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7 Attorneys for Plaintiff

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

9 **IN AND FOR THE COUNTY OF MARICOPA**

10
11 THE STATE OF ARIZONA,

12 Plaintiff,

13 vs.

14 **HAROLD CADIZ (001),**

15
16 Defendant.

Case No.: **CR2019-001128-001**

STATE'S SENTENCING MEMORANDUM

(Settlement conducted by Honorable Jay
Adleman)

17
18 The State of Arizona, submits its recommendation in support of the sentencing currently
19 set for September 14, 2020, at 9:00. The State is asking that Defendant be sentenced to an
20 aggravated term of eight in years in DOC followed by a period of supervised probation for his
21 role in the theft of \$2,538,722.08 from the Arizona Dept. of Education, U.S. Dept. of Education,
22 and U.S. Dept. of Agriculture.

23 **FACTS**

24 Bradley Academy of Excellence (formerly Discovery Creemos Academy and Bradley
25 Creemos Academy) was a K-8 charter school located in Goodyear, Arizona. The school's CEO
26 Daniel Hughes (charged under CR 2018-006754), its Principal, Defendant Cadiz, and Vice-

1 Principal Co-defendant Joann Vega (002) worked together to steal \$2,538,722.08 from the
2 Arizona Dept. of Education, U.S. Dept. of Education, and U.S. Dept. of Agriculture over a
3 period of almost two academic years in an attempt to keep the failing Bradley Academy open.

4 Bradley Academy was formed in December of 2002 as a non-profit education business
5 by Tanya Burston who started the school in 2003 with seven students. She eventually grew
6 enrollment to approximately 160 students in the 2010-2011 school year. During that school
7 year, Burston entered a lease agreement with Highmark School Development to build a larger
8 facility that could accommodate over 500 students. The monthly payment on under the lease
9 agreement was \$85,000. To meet expenses, including the new \$85,000 monthly lease payment,
10 the school needed to run near its student capacity.

11 In 2013, Hughes' janitorial company, Benson, was hired to handle facilities management
12 at Bradley Academy. Cadiz worked as an inside sales representative with Benson and landed
13 the Bradley Academy account. Both Hughes and Cadiz began to spend time at the school
14 fulfilling the Benson contract. Burston shared with Hughes the financial difficulties the school
15 was facing due to enrollment continuing to average around 200 students. Bradley Academy was
16 behind on its lease payments to Highmark and facing foreclosure.

17 In 2015, at the request of Burston, Hughes took on a larger managerial role and traveled
18 to Utah to meet with Highmark and negotiate a new lease agreement. Under the new agreement
19 negotiated by Hughes, Highmark agreed not to foreclose Bradley Academy if Burston stepped
20 aside and transferred control of the school to Hughes as its new owner operator. Hughes was
21 designated as the school's representative with the Arizona Corporation Commission on October
22 13, 2015. In 2016, Hughes asked Cadiz if he would be the Principal of Bradley Academy.
23 Neither had any background in education; neither holds a college degree. Co-Defendant Vega
24 was employed by the school as its registrar.

25 After taking over, Hughes based the new budget for Bradley Academy on full enrollment
26

1 of 530 students. At the start of the 2016-2017 school year over 600 kids showed up for the first
2 day of school. Bradley Academy provided Arizona Dept. of Education with an estimated
3 student count of 652. Arizona Dept. of Education pays both charter schools and public schools
4 based upon Average Daily Membership. Payments are made up of Arizona Dept. of Education.
5 Funds, which come from Arizona taxpayers, and funds from the U.S. Department of Education
6 and the U.S. Department of Agriculture. Arizona Dept. of Education distributes the funds to
7 support education and cover the cost of the reduced school lunch program.

8 Schools are permitted to provide Arizona Dept. of Education with estimated enrollment
9 at the beginning of an academic year. However, on the 100th day schools must report their actual
10 enrollment and payments are adjusted up or down based on enrollment. Unfortunately for
11 Bradley Academy significant attrition in the 2016-2017 academic year occurred by the 100th day
12 and their actual enrollment number was only 461. It was clear that the payments based on the
13 lower enrollment number would not be sufficient to cover expenses. Bradley Academy was
14 contemplating deep cuts in staff and programs and potentially closure of the school.

15 The three co-conspirators met to discuss the dire financial situation at the school. All
16 three believed this was merely a bump in the road and Bradley Academy could be successful.
17 According to Hughes, during the meeting Defendant Vega suggested the idea of reporting
18 placeholder students to Arizona Dept. of Education. These fake student profiles would be
19 replaced by real students as enrollment increased. Defendant Cadiz created fraudulent student
20 and family information which was provided to Defendant Vega. Using her login information,
21 Defendant Vega entered the fraudulent information into Arizona Dept. of Education's Synergy
22 registration portal. To assure consistency, the information was used school wide including to
23 enroll the students in the Federal reduced cost lunch program. In this way, Bradley Academy
24 continued to receive inflated payments from Arizona Dept. of Education, US Dept. of
25 Education, and U.S. Dept. of Agriculture while they worked on increasing enrollment.

1 According to the audit performed by Arizona Dept. of Education, in the 2016-2017
2 academic year Bradley Academy reported enrollment of 652 students to Arizona Dept. of
3 Education; 191 of those students were fake. This resulted in Bradley Academy receiving
4 \$1,035,231 in overpayments; Arizona Dept. of Education overpaid by \$951,778.55, U.S. Dept.
5 Education overpaid \$42,900 and U.S. Dept. of Agriculture overpaid by \$40,553.

6 Despite the low enrollment number in the 2016-2017 academic year, Bradley Academy
7 did not close its doors over the summer. Rather it opened for the 2017-2018 academic year. At
8 the beginning of that year Bradley Academy enrollment was even lower. Rather than accept that
9 the school was not a viable business and close its doors, the group decided to continue reporting
10 fraudulent students. In the 2017-2018 academic year, Bradley Academy reported and 453 fake
11 students to Arizona Dept. of Education. This included rolling over fake students from the last
12 year and creating new fake students, often by creating kindergarten siblings for existing fake
13 families. In a text message, Hughes specifically directed Cadiz to create 150 “Casper kinders”
14 for existing families to cut down on the work. [Exhibit A]

15 For the 2017-2018 academic year, which ended early with the school’s closure in
16 December of 2017, the Bradley Academy reported enrollment of 528 students to Arizona Dept.
17 of Education; 453 of those students were fake. This resulted in Bradley Academy receiving
18 \$1,199,456 in overpayments; Arizona Dept. of Education overpaid by \$1,059,647, U.S. Dept. of
19 Education overpaid by \$48,456, and U.S. Dept. of Agriculture overpaid by \$ 91,356. Had the
20 school not closed half way through the school year Bradley Academy would have collected
21 \$2,399,092 for that year.

