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**STATE OF WASHINGTON
SPOKANE COUNTY SUPERIOR COURT**

THE STATE OF WASHINGTON,

Plaintiff,

v.

RHONDA S. ACKERMAN,
aka RHONDA SUE ACKERMAN,
RHONDA SUE HENDRICKSON,
RHONDA S. HENRY

Defendant.

NO.

21110632-32

**AFFIDAVIT FOR DETERMINATION
OF PROBABLE CAUSE**

Janice Oliver, being first duly sworn upon oath, deposes and states:

I, Janice Oliver, am a Detective with the Spokane Police Department in Spokane, Washington. My duties are to conduct criminal investigations. I have been employed as a sworn police officer at the Spokane Police Department since September 1997. Prior to my current position, I worked as a Spokane patrol officer for seven years and as a drug K-9 handler for one year. My previous assignments also include the Special Investigations Unit (Drug Unit), Crime Analysis, and the Special Victim's Unit.

In December 2008, I became a Fraud Detective. In that role, I have investigated numerous fraud cases. I have been trained to investigate vulnerable adult crimes and have worked within the VALOR (Vulnerable Adult Linked Organizational Response) Task Force. VALOR is a multi-disciplinary task force that investigates vulnerable adult crimes in collaboration with community organizations and city, county, state, and federal agencies. VALOR also has provided training for law enforcement, prosecutors, and citizens.

1 My education includes the Basic Law Enforcement Academy, where I graduated in 1997.
2 I attend yearly in-service training provided by the Spokane Police Department Training Academy,
3 which covers numerous topics such as current case law, department policies, technology, and
4 defensive tactics. In addition, I completed training at the Washington State Criminal Justice
5 Training Commission as a Child Abuse Interviewer.

6 Because of my education, training, and experience as a Detective, I am familiar with
7 fraud schemes and various types of financial documents. These documents can include bank
8 account statements, records of funds transfers, and other evidence that can indicate dominion
9 and control of a financial account. The facts in this affidavit come from my training and
10 experience, as well as information and documents obtained from witnesses and agents and
11 auditors employed by Internal Revenue Service and the Office of the Washington State
12 Auditor. The findings of this investigation center on Rhonda S. Ackerman (hereafter
13 "ACKERMAN"), a former Spokane County government employee.

14 **County Claims Process and Ackerman**

15 Spokane County's Department of Risk Management (hereafter "the Risk Management
16 Department") handles all civil claims filed against county government or its employees. The
17 Risk Management Department typically processes 350 to 400 claims each year, resulting in \$3
18 million annually in claim liability expenses. Two types of claims are filed against Spokane
19 County – first-party claims and third-party claims. First party-claims involve physical damage
20 to county property, such as vehicles and equipment. These are usually filed by the Spokane
21 County Sheriff's Department and other county agencies. After a valid first-party claim has been
22 reviewed and adjudicated, the Risk Management Department requests payment by filing a
23 voucher request form with the County Auditor's Office (hereafter "Auditor's Office"). The
24 Auditor's Office then issues a warrant (county check) to the vendor that made the repairs or
25 replaced county property.

1 Third-party claims, by contrast, usually involve alleged injury or damage to an
2 individual or private property. These claims may include medical expenses or repair costs that
3 arise from an incident involving a county employee or project. Once a third-party claim is
4 received, the Risk Management Department sends a copy to the Washington Counties Risk Pool
5 (hereafter "Risk Pool") to verify coverage. The Risk Management Department reviews each
6 third-party claim to determine whether it is valid and should be resolved with a settlement
7 payment, or denied. After a valid claim is reviewed and approved, the Risk Management
8 Department requests that the Risk Pool pay the claim. Along with the request, the Risk
9 Management Department sends two forms signed by the claimant: A settlement and liability
10 release form and a W-9 form.¹ The Risk Pool then mails a check to the claimant or his or her
11 attorney to resolve the claim. Ninety-percent of third-party claims are processed and closed in
12 60 days. The remaining 10 percent of claims may result in litigation that takes three or four
13 years to resolve.

14 From 2007 to 2016, the Risk Management Department included a director, three loss-
15 control specialists, a liability claims adjuster, a liability claims technician, two workers
16 compensation claims adjudicators, a security coordinator, and an administrative assistant.
17 ACKERMAN worked as the liability claims technician starting in November 2001.²
18 ACKERMAN handled the initial processing of first-party and third-party claims as well as
19 workers compensation claims filed by county employees. In 2006-2007, ACKERMAN's job
20 duties changed during a staff reorganization. From then on, ACKERMAN was responsible for
21 reviewing and adjudicate first-party claims that were less than \$15,000. ACKERMAN also was
22 permitted to accept receipt of third-party claims and forward them to the Risk Pool for coverage
23 determination, as needed. As of 2007, ACKERMAN was no longer authorized to adjust and
24

25 ¹ Taxpayers are required to report taxable income on a W-9 form. The Department files W-9 forms with
the Internal Revenue Service on behalf of third-party claimants who receive Risk Pool payments.

26 ² Spokane County initially hired ACKERMAN as a secretary in the Human Resources Department in 1998.
She transferred to the Risk Management Department in early 2001 as a secretary and was promoted to liability
claims technician.

1 settle third-party claims. Nor did ACKERMAN have Department authorization to request third-
2 party claim payments.

3 In May 2018, ACKERMAN was terminated for job abandonment. ACKERMAN had
4 taken a week of sick leave for an illness that was so severe, she said, it had swollen her face and
5 she could not leave her home. The director fired her after learning ACKERMAN attended a
6 weekend mud bogging event with her husband.

7 Internal Investigation

8 In July 2018, during an internal review of uncashed checks, the Auditor's Office
9 discovered an uncashed check for \$8,963.45. The Auditor's Office had issued the check to
10 Mariah Lockridge in December 2016 as payment on a third-party claim. Leslie Simpson, a
11 senior accountant, sent a letter notifying Lockridge of the check. Lockridge called Simpson and
12 told her she had not filed a claim against the county.

13 On August 2, 2018, the Auditor's Office notified Lauren Williams in the Risk
14 Management Department of the uncashed check. Williams, the liability claims adjuster, was
15 responsible for handling all third-party claims. Williams said she logged into RiskMaster, a
16 software program which the Risk Management Department uses to monitor claims filed against
17 the County. Each electronic claim file includes the claimant's name, the property allegedly
18 damaged, and any approved settlement payments. Williams found no information in RiskMaster
19 about the Lockridge claim. She said she also found no information in the claim liability log, an
20 Excel spreadsheet the Risk Management Department uses to track claims by calendar year.

21 "It just didn't look right," Williams said. "I went into the system. I couldn't find what I
22 should have been able to see...either a claim on the claim liability log, something in RiskMaster,
23 anything with [Lockridge's] name. Essentially, I couldn't find anything" in the records.

24 What Williams did receive from the Auditor's Office was a liability release form
25 ACKERMAN had submitted with a request to pay Lockridge's claim. Williams said she
26

1 immediately suspected the uncashed check was fraudulent because ACKERMAN should not
2 have used a liability release form for a third-party claim.

3 The County launched an internal investigation. Williams and top officials in the Risk
4 Management Department and Auditor's Office reviewed every liability claim and county check
5 with a connection to ACKERMAN going back to 2011. Using electronic records and paper
6 documents, County officials organized ACKERMAN-related claims into a series of Excel
7 spreadsheets. The data collected included: the claimant's name, dollar amount, claim number,
8 the date ACKERMAN entered information about the claim in County records (if any), warrant
9 (check) number, the year the claim was filed, whether the claim was valid, whether there were
10 supporting invoices or receipts to support the claim, whether the assigned claim number was
11 used to process payment, and whether the claimant received multiple County payments. County
12 officials also cross-checked ACKERMAN-related claims to RiskMaster and the claim liability
13 log to determine whether a claim was valid. In most instances, it was not valid.

14 The Auditor's Office gathered electronic copies of hundreds of voucher request forms
15 ACKERMAN had filled out and signed to request payments for third-party claims. The
16 Auditor's Office also provided copies of liability release forms ACKERMAN prepared and
17 submitted with the vouchers. In addition, the Auditor's Office requested and obtained copies of
18 cancelled checks from U.S. Bank, which they identified as having a connection to
19 ACKERMAN. U.S. Bank holds Spokane County's financial accounts.

