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T002-2021-000146
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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:

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
FRAUDULENT 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.

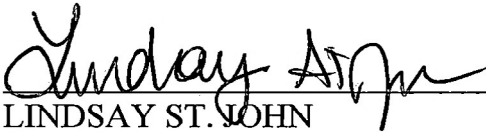
CR20224569-001

COUNT SIX
THEFT, A CLASS 2 FELONY

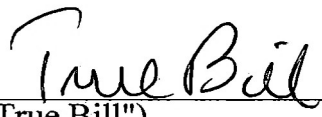
From on or about November 13, 2015, through on or about July 2, 2020, **MICHAEL VACCARO WOOLBRIGHT (001)**, committed theft with a value of twenty-five thousand dollars or more, from an account belonging to Tucson Delta Chi Alumni Board, INC., in violation of A.R.S. §§ 13-1802, 13-108, 13-109, 13-701,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

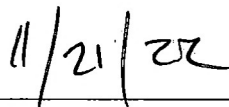
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

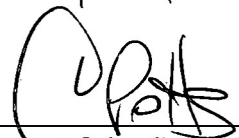
MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA


LINDSAY ST. JOHN
Assistant Attorney General

PHX # 10644591


(A "True Bill")

Dated: 


Foreperson of the State Grand Jury