22 Fraudulent student information was kept on a spread sheet. However, in late 2107,
23 Arizona Dept. of Education selected Bradley Academy for a random physical audit of their
24 student files. To pass the audit Defendants realized they would need physical fraudulent student
25 files for the auditors to review. A typical student file contains birth certificates for students,
26

1 proof of residency, parent driver's license, student progress reports, and immunization records.
2 Due to his computer expertise, Defendant Cadiz began the process of creating the various
3 documents electronically and storing them in a share drive on the cloud. At Hughes' request,
4 Cadiz provided him with a link to the share drive so he could check on Cadiz' progress.

5 The content of the share drive was seized by the State. It contained hundreds of false
6 documents for "Casper" students created by Defendant Cadiz kept in family folders. [Exhibit B]
7 Also included in the seized documents were stock photos used to forged driver's licenses and
8 the forged licenses [Exhibit C], fraudulent immunization records [Exhibit D], and forged birth
9 certificates [Exhibit E]. A sample of a completed student and family profile appeared to be
10 ready to be printed and placed in file for Arizona Dept. of Education inspection is attached.
11 [Exhibit F] Bradley abruptly closed its doors in December of 2017 before the audit. All student
12 files were packed up and removed from the school, therefore, it is unknown if any of the files
13 were printed out and added to the real student files.

14 **Recommendation**

15 Under Count 1, theft as a class 2 felony, Defendant is facing between 3 and 12.5 years
16 with a presumptive of 5 years in DOC, and Under Count 2, theft as a class 2 felony, a period of
17 supervised probation and restitution in the amount of \$2,538,722.08. Due to his significant role
18 in defrauding the taxpayers of the State of Arizona, the State is asking the Defendant be
19 sentenced to an aggravated term of 8 years based on the following aggravating factors:

20 **1. Value of the property taken A.R.S. §13-701(D)(3).**

21 Defendant participated in a fraud that stole \$2,538,722.08 of taxpayer money from the
22 Arizona Dept. of Education, U.S. Dept. of Education, and U.S. Dept. of Agriculture earmarked
23 to provide education to the children of Arizona. Arizona Dept. of Education has only one fund
24 that it uses for both public schools and charter schools students so these funds were taken from
25 all students statewide. During the 2016-2017, the State can see how Defendants could chose to
26

1 steal funds to keep the school from closing school mid-year and displacing students, faculty, and
2 staff. What the State cannot understand is why the Defendants did not close the school over the
3 summer. The decision to enter the 2017-2018 academic year with more than double the number
4 of fraudulent students shows this was not about the welfare of the students or faculty and staff.
5 Neither Hughes nor Cadiz had any background in education; they viewed this as a business
6 venture with free money, \$2.5 million dollars of free taxpayer money.

7 **2. Presence of an accomplice. A.R.S. §13-701(D)(4).**

8 This scheme would not have worked without the cooperation of each of the three
9 defendants. Each used their own unique skills or access to assure that the Arizona Dept. of
10 Education was unaware of the fraud. Although Hughes was the CEO this scheme absolutely
11 could not have worked without Defendant Cadiz significant efforts in creating fraudulent student
12 records.

13 **3. Defendant was entrusted with taxpayer funds, A.R.S. §13-701(D)(27)**

14 If Bradley Academy were a public school Defendant would have been considered a
15 public servant under A.R.S. §13-701(D)(8). Although a charter school is not a public school it
16 is funded in the exact same way, by the taxpayers of the State of Arizona. Defendant's actions
17 were a betrayal of public trust.

18 The State acknowledges that there are some mitigating factors for this Court to consider
19 including that the Defendant came forward to report what he knew about the commission of the
20 crime. Also Defendant did not appear to profit significantly from the crime. The State's analysis
21 of bank records showed that during the relevant period Defendant received \$119,025 in salary
22 and his wife, who was also employed by the school, received \$13,042. However, presumably
23 Defendant was collecting a salary from State funds to spend time perpetrating a fraud against the
24 State.

25 Defendant and his co-conspirators knowing engaged in an elaborate and systematic fraud
26

1 that lasted for almost two years that took taxpayer funds earmarked to educate children to prop
2 up a failing business. This behavior is egregious and the State asks that Defendant be sentenced
3 to 8 years of DOC followed by no less than 5 years of supervised probation to include white
4 collar terms and be ordered to pay \$ \$2,538,722.08 jointly and severally with his two co-
5 defendants.

6 RESPECTFULLY SUBMITTED this 11th day of September, 2020.

7
8 MARK BRNOVICH
ATTORNEY GENERAL

9 /s/ Mary Harriss

10 Mary Harriss
11 Assistant Attorney General
12 Criminal Division

13
14 Foregoing filed/delivered
15 this 11th day of September, 2020 with:

16 Maricopa County Superior Court
17 Clerk of the Court
201 W. Jefferson
Phoenix, AZ 85003

18 Copy of the foregoing mailed/e-mailed
19 This 11th day of September, 2020. to:

20 The Honorable Judge Jay Adleman
21 Judge of the Superior Court
201 W. Jefferson
22 Phoenix, AZ 85003

23 Dwane Cates
24 CATES & GARVEY LAW GROUP PLLC
4425 N. 24th Street, Suite 150
25 Phoenix, Arizona 85016

1 info@azlaw4u.com

2 *Attorney for Defendant Harold Cadiz(001)*

3 /s/ Mary Harriss

4 #8852151

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Exhibit A

 **Daniel Hughes** 11:04 AM
Not sure. I'll reach out to Bishop later today to find out.

 **Brenda Conrad** 10:12 AM


 **Raquel Salvador** 9:58 AM
Please make an appointment with him ASAP... He will help you!!!!!!...

 **+1 (602) 872-1767** 6:39 AM
Yea on my way

 **Tonyo - Marco Gali...** Yesterday
Attachment: 1 Image

 **Brittany Hughes** Yesterday

Today, 10:08 AM

Just FYI... bishops grandma died this morning. The one he visits here.





