20 The investigation was hampered by the fact that older claims files no longer existed on
21 paper. Spokane County, like other government entities, has a retention policy requiring that
22 paper documents be destroyed after a certain number of years.³ Steve Bartel, Risk Management
23 Department director, said he found only eight or nine claims files in manila folders with claims
24 numbers that matched the fraudulent payments. However, the underlying documents did not
25 correspondent with the claimants' names or other information ACKERMAN had submitted to

26 ³ Spokane County claim files are destroyed six years after the claim is closed. Lawsuit records are destroyed after 10 years.

1 the Auditor's Office to request checks. County officials also suspect ACKERMAN removed
2 claim files with invoices and receipts she created for fraudulent claims.

3 Initially, the Auditor's Office determined ACKERMAN had created false third-party
4 claims between 2012 and 2016, resulting in a loss of approximately \$802,015 in county funds.
5 Bartel said several "claimants" had filed multiple claims, which he found very odd. "I mean to
6 have the County take out your fence once, that's one thing," he said. "To have them do it two
7 or three times, no."

8 Bartel notified the County's crime insurance company, Spokane County commissioners,
9 and the County Chief Executive Officer of the initial findings. The Auditor's Office also
10 notified the Washington State Auditor (hereafter "State Auditor's Office"), as required by law
11 when a government entity discovers a loss in public funds.

12 On August 9, 2018, Bartel called Spokane Police to report alleged embezzlement. He
13 identified ACKERMAN as the primary suspect. Bartel provided the names of 16 individuals
14 who received claim payments from the County. He told police some check recipients were
15 family members of ACKERMAN and that the investigation was not yet complete.

16 The County expanded the scope of its investigation beyond 2011. Six weeks later,
17 County officials concluded that ACKERMAN processed false third-party claims for 45
18 individuals between January 24, 2007 and December 5, 2016. ACKERMAN's fraud scheme
19 continued for 10 years, not five years. The County's loss was higher than initially estimated:
20 \$1,311,180. The investigation also found:

- 21 • Check recipients included ACKERMAN'S cousin,
22 grandmother, deceased father, brother, daughter-in-law, family
23 friends, and ACKERMAN'S son's friends.
- 24 • ACKERMAN did not enter most fictitious claims in the
25 database system, where claims are recorded and monitored. This
26

1 helped conceal her actions from Bartel, who was her supervisor,
2 and Williams, who was in charge of third-party claims.

3 • ACKERMAN bypassed normal payment procedures by
4 processing payments for third-party claims through the Auditor's
5 Office rather than the Risk Pool. This gave ACKERMAN the
6 means to directly request checks on behalf of the payees.

7 • ACKERMAN used fake claim numbers or valid claim numbers
8 multiple times. For example, she wrote a fake claim number on
9 the voucher to request the check from the Auditor's Office. After
10 the check was issued and cashed, ACKERMAN entered the
11 disbursement in RiskMaster under a valid claim number. This
12 helped ensure there were no discrepancies when third-party claim
13 payments were reconciled.

14 • ACKERMAN manually adjusted year-end claims reports, so
15 she could remove hundreds of thousands of dollars in false claim
16 payments from the report before submitting it to Bartel.

17 According to County officials, ACKERMAN rolled the dollar
18 amounts into the numbers for valid claims to conceal the theft.

19 • Claims disbursements are usually mailed to the payee or their
20 attorney. Once the checks were prepared, ACKERMAN made
21 arrangements to pick them up from Accounts Payable.

22 • ACKERMAN advised the Auditor's Office not to prepare 1099
23 tax forms for 43 of the check recipients, saying the forms were
24 unnecessary. Thus, the Auditor's Office did not prepare tax-
25 reporting forms for the individuals or the IRS. This reduced the
26 chance of the IRS noticing unreported personal income.

1 During the investigation, two Risk Management Department employees—Angie
2 Schoeffler and Candi Walker—helped identify several check recipients as having a direct or
3 indirect connection to ACKERMAN. According to Bartel,⁴ Schoeffler and Walker are former
4 co-workers and friends of ACKERMAN. They were bridesmaids in her wedding and recognized
5 the names of some check recipients as ACKERMAN's relatives or friends. Schoeffler and
6 Walker used Facebook to see if there were connections among check recipients they did not
7 know. They drafted a flow chart showing personal connections between Ackerman and 29 check
8 recipients.

9 In their Facebook search of names, Schoeffler and Walker identified a common
10 connection: Jory Ackerman (hereafter "Jory"), ACKERMAN's son. Jory's name did not appear
11 on any county checks. However, he was listed as a Facebook friend of several Spokane-area
12 claimants who received checks between 2011 and 2016.

13 State Auditor Investigation

14 Spokane County turned over its records and investigation findings to the State Auditor's
15 Office on September 24, 2018. State auditors⁵ conducted a forensic audit review and further
16 investigation. They agreed with the County's general findings but identified an additional
17 \$73,227 that had been misappropriated. When the State Auditor's Office issued its report on
18 March 28, 2019, Spokane County's total loss in public funds was estimated at \$1,384,407.

19 State auditors conducted in-person interviews⁶ with Bartel, three Department
20 employees, two check recipients, and ACKERMAN'S son. They asked about the County's
21 claims process, ACKERMAN's job duties, and her interactions and personal relationships with
22 co-workers and other County employees.

23
24
25 ⁴ Bartel provided this information to Assistant Attorney General Barbara A. Serrano via telephone on May
26 10, 2021 and August 16, 2021.

⁵ Sarah Walker, Fraud Manager, and Stephanie Sullivan, Assistant Fraud Manager.

⁶ Walker, Sullivan and Phillip Ventress, Assistant Audit Manager, conducted the interviews in November
2018 and January and February 2019. One witness, Rebecca Howard Ackerman, was interviewed by telephone.

1 Three loss-control specialists in the Department are designated as "auxiliary signors."
2 These specialists have authority to sign voucher request forms for a County disbursement when
3 Bartel is unavailable. From 2007 to 2016, the auxiliary signors were Daniel Gadd, Cindy Close,
4 and Cliff Webb (now deceased). County officials realized from their review of documents that
5 ACKERMAN submitted voucher requests for disbursements to the auxiliary signors when
6 Bartel was out of the office.

7 During their interviews with State auditors, Gadd and Close verified their signatures on
8 vouchers they signed at ACKERMAN's request. When ACKERMAN presented a claim file,
9 they said they looked to see whether the dollar amount and name of the payee on the voucher
10 matched the underlying receipts or other documents in the file. ACKERMAN generated a
11 liability release form and included it in the folder. Gadd said she made sure the name and dollar
12 figures on the voucher request form and liability release form matched.

13 Gadd and Close said they did not verify claim numbers by cross-checking information
14 in RiskMaster. If they had, they likely would have seen that the claim number ACKERMAN
15 presented was fictitious. "Rhonda would have these [vouchers] ready for me to sign," Gadd told
16 State auditors. "I would check the amounts agreed on all the paperwork. There wasn't much
17 else I could do since I didn't have access to RiskMaster."

18 Bartel acknowledged that he, too, signed a handful of ACKERMAN's vouchers, not
19 realizing they were false third-party claims. He recalled that ACKERMAN often had paper
20 receipts attached to each voucher request. Bartel believes the receipts were likely forged and
21 then later destroyed after the voucher was signed and the check issued. Like the loss-control
22 specialists, Bartel said he only checked to see whether dollar figures on the voucher request
23 form and the liability release form or receipts matched.

24 As noted previously, the Auditor's Office was supposed to issue claim disbursement
25 checks only for first-party claims filed by vendors who repair and replace County equipment.
26

1 However, ACKERMAN, used personal relationships and her co-workers' trust to process
2 fictitious third-party claims through the Auditor's Office.

3 **Exhibit A** provides an example of the vouchers ACKERMAN prepared, signed, and
4 submitted to Gadd, Close, and Webb to request county payment on a false third-party claim.
5 ACKERMAN identified herself as the Risk Management Department employee who prepared
6 and signed the voucher on October 10, 2014, before obtaining Gadd's approval and submitting
7 it to the Auditor's Office. The voucher requests a check disbursement of \$9,368.52 to "vendor"
8 Zach Sharrai. Sharrai is listed on the county flow chart as a friend of Jory.

