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**REDACTED FOR
PUBLIC DISCLOSURE**

8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE DISTRICT OF ARIZONA

10 United States of America,
 11 Plaintiff,
 12 vs.
 13 Glenn Michael Eigenbrodt,
 14 Defendant.

No. CR-22-08068-PCT-MTL (ESW)

INDICTMENT

18 U.S.C. § 664
 (Theft from Employee Benefit Plan)
 Counts 1-18

THE GRAND JURY CHARGES:

INTRODUCTION

- 20 1. Between September 2014 until on or about March 2018, EIGENBRODT was the
- 21 President of Social Services Interagency Council of Lake Havasu City, Inc. (SSIC).
- 22 2. The SSIC was a local non-profit organization formed in 1984 to provide social services
- 23 primarily in Mohave County, Arizona and received, in the one-year period beginning
- 24 in 2014, benefits in excess of \$10,000 funded by the federal Office of Justice Programs
- 25 (OJP) Victims of Crime Act (VOCA) Grant.
- 26 3. EIGENBRODT illegally used employee funds in a number of unauthorized ways,
- 27 including among others: (1) to settle personal claims against him; (2) to pay for legal
- 28 fees; (3) to pay for restaurant bills; and (4) in direct payments to himself.

- 1 4. EIGENBRODT also misappropriated proceeds from the sale of a house that was
- 2 donated to SSIC for use as a halfway house or domestic violence shelter.
- 3 5. In May 2017, at a SSIC board meeting, EIGENBRODT was informed by the plan
- 4 administrator that SSIC employee payroll deductions were not remitted into the
- 5 employees' pension plans. Following this meeting EIGENBRODT fired the plan
- 6 administrator.
- 7 6. In October 2017, EIGNEBRODT misrepresented that he had self-reported the failure
- 8 to remit withholdings to SSIC employees' pension and health savings accounts to the
- 9 Department of Labor and the Internal Revenue Service.

COUNTS 1-18
(Theft from Employee Benefit Plan)
18 U.S.C. § 664

- 13 7. On or about the dates specified as to each count below, in the District of Arizona,
- 14 defendant EIGENBRODT did knowingly embezzle, steal, and unlawfully and
- 15 willfully abstract and convert to his own use and to the use of another, in the
- 16 approximate amounts listed below, the moneys, funds, securities, premiums,
- 17 credits, property, and other assets of the SSIC employees' 401(k) and health savings
- 18 plans, employee pension benefit plans subject to Title I of the Employee Retirement
- 19 Income Security Act of 1974, and of a fund connected with such plans:

Counts	Date of Transaction	Description
1	08/03/2017	Check in the amount of \$2,125.18 paid to EIGENBRODT
2	08/16/2017	Check in the amount of \$2,000 legal fee paid to Denton Peterson law firm for legal fees to settle \$8,753.98 for employee missing funds from retirement Plan at SSIC
3	08/21/2017	Check in the amount of \$3,774.63 part of \$8,753.98 withdrawn from Horizon Operating account to fund agreed settlement with employee for missing funds from retirement Plan at SSIC

1	4	08/21/2017	Check in the amount of \$2,192.22 part of \$8,753.98 withdrawn from Horizon Operating account to fund agreed settlement with employee for missing funds from retirement Plan at SSIC
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3	5	08/21/2017	Check in the amount of \$2,787.13 part of \$8,753.98 withdrawn form Horizon Operating account to fund agreed settlement with employee for missing funds from retirement plan at SSIC
4			
5			
6	6	09/06/2017	Check in the amount of \$1,062.59 paid to EIGENBRODT
7			
8	7	09/18/2017	Check in the amount of \$242.66 paid to EIGENBRODT
9			
10	8	10/25/2017	Check in the amount of \$1062.59 paid to EIGENBRODT
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12	9	11/1/2017	Check in the amount of \$1062.59 paid to EIGENBRODT
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14	10	11/2/2017	Check in the amount of \$6,170.00 paid to EIGENBRODT
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16	11	11/8/2017	Check in the amount of \$5,865.00 paid to Shuegrue's Restaurant
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18	12	12/5/2017	Check in the amount of \$1062.59 paid to EIGENBRODT
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20	13	01/5/2018	Check in the amount of \$1062.59 paid to EIGENBRODT
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22	14	01/26/2018	Check in the amount of \$6000.00 paid to EIGENBRODT
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24	15	02/1/2018	Check in the amount of \$1062.59 paid to EIGENBRODT
25			
26	16	02/9/2018	Check in the amount of \$660.00 paid to Shogun Restaurant
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28	17	03/13/2018	Check in the amount of \$500.00 paid to the [Redacted] Law Firm
	18	04/6/2018	Check in the amount of \$1000.00 paid to the [Redacted] Law Firm

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This conduct is in violation of Title 18 U.S.C. § 664.

Dated this 12th day of July, 2022.

A TRUE BILL

s/
FOREPERSON OF THE GRAND JURY
Date: July 12, 2022

GARY M. RESTAINO
United States Attorney
District of Arizona

s/
KEVIN M. RAPP
Assistant U.S. Attorney