

1 TODD D. RIEBE
2 District Attorney
3 County of Amador
4 708 Court Street
5 Jackson, CA 95642
6 Telephone: (209) 223-6444

7 **Attorney for Plaintiffs**

FILED
AMADOR SUPERIOR COURT

AUG 10 2016

CLERK OF THE SUPERIOR COURT
BY 10080

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF AMADOR**

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11
12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 vs.

15 **ELIZABETH ANNE CHAPINPINOTTI**

16 09/13/1965

17 Defendant.

Case No. *16CR25084*

DA No. 074539

COMPLAINT

18 The District Attorney of Amador County states, on information and belief, that at and
19 within the County of Amador, State of California, defendant ELIZABETH ANNE
20 CHAPINPINOTTI did commit the following crimes:

21 **COUNT I Violation of GC1090(a), namely, CONFLICT OF INTEREST,**
22 **a Felony.**

[16-2-3 State Prison]

23
24 On or between August 12, 2014 and June 9, 2015, in the County of Amador, State of
25 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
26 Government Code Section 1090(a), Conflict of Interest, a felony, in that defendant, while
27 she was employed as Assistant Superintendent of Curriculum and Instruction for the
28 Amador County Unified School District, did willfully and unlawfully enter into contracts
on behalf of the District with TEACHERS PAY TEACHERS for the purchase of
\$50,752.62 in books and educational products, knowing that she had a financial interest in
the contracts.

1 **COUNT II Violation of PC470(d), namely, FORGERY, a Felony.**
2 [16-2-3 County Jail]

3 On or between June 20, 2015 and June 30, 2015, in the County of Amador, State of
4 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
5 Penal Code Section 470(d), Forgery, a felony, uttering a forged instrument, in that she did
6 willfully, unlawfully and knowingly make, alter and utter and caused to be made altered
7 and uttered as true and genuine forged and fraudulent school donor letters and school
8 donor list, and an altered completed copy of a check to TEACHERS PAY TEACHERS
9 with the intent to deceive and defraud TEACHERS PAY TEACHERS and the AMADOR
10 COUNTY UNIFIED SCHOOL DISTRICT.

11 **COUNT III Violation of PC118(a), namely, PERJURY, a Felony.**
12 [+2-3-4 County Jail]

13 On or between January 28, 2015 and March 5, 2015, in the County of Amador, State of
14 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate Penal Code
15 Section 118(a), Perjury, a felony, in that the defendant, as Assistant Superintendent
16 of Curriculum and Instruction, a designated employee of the Amador County Unified
17 School District, made material omissions and false statements in Form 700 Statement of
18 Economic Interests for 2014 filed with the Amador County Recorder's Office wherein she
19 failed to make required disclosures of interest in business entities HEWSON
20 PUBLISHING, LUCKY JENNY PUBLISHING, LUCKY WILLY PUBLISHING,
21 TRICETTA PUBLISHING, LJ TEACHING, THE LIT CHANNEL, ELIZABETH'S
22 LESSONS and other publishing companies and failed accurately to state gross income
23 received from and paid to these businesses from CREATSPACE (dba ON DEMAND
24 PUBLISHING), AMAZON.com, TEACHERS SYNERGY, AMADOR COUNTY
25 UNIFIED SCHOOL DISTRICT and other publishing interests from which she derived
26 reportable income and payments for calendar year 2014.

27 **COUNT IV Violation of PC118(a), namely, PERJURY, a Felony.**
28 [+2-3-4 County Jail]

29 On or between August 2, 2015 and October 7, 2015, in the County of Amador, State of
30 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
31 Penal Code Section 118(a), to wit Perjury, a felony, in that the defendant, as Interim
32 Superintendent, a designated employee of the Amador County Unified School District,
33 made material omissions and false statements in Form 700 Statement of Economic
34 Interests for 2014 filed with the Amador County Recorder's office wherein she failed to
35 make required disclosures of interest in business entities HEWSON PUBLISHING,
36 LUCKY JENNY PUBLISHING, LUCKY WILLY PUBLISHING, TRICETTA
37 PUBLISHING, LJ TEACHING, THE LIT CHANNEL, ELIZABETH'S LESSONS and
38 other publishing companies and failed accurately to state gross income received from and
39 paid to these businesses from CREATSPACE (dba ON DEMAND PUBLISHING),
40 AMAZON.com, TEACHERS SYNERGY, AMADOR COUNTY UNIFIED SCHOOL

1 DISTRICT and other publishing interests from which she derived reportable income and
2 payments for calendar year 2014 through July 1, 2015.

3 **COUNT V Violation of GC1090(a), namely, CONFLICT OF INTEREST,
4 a Felony.**

[16-2-3 State Prison]

5 On or between June 1, 2012 and February 1, 2015, in the County of Amador, State of
6 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
7 Government Code Section 1090(a), Conflict of Interest, a felony, in that while she was
8 employed as Assistant Superintendent of Curriculum and Instruction for the Amador
9 County Unified School District, did willfully and unlawfully enter into contracts on behalf
10 of the District with CREATSPACE (dba ON DEMAND PUBLISHING), for the
11 purchase of \$115,309.62 in books and educational products, knowing that she had a
12 financial interest in the contracts.

13 **COUNT VI Violation of GC1090(a), namely, CONFLICT OF INTEREST,
14 a Felony.**

[16-2-3 State Prison]

15 On or between June 1, 2012 and January 31, 2014, in the County of Amador, State of
16 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
17 Government Code Section 1090(a), Conflict Of Interest, a felony, in that while she was
18 employed as Assistant Superintendent of Curriculum and Instruction for the Amador
19 County Unified School District, did willfully and unlawfully enter into contracts on behalf
20 of the District with AMAZON.com for the purchase of \$10,976.78 in books and
21 educational products, knowing that she had a financial interest in the contracts.

22 **COUNT VII Violation of PC118(a), namely, PERJURY, a Felony.**


[+2-3-4 County Jail]

23 On or between February 26, 2014 and March 12, 2014, in the County of Amador, State of
24 California, defendant ELIZABETH ANNE CHAPINPINOTTI, did violate California
25 Penal Code Section 118(a), Perjury, a felony, in that the defendant, as Assistant
26 Superintendent of Curriculum and Instruction, a designated employee of the Amador
27 County Unified School District, made material omissions and false statements in Form 700
28 Statement of Economic Interests for 2013 filed with the Amador County Recorder's
Office, wherein she failed to make required disclosures of interest in business entities
HEWSON PUBLISHING, LUCKY JENNY PUBLISHING, LUCKY WILLY
PUBLISHING, TRICETTA PUBLISHING and other publishing companies and failed
accurately to state gross income received from and paid to these businesses from
CREATSPACE (dba ON DEMAND PUBLISHING), AMAZON.com, AMADOR
COUNTY UNIFIED SCHOOL DISTRICT and other publishing interests from which she
derived reportable income and payments for calendar year 2013.

DISCOVERY REQUEST

Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that defendant and his or her attorney disclose to the prosecuting attorney the information and materials required to be disclosed to the prosecuting attorney by a defendant and his or her attorney pursuant to Penal Code Section 1054.3, and the cases interpreting Penal Code Section 1054, et seq., including, but not limited to, Thompson v. Superior Court (1997) 53 Cal.App 4th 480 and People v. Hardy (1992) 2 Cal.4th 86, 179.

Executed at Jackson, California, on August 8, 2016.



MARY DAVIS SIMMONS
Deputy District Attorney

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