9 **Exhibit B** shows a U.S. Bank check in the amount of \$9,268.52, which the County
10 Auditor's Office issued to Sharrai based on ACKERMAN'S voucher. The date on the check is
11 October 14, 2014—four days after ACKERMAN submitted the voucher request.

12 On the voucher request form (**Exhibit B**), there is a handwritten note Bartel identified
13 as ACKERMAN's handwriting: "Will pick up 10-14-14." Bartel told State auditors it was not
14 normal procedure for disbursement checks to be picked up in person from Accounts Payable.

15 In a voluntary interview with State auditors, Jory identified Sharrai as one of five friends
16 who cashed checks and received money from ACKERMAN. At his mother's request, Jory said
17 he recruited friends to cash the county checks for her. He said ACKERMAN offered to give him
18 and his friends \$100 to \$200 for each check cashed. Jory explained his pitch: It was "basically
19 what my mom told me I told them. I was honest with my friends. These were checks my mom
20 was getting from her work and we were to cash them and give her the money to help boost her
21 credit."

22 The checks were endorsed and cashed at various U.S. Bank branches in Spokane and
23 Spokane Valley. Jory said all the proceeds were delivered to ACKERMAN, with the exception
24 of the \$100 to \$300 she gave him and another \$100 to \$200 for the check recipient. "Once we'd
25 cashed the checks, she would give us what she told us she would and take the rest," he said.
26

1 Jory's wife, Rebecca Howard Ackerman (hereafter "Rebecca"), confirmed Jory's
2 account of the check-cashing process. Rebecca told State auditors that she agreed to cash checks
3 because ACKERMAN "said it would build her credit."

4 Rebecca and Jory were dating when she cashed five county checks that totaled
5 \$43,165.99. Each check was issued to Rebecca Lynn Howard, her maiden name. Rebecca said
6 she gave all the money to ACKERMAN, except for the \$100 to \$300 she took or received from
7 ACKERMAN for each check cashed. "Basically I thought, what [ACKERMAN] was doing
8 was taking out loans and then paying them back," Rebecca said, adding that she was 22 years
9 old at the time and did not understand how credit works.

10 Rebecca and Jory told State auditors they trusted ACKERMAN and did not realize they
11 were doing anything wrong. They had a clear understanding, however, that the check cashing
12 should be kept secret from anyone not participating. "She'd tell us not to tell anyone or say
13 anything and it was ok[ay,]" Rebecca said.

14 In her interview, Schoeffler, the Risk Management Department's workers compensation
15 adjuster, said she and ACKERMAN used to be close friends and went shopping during their
16 lunch breaks. Their friendship dissolved after ACKERMAN'S behavior changed and she
17 stopped showing up for work in the months leading up to her termination in 2018. "I always
18 wondered why [ACKERMAN] seemed to always have cash on her to buy things," Schoeffler
19 said. "I thought this was odd because I made more money than she, did but she always had
20 cash."

21 She recalled going to "a lavish party" ACKERMAN hosted at the Northern Quest Resort
22 & Casino in Airway Heights, WA. She said ACKERMAN "rented the whole upper floor."

23 The State Auditor's Office identified several weaknesses in Spokane County's claims
24 process and recommended improvements. The March 28, 2019 report was sent to the Board of
25 Commissioners and the Spokane County Prosecuting Attorney.
26

Prosecuting Attorney Larry Haskell asked the Washington Office of the Attorney General (hereafter "AGO") to investigate and review the ACKERMAN case for potential criminal charges. The Spokane County Prosecuting Attorney's Office had numerous conflicts: The suspect was a former County employee, most of the witnesses were County employees, and the embezzled funds came from a county agency that the Prosecuting Attorney advises in civil matters. The AGO accepted the case on April 3, 2019. The AGO received concurrent jurisdiction from Spokane County.

Independent Forensic Audit

In July, 2019, the AGO retained Berntson, Porter & Company, PLLC (hereafter "BP") in Bellevue, WA to conduct a forensic review of the County investigation materials and State Auditor's conclusions. The AGO requested the independent audit to verify the State Auditor's findings and to help Spokane Police identify potential witnesses and accomplices for interviews. BP was asked to organize and analyze cancelled checks and related documents into three time periods: 2007 – 2011, 2012- 2016 and 2007-2016. The firm also was asked to identify the top check recipients based on total amount received.

On December 20, 2019, BP submitted its report and schedules to the AGO. BP representatives will testify that they conducted this forensic review and analysis in accordance with lawful fraud examination techniques, including examination of books and records, interview records, and other evidence-gathering procedures. BP examined numerous pages from Spokane County's 2007-2016 claim binders, claimant checks, federal tax forms, and other documents.

BP issued the following findings:

- From 2007 to 2016, Spokane County issued 211 checks as a result of false claims, totaling \$1,378,541.
- From 2012 to 2016, there were 105 checks issued for a total of \$766,767.

- Forty-five⁷ people received County checks as a result of false claims between 2007 and 2016.

BP reduced the estimate of Spokane County's loss in public funds from \$1,384,407 to \$1,378,541 after identifying a voided check for \$5,865.85 that had been included in the State Auditor's calculation.

BP provided the AGO with a schedule for each of the 45 claimants. Each schedule contains hyperlinks that display a copy of cancelled checks (front and back) and corresponding false third-party claim documentation, if available. Using the cancelled checks, I was able to pinpoint the exact period of time that each individual received County funds.

Criminal Investigation

The AGO and Spokane Police sought to investigate the role of the 45 claimants and whether they were accomplices in the check-cashing scheme, or whether ACKERMAN may have manipulated them as participants. We set out to learn more about how Jory and his friends received and cashed County checks. We also sought to determine whether any County employees, other than ACKERMAN, may have knowingly participated in criminal conduct.

As part of my investigation, I reviewed copies of claims files and other materials from the County and State Auditor investigations, along with the BP report and schedules. In August 2019, I obtained and reviewed copies of ACKERMAN's work emails from the County.

In several emails, ACKERMAN talked with friends about trips to Las Vegas, Priest Lake, Lake Roosevelt, Marshall Lake, and going on a cruise. I reviewed emails between ACKERMAN and two women who received and cashed County checks based on fraudulent claims: Nikki Banks and Julie Amsbury aka Julie Mohr. In addition, there were emails from County employees notifying ACKERMAN that checks were ready for pick up.

I learned that IRS agents in Spokane also were conducting a criminal investigation. Agent Joshua Stueckle and I agreed to try and conduct witness interviews together so as to avoid

⁷ State auditors identified a 46th claimant in their report. However, I found from my investigation that Julie Mohr and Julie Amsbury are the same person.

1 duplication between State and federal investigations. We relied on BP's overview of the 45
2 claimants. (EXHIBIT C) Our witness list included claimants who received at least three or
3 more checks during the 2012-2016 time period as well as ACKERMAN's son, daughter-in-law,
4 and brother.

5 Each witness interview was audio- and video-recorded with my body cam. I notified each
6 witness that: (1) the interview was completely voluntary, (2) they did not have to answer any
7 questions, and (3) they were free to leave at any time. Each witness said they understood. All
8 but one witness agreed to have their interviews recorded in full. The interviews were conducted
9 in November 2019, December 2019, and January 2020.

10 Jory Ackerman

11 The evidence show Jory was 18 and a high school senior when ACKERMAN asked him
12 to recruit friends to cash checks for her in the fall of 2011. Jory estimated that he was involved
13 with 50 county checks.

14 He identified the following individuals as friends he accompanied when they cashed
15 checks between 2011 and 2016: Brandon Link, Colton Trebe, Mikel Albert Jones⁸, Justin
16 Smith, Richard Reynolds, and (Zach) Sharrai. The BP report shows that these six men were
17 among nine individuals who received the largest number of county checks and cash between
18 2007 and 2016.

19 After one or two friends agreed, Jory said, ACKERMAN asked for more names.
20 Cancelled checks show Link and Trebe were cashing checks with Jory for two years before
21 Sharrai joined the group in 2013. Jones, Smith, and Reynolds started cashing checks with Jory
22 in 2014.