Thank you for the update... my heart goes out to him

Feel free to let him know.






































Please prepare 150 casper kinders. feel free to add as many as you can of them to families you are already created so that way you wont have to do all new residency and ID paperwork for the parents. Thanks!

































OK






































Exhibit B

Name	Type
 Abbott	File folder
 Abu	File folder
 Acosta	File folder
 Addermay	File folder
 Alexander	File folder
 Allen-Rodriguez	File folder
 Askey	File folder
 Avila	File folder
 Baj	File folder
 Barber	File folder
 Barker	File folder
 Barnes	File folder
 Bartel	File folder
 Bauer	File folder
 Bayers	File folder
 Belliveau	File folder
 Benjamin	File folder
 Bibeau	File folder
 Binford	File folder
 Blau	File folder
 Bowen	File folder
 Bracker	File folder
 Brenig	File folder
 Brenner	File folder
 Bretscher	File folder
 Brookschmidt	File folder
 Callahan	File folder
 Canyon	File folder
 Castelda	File folder
 Castro	File folder
 Cervantes	File folder
 Chafin	File folder
 Chandra	File folder
 Chayes	File folder
 Chiang	File folder
 Chiu	File folder

Name	Type
Collins	File folder
Costandzaneti	File folder
County	File folder
Culasso	File folder
Currall	File folder
Darosa	File folder
Davis	File folder
Dawson	File folder
Day	File folder
De Casserress	File folder
De Gruttola	File folder
Deehy	File folder
Degeorge	File folder
Derman	File folder
Derrah	File folder
Donahue	File folder
Donaldson	File folder
Dorra	File folder
Duncan	File folder
Elliott-Linehan	File folder
Eyberg	File folder
Fates	File folder
Fauroat	File folder
Felton	File folder
Fernando	File folder
Ferrandino	File folder
Figueroa	File folder
Fontana	File folder
Forte	File folder
Foster	File folder
Garcia Williams	File folder
Garza	File folder
Genova	File folder
Glazer	File folder
Gogan	File folder
Gomez_Young	File folder
Gonzalez	File folder

Name	Type
 Graham	File folder
 Green	File folder
 Gurse	File folder
 Hammond	File folder
 Harasymiak	File folder
 Harriman	File folder
 Haverson	File folder
 Herzlinger	File folder
 Hoffman	File folder
 Hogle	File folder
 Humenek	File folder
 Hurton	File folder
 Hutchinson	File folder
 Irvin	File folder
 Jander	File folder
 Kademan	File folder
 Kanzw	File folder
 Kearns	File folder
 Kelley	File folder
 Kellner	File folder
 Kennedy	File folder
 Kertis	File folder
 Keynes	File folder
 King	File folder
 Kinlin	File folder
 Kipling	File folder
 Lans	File folder
 Lavin	File folder
 Leblanc	File folder
 Lee	File folder
 Lehr	File folder
 Leonard	File folder
 Levinson	File folder
 Liber	File folder
 Lievesley	File folder
 Liman	File folder
 Limon	File folder

Name	Type
 Long	File folder
 Longstaff	File folder
 Macleod	File folder
 Makinnon	File folder
 Maldonado (need to reprint birth certific...	File folder
 Malmstad	File folder
 Mandell	File folder
 Mann	File folder
 Marcillo	File folder
 Marshall	File folder
 Masters	File folder
 Mcbride	File folder
 McCrickerd	File folder
 McCue	File folder
 Mcintire	File folder
 Mcmeeking	File folder
 Medin	File folder
 Meehan	File folder
 Mejia	File folder
 Menchiari	File folder
 Merminod	File folder
 Metts	File folder
 Meyer	File folder
 Montilio	File folder
 Morris	File folder
 Morse	File folder
 Mungia	File folder
 Musinsky	File folder
 Nedzweski	File folder
 Nelson	File folder
 Newell	File folder
 Nisbet	File folder
 Nummi	File folder
 Nupdal	File folder
 O'Conner	File folder
 Oldman	File folder
 Onley	File folder

Name	Type
 Ozols	File folder
 Paine	File folder
 Pendleton	File folder
 Pittman	File folder
 Pukac	File folder
 Ramella	File folder
 Reilly	File folder
 Reinhardt	File folder
 Reiver	File folder
 Renner	File folder
 Reyes	File folder
 Rifkin	File folder
 Rivard	File folder
 Robles	File folder
 Roosevelt	File folder
 Ruiz	File folder
 Sacchetti	File folder
 Saivetz	File folder
 Salinas	File folder
 Salmond	File folder
 Sankale	File folder
 Schroth	File folder
 Sebile	File folder
 Sharples	File folder
 Shephard	File folder
 Shieber	File folder
 Shuppert	File folder
 Simmons	File folder
 Sladek	File folder
 Slanda	File folder
 Sobol	File folder
 Solis	File folder
 Sorensen	File folder
 Sorvillo	File folder
 Spera	File folder
 Stager	File folder
 Stagliano	File folder


































Name	Type
 Stine	File folder
 Stukel	File folder
 Sullivan	File folder
 Summerville	File folder
 Sutton	File folder
 Sviokla	File folder
 Taplin	File folder
 Taylor	File folder
 Tefft	File folder
 Thielst	File folder
 Tilton	File folder
 Todd	File folder
 Torok	File folder
 Tramo	File folder
 Trejo	File folder
 Trujillo	File folder
 Tryniski	File folder
 Tuck	File folder
 Vaggler	File folder
 Valminuto	File folder
 Vazquez	File folder
 Velichaner	File folder
 Villegas	File folder
 Voligny	File folder
 Wallace	File folder
 Walton	File folder
 Watts	File folder
 Welles	File folder
 Williams	File folder
 Williamson	File folder
 Wiske	File folder
 Wood	File folder
 Zaccarin	File folder

