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DHSI DR# I21-FEMA-TUC-18696

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

DAVID CHRISTOPHER ELLIS
(001),
(Counts 1 - 18)

GABBRIELLE ELIZABETH ELLIS
(002),
(Counts 1 - 18)

Defendants.

Cause No:

96 SGJ 143

DIRECT INDICTMENT

CHARGING VIOLATIONS OF:

COUNTS 1, 3, 5, 7, 9, 11, and 13:
FORGERY, a Class 4 Felony, in violation of
A.R.S. § 13-2002(A)(3)

COUNTS 2, 6, 8, 10, 12, and 14:
AGGRAVATED TAKING IDENTITY
OF ANOTHER, a Class 3 Felony, in
violation of A.R.S. § 13-2009(A)(2)

COUNT 4: TAKING THE IDENTITY OF
ANOTHER, a Class 4 Felony, in violation of
A.R.S. § 13-2008(A)

COUNT 15: FRAUDULENT SCHEMES
AND ARTIFICES, a Class 2 Felony, in
violation of A.R.S. § 13-2310(A)

COUNT 16: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(1)

COUNT 17: ILLEGALLY CONDUCTING AN ENTERPRISE, a Class 3 Felony, in violation of A.R.S. § 13-2312(B) and (D)

COUNT 18: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. § 13-1003

The State Grand Jury accuses **DAVID CHRISTOPHER ELLIS (001)** and **GABBRIELLE ELIZABETH ELLIS (002)**, charging on this 23rd day of June, 2025 that in or from Pima County, Arizona:

COUNT 1

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 3, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Kelson Dingel, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 2

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 3, 2020 and July 20, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Kelson Dingel, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 3

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 3, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Nathaniel Kowalski, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 4

TAKING THE IDENTITY OF ANOTHER, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 3, 2020, knowingly did take, purchase, manufacture, record, possess or use any personal identifying information or entity identifying information of Nathaniel Kowalski, without consent, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity, in violation of A.R.S. §§ 13-2001, 13-2008, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 5

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 12, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Claudia Uriarte, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-701, 13-702, and 13-801.

COUNT 6

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 12, 2020 and July 20, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Claudia Uriarte, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 7

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 13, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Florence Nicholson, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 8

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 13, 2020 and August 3, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Florence Nicholson, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 9

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 13, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Melissa Saulsgiver, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 10

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 13, 2020 and July 20, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Melissa Saulsgiver, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 11

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about June 23, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Valerie Washington, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 12

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 23, 2020 and July 20, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Valerie Washington, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 13

FORGERY, A CLASS 4 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or about July 15, 2020, with intent to defraud, did offer or present to Arizona Department of Economic Security a Pandemic Unemployment Assistance application on behalf of Nathaniel Kowalski, a forged instrument or one which contained false information, in violation of A.R.S. §§ 13-2001, 13-2002(A)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 14

AGGRAVATED TAKING IDENTITY OF ANOTHER, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between July 15, 2020 and July 20, 2020, knowingly did take, purchase, manufacture, record, or use any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, to wit: Nathaniel Kowalski, with the intent to obtain or use the other person's or entity's identity for any unlawful purpose and caused another person or entity to suffer an economic loss of one thousand dollars or more, in violation of A.R.S. §§ 13-2009, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 15

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 3, 2020 and August 3, 2020, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit from Arizona Department of Economic Security, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801. The alleged fraudulent schemes and artifices included, but were not limited to: submitting false Pandemic Unemployment Assistance applications to Arizona DES using others' identities and receiving the benefits paid out on behalf of those individuals.

COUNT 16

THEFT, A CLASS 2 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 3, 2020 and August 3, 2020, without lawful authority, knowingly did control Arizona Department of Economic Security's money, of a value of \$25,000 or more, but less than \$100,000, with the intent to deprive Arizona Department of Economic Security of such property, in violation of A.R.S. §§ 13-1801, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 17

ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 3, 2020 and August 3, 2020, was/were employed by or associated with an enterprise and did knowingly conduct the enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct of the enterprise which he knew was being conducted through racketeering. The enterprise(s) included, but were not limited to a group of persons associated in fact, including but not limited to David Christopher Ellis (001) and Gabbrielle Elizabeth Ellis (002), and others known and/or unknown.

The racketeering included: Forgery, in violation of A.R.S. § 13-2301(D)(4)(b)(iv);, Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v); and a Scheme or Artifice to Defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx).

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(B) and (D), 13-2301, 13-108, 13-109, 13-301, 13-302, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

COUNT 18

CONSPIRACY, A CLASS 2 FELONY

DAVID CHRISTOPHER ELLIS (001) and **GABBRIELLE ELIZABETH ELLIS (002)**, on or between June 3, 2020 and August 3, 2020, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310A;
- 2) Theft, in violation of A.R.S. § 13-1802A3; and
- 3) Forgery, in violation of A.R.S. § 13-2002A3.

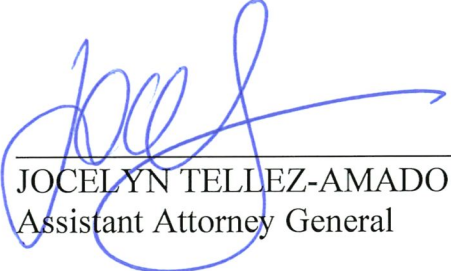
In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 1, 3, 5, 7, 9, 11, 13, 15, and 16 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

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

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 6-23-25



JOCELYN TELLEZ-AMADO
Assistant Attorney General



Foreperson of the Grand Jury