23 Sometimes, Jory said, his mother asked about specific friends in his social circle. "My
24 house and my mom was kind of like the mom to all of my friends, so we always hung out at my
25 house, so she knew my friends by name," he said.

26

⁸Jones changed his name to Mikel A. Jones in September 2018.

1 Jory was living in the basement after high school and did not have steady income when
2 his mother requested more names. Many of his friends, also recent high school graduates, were
3 working at low-wage jobs. So ACKERMAN's offer of \$100 to \$200 a check was tempting.

4 Because the Auditor's Office required a signed W-9 form with each voucher request,
5 ACKERMAN asked Jory to get each friend's Social Security number. Nine times out of ten,
6 Jory said, his friends gave him their number.

7 Jory took on the role of courier as well as recruiter—receiving the checks from
8 ACKERMAN and then delivering them to friends. According to Jory, ACKERMAN would
9 bring the checks home in an envelope. Sometimes there were two or three checks inside, each
10 issued to a different person. Jory said he never received more than five checks at one time.

11 Other times ACKERMAN asked her son to meet her at work. "She would always have
12 me meet her in her office and the door would be closed," Jory said. "If they were handed out in
13 the open, they were always folded in half so they just looked like pieces of paper."

14 ACKERMAN maintained oversight and control of the check-cashing process. According
15 to Jory, she directed him to have each check recipient go to a U.S. Bank branch, endorse and
16 cash the check, and then hand the money to him. ACKERMAN also had her son accompany
17 friends to the bank.

18 Jory said he would stand next to them at the teller window, or sit nearby and wait for the
19 transaction to be completed. He did not understand why ACKERMAN wanted him to go along,
20 though "[m]y theory was because it was a lot of money and to make sure it would all be brought
21 back."

22 Jory said he was told to make sure no more than one check was cashed at the same branch
23 on the same day. Also, the check was never deposited but converted to cash. If a bank teller asks
24 what the money was for, Ackerman told Jory, "Tell them it's for a car loan, house loan or repairs
25 of some sort."
26

1 After he was handed the cash in a bank envelope, Jory said he would take his share out
2 (\$100 to \$300), then give \$100 to \$200 back to his friend (check recipient) before delivering the
3 rest of the cash to ACKERMAN. Jory said he would give her the envelope at home, never at her
4 workplace.

5 The check-cashing operation became so familiar that Jory and his friends had a
6 shorthand phrase for their driving trips to the bank: "Doing checks." "To us, it was free money,"
7 Jory said. "We didn't know where it was coming from or what it was."

8 After he started dating Rebecca, Jory said, ACKERMAN asked him to see if Rebecca
9 would cash checks, too. She agreed and began going along for trips to the bank in April 2015.
10 "After we got married, my mom said Rebecca wouldn't be able to do checks anymore," Jory
11 said. Although she never explained why, he said he thinks it was because Rebecca would soon
12 share the family name.

13 Jory said he had no idea what ACKERMAN did with all the cash. He was told she was
14 using it to boost her credit. Jory did notice his parents trading in their vehicles every year and
15 going on occasional trips. ACKERMAN also was known to be a gambler. Every Thursday, Jory
16 said, he babysat his two younger sisters because his mother was at the casino.

17 Jory reviewed a list of check recipients to see if he recognized names. He identified (1)
18 Danielle Howard (family friend); (2) Melissa Weidert (his ex-girlfriend); (3) Dawnyia Brewer
19 (Weidert's friend); (4) Jessica Hartzog (Weidert's friend), (5) Mariah Lockridge (Sharrai's
20 girlfriend); (6) Nikki Banks (a cousin); (7) Robin Johnson (lifelong friend of his step-father); (8)
21 Thomas Hendrickson (uncle or deceased grandfather); and (9) TR Hendrickson (uncle, who he
22 knew as Toby or Tobias).

23 Jory said ACKERMAN probably reached out directly to Banks, Johnson, and Howard to
24 cash checks. He said he "never did checks" with Weidert and was unaware she was involved.

25 Rebecca Howard Ackerman
26

1 Rebecca confirmed her statements to State auditors, including the cover story
2 ACKERMAN gave for bank tellers. After they started dating, she said she and Jory received
3 \$100 to \$300 from each check, apparently for arranging the transport and bringing the money
4 back to ACKERMAN.

5 Rebecca said, "Jory would get a text message saying checks were ready," so they
6 arranged to pick up the checks from ACKERMAN at her house or office. ACKERMAN "would
7 give the checks to Jory and he would distribute them to his friends or we would go pick up his
8 friends because most of them didn't drive and drive them to the U.S. Bank," Rebecca said.

9 Rebecca provided insight into how ACKERMAN used some of the proceeds from county
10 checks. She said ACKERMAN took trips to Las Vegas and went to mud bogging events on
11 weekends. Rebecca said she observed ACKERMAN "constantly drinking and partying."
12 ACKERMAN also "would spend a lot of money on alcohol and gambling" and shower her
13 children with gifts. Rebecca said she and Jory would leave ACKERMAN's house with "\$1,000
14 in Christmas gifts," including gift cards to the casino and for massages. ACKERMAN also spent
15 generously on herself. She had lavish hair and nails and a new car every year, Rebecca said.

16 She recalled going to a bank in Spokane Valley with ACKERMAN and watching her
17 deposit money she had just received. Rebecca thought the money may have been deposited into
18 a loan account, but she was not sure.

19 Another time, Rebecca said, she and Jory were in ACKERMAN's truck and
20 ACKERMAN was driving. Rebecca and Jory had just given her money from multiple checks
21 cashed earlier in the day. "I was sitting in the back seat of her truck and Rhonda and Jory were
22 talking about the checks," Rebecca said. She jokingly told ACKERMAN that her friends "think
23 you're in the mafia, and we don't understand how this is working" and where the money was
24 coming from. When asked, Rebecca said she did not recall whether ACKERMAN responded
25 directly to her comment. But, Rebecca said, ACKERMAN always told her and Jory, "The less
26 questions we asked the better," and "We don't need to know more than we need to know."

1 County records and the BP report show Rebecca cashed five checks between April 2015
2 and February 2016. Based on her account of how county checks were cashed and proceeds
3 delivered to ACKERMAN, the evidence indicates that ACKERMAN received the lion's share
4 of \$43,165.99 Spokane County paid in disbursements for false third-party claims filed under
5 Rebecca's maiden name.

6 When shown a copy of the W-9 form that contained her name, address, and Social
7 Security number, Rebecca said she had never seen it. She said the signature was not hers.

8 Rebecca recognized the following names from our list of check recipients: (1) Brandon
9 Link (Jory's best friend); (2) Colton Trebe (Jory's friend); (3) Justin Smith (Jory's friend); (4)
10 Richard Reynolds (Jory's friend); (5) Robin Johnson (close family friend who she knew as
11 "Rob"); (6) Thomas Hendrickson (Jory's grandfather); (7) TR (Tobias) Hendrickson
12 (ACKERMAN'S brother); (8) Zach Sharrai (Jory's friend).

13 **Brandon Link**

14 Among Jory's friends, Trebe and Link cashed the most checks on behalf of
15 ACKERMAN from 2011 to 2016. Trebe cashed 26 county checks for a total of \$164,648.23.
16 Link cashed 16 checks for a total of \$91,308.60.

17 Link recounted how ACKERMAN asked him to cash checks for her. He said they were
18 at the ACKERMAN residence when the conversation occurred. I asked how the conversation
19 started. "She's like, 'Hey, you know, I know you need some - you know, extra money. I'm trying
20 to do this thing where it boosts my credit. If you could do this for me, bring me back the money,
21 then I'll give you, you know, hundred bucks here and there,'" Link recalled.

22 ACKERMAN told Link the checks would help her get loans that she would then pay
23 back, "but she had to put it through other people." When ACKERMAN offered a \$100 or \$200
24 for each check cashed, Link said he thought to himself, "Oh, free money. Right on." He was 19.

1 ACKERMAN gave him the same instructions she had given to Jory and Rebecca: "Just
2 go up to a U.S. Bank, cash the check, and bring it back to her," Link said. ACKERMAN never
3 said what she did with the cash.