Exhibit C



CALIFORNIA USA

DRIVER LICENSE



Adam Morris

DL A1998012

EXP 06/17/2029

LN MORRIS

FN ADAM

**1341 NETTLETON CRT
RIVERSIDE CA 92506**

DOB 05/17/1972

RSTR NONE

DONOR

SEX M

HGT 5'-08"

DD 09/30/201060221/21FD/15

HAIR BN

WGT 157 lb

EYES BN

ISS

06/17/2009

**CLASS C
END NONE**

08311977

JOHN R KASICH, GOVERNOR
Donald J Peit Registrar, BMV



Class
D

Ohio

7502TL7325190000

USA

DRIVER LICENSE



1 MEYER
2 AUBREY ELEANOR
8 327 GREENWOOD AVE
AKRON, OH 44320

4d LICENSE NO. 3 BIRTHDATE 4a ISSUE DATE
TL545796 05-14-1975 08-01-2015

9 CLASS 4b EXPIRES 9a ENDORS 12 RESTR
D A

Aubrey Meyer
05-14-1975

15 Sex: **F** 16 Ht. **5-07** 17 Wt. **135**
18 Eyes: **BRO** 19 Hair: **BLK**

Virginia

VA, USA

DRIVER'S LICENSE



91123

Angela Duncan

♥ Organ Donor
DD T91123228

Customer identifier
T91123228

Court Code
PQ2Q

Name
**DUNCAN
ANGELA SUSANNA**

Address
**124 N GRAYSON ST
ALEXANDRIA, VA 22304**

Sex
F

Eyes
BRO

Height
5 FT 6 IN

Class
NONE

Endorsements
S

Restrictions
NONE

Date of birth
08/22/1974

Iss ORI
05/05/2010

Exp
05/05/2020



T91123228DUNCANANGELAT911

dmv
www.dmvNow.com

Exhibit D

ARIZONA SCHOOL IMMUNIZATION RECORD

This form must be completed from an immunization record provided by parent or guardian.
See reverse side for instructions.

1163

I. IDENTIFICATION INFORMATION

CHILD'S NAME NOMBRE DE NIÑO <i>Mitchell, Elijah. P.</i>	BIRTH DATE FECHA DE NACIMIENTO <i>4/11/05</i>
ENTRY GRADE (circle) Pre-K K 1 <u>2</u> 3 4 5 6 GRADO (marque con circulo) 7 8 9 10 11 12	SEX Male <input checked="" type="checkbox"/> Female <input type="checkbox"/> SEXO Niño <input type="checkbox"/> Niña <input type="checkbox"/>

II. IMMUNIZATIONS

	1st MO/DAY/YR	2nd MO/DAY/YR	3rd MO/DAY/YR	4th MO/DAY/YR	5th MO/DAY/YR	6th MO/DAY/YR
(DTaP/DTP) Diphtheria, Tetanus & Pertussis Difteria, Tetano y Tos Ferina	<i>1/3/06</i>	<i>10/27/07</i>	<i>3/25/09</i>	<i>4/6/10</i>		
(DT) Diphtheria & Tetanus Difteria y Tetano						
(Td) Tetanus & Diphtheria Tetano y Difteria						
(Tdap) Tetanus, Diphtheria, acellular Pertussis Tetano, Difteria y Tos Ferina						
(IPV/OPV) Polio Vaccine Vacuna Antipoliomielitica	<i>1/3/06</i>	<i>10/27/07</i>	<i>3/25/09</i>	<i>4/6/10</i>		
(MMR) Measles, Mumps & Rubella Sarampión, y Paperas, y Rubèola (Month, Day & year required)	<i>3/25/09</i>	<i>4/6/10</i>				
(Hib) Haemophilus Influenzae b Required for Pre-K program, children age 2 months to age 5 years. Influenzae Haemophilus tipo B	<i>1/3/06</i> Manufacturer	<i>10/27/07</i> Manufacturer	<i>4/6/10</i> Manufacturer			
(Hep B) Hepatitis B La Vacuna Hepatitis B	<i>4/11/05</i>	<i>6/1/05</i>	<i>5/25/09</i>			
(Hep A) Hepatitis A La Vacuna Hepatitis A	<i>3/25/09</i>	<i>4/6/10</i>				
Varicella (Chickenpox) Varicella Check box if pupil attended childcare/school in AZ with parental recall of chicken pox before 9/1/11 <input type="checkbox"/>	<i>3/25/09</i>	<i>4/6/10</i>				
Meningococcal Meningococicas						
HPV (Human Papilloma Virus) Virus Papilloma Humano						
Other (Including Influenza Vaccine)						
TB Skin Test: (optional) List most recent test Prueba de tuberculosis del piel: (opcion) Liste la más reciente prueba						

This record is part of the mandatory permanent pupil records as defined in Arizona Revised Statute 15-874 and shall transfer with that record. Local health departments shall have access to this record.

FOR SCHOOL USE ONLY:

Enrollment Date: *9/12/11*

Schedule for Completion (Check dose(s) needed)

VACCINE	1ST	2ND	3RD	4TH	5TH	6TH
DTap/DTP/DT/Td						
Tdap						
OPV/IPV						
MMR						
Hib						
Hep A						
Hep B						
Mening						
VAR						

III. Documentation

I certify that I reviewed this student's immunization record and it has been transcribed accurately.
Date *11/18/13*
Admitting Official *[Signature]*

Documentation presented:

- Arizona Lifetime Record
- Foreign country (name) _____
- Out-of-State record (name) _____
- Other (name) _____

IV. Status of Requirements

- A. Immunization complete Date *1/1/11*
- B. Currently up-to-date; more doses are due later. Needs follow-up.
- C. Laboratory evidence of immunity to: _____

Exemption for:

- D. Medical Reasons-Permanent
Date *1/1/11*
- E. Medical Reasons-Temporary until
Date *1/1/11*
- F. Personal Beliefs
Date *1/1/11*

ImmTrac ID: 133281073
 Client Name: STROM, BRYAN D
 DOB: 10/10/2010
 Client Type: ImmTrac Child (IC)

