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6 T002-2009-000040
0812170396

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8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF PIMA**

10 **STATE OF ARIZONA,**)
11 **Plaintiff,**) **214 GJ 1215**
12 **vs.**) **INDICTMENT**
13 **RUTH SONS, (001)**) **Cause No.**
14 **Defendant.**)

15 The grand jurors of the County of Pima, in the name of the State of Arizona, and by
16 its authority accuse and charge that in Pima County:

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18 **COUNT ONE: FRAUDULENT SCHEMES AND ARTIFICES, A Class 2 Felony**

19 Between the dates of January 2003 and December 2008, **RUTH SONS**, pursuant to
20 scheme or artifice to defraud, knowingly obtained a benefit from the Tucson Art Museum,
21 to wit: approximately \$412,003.97 in cash from the Tucson Museum of Art payroll and
22 operating accounts, by means of fraudulent pretenses, representation, promises, or material
23 omissions, in violation of A.R.S. §§13-2310(A) and (C), 13-2301, 13-701, 13-702, 13-
24 702.02, and 13-801.

1 **COUNT TWO: THEFT, A Class 2 Felony**

2 Between the dates of January 2003 and December 2008, **RUTH SONS**, knowingly
3 controlled property belonging to the Tucson Art Museum with the intent to deprive the
4 Tucson Art Museum of such property and/or knowingly converted for an unauthorized use
5 property belonging to the Tucson Art Museum entrusted to her or placed in her possession
6 for a limited, authorized term or use, to wit: approximately \$412,003.97 in cash from the
7 Tucson Museum of Art's payroll and operating accounts, in violation of A.R.S. §§ 13-
8 1802(A)(1) and/or 13-1802(A)(2), 13-1802(E), 13-1802(F), 13-1801, 13-701, 13-702, 13-
9 702.02, and 13-801.

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11 **COUNT THREE: FRAUDULENT SCHEMES AND ARTIFICES, A Class 2 Felony**

12 Between the dates of January 2003 and December 2008, **RUTH SONS**, pursuant to
13 scheme or artifice to defraud, knowingly obtained a benefit from the Tucson Art Museum,
14 to wit: approximately \$554,473.91 in cash from the Tucson Museum of Art's gift shop
15 account, by means of fraudulent pretenses, representation, promises, or material omissions,
16 in violation of A.R.S. §§13-2310(A) and (C), 13-2301, 13-701, 13-702, 13-702.02, and 13-
17 801.

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20 **COUNT FOUR: THEFT, A Class 2 Felony**

21 Between the dates of January 2003 and December 2008, **RUTH SONS**, knowingly
22 controlled property belonging to the Tucson Art Museum with the intent to deprive the
23 Tucson Art Museum of such property and/or knowingly converted for an unauthorized use
24 property belonging to the Tucson Art Museum entrusted to her or placed in her possession
25 for a limited, authorized term or use, to wit: approximately \$554,473.91 in cash from the
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1 Tucson Museum of Art's gift shop account, in violation of A.R.S. §§ 13-1802(A)(1) and/or
2 13-1802(A)(2), 13-1802(E), 13-1802(F), 13-1801, 13-701, 13-702, 13-702.02, and 13-801.

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4 **COUNT FIVE: FRAUDULENT SCHEMES AND ARTIFICES, A Class 2 Felony**

5 Between the dates of January 2003 and December 2008, **RUTH SONS**, pursuant to
6 scheme or artifice to defraud, knowingly obtained a benefit from the Tucson Art Museum,
7 to wit: approximately \$6,532.65 in cash from the Tucson Museum of Art's petty cash
8 account, by means of fraudulent pretenses, representation, promises, or material omissions,
9 in violation of A.R.S. §§13-2310(A), 13-2301, 13-701, 13-702, 13-702.02, and 13-801.

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11 **COUNT SIX: THEFT, A Class 3 Felony**

12 Between the dates of January 2003 and December 2008, **RUTH SONS**, knowingly
13 controlled property belonging to the Tucson Art Museum with the intent to deprive the
14 Tucson Art Museum of such property and/or knowingly converted for an unauthorized use
15 property belonging to the Tucson Art Museum entrusted to her or placed in her possession
16 for a limited, authorized term or use, to wit: approximately \$6,532.65 in cash from the
17 Tucson Museum of Art's petty cash account, in violation of A.R.S. §§ 13-1802(A)(1) and/or
18 13-1802(A)(2), 13-1802(E), 13-1801, 13-701, 13-702, 13-702.02, and 13-801.

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20 **COUNT SEVEN: ILLEGALLY CONDUCTING AN ENTERPRISE, A Class 3 Felony**

21 Between the dates of January 2003 and December 2008, **RUTH SONS**, knowingly
22 conducted an enterprise and/or participated directly in the conduct of an enterprise, to wit:
23 the Tucson Museum of Art, through racketeering, to wit: fraudulent schemes and artifices
24 and theft as set forth in Counts 1-6, in violation of A.R.S. §§ 13-2312(B) and (D), 13-2301,
25 13-701, 13-702, 13-702.02, and 13-801.

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BARBARA LaWALL
PIMA COUNTY ATTORNEY

By: _____
Michael Jette
Assistant Attorney General

By: _____
FOREPERSON OF THE GRAND JURY

Dated _____