

SECOND JUDICIAL DISTRICT
STATE OF NEW MEXICO
COUNTY OF BERNALILLO

STATE OF NEW MEXICO,

Plaintiff.

vs.

NO: **D 0202 CR 2017002556**

Judge: **BRETT R. LOVELESS**

CLAIRE E. LOGAN,
DOB: XX/XX1950
SSN: XXX-XX-8006

Defendant.

CHARGES: Tax Fraud, Conspiracy to Commit Tax Fraud, Conspiracy to Commit Fraud,
Fraud

GRAND JURY INDICTMENT

THE GRAND JURY CHARGES:

TB
COUNT 1: TAX FRAUD (OVER \$500) (5265), in that on or about the 15th day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant did willfully make and subscribe a return containing a written declaration that it was true and correct as to every material matter and which defendant did not believe was true and correct as to every material matter, and the amount of tax owed was over \$500 but not more than \$2,500, contrary to Sections 7-1-73(A)(1) and 7-1-73(D), NMSA 1978.

TB
COUNT 2: TAX FRAUD (OVER \$2,500) (5269), in that on or about the 8th day of October, 2015, in Bernalillo County, New Mexico, the above-named defendant did willfully make and subscribe a return containing a written declaration that it was true and correct as to every material matter and which defendant did not believe was true and correct as to every material matter, and the amount of tax owed was over \$2,500 but not more than \$20,000, contrary to Sections 7-1-73(A)(1) and 7-1-73(E), NMSA 1978.

TB
COUNT 3: CONSPIRACY TO COMMIT TAX FRAUD (OVER \$500) (5267), in that on or about the 15th day of October, 2014, the above named defendant and James Logan did by words or acts agree together to commit Tax Fraud (Over \$500) contrary to Sections 7-1-73 and 30-28-2, NMSA 1978.

TB
COUNT 4: CONSPIRACY TO COMMIT TAX FRAUD (OVER \$2,500) (5271), in that on or about the 8th day of October, 2015, the above named defendant and James Logan did by words or acts agree together to commit Tax Fraud (Over \$2,500) contrary to Sections 7-1-73 and 30-28-

2, NMSA 1978.

TB **COUNT 5: CONSPIRACY TO COMMIT FRAUD (EXCEEDS \$20,000) (0565)**, in that on, or about or between the 18th day of September, 2013 and the 1st day of March, 2016, in Bernalillo County, New Mexico, the above-named defendant and James Logan did by words or acts agree together to commit Fraud (Exceeds \$20,000), contrary to Sections 30-16-6(F) and 30-28-2, NMSA 1978.

TB **COUNT 6: FRAUD (OVER \$2,500) (0558)**, in that on or about the 11th day of August, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 7: FRAUD (OVER \$2,500) (0558)**, in that on or about the 16th day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 8: FRAUD (OVER \$2,500) (0558)**, in that on or about the 4th day of November, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 9: FRAUD (OVER \$2,500) (0558)**, in that on or about the 2nd day of December, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 10: FRAUD (OVER \$2,500) (0558)**, in that on or about the 8th day of December, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 11: FRAUD (OVER \$2,500) (0558)**, in that on or about the 30th day of December, 2014, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB **COUNT 12: FRAUD (OVER \$2,500) (0558)**, in that on or about the 11th day of February, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct

misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 13: FRAUD (OVER \$2,500) (0558), in that on or about the 26th day of February, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 14: FRAUD (OVER \$2,500) (0558), in that on or about the 24th day of March, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 15: FRAUD (OVER \$2,500) (0558), in that on or about the 13th day of July, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 16: FRAUD (OVER \$2,500) (0558), in that on or about the 9th day of August, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 17: FRAUD (OVER \$2,500) (0558), in that on or about the 4th day of October, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 18: FRAUD (OVER \$2,500) (0558), in that on or about the 11th day of November, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

TB
COUNT 19: FRAUD (OVER \$2,500) (0558), in that on or about the 16th day of December, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$2,500, contrary to Section 30-16-6(E), NMSA 1978.

OR IN THE ALTERNATIVE TO COUNTS 6 – 19:

COUNT 6: FRAUD (EXCEEDS \$20,000) (0556), in that on, or about or between the 11th day of August, 2014 and the 16th day of December, 2015, in Bernalillo County, New Mexico, the above-named defendant did by words or conduct misrepresent a fact intending to deceive or cheat Shirley Cashwell, or another, and because of Shirley Cashwell's reliance on the misrepresentation, the defendant obtained over \$20,000, contrary to Section 30-16-6(F), NMSA 1978.

The names of the witnesses upon whose testimony this Indictment is based are:

Gregory Stover
Teresa DeMenge
Chad Hoffman

I hereby certify that the foregoing is a TRUE bill.

Rockelle Myers
Foreperson

July 27 2017
Date

APPROVED:

Benjamin R. Schrope
Benjamin R. Schrope
Senior Prosecuting Attorney
Securities Division
New Mexico Regulation and Licensing Department