Gender: F
 Client Age: 6 years 10 month
 Report Date: 07/08/2014

IMMUNIZATION HISTORY

Vaccine Family	Vaccine Type	Immunization Date
Any combination vaccines (e.g., DTaP-HepB-IPV, HepB-Hib) administered are listed within each appropriate vaccine family.		
Hepatitis B	HepB, 3 dose series, ped/adol	11/22/2010
	HepB, 3 dose series, ped/adol	11/22/2010
DTP/DTaP/DT/Td	DTaP	02/20/2011
	DTaP	02/20/2011
	DTaP	02/20/2011
Hib	Hib, PRP-T	03/27/2011
	Hib, PRP-T	03/27/2011
Pneumococcal	Pneumococcal (PCV7)	06/16/2012
	Pneumococcal (PCV7)	06/16/2012
Polio/IPV	Polio, IPV	08/20/2013
	Polio, IPV	10/16/2013
Varicella	Varicella (VAR)	08/09/2014
Hepatitis A	HepA, 2 dose series, ped/adol	09/08/2015
Influenza	Influenza, split, 36+ mos pres free	10/26/2016
	Influenza, split, 6-35 mos.	01/17/2016
	Influenza, split, 36+ mos.	01/17/2016

Next Vaccine Due / Próxima Vacuna Necesaria: _____

ImmTrac - Immunization Registry

Signature of Issuing Entity: Department of State Health Services

/ PFS# 0000040002 Date: 07/08/2014

Client Record

Disclaimer: The registry may not contain complete immunization histories.

Page: 1 of 1



FLORIDA CERTIFICATION OF IMMUNIZATION

Legal Authority: Sections 1003.22, 402.305, 402.313, Florida Statutes; Rule 64D-3.046, Florida Administrative Code

MADDOX TANIYA N 01/06/2006
 Last Name First Name MI DOB
 THORPE, TEANDREA 771-46-5365 8002808717
 Parent or Guardian Child's SS# (optional) State Immunization ID#

Directions:

- Review all appropriate doses and dates then sign and date the certificate below.
- For additional information: See DH Form 150-615, *Immunization Guidelines - Florida Schools, Childcare Facilities and Family Daycare Homes* (July 2010) for information and instructions on form completion and immunization requirements. Guidelines are available at: www.ImmunizeFlorida.org/schoolguide.pdf.

VACCINE	DOE CODE	Dose 1 MM/DD/YYYY	Dose 2 MM/DD/YYYY	Dose 3 MM/DD/YYYY	Dose 4 MM/DD/YYYY	Dose 5 MM/DD/YYYY
DTaP/DTP	A	03/06/2006	05/08/2006	07/06/2006	11/26/2007	03/02/2010
DT	B					
Tdap	P					
Td	Q					
Polio	D	03/06/2006	05/08/2006	07/06/2006	03/02/2010	Complete
HIB	E	03/06/2006	05/08/2006	07/06/2006	01/08/2007	
MMR (Combined) (Separate)	F	01/08/2007	03/02/2010			
	G,H	Measles (dose 1)	Measles (dose 2)	Mumps (dose 1)	Mumps (dose 2)	
		I	Rubella (dose 1)	Rubella (dose 2)		
Hepatitis B	J	03/06/2006	05/08/2006	07/06/2006		
Varicella Varicella Disease	K	11/26/2007	03/02/2010			
	L	Year				
PneumoConju	N	03/06/2006	05/08/2006	07/06/2006	01/08/2007	

Certificate of Immunization for K-12

PART A DOE Code 1: Immunizations are complete K-12 (Excluding 7th grade/middle school requirements)
 I have reviewed the records available, and to the best of my knowledge, the above named child has been adequately immunized for school attendance as documented above.

Physician or Clinic Name:

ALL ABOUT KIDS PEDIATRIC ASSOC
 12086 FORT CAROLINE RD STE 401
 JACKSONVILLE, FL 32225
 (904) 565-1271

Physician or
 Authorized Signature:

Date: 05/09/2013

Exhibit E

CERTIFICATE OF BIRTH

State of Illinois, }
County of Peoria. } ss.

I, LEONARD T. SOURS, do hereby certify that

Carmine Otto Tefft _____ of the Male sex
(Male or Female)

was born on July 30th, 2010 _____ at Limestone Twp., Peoria, Ill.
(Date of Birth) (City, Village or Township)

in the County of Peoria and State of Illinois, all of which appears from the records and files in my office.

GIVEN under my hand and seal this 4th day of August 20 10

Leonard T. Sours

Date filed August 7th, 2010

By

Glen R. Gullett
County Clerk
Deputy

P0022018000375
AG006209

CERTIFICATION OF VITAL RECORD

STATE OF TEXAS
ELLIS COUNTY

FILE NO.: 566220-8012

NAME: SCOT LARS SALINAS

DATE OF BIRTH: 04-19-2011

SEX: MALE

PLACE OF BIRTH: DALLAS COUNTY, TEXAS

FATHER: CLARENCE SALINAS

DATE FILED: 04-24-2011 1

04-24-2011

40091

I hereby certify that this abstract of birth facts has been provided to this office by the Texas Department of Health, Bureau of Vital Statistics, from a document officially in its custody.















Cindy Polley

CINDY POLLEY
COUNTY CLERK
ELLIS COUNTY, TEXAS



FOR REORDER: CALL SCOTT WERNER, INC., DALLAS, TX 1-800-448-1032

Exhibit F

Name	Date modified	Type	Size
 Birth-Certificate---Arianna-Abbott.gif	9/20/2017 2:36 AM	GIF Image	344 KB
 Birth-Certificate---Charles-Abbott.gif	2/9/2017 1:53 AM	GIF Image	344 KB
 Birth-Certificate---Jackie-Abbott.gif	2/9/2017 1:51 AM	GIF Image	344 KB
 Birth-Certificate---Malcom-Abbott.gif	2/9/2017 1:55 AM	GIF Image	344 KB
 Leap-Report---Arianna-Abbott.gif	9/20/2017 8:28 AM	GIF Image	674 KB
 Leap-Report---Charles-Abbott.gif	9/20/2017 2:57 AM	GIF Image	634 KB
 Leap-Report---Jackie-Abbott.gif	5/17/2017 10:35 AM	GIF Image	1,362 KB
 Leap-Report---Malcom-Abbott.gif	5/17/2017 10:53 AM	GIF Image	1,362 KB
 Liberty Utilities - Charles Abbott.pdf	2/22/2017 10:54 PM	Adobe Acrobat D...	1,566 KB
 License---Charels-Abbott.gif	3/14/2017 12:38 AM	GIF Image	370 KB
 Shot-Record---Arianna-Abbott.gif	9/20/2017 8:44 AM	GIF Image	247 KB
 Shot-Record---Charles-Abbott.gif	3/31/2017 4:44 AM	GIF Image	90 KB
 Shot-Record---Jackie-Abbott.gif	3/28/2017 2:44 AM	GIF Image	246 KB
 Shot-Record---Malcom-Abbott.gif	3/31/2017 6:46 AM	GIF Image	185 KB