4 He said he viewed ACKERMAN like his mother because he did not come from a stable
5 household. He felt reassured when ACKERMAN told him her request would not present
6 problems. "She was just saying, you know, 'This is boosting our credit so we can provide and
7 do things for the family and stuff like that, and, you know, the better credit I have, the better
8 loans ... No risk to you, sweetie.'"

9 Link appeared unaware that ACKERMAN filed a third-party claim under his name. He
10 said he had never filed a claim against Spokane County.

11 Records show Link cashed 16 county checks between October 2011 and January 2015.
12 Based on his account and Jory's account of how these checks were cashed and delivered, the
13 evidence indicates that ACKERMAN received the lion's share of \$91,308.60 Spokane County
14 paid for false third-party claims ACKERMAN filed under Link's name.

15 Link confirmed his endorsement signature and phone number written on the back of each
16 check. However, he said he had never seen the W-9 form submitted with his name, address, and
17 Social Security number. Link also said the signature was not his.

18 Link recognized names of the following check recipients: (1) Colton Trebe; (2) Justin
19 Smith; (3) Jory Ackerman; (4) Zach Sharrai; (5) Mariah Lockridge (Sharrai's girlfriend); (6)
20 Melissa Weidert (Jory's ex-girlfriend); (7) Mikel Albert Jones (who he knew as Mike); (8)
21 Richard Reynolds (Trebe's friend); (9) Rebecca Lynn Howard (Jory's wife); (10) Robin Johnson
22 (a family friend he knew as Rob); (11) TR (Tobias) Hendrickson (possibly Jory's uncle).

23
24 Richard Reynolds

1 Reynolds, who now lives in Oakbrook Terrace, IL, agreed to talk with us by telephone.
2 His attorney, Stephen Graham, was present in the room during the interview, which we
3 conducted in Spokane, WA.

4 Reynolds recalled Jory asking if he would cash checks for ACKERMAN: "He asked me,
5 'Hey, do you want to do these checks that are—you know, my mom gets them from the State
6 and they help my family out?' And I was like, 'Okay. Well, I'll go talk to your mom.'"

7 Jory brought Reynolds to talk with ACKERMAN at their house. Reynolds said he had
8 already knew her because he had spent quite a bit of time hanging out with Jory. When he asked
9 questions about her request, "everything seemed ... legit," Reynolds said. "She made me feel
10 like, you know, everything was okay. I just felt like I was helping them out."

11 He could not recall ACKERMAN's specific explanation but thought it had something to
12 do with helping the family buy property. Reynolds became aware other friends were cashing
13 checks for ACKERMAN. So he felt comfortable with the arrangement.

14 Reynolds said a trip to the bank usually started with a text, with Jory saying he had
15 checks. Trebe would drive, pick up him, and "Jory would already have the checks on him,"
16 Reynolds said. If they were all together, he, Trebe, and Link, and Jory cashed their checks at
17 different branches of U.S. Bank. It was Reynolds's understanding they did this because banks
18 had a limited amount of cash.

19 The first time he cashed a check, Reynolds said he gave the envelope of cash to
20 ACKERMAN personally, probably at her workplace. He said ACKERMAN pulled out \$200
21 and gave it to him. After that, Reynolds gave the envelopes to Jory.

22 He described Jory pulling money out of the envelope and handing him \$200. He added
23 that it was understood among friends that Jory received more cash for each check because he
24 was ACKERMAN'S son.

1 Reynolds's attorney sent him a digital copy of a W-9 form via text message. It contained
2 Reynolds's Social Security number, address, and signature. Reynolds confirmed the Social
3 Security number but said the signature and handwriting on the tax form were not his.

4 County records and the BP report show Reynolds cashed nine checks between November
5 2014 and November 2016. Based on his account of how these county checks were cashed and
6 proceeds delivered to ACKERMAN, the evidence indicates that ACKERMAN received the
7 lion's share of \$71,732.26 Spokane County paid based on fictitious third-party claims filed under
8 Reynolds's name.

9 Reynolds said he and his friends never questioned what they were doing. He viewed
10 ACKERMAN as trustworthy because she was a parent.

11 We read aloud a list of names to Reynolds. He said he recognized the following: (1)
12 Brandon Link; (2) Colton Trebe; (3) Dawnyia Brewer; (4) Jessica Hertzog (high school); (5)
13 Justin Smith, (6) Kenneth Keller (high school); (7) Rebecca Howard⁹; (8) Zach Sharrai ("part of
14 our group").

15 **Dawnyia Brewer Smith**

16 Jory was not the only person enlisting friends to cash county checks for ACKERMAN.
17 Melissa Weidert also became a recruiter for ACKERMAN.

18 Dawnyia Brewer Smith¹⁰ (hereafter "Smith") said she was approached by Weidert, her
19 best friend from high school. Weidert and Smith were sharing an apartment in 2013. Smith was
20 still single and using her maiden name.

21 Asked about the initial conversation regarding checks, Smith said, "I don't even
22 remember exactly what was said. It was just, 'Hey, these are for home renovations. Can you help
23 out and cash a couple?'" Smith said. "And young and stupid me, 'Yeah. Okay.'" She was 19.

24
25
26 ⁹ Rebecca Howard is the same person as Rebecca Howard Ackerman.

¹⁰ Brewer's married name is Smith. We have no information indicating she is related to Justin Smith.

1 Smith said Weidert told her the request was from ACKERMAN. While Smith did not
2 know Jory well, she said she knew "Rhonda" was his mother because Jory and Weidert dated in
3 high school.

4 Smith did not initially recognize the cancelled checks we presented. However, she
5 verified and initialed each endorsement signature. County records and the BP report show that
6 Smith cashed three county checks in 2013. She received one check for \$8,427, another for
7 \$8,279, and a third check for \$5,928.

8 Smith did not recall meeting or talking with ACKERMAN about the checks. But she
9 thinks she gave her Social Security number to Weidert, who passed it on to ACKERMAN.

10 We asked Smith how much time passed between the time she verbally agreed to cash
11 checks and when checks were ready. She estimated it was a couple of days. Smith remembered
12 taking a check to U.S. Bank and Weidert being with her. Smith was driving. Weidert also may
13 have had a check to cash that day, too. Smith did not recall.

14 Agent Stueckle asked Smith to explain what she did after a bank teller handed her an
15 envelope full of cash. After returning to the car, Smith said she handed the envelope to Weidert.

16 From the bank, they drove to ACKERMAN's workplace (the Risk Management
17 Department). Smith said she stayed in the car while Weidert went into the building to contact
18 ACKERMAN. After Weidert returned to the car, she handed Smith \$100 or \$200. Smith said
19 she thinks Weidert typically received more because of her help with recruitment.

20 When asked whether "any bells went off" in her head about trips to the bank and driving
21 to ACKERMAN's office to hand over money, Smith said yes. After the second check, "I'm like,
22 how many renovations do you need?" She said she declined to cash more after the third check.

23 Based on Smith's account of how checks were cashed and proceeds delivered to
24 ACKERMAN via Weidert, the evidence indicates that ACKERMAN received the lion's share
25 of \$22,635.51 Spokane County paid based on fictitious third-party claims ACKERMAN filed
26 under Smith's maiden name.

1 Smith reviewed a W-9 form that had been filled out with her name, address and Social
2 Security number. She verified the number but said the handwriting and signature were not hers.

3 She recognized the following names: (1) Jessica Hartzog (high school); (2) Jory
4 Ackerman; (3) Kenneth Keller (high school, dated Weidert); (4) Richard Reynolds (high school,
5 Jory's friend).

6 Smith said she was not aware Keller and Reynolds had cashed checks for ACKERMAN.

7 **Kenneth Keller**

8 Kenneth Keller was living with Weidert in June 2014 when she asked whether he would
9 cash a check. They had been dating for about a year and had known each other since high school.

10 Keller recalled her asking, "Hey, can you cash a check for me because it has to be in
11 your name." He said she reassured him there was nothing to worry about. After he agreed,
12 Weidert brought him a check less than a week later. Keller said they drove together to a U.S.
13 Bank branch in the north end of Spokane.

14 During our interview, he described walking out of the bank with a lot of cash. Keller said
15 he gave the bank envelope to Weidert. Keller said they returned home with the money, and that
16 Weidert did not give him any cash from the proceeds.

17 He did not recall Weidert going on shopping sprees but said she talked about using the
18 money to help pay for medical bills. At the time, Keller said, Weidert was unable to work because
19 of serious health issues. He was covering their living expenses.

