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

STATE OF ARIZONA,

Plaintiff,

v.

**CHALICE RENEE ZEITNER AKA
CHALICE ZEITNER-HUTCHINSON
AKA CHALICE R. VEITNER-
HUTCHINSON AKA AL
HUTCHINSON AKA AL ZEITNER
AKA AL SERKEZ,**

Defendant.

Case No:

77 SGJ 90

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-2: FRAUDULENT
SCHEMES AND ARTIFICES, Class 2
Felonies, in violation of A.R.S. § 13-2310;**

**COUNT 3: MONEY LAUNDERING, a
Class 2 Felony, in violation of A.R.S. § 13-
2317;**

**COUNT 4: THEFT, a Class 3 Felony, in
violation of A.R.S. § 13-1802;**

**COUNTS 5-6: TAKING THE
IDENTITY OF ANOTHER PERSON OR
ENTITY, Class 4 Felonies, in violation of
A.R.S. § 13-2008;**

**COUNT 7: RECEIPT OF ANYTHING
OF VALUE OBTAINED BY
FRAUDULENT USE OF A CREDIT
CARD, a Class 5 Felony, in violation of
A.R.S. § 13-2103;**

COUNT 8: THEFT, a Class 6 Felony, in violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, charging on this 17 day of August, 2015, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On, about, or between July 3, 2012 and September 13, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: transaction made to Arizona Public Service, Rent-A-Center, Love's Travel Stop, and the Phoenix Municipal Court, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES

On, about, or between August 14, 2012 and November 30, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: U.S. currency from Veteran Tickets Foundation and/or Michael A. Focareto III, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

COUNT 3

MONEY LAUNDERING

On, about, or between July 3, 2012 and October 31, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, knowingly initiated, organized, planned, directed, managed or supervised money laundering in that he acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that they were the proceeds of an offense, or he conducted a transaction knowing or having reason to know that the property involved was the proceeds of an offense and with the intent to conceal or disguise the nature, location, source, ownership or control of the property or the intent to facilitate racketeering TO WIT: a scheme or artifice to defraud, forgery, and/or theft, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-701, 13-702, and 13-801.

COUNT 4

THEFT

On, about, or between August 14, 2012 and November 30, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, without lawful authority, knowingly converted for an unauthorized term or use, property of Veteran Tickets Foundation and/or Michael A. Focareto III, TO WIT: U.S. currency, of a value of four thousand dollars or more but less than twenty-five thousand dollars, entrusted to or placed in **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**

possession for a limited, authorized term or use, in violation of A.R.S. §§ 13-1801, 13-1802(A)(2), 13-701, 13-702, and 13-801.

COUNT 5

TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On, about or between July 3, 2012 and September 13, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, knowingly took, manufactured, possessed or used any entity identifying information of BRITTANY ECKER, TO WIT: her name, date of birth, and social security number, without the consent of BRITTANY ECKER, with the intent to obtain or use BRITTANY ECKER'S identity for any unlawful purpose, in violation of A.R.S. §§13-2008, 13-2001, 13-701, 13-702, and 13-801.

COUNT 6

TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On, about or between October 28, 2012 and November 1, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, knowingly took, manufactured, possessed or used any entity identifying information of KENNETH CHRIS JOHNSON, TO WIT: his name without the consent of KENNETH CHRIS JOHNSON, with the intent to obtain or use KENNETH CHRIS JOHNSON'S identity for any unlawful purpose, in violation of A.R.S. §§13-2008, 13-2001, 13-701, 13-702, and 13-801.

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COUNT 7

**RECEIPT OF ANYTHING OF VALUE OBTAINED BY FRAUDULENT USE OF
A CREDIT CARD**

On, about, or between August 11, 2012 and September 5, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, obtained by fraudulent use of a credit card bought or received money, goods, services or any other thing of value TO WIT: payments to Arizona Public Service, Rent-a-Center, Love's Travel Stop, and the City of Phoenix Municipal Court, with an aggregated value of value of one thousand dollars or more, obtained in violation of A.R.S. § 13-2105, knowing or believing that it was so obtained, in violation of A.R.S. §§13-2103, 13-2101, 13-701, 13-702, and 13-801.

COUNT 8

THEFT

On, about, or between August 11, 2012 and September 5, 2012, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VEITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, without lawful authority, knowingly obtained services or property of AMERICAN EXPRESS, TO WIT: U.S. Currency, by means of any material misrepresentation with intent to deprive AMERICAN EXPRESS of such property or services, in violation of A.R.S. §§ 13-1801, 13-1802(A)(3), 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 Pima County, Arizona.

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 8/17/15



Scott W. Blake
Assistant Attorney General



Foreperson of the State Grand Jury

#4599445