MICHIGAN MI
USA

DRIVER LICENSE



Charles Abbott

D 911 899 110 213
DOB 07-14-1972

ISS 04-01-2011
EXP 05-01-2021

071472

CHARLES DEXTER ABBOTT
14311 SAINT MARYS ST
DETROIT, MI 48227

Sex M
Lic Type 0

Hgt 509
End NONE

Eyes BRO

Restrictions NONE



DD 8772100940173

DONOR ❤️
Rev 01-21-2011



Liberty Utilities

12725 W. Indian School RD. D101
Avondale, AZ 85392
Visit our website at www.LibertyUtilities.com

FOR QUESTIONS REGARDING YOUR BILL CALL (623) 935-9367
FOR EMERGENCIES (After Hours) CALL (623) 935-3395
BUSINESS HOURS M-F 7:30 am - 4:30 pm

CHARLES ABBOTT
15400 W GOODYEAR BLVD
GOODYEAR AZ 85338

s853950s

Statement

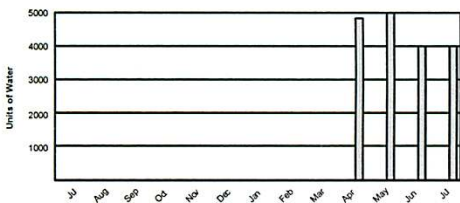
ACCOUNT INFORMATION	
Account Number:	8600410383-542252
Community Code:	8600
Statement #:	1213364
Bill Date:	06/01/2016
Due Date:	07/01/2016
Service Address: 15400 W GOODYEAR BLVD	

SPECIAL MESSAGE

Please visit us at www.LibertyUtilities.com

SERVICE TYPE	SERVICE DATES	METER NUMBER	CURRENT READ	PREVIOUS READ	UNITS	CHARGE
Residential Sewer	06/01/2016 - 07/01/2016				1.000	\$ 40.35
1 Inch Residential Water Meter	06/03/2016 - 07/30/2016	64365678	655	651	4	\$ 32.87
<i>Current Charges Before Taxes</i>						\$ 73.22

ANNUAL WATER CONSUMPTION COMPARISON



ACCOUNT ACTIVITY

Previous Balance	76.28
Payment - Thank you!	-76.28
Residential Sewer Monthly Charge	40.35
Monthly Water Meter Charge	29.84
Consumption Charge 4000.00 Gal @ 0.07500	3.00
ADEQ	0.03
ACC Assessment Surcharge	0.15
Arizona State Sales Tax	1.78
Maricopa County Sales Tax	0.30
Goodyear Sales Tax	0.83
Total Amount Due	76.28

KEEP THIS PORTION FOR YOUR RECORDS

Please include your account number on your check
Make check payable to Litchfield Park Service Co.

Payment Coupon

Please check box and see reverse for

Automatic payment sign up Update phone / address

Service Address: 15400 W GOODYEAR BLVD

CHARLES ABBOTT
15400 W GOODYEAR BLVD
GOODYEAR AZ 85338

LATE PAYMENT FEE:
Payments received after the due date
are subject to Greater of \$5 or 1.5%

Account Number: 8600410383-542252
Community Code: 8600
Statement #: 1213364
Bill Date: 06/01/2016
Due Date: 07/03/2016

Liberty Utilities
PO Box 52691
Department 8600
Phoenix, AZ 85072
85072

0000001213364000000005422520000860041038300000076286918

P0022018000375
AG006360



STATE OF MICHIGAN CERTIFICATE OF LIVE BIRTH



State File Number: 762-619-9800122 Date Filed: May 06, 2012
Child's Name (First, Middle, Last, Suffix): Arianna Mila Abbott
Date of Birth: May 01, 2012
Gender: Female
Child's Birthplace: Detroit, Wayne County
Mother's Name Before First Married: Cynthia James
Mother's Birthplace: Utah Mother's Age: 36
Father's Name: Charles Abbott
Father's Birthplace: Mexico Father's Age: 39

I hereby certify that the above is a true and correct representation of the birth facts on file with the Division for Vital Records, Michigan Department of Community Health.

Certified by:

A. Lynn Cozeland

Date Issued: May 09, 2012
AFS: 2249411



STATE OF MICHIGAN CERTIFICATE OF LIVE BIRTH



State File Number: 311-783-4575999

Date Filed: June 08, 2009

Child's Name (First, Middle, Last, Suffix): Charles Mason Abbott

Date of Birth: June 03, 2009

Gender: Male

Child's Birthplace: Detroit, Wayne County

Mother's Name Before First Married: Cynthia James

Mother's Birthplace: Utah

Mother's Age: 36

Father's Name: Charles Abbott

Father's Birthplace: Mexico

Father's Age: 39

I hereby certify that the above is a true and correct representation of the birth facts on file with the Division for Vital Records, Michigan Department of Community Health.

Certified by: *Alanna Copeland*

Date Issued: June 11, 2009
AFS: 2249411



STATE OF MICHIGAN CERTIFICATE OF LIVE BIRTH



State File Number: 217-273-4515019 Date Filed: July 16, 2010
Child's Name (First, Middle, Last, Suffix): Jackie Ann Abbott
Date of Birth: July 12, 2010
Gender: Female
Child's Birthplace: Detroit, Wayne County
Mother's Name Before First Married: Cynthia James
Mother's Birthplace: Utah Mother's Age: 36
Father's Name: Charles Abbott
Father's Birthplace: Mexico Father's Age: 39

I hereby certify that the above is a true and correct representation of the birth facts on file with the Division for Vital Records, Michigan Department of Community Health.