20 Keller verified his endorsement signature on the checks. He also confirmed the Social
21 Security number on a W-9 form, but said the signature was not his.

22 County records and the BP report show that Keller cashed three county checks in June
23 and August 2014. Based on his account and Smith's account of how checks were cashed and
24 money delivered to ACKERMAN via Weidert, the evidence indicates it is likely ACKERMAN
25 received the lion's share of the \$23,324.45 Spokane County paid for false third-party claims filed
26 under Keller's name.

1 Keller said he did not know Rhonda ACKERMAN, Jory Ackerman, or anyone else with
2 the last name of Ackerman. He recognized (1) Dawnya Brewer as Weidert's friend and (2)
3 Jessica Hartzog as Weidert's best friend.

4 **Melissa Weidert**

5 County records and the BP report show that Weidert began cashing checks for
6 ACKERMAN in July 2011—a few months before ACKERMAN asked Jory to recruit his friends.
7 The evidence indicates ACKERMAN recruited Weidert personally. Jory said he was unaware
8 Weidert was involved until he saw her name on the list of 45 claimants.

9 Agent Stueckle conducted a separate interview with Weidert.¹¹ She told him she was on
10 medication and had undergone two or three brain surgeries during the period she cashed checks
11 for ACKERMAN. Other than accepting ACKERMAN's fee, Weidert said she gave all the cash
12 to ACKERMAN, who told her the money was being used for home improvements and
13 renovations.

14 Weidert said she felt ACKERMAN took advantage of her, knowing she needed money
15 for medical expenses. Weidert said she was aware Smith, Keller, and Hartzog were cashing
16 checks for ACKERMAN but did not recall recruiting them.

17 County records and the BP report show that Weidert received and cashed 13 checks
18 between July 2011 and December 2013. Based on her account to the IRS of cashing the checks
19 and delivering money to ACKERMAN, the evidence indicates that ACKERMAN received the
20 lion's share of \$72,523.26 the County paid for false third-party claims filed under Weidert's
21 name.

22 **Robin Johnson**

23 Robin (Rob) Johnson was among 22 individuals who cashed Spokane County checks
24 based on ACKERMAN's fraudulent third-party claims between 2007 and 2011. These check
25 recipients were not part of Jory's and Weidert's social circles.

26
¹¹ Agent Stueckle provided a summary of his interview notes to AAG Serrano.

1 Johnson said he was a good friend of ACKERMAN's husband, Neil, whom he had
2 known about 50 years. He recalled ACKERMAN asking if he would like to make \$100. Johnson
3 said she asked him to cash a check and to keep \$100 from the proceeds, which he agreed to do.

4 ACKERMAN explained that she had an overdraft on her bank account because of her
5 gambling at the casino, Johnson said. She told him that if she didn't put the money back in the
6 account, Neil would find out and leave her. ACKERMAN asked Johnson not to tell Neil.

7 ACKERMAN's explanation seemed plausible to Johnson. Neil had bailed out
8 ACKERMAN financially because of her gambling habits when they first got together, Johnson
9 said, and he refused to do so again. Johnson said Rhonda likes to gamble and goes to the
10 Chewelah Casino and Northern Quest Resort & Casino.

11 Johnson recalled picking up the second check from ACKERMAN at their house.
12 ACKERMAN told him to go to a U.S. Bank and cash the check that same day. After returning
13 from the downtown branch, Johnson said he went back to the house and handed ACKERMAN
14 the money. He said the second check was about \$7,000. ACKERMAN gave him \$100.

15 Johnson said he knew ACKERMAN worked for the County, but that ACKERMAN
16 never explained where she got the checks. She assured him that no one would trace the checks
17 back to him because they were real. Johnson said he felt ACKERMAN took advantage of him
18 because she knew he would never say no to her.

19 Initially Johnson agreed to have the interview recorded. But he asked that the recording
20 be stopped when I began asking about checks he had cashed. Johnson later explained that he was
21 not certain he could provide all the information if the recording was on.

22 County records show Johnson cashed five checks between June 2008 and November
23 2012. He said he did not deposit any checks.

24 Based on Johnson's account of how these checks were cashed and proceeds delivered to
25 ACKERMAN, the evidence indicates that ACKERMAN received the lion's share of \$35,856.95
26 Spokane County paid for false third-party claims she filed under Johnson's name.

1 Agent Stueckle showed Johnson a W-9 form that had his name and other personal
2 information. Johnson verified that the form contained his Social Security number and signature.
3 He also verified his endorsement signature on the back of three of the five checks.

4 TR (Tobias) Hendrickson

5 Tobias Hendrickson cashed the first check for ACKERMAN in January 2007. He said
6 his sister had called him and told him that anyone driving on a road could have damage to their
7 car, and that Spokane County was allowing "anybody in the county" to file a claim for \$200.

8 "That's what I kind of remember," Hendrickson said. "She said it was anybody who
9 drove on county roads or something like that."

10 He said he agreed to file a claim because the claims process ACKERMAN described was
11 open to anyone and he had a Toyota Camry at the time. Hendrickson said he made a phone call
12 to the county but did not submit photos or fill out any paperwork about car damage.

13 ACKERMAN told Hendrickson the county would give him \$200 to compensate him for
14 damage to his car. One check arrived in the mail. He said he went to the county to pick up another
15 check.

16 When the first check arrived, Hendrickson said he called ACKERMAN because it was
17 issued for much more than \$200. County records show the amount was \$2,390.45. ACKERMAN
18 told her brother it was hard to explain. Hendrickson said her explanation had something to do
19 with the dollar figure representing "an estimated amount" of what all claimants received.

20 ACKERMAN told Hendrickson that except for \$200, he had to return the remaining
21 amount of money, so the funds would be available in case something else were to happen to him.
22 If he kept more, Hendrickson said, ACKERMAN told him he would not be able to file another
23 claim.

24 "Made no sense now thinking about it, but at the time I totally thought it was fine," he
25 said. "So I just went to the bank, cashed the check and kept \$200."

1 Hendrickson said he delivered the remaining money to ACKERMAN at her office. When
2 asked whether his Camry had been damaged after being driven on a county road, Hendrickson
3 said he did not know because it was so long ago.

4 He remembered ACKERMAN inviting him to file more claims after January 2007. "She
5 would call me every once in a while and say the county did this again so you can do this again,"
6 Hendrickson said. When asked to recount what she told him, he said, "The County screwed up
7 again. You can get this money, \$200."

8 He verified his endorsement signature on the back of six of the 13 checks he received.
9 Agent Stueckle showed Hendrickson a W-9 form that had his name and other personal
10 information. Hendrickson said the Social Security number and signature were not his.

11 Based on Hendrickson's account and his description of how his checks were cashed and
12 proceeds delivered to ACKERMAN, the evidence indicates that ACKERMAN received the
13 lion's share of \$77,215.72 Spokane County paid for fictitious third-party claims she filed under
14 Hendrickson's name.

15 Hendrickson said he told friends at the bar where he worked about the claims process
16 ACKERMAN described. At the time, he was working at Dempsey's Brass Rail in Spokane.
17 Hendrickson said he may have told Jeff Scarone, a friend, and Carr Mancini, a co-worker. Both
18 of their names are on the BP list of claimants.

19 County records and the BP report show that Scarone cashed 10 checks issued to Jeffrey
20 William Scarone between February 2007 and January 2011 based on false third-party claims
21 filed by ACKERMAN in Scarone's name. The payments totaled \$48,944.68. Mancini cashed
22 three checks between December 2008 and June 2009 for a total of \$22,684.84. All three checks
23 were issued based on fictitious claims.

24 /

25 /

26 /

1 **Mariah Lockridge**

2 Mariah Lockridge, whose unclaimed 2016 check prompted the county investigation, had
3 a personal connection to ACKERMAN's check-cashing scheme. She just didn't remember it.
4 When Agent Stueckle and I requested an interview, Lockridge said she had a feeling it had
5 something to do with Jory and his mother.

6 Lockridge heard about the check cashing while dating Sharrai in 2016. He told her about
7 money he made on the side by cashing checks and asked Lockridge if she wanted to participate.
8 Although she did not know Rhonda ACKERMAN by name, Lockridge said she knew "it was
9 Jory's mom that would set them up" with checks.

