

MARK BRNOVICH
Attorney General
Firm Bar No. 14000

SHAWN L. STEINBERG
State Bar No. 020694
Assistant Attorney General
2005 N. Central Avenue
Phoenix, Arizona 85004
Telephone 602-542-3881
crmfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

JEFFREY ALLAN MARCUSSEN,

Defendant.

Case No:

87 SGJ 29

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEMES & ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310

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

COUNTS 3-4: FALSE RETURN, Class 5 Felonies, in violation of A.R.S. § 42-1127(B)(2)

The Arizona State Grand Jury accuses, **JEFFREY ALLAN MARCUSSEN**, charging on this 14th day of September, 2020, that in or from Maricopa County, Arizona:

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COUNT 1
FRAUDULENT SCHEMES & ARTIFICES

On or between August 1, 2017 and March 1, 2019, **JEFFREY ALLAN MARCUSSEN**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702, 13-811, and 13-801.

COUNT 2
THEFT

On or between, August 1, 2017 and March 1, 2019, **JEFFREY ALLAN MARCUSSEN**, without lawful authority, knowingly took control of property of the NBA Phoenix Suns with the intent to deprive the Suns Legacy Partners of such property, TO WIT: game tickets with an aggregate value of more than \$25,000 in violation of A.R.S. §§ 13-1802(A)(1)(H), 13-1801, 13-1801(B), 13-701, 13-702, 13-801, 13-811.

COUNT 3
FALSE RETURN

On or about April 12, 2018, **JEFFREY ALLAN MARCUSSEN**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document, in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-701, 13-702, 13-703, 13-801 and 13-811.

...

...

COUNT 4
FALSE RETURN

On or about April 16, 2019, **JEFFREY ALLAN MARCUSSEN**, knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document, in violation of A.R.S. §42-1127(B)(2), 42-1101.01, 13-701, 13-702, 13-703, 13-801 and 13-811.

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

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9-14-20



SHAWN STEINBERG
Assistant Attorney General



Foreperson of the State Grand Jury

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