Certified by: *A. Lynn Cozeland*

Date Issued: July 20, 2010
AFS: 2249411



STATE OF MICHIGAN CERTIFICATE OF LIVE BIRTH



State File Number: 845-682-4474992

Date Filed: April 18, 2008

Child's Name (First, Middle, Last, Suffix): Malcom Jay Abbott

Date of Birth: April 15, 2008

Gender: Male

Child's Birthplace: Detroit, Wayne County

Mother's Name Before First Married: Cynthia James

Mother's Birthplace: Utah

Mother's Age: 36

Father's Name: Charles Abbott

Father's Birthplace: Mexico

Father's Age: 39

I hereby certify that the above is a true and correct representation of the birth facts on file with the Division for Vital Records, Michigan Department of Community Health.

Certified by: *Alanna Copeland*

Date Issued: April 21, 2009
AFS: 2249411



Learning | Engagement | Academic | Portfolio
 Kindergarten LEAP Report for: Abbott, Arianna M.
 LEAP Report Date: December 9, 2016

English Language Arts Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages	LEAP Component	Title Earned
Reading Writing Speaking & Listening Spelling and Vocabulary Grammar	Master Understudy Understudy Master Master	Learning Skills / Standards Engagement Behavior Portfolio Collection / Review	Master Master Explorer
Math Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages		
Algebraic Thinking Number and Operations Measurement and Data Geometry	Understudy Master Understudy N/A		



Learning | Engagement | Academic | Portfolio
 2nd Grade LEAP Report for: Abbott, Charles Jr., M.
 LEAP Report Date: December 9, 2016

English Language Arts Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages	LEAP Component	Title Earned
Reading Writing Speaking & Listening Spelling and Vocabulary Grammar	Master Understudy Understudy Master Master	Learning Skills / Standards Engagement Behavior Portfolio Collection / Review	Master Master Explorer
Math Skills / Standards Algebraic Thinking Number and Operations Measurement and Data Geometry	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages Understudy Master Understudy N/A		



Learning | Engagement | Academic | Portfolio
1st Grade LEAP Report for: Abbott, Jackie A
LEAP Report Date: December 9, 2016

English Language Arts Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages	LEAP Component	Title Earned
Reading	Master	Learning Skills / Standards	Master
Writing	Understudy		
Speaking & Listening	Understudy	Engagement Behavior	Master
Spelling and Vocabulary	Master		
Grammar	Master	Portfolio Collection / Review	Explorer
Math Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages		
Algebraic Thinking	Understudy		
Number and Operations	Master		
Measurement and Data	Understudy		
Geometry	N/A		



Learning | Engagement | Academic | Portfolio
3rd Grade LEAP Report for: Abbott, Malcom J.
LEAP Report Date: December 9, 2016

English Language Arts Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages	LEAP Component	Title Earned
Reading	Master	Learning Skills / Standards	Master
Writing	Understudy		
Speaking & Listening	Understudy	Engagement Behavior	Master
Spelling and Vocabulary	Master		
Grammar	Master	Portfolio Collection / Review	Explorer
Math Skills / Standards	Title Earned <small>based on</small> Average Weekly Assessment Grades / Percentages		
Algebraic Thinking	Understudy		
Number and Operations	Master		
Measurement and Data	Understudy		
Geometry	N/A		

Logged in: ROSALIA HAYES

Organization (IRMS): BRADLEY ACADEMY OF EXCELLENCE, INC. (4033)

Date: February 19, 2015

Name: ARIANNA MILA ABBOTT
 Date of Birth: 05/01/2012
 Guardian: CHARLES ABBOTT
 SIIS Patient ID: 5325707
 Age: 247 weeks, 56 months, 4 yrs
 Status: Active

[Print Page](#)

(*- Historicals , # - Adverse Reaction , !1- Warning , !2- Warning , !3- Warning , +- Unverified Historicals , ^ - Compromised Vaccination)

Vaccine	1	2	3	4	5	6
DTaP	02/19/2015					
DTaP/Hep B/IPV	02/09/2012	04/12/2012	06/16/2012			
DTaP/IPV	12/12/2015					
Hep A 2 dose - Ped/Adol	12/21/2012	06/26/2013				
Hep B - Ped/Adol - presv. free	11/28/2012					
Hib-PRP-OMP	02/09/2012	04/12/2012	06/16/2012	02/19/2014		
Influenza, live intranasal, quadrivalent	12/12/2015					
MMR	12/21/2012	12/12/2015				
Pneumococcal, PCV-13	02/09/2011	04/12/2012	06/16/2012	12/21/2012		
Rotavirus, pentavalent RV5	02/09/2012	04/12/2012	06/16/2012			
Varicella	12/21/2011	12/12/2015				
DTaP/Hib/IPV						
HPV, bivalent						
HPV, quadrivalent						
HPV9						
Hib-PRP-T						
IPV						
Influ Inact 48+ mos pres free						
Influ split 36+ mos						
Influ split 36+ mos pres free						
Influ split 6-35 mos pres free						
Influenza Split						
Influenza inj quadrivalent pres free 36+ mos						
Influenza inj quadrivalent pres free 6-35 mos						
Influenza inj quadrivalent w/presv. 36+ mos						
Influenza inj quadrivalent w/presv. 6+ mos						
Influenza split, 6-35 mos.						