10 Sharrai asked for Lockridge for her name, Social Security number, and date of birth, and
11 she gave it to him. But Lockridge said she "chickened out" and did not pick up the check when
12 it arrived. "They wanted to meet at the U.S. Bank in the Valley, and I told them, 'I can't.'"
13 Lockridge said. "Jory was going to meet Zach and I felt uneasy that Jory wanted to follow me
14 into the bank."

15 She recalled this conversation occurring in December 2016. That was the same month
16 Spokane County issued a check to Lockridge for \$8,963.45 that was never picked up or cashed.

17 County records and the BP report show Lockridge received and cashed a check issued
18 by the State Auditor's Office in April 2016 for \$9,368.42.

19 When presented with a copy of the cancelled check, Lockridge verified her endorsement
20 signature, thumbprint, and cell phone number on the back. She said she did not recall cashing
21 the check, or receiving money from it. Like other check recipients, Lockridge was unaware that
22 a third-party claim had been filed in her name.

23 She recalled going to the bank with Sharrai and Jory three times, all in the same car.
24 "Everybody got the information that it was legal and safe to do," Lockridge said of the check-
25 cashing operation, adding that she warned her boyfriend that it sounded sketchy.
26

1 County records and the BP report show that Sharrai cashed the last check requested by
2 ACKERMAN on December 5, 2016, the same day Lockridge would have been able to pick up
3 and cash the second check.

4 Jory and other witnesses said they do not know why ACKERMAN suddenly stopped
5 asking for their help cashing checks.

6 County Employees

7 In addition to the check recipients, I took statements from the following Risk Management
8 Department employees: Bartel, Gadd, Close, and Williams. In the Auditor's Office, I
9 interviewed Simpson, who discovered the unclaimed check; Marcel Chesney in Accounts
10 Payable; and Debbie Crocker, Accounting Supervisor. Based on these interviews and my
11 investigation, there is no indication that other County employees were aware that the
12 ACKERMAN was filing false third-party claims. It is more likely that ACKERMAN took
13 advantage of the trust built up among employees and loopholes in claim-processing procedures.

14 Gadd, one of the auxiliary signors who approved ACKERMAN's vouchers, said she
15 would bring a stack to him in the afternoon when there were not a lot of people in the office.
16 Sometimes, Gadd said, he would ask what the disbursements were for, and ACKERMAN would
17 sit and answer his questions while he signed the vouchers. Sometimes she provided receipts.
18 Sometimes there were none.

19 Often ACKERMAN would say she was filling in for Williams, the liability claims
20 adjuster responsible for handling all third-party claims. Dan said he ACKERMAN because she
21 had worked there a long time.

22 Close, another auxiliary signor, said ACKERMAN would come into her office, hand her
23 the claim file, and say this was a rush payment. ACKERMAN would tell her she was handling
24 the job on behalf of either Williams or another co-worker. Close said ACKERMAN made a point
25 of waiting in her office until Close signed the vouchers.
26

1 In the Auditor's Office, Chesney said the staff had been instructed not to request
2 supporting documentation on Risk Management vouchers due to privacy concerns. She did not
3 recall seeing any back-up documentation with vouchers for claim settlement payments.

4 According to Crocker, the staff often received "last-minute emergencies" from
5 ACKERMAN on Friday afternoons. Crocker said she remember a time or two when
6 ACKERMAN would call or come over to the Auditor's Office and say she had emergency
7 vouchers that needed to be processed. I asked whether ACKERMAN could get a county check
8 issued the same day after submitting such a request. Crocker said yes.

9 Gambling Records

10 Gambling records indicate ACKERMAN held onto much of the cash and spent it at local
11 casinos. Northern Quest Resort & Casino voluntarily provided ACKERMAN'S gambling
12 records for 2011 to 2017. The records show the following regarding ACKERMAN'S activity:

| | <u>Buy In</u> | <u>Won</u> |
|---------|---------------|------------|
| 13 2012 | \$ 636,504 | \$ 19,759 |
| 14 2013 | \$ 769,495 | \$ 43,451 |
| 15 2014 | \$2,190,400 | \$112,375 |
| 16 2015 | \$1,831,797 | \$ 85,342 |
| 2016 | \$ 572,151 | \$ 20,101 |

17 The "buy in" amount represents (1) the funds ACKERMAN brought to the casino to use
18 for playing, (2) other winning amounts, and (3) prior winnings. This means the "buy in" amount
19 could be significantly higher than the amount of cash used for playing on a particular day.

20 Based on my review, it appeared ACKERMAN spent much of the cash she received from
21 check recipients at local casinos.

22 **CONCLUSION**

23 Based on the facts and circumstances provided herein, ACKERMAN wrongfully
24 obtained approximately \$1,378,541 in county funds between January 24, 2007 and December 5,
25 2016. The evidence shows that Spokane County approved the disbursements payments as a result
26 of fictitious third-party claims ACKERMAN processed on behalf of 45 individuals through the

1 Auditor's Office and the Department of Risk Management, where she was employed. Based on
2 the foregoing, the declarant requests that this Court find probable cause to charge the defendant
3 with:

4 **Theft in the First Degree (RCW 9A.56.030)**

5 **Leading Organized Crime (RCW 9A.82.060)**

6 Under penalty of perjury under the laws of the State of Washington, I certify that the
7 foregoing is true and correct to the best of my knowledge.

8 Signed and dated by me this 26 day of August, 2021, at Spokane, Washington.

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12 Detective Janice Oliver
13 Spokane Police Department
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EXHIBIT A

00647903

Voucher ID
Vendor ID
Invoice #
PAGE 1 OF 1

VENDOR:

SHARRAI, ZACH
13814 E MISSION AVE
SPOKANE VALLEY WA 99216

SPOKANE COUNTY PAYMENT DOCUMENT

SPOKANE COUNTY AUDITOR

SCHED DT: 10/10/2014

SHIP TO:

BILL TO:

will pick up
10-14-14
ENTERED

OCT 14 2014

Vendor Contact/Tel

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| VENUE: COUNTRY RD. | | | | | | | | | | PO DATE: | | | | | | | | | | BUYER: | | | | | | | | | |
| ENTERED DATE: 10/10/2014 | | | | | | | | | | ENTERED BY: Rhonda Ackerman | | | | | | | | | | PURCHASING DIRECTOR: BELA G. KOVACS | | | | | | | | | |
| ACCTG. PERIOD: 10/2014 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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|----------|-------------|---------|------|---------|----------|---------|---------|---------|-----------|-----------------|
| LINE NO. | DISTRI LINE | ACCOUNT | FUND | DEPTID | PROGRAM | EACCT | ESUB | BD REF | PC UNIT | PAY THIS AMOUNT |
| 1 | 1 | 4960 | 507 | 5075007 | CATEGORY | SUB CAT | AM UNIT | PROFILE | ASSET FLG | ASSET ID |
| | | | | | | | | | | 9,368.52 |

Comments:

DISCOUNT TOTAL: 0.00
FREIGHT TOTAL: 0.00
SALES TAX TOTAL: 0.00
SUBTOTAL: 9,368.52
USE TAX TOTAL: 0.00
GRAND TOTAL: 9,368.52

RECEIVED

OCT 13 2014

SPOKANE COUNTY AUDITOR

TOTAL TO VENDOR: 9,368.52

RECEIVING CERTIFICATION

Materials noted in quantity * have been received in good condition or contracted for.

SIGNED

DATE 10-10-14

TITLE

SPOKANE COUNTY AUDITOR

PAYMENT CERTIFICATION

I, the undersigned, do hereby certify under penalty of perjury that the materials have been furnished, the services rendered or the labor performed as described herein, that any advance payment is due and payable pursuant to a contract or is available as an option for full or partial fulfillment of a contractual obligation, and that the claim is a just, due and unpaid obligation against Spokane County, and that I am authorized to authenticate and certify to said claim.

SIGNED

DATE 10-10-14

TITLE

SPOKANE COUNTY AUDITOR

TRAVEL CERTIFICATION

I hereby certify under penalty of perjury that this is a true and correct claim for necessary expenses incurred by me and that no payment has been received by me on account thereof.

