUNT 1

THEFT

On or about July 01, 2007, through January 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$100,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** utilized a City of Kingman employee credit card attached to a JP Morgan Chase account ending in -2342. **DIANE MAXINE RICHARDS** used this card without authorization to cover personal expenses.

COUNT 2

THEFT

On or about August 01, 2010, through May 01, 2012, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$100,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Chase Bank held by **DIANE MAXINE RICHARDS**.

COUNT 3

THEFT

On or about February 01, 2013, through November 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$100,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Discover Card held by **DIANE MAXINE RICHARDS**.

COUNT 4

THEFT

On or about January 01, 2014, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$100,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Barclays held by **DIANE MAXINE RICHARDS**.

COUNT 5

THEFT

On or about November 01, 2012, through November 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with First National Bank of Omaha held by **DIANE MAXINE RICHARDS**.

COUNT 6

THEFT

On or about December 01, 2013, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Comenity held by **DIANE MAXINE RICHARDS**.

COUNT 7

THEFT

On or about November 01, 2012, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Walmart held by **DIANE MAXINE RICHARDS**.

COUNT 8

THEFT

On or about September 01, 2008, through March 01, 2010, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with HSBC held by **DIANE MAXINE RICHARDS**.

COUNT 9

THEFT

On or about March 01, 2010, through March 01, 2012, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Santander held by **DIANE MAXINE RICHARDS**.

COUNT 10

THEFT

On or about December 01, 2012, through November 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Amazon held by **DIANE MAXINE RICHARDS**.

COUNT 11

THEFT

On or about September 01, 2008, through February 01, 2010, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with HSBC Automotive Finance held by **DIANE MAXINE RICHARDS**.

COUNT 12

THEFT

On or about September 01, 2008, through March 01, 2014, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$4,000, but less than \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money

was used to make payments on a personal line of credit with Capital One held by **DIANE MAXINE RICHARDS**.

COUNT 13

THEFT

On or about June 01, 2013, through February 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$4,000, but less than \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with BBVA Compass Bank held by **DIANE MAXINE RICHARDS**.

COUNT 14

THEFT

On or about July 01, 2015, through November 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$4,000, but less than \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP

Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with American Express held by **DIANE MAXINE RICHARDS**.

COUNT 15

THEFT

On or about May 01, 2013, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$4,000, but less than \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Sam's Club held by **DIANE MAXINE RICHARDS**.

COUNT 16

THEFT

On or about September 01, 2008, through February 01, 2010, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$4,000, but less than \$25,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Credit One Bank held by **DIANE MAXINE RICHARDS**.

COUNT 17

THEFT

On or about April 01, 2013, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$3,000, but less than \$4,000, with the intent to deprive the City of Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with JC Penny held by **DIANE MAXINE RICHARDS**.

COUNT 18

THEFT

On or about November 01, 2013, through October 01, 2015, **DIANE MAXINE RICHARDS**, controlled property of the City of Kingman, TO WIT: US currency with a value in excess of \$3,000, but less than \$4,000, with the intent to deprive the City of

Kingman of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. Acting without authorization, **DIANE MAXINE RICHARDS** transferred money from a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This money was used to make payments on a personal line of credit with Target held by **DIANE MAXINE RICHARDS**.

COUNT 19

FORGERY

On or about October 08, 2009, **DIANE MAXINE RICHARDS**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§ 13-2002, 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS**, acting without authorization, utilized a City of Kingman employee credit card attached to a JP Morgan Chase account ending in -2342. **DIANE MAXINE RICHARDS** presented to the City of Kingman a falsified invoice representing that the credit card was used for the purchase of books.

COUNT 20

FORGERY

On or about February 18, 2010, **DIANE MAXINE RICHARDS**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that

contains false information, in violation of A.R.S. §§ 13-2002, 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS**, acting without authorization, utilized a City of Kingman employee credit card attached to a JP Morgan Chase account ending in -2342. **DIANE MAXINE RICHARDS** presented to the City of Kingman a falsified invoice representing that the credit card was used for the purchase of books.

COUNT 21

FORGERY

On or about October 04, 2010, **DIANE MAXINE RICHARDS**, with intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§ 13-2002, 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS**, acting without authorization, utilized a City of Kingman employee credit card attached to a JP Morgan Chase account ending in -2342. **DIANE MAXINE RICHARDS** presented to the City of Kingman a falsified invoice representing that the credit card was used for the purchase of materials.

COUNT 22

MISUSE OF PUBLIC MONEY

On or about July 01, 2007, through January 01, 2015, **DIANE MAXINE RICHARDS**, while acting as a person charged with the receipt, safekeeping, transfer, or disbursement of public money, without authority of law, appropriated public money, TO

WIT: US currency belonging to the City of Kingman, or any portion thereof, to her own use, in violation of A.R.S. §§ 35-301, 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** utilized a City of Kingman employee credit card attached to a JP Morgan Chase account ending in -2342. **DIANE MAXINE RICHARDS** used this card without authorization to cover personal expenses.

DIANE MAXINE RICHARDS, acting without prior authorization from her supervisors, misappropriated \$ 121,862.11 from this account to cover various personal expenses.

COUNT 23

MISUSE OF PUBLIC MONEY

On or about September 01, 2008, through November 01, 2015, **DIANE MAXINE RICHARDS**, while acting as a person charged with the receipt, safekeeping, transfer, or disbursement of public money, without authority of law, appropriated public money, TO WIT: US currency belonging to the City of Kingman, or any portion thereof, to her own use, in violation of A.R.S. §§ 35-301, 13-701, 13-702, 13-801, 13-811.

This conduct occurred when **DIANE MAXINE RICHARDS** abused her authority as an employee within the City of Kingman Finance Department. **DIANE MAXINE RICHARDS**, acting as a Budget Analyst, was given authority to manage a JP Morgan Chase bank account held by the City of Kingman ending in -8514. This account was used by the City of Kingman as an Employee Benefits Trust Account. **DIANE MAXINE RICHARDS** served as Security Master for this account. As such, she was given authority to configure employee authorization for the initiation and approval of transactions in and out of this account. This allowed her to authorize transactions without the required approval of supervisors.

DIANE MAXINE RICHARDS, acting without prior authorization from her supervisors, misappropriated \$ 991,727.74 from this account to cover various personal expenses.

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

(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

Michael A. Powell
Assistant Attorney General
#4830590

Foreperson of the State Grand Jury