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MARK BRNOVICH
Attorney General
Firm Bar No. 14000

LINDSAY ST. JOHN
Assistant Attorney General
400 West Congress, Suite S-315
Tucson, Arizona 85701
Telephone No.: (520) 209-4310
Pima County Computer No.: 65954
State Bar No.: 024825
CRMTucson@azag.gov
T002-2021-000146
DR# SIS-2021-0212

Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA, Plaintiff, v. **MICHAEL VACCARO WOOLBRIGHT (001),** Defendant.	Case No: **CR20224569-001** **91 SGJ 248** **DIRECT INDICTMENT** CHARGING VIOLATIONS OF: **COUNTS 1-5: FRAUDULENT SCHEMES AND ARTIFICES,** a Class 2 Felony, in violation of A.R.S. § 13-2310. **COUNT 6: THEFT,** a Class 2 Felony, in violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **MICHAEL VACCARO WOOLBRIGHT (001),** charging on this 21st day of November, 2022 that in or from Pima County, Arizona:

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COUNT ONE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

From on or about November 13, 2015, through on or about December 22, 2016, **MICHAEL VACCARO WOOLBRIGHT (001),** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, and 13-811.

The fraudulent schemes and artifices involved **MICHAEL VACCARO WOOLBRIGHT (001)** issuing $72,986.50 in unauthorized checks and making a unauthorized $10,000.00 wire transfer from an account belonging to Tucson Delta Chi Alumni Board, INC., while concealing the money as legitimate payments and by withholding access to the Board's financials from other members.

COUNT TWO
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

From on or about January 1, 2017, through on or about December 31, 2017, **MICHAEL VACCARO WOOLBRIGHT (001),** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, and 13-2313.

The fraudulent schemes and artifices involved **MICHAEL VACCARO WOOLBRIGHT (001)** issuing $108,841.00 in unauthorized checks from an account belonging to Tucson Delta Chi Alumni Board, INC., while concealing the money as legitimate payments and by withholding access to the Board's financials from other members.

COUNT THREE
FRADULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

From on or about January 1, 2018, through on or about December 31, 2018, **MICHAEL VACCARO WOOLBRIGHT (001),** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, and 13-2313.

The fraudulent schemes and artifices involved **MICHAEL VACCARO WOOLBRIGHT (001)** issuing $170,021.46 in unauthorized checks from an account belonging to Tucson Delta Chi Alumni Board, INC., while concealing the money as legitimate payments and by withholding access to the Board's financials from other members.

COUNT FOUR
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

From on or about January 1, 2019, through on or about December 31, 2019, **MICHAEL VACCARO WOOLBRIGHT (001),** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, 13-811, and 13-2313.

The fraudulent schemes and artifices involved **MICHAEL VACCARO WOOLBRIGHT (001)** issuing $131,193.93 in unauthorized checks from an account belonging to Tucson Delta Chi Alumni Board, INC., while concealing the money as legitimate payments and by withholding access to the Board's financials from other members.

COUNT FIVE
FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

From on or about January 1, 2020, through on or about July 2, 2020, **MICHAEL VACCARO WOOLBRIGHT (001),** pursuant to a scheme or artifice to defraud, knowingly obtained any benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-108, 13-109, 13-603, 13-701, 13-702, 13-703, 13-711, 13-801, 13-804, and 13-811.

The fraudulent schemes and artifices involved **MICHAEL VACCARO WOOLBRIGHT (001)** issuing $70,862.98 in unauthorized checks from an account belonging to Tucson Delta Chi Alumni Board, INC., while concealing the money as legitimate payments and by withholding access to the Board's financials from other members.

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COUNT SIX
THEFT, A CLASS 2 FELONY

From on or about November 13, 2015, through on or about July 2, 2020, **MICHAEL VACCARO WOOLBRIGHT (001),** committed theft with a value of twenty-five thousand dollars or more, from an account belonging to Tucson Delta Chi Alumni Board, INC., in violation of A.R.S. §§ 13-1802, 13-108, 13-109, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

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

True Bill
(A "True Bill")

Dated: 11/21/22

Foreperson ~~of~~ the State Grand Jury

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Lindsay AAG
LINDSAY ST. JOHN
Assistant Attorney General

PHX # 10644591