SIGNED

DATE

TITLE

EXHIBIT B

96-671/1232

Void After One Year

PAYABLE OUT OF THE CLAIMS FUND

*****NINE THOUSAND THREE HUNDRED SIXTY-EIGHT AND 52 / 100 DOLLAR****

Pay

Pay Amount \$9,368.52***

SHARRAI, ZACH
13814 E MISSION AVE
SPOKANE VALLEY, WA 99216

Chick M Dalton

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EXHIBIT C

**Individuals Listed by Total Amount Dispersed (Descending Order for Full Period of False Claims)
Comparison of Periods**

Rhonda S. Ackerman - Investigative Matter

Schedule 1

Analysis:

| Ref. No. | Suspects | 2007 to 2011 | | 2012 to 2016 | | Full Period of False Claims (2007 to 2016) | |
|----------|--------------------------|--------------|--------------|--------------|---------------|--|---------------|
| | | Checks | Amount | Checks | Amount | Checks | Amount |
| 1 | Trebe, Colton | 2 | \$ 10,586.14 | 24 | \$ 154,062.09 | 26 | \$ 164,648.23 |
| 2 | Link, Brandon | 3 | \$ 8,251.78 | 13 | \$ 83,056.82 | 16 | \$ 91,308.60 |
| 3 | Smith, Justin | 0 | \$ - | 10 | \$ 78,524.61 | 10 | \$ 78,524.61 |
| 4 | Weidert, Melissa | 2 | \$ 5,325.66 | 11 | \$ 72,523.96 | 13 | \$ 77,849.62 |
| 5 | Hendrickson, TR | 8 | \$ 48,078.91 | 5 | \$ 29,136.81 | 13 | \$ 77,215.72 |
| 6 | Reynolds, Richard | 0 | \$ - | 9 | \$ 71,732.26 | 9 | \$ 71,732.26 |
| 7 | Sharrai, Zach | 0 | \$ - | 8 | \$ 68,728.40 | 8 | \$ 68,728.40 |
| 8 | Woller, Jeremy Noel | 13 | \$ 63,545.30 | 0 | \$ - | 13 | \$ 63,545.30 |
| 9 | Jones, Mikel Albert | 0 | \$ - | 6 | \$ 49,297.80 | 6 | \$ 49,297.80 |
| 10 | Scarone, Jeffrey William | 10 | \$ 48,944.68 | 0 | \$ - | 10 | \$ 48,944.68 |
| 11 | Howard, Rebecca Lynn | 0 | \$ - | 5 | \$ 43,165.99 | 5 | \$ 43,165.99 |
| 12 | Hayes, Jason | 7 | \$ 42,543.36 | 0 | \$ - | 7 | \$ 42,543.36 |
| 13 | Johnson, Robin | 3 | \$ 19,937.47 | 2 | \$ 15,919.48 | 5 | \$ 35,856.95 |
| 14 | Sprague, April L | 5 | \$ 29,412.38 | 0 | \$ - | 5 | \$ 29,412.38 |
| 15 | Howard, Danielle | 3 | \$ 13,275.58 | 2 | \$ 15,048.19 | 5 | \$ 28,323.77 |
| 16 | Banks, Nikki | 4 | \$ 27,164.26 | 0 | \$ - | 4 | \$ 27,164.26 |
| 17 | Hartzog, Jessica | 0 | \$ - | 2 | \$ 25,848.23 | 2 | \$ 25,848.23 |
| 18 | Vargas, Erin | 4 | \$ 25,736.73 | 0 | \$ - | 4 | \$ 25,736.73 |
| 19 | Keller, Kenneth | 0 | \$ - | 3 | \$ 23,324.45 | 3 | \$ 23,324.45 |
| 20 | Hanson, Karissa | 2 | \$ 22,901.42 | 0 | \$ - | 2 | \$ 22,901.42 |
| 21 | Mancini, Carr | 3 | \$ 22,664.84 | 0 | \$ - | 3 | \$ 22,664.84 |
| 22 | Brewer, Dawnyia | 0 | \$ - | 3 | \$ 22,635.51 | 3 | \$ 22,635.51 |
| 23 | Gray, Joshua | 3 | \$ 22,122.60 | 0 | \$ - | 3 | \$ 22,122.60 |

Individuals Listed by Total Amount Dispersed (Descending Order for Full Period of False Claims) Comparison of Periods

Rhonda S. Ackerman - Investigative Matter

Schedule 1

Analysis:

| Ref. No. | Suspects | 2007 to 2011 | | 2012 to 2016 | | Full Period of False Claims (2007 to 2016) | |
|-------------------------------------|----------------------------|--------------|-------------------|--------------|-------------------|--|---------------------|
| | | Checks | Amount | Checks | Amount | Checks | Amount |
| 24 | Gleeson, Anna | 4 | \$ 18,110.76 | 0 | \$ - | 4 | \$ 18,110.76 |
| 25 | Taegel, Hope | 2 | \$ 15,895.55 | 0 | \$ - | 2 | \$ 15,895.55 |
| 26 | Cervantes, Jose | 2 | \$ 13,821.92 | 0 | \$ - | 2 | \$ 13,821.92 |
| 27 | Vadon, Kevin | 2 | \$ 12,908.25 | 0 | \$ - | 2 | \$ 12,908.25 |
| 28 | Hendrickson, Thomas | 3 | \$ 12,668.17 | 0 | \$ - | 3 | \$ 12,668.17 |
| 29 | Provost, Matt | 2 | \$ 12,232.89 | 0 | \$ - | 2 | \$ 12,232.89 |
| 30 | Amsbury/Mohr, Julie | 2 | \$ 11,979.32 | 0 | \$ - | 2 | \$ 11,979.32 |
| 31 | Green, Levi | 2 | \$ 10,747.36 | 0 | \$ - | 2 | \$ 10,747.36 |
| 32 | Olson, Eric | 1 | \$ 10,607.68 | 0 | \$ - | 1 | \$ 10,607.68 |
| 33 | Giese, Tierney J | 2 | \$ 10,390.64 | 0 | \$ - | 2 | \$ 10,390.64 |
| 34 | Self, Christopher | 1 | \$ 9,821.93 | 0 | \$ - | 1 | \$ 9,821.93 |
| 35 | Lewis, Joshua | 2 | \$ 9,646.44 | 0 | \$ - | 2 | \$ 9,646.44 |
| 36 | Lockridge, Mariah | 0 | \$ - | 1 | \$ 9,368.42 | 1 | \$ 9,368.42 |
| 37 | Zimmerman, Kerstin A | 1 | \$ 9,256.25 | 0 | \$ - | 1 | \$ 9,256.25 |
| 38 | Jones, Mitchell | 1 | \$ 8,632.65 | 0 | \$ - | 1 | \$ 8,632.65 |
| 39 | Mills, Jeff | 1 | \$ 7,300.00 | 0 | \$ - | 1 | \$ 7,300.00 |
| 40 | Jones, Kyle | 1 | \$ 7,240.63 | 0 | \$ - | 1 | \$ 7,240.63 |
| 41 | Vanwinckel, Kimberly Lynne | 1 | \$ 7,132.13 | 0 | \$ - | 1 | \$ 7,132.13 |
| 42 | Austin, Joshua | 1 | \$ 5,825.64 | 0 | \$ - | 1 | \$ 5,825.64 |
| 43 | Bronkhorst, Kelly J | 2 | \$ 5,144.81 | 0 | \$ - | 2 | \$ 5,144.81 |
| 44 | Coan, Jessica | 0 | \$ - | 1 | \$ 4,394.25 | 1 | \$ 4,394.25 |
| 45 | Watson, Kayla Marie | 1 | \$ 1,920.00 | 0 | \$ - | 1 | \$ 1,920.00 |
| Total | | 106 | \$ 811,774 | 105 | \$ 766,767 | 211 | \$ 1,378,541 |
| Total for Top 23 Individuals | | 72 | \$ 410,491 | 103 | \$ 753,005 | 175 | \$ 1,163,496 |

I CERTIFY THIS DOCUMENT IS A TRUE AND
CORRECT COPY OF THE ORIGINAL ON FILE
AND OF RECORD IN MY OFFICE.

SEP 03 2021

TIMOTHY W. FITZGERALD, COUNTY CLERK

BY  DEPUTY