Logged in: ROSALIA HAYES

Organization (IRMS): BRADLEY ACADEMY OF EXCELLENCE, INC. (4033)

Date: October 14, 2016

Patient Name: CHARLES JR MASON ABBOTT SIIS Patient ID: 4194789
 Date of Birth: 06/03/2009 Age: 329 weeks, 75 months, 6 yrs
 Guardian: Status: Active

[Print Page](#)

Vaccination View

(* - Historicals , # - Adverse Reaction , !1 - Warning , !2 - Warning , !3 - Warning , +- Unverified Historicals , ^ - Compromised Vaccination)

Vaccine	1	2	3	4	5	6
DTaP	04/11/2014					
DTaP/Hib/IPV	08/21/2009	10/22/2009	02/16/2010	X 10/21/2010		
Hep A 2 dose - Ped/Adol	10/21/2010	04/11/2014				
Hep B - Ped/Adol - presv. free	06/20/2009					
Hepatitis B--adol. or pediatric	07/22/2009	04/22/2010				
IPV	04/11/2014					
MMR	07/12/2010	04/11/2014				
Pneumococcal, PCV-13	07/12/2010					
Pneumococcal, PCV7	08/21/2009	10/22/2009	02/16/2010			
Rotavirus, pentavalent RV5	10/22/2009	02/16/2010				
Varicella	07/12/2010	04/11/2014				
DTaP/Hep B/IPV						
DTaP/IPV						
HPV, bivalent						
HPV, quadrivalent						
HPV9						
Hib--PRP-OMP						
Hib--PRP-T						
Influ Inact 48+ mos pres free						
Influ split 36+ mos						
Influ split 36+ mos pres free						
Influ split 6-35 mos pres free						
Influenza Split						
Influenza inj quadrivalent pres free 36+ mos						
Influenza inj quadrivalent pres free 6-35 mos						
Influenza inj quadrivalent w/presv. 36+ mos						
Influenza inj quadrivalent w/presv. 6+ mos						

Logged in: ROSALIA HAYES

Organization (IRMS): BRADLEY ACADEMY OF EXCELLENCE, INC. (4033)

Date: November 25, 2016

Name: JACKIE ANN ABBOTT
 Date of Birth: 07/12/2010
 Guardian: CHARLES ABBOTT
 SIIS Patient ID: 5325707
 Age: 247 weeks, 56 months, 4 yrs
 Status: Active

[Print Page](#)

(*- Historicals , # - Adverse Reaction , !1- Warning , !2- Warning , !3- Warning , +- Unverified Historicals , ^ - Compromised Vaccination)

Vaccine	1	2	3	4	5	6
DTaP	02/19/2013					
DTaP/Hep B/IPV	02/09/2011	04/12/2011	06/16/2011			
DTaP/IPV	12/12/2014					
Hep A 2 dose - Ped/Adol	12/21/2011	06/26/2012				
Hep B - Ped/Adol - presv. free	11/28/2010					
Hib-PRP-OMP	02/09/2011	04/12/2011	06/16/2011	02/19/2013		
Influenza, live intranasal, quadrivalent	12/12/2014					
MMR	12/21/2011	12/12/2014				
Pneumococcal, PCV-13	02/09/2011	04/12/2011	06/16/2011	12/21/2011		
Rotavirus, pentavalent RV5	02/09/2011	04/12/2011	06/16/2011			
Varicella	12/21/2011	12/12/2014				
DTaP/Hib/IPV						
HPV, bivalent						
HPV, quadrivalent						
HPV9						
Hib-PRP-T						
IPV						
Influ Inact 48+ mos pres free						
Influ split 36+ mos						
Influ split 36+ mos pres free						
Influ split 6-35 mos pres free						
Influenza Split						
Influenza inj quadrivalent pres free 36+ mos						
Influenza inj quadrivalent pres free 6-35 mos						
Influenza inj quadrivalent w/presv. 36+ mos						
Influenza inj quadrivalent w/presv. 6+ mos						
Influenza split, 6-35 mos.						

Desert Valley Pediatrics
4137 N 108th Avenue Phoenix, AZ 85037
6238777337 Fax: 6237720686

December 6, 2013
Page 1

Patient Information

For: Malcom J Abbott

Immunization Report

Malcom J Abbott
15400 W Goodyear Blvd
Goodyear, AZ 85338
(480) 739-5964

Date of Birth: 04/15/2008
Responsible Provider:
Robert Altamura DD
Social Security #:

<u>IMMUNIZATION</u>	<u>DATE ADMINISTERED</u>	<u>VALUE</u>
Hepatitis B Vaccine #1	11/23/2009	given
Hepatitis B Vaccine #2	01/12/2010	given
Hepatitis B Vaccine #3	08/29/2013	given
DTaP Immunization #1	11/20/2008	given
DTaP Immunization #2	02/05/2009	given
DTaP Immunization #3	07/21/2009	given
DTaP Immunization #4	01/12/2010	given
DTaP Immunization #5	08/29/2013	given
Hemophilus Influenza B Immunization #1	01/07/2009	given
Hemophilus Influenza B Immunization #2	03/20/2009	given
Hemophilus Influenza B Immunization #3	06/10/2009	given
Hemophilus Influenza B Immunization #4	09/29/2011	given
MMR Virus Immunization #1	09/29/2011	given
MMR Virus Immunization #2 ***	08/29/2013	given
Varicella (Chickenpox) Immunization #1	09/22/2009	given
Varicella (Chickenpox) Immunization #2 ***	08/29/2013	given
Pediatric Pneumococcal Vaccine (Pevnar 7) #1	06/10/2009	given
Pediatric Pneumococcal vaccine (Pevnar 7) #2	07/21/2009	given
Pediatric Pneumococcal vaccine (Pevnar 7) #3	09/22/2009	given
Pediatric Pneumococcal vaccine (Pevnar 7) #3	07/21/2009	given
Pediatric Pneumococcal Vaccine (Pevnar 13) #4	09/30/2010	given
Hepatitis A Vaccine #1	11/23/2009	given
Hepatitis A Vaccine #2	09/30/2010	given
Rotavirus vaccine #1 (Rotateq)	11/20/2008	given
Rotavirus vaccine #2 (Rotateq)	02/05/2009	given
Rotavirus vaccine #3 (Rotateq)	03/20/2009	given

Bold items indicate information that is unsigned and could be changed

- * given as the Pediarix vaccine (combined DTaP, HepB, IPV)
- ** given as the Comvax vaccine (combined HIB and HepB)
- *** given as the Proquad vaccine (combined MMR and Varicella)
- **** given as the Kinrix vaccine (combined DTaP and IPV)
- ^ given as the combined DTaP and HIB vaccine
- ~ given as the combined DTP and HIB vaccine