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IN THE THIRD DISTRICT COURT IN AND FOR SALT LAKE COUNTY
STATE OF UTAH

STATE OF UTAH,

Plaintiff,

vs.

KENNETH HUGH BULLOCK,
DOB: 12/29/1958,
2215 BLAINE AVENUE
SALT LAKE CITY, UT 84108
OTN
SO#

Defendant.

MICHELLE PICKERING REILLY,
DOB: 09/15/1964

Screened by: SPECIAL INVESTIGATIONS
Assigned to: JAKE TAYLOR
KENT F. DAVIS
HYRUM HEMINGWAY

INFORMATION

DA Case No. 18016970

SUMMONS TO BE ISSUED

Case No.

CO-DEFENDANT DA Case No. 18020405
CO-DEFENDANT Case No. 181910486

The undersigned Lieutenant Marcos Garaycochea with the Salt Lake County District Attorney's Office, in reference to DA case no. 18016970, upon a written declaration states on information and belief that the defendant, KENNETH HUGH BULLOCK, committed the crimes of:

COUNT 1

MISUSE OF PUBLIC MONEY, 76-8-402(1) UCA, Second Degree Felony, as follows: That on or about September 10, 2012 through August 26, 2016, in Salt Lake County, State of Utah, the defendant did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

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- (a) appropriate the money or any portion of it to his own use or benefit or to the use or benefit of another without authority of law;
- (b) loan or transfer the money or any portion of it without authority of law;
- (c) fail to keep the money in his possession until disbursed or paid out by authority of law;
- (d) unlawfully deposit the money or any portion in any bank or with any other person;
- (e) knowingly keep any false account or make any false entry or erasure in any account of or relating to the money;
- (f) fraudulently alter, falsify, conceal, destroy, or obliterate any such account;
- (g) willfully refuse or omit to pay over, on demand, any public money in his hands, upon the presentation of a draft, order, or warrant drawn upon such money by competent authority;
- (h) willfully omit to transfer the money when the transfer is required by law; or
- (i) willfully omit or refuse to pay over, to any officer or person authorized by law to receive it, any money received by him under any duty imposed by law so to pay over the same.

The amount or value of the money exceeds \$5,000.

COUNT 2

THEFT, 76-6-404 UCA, a Second Degree Felony, as follows: That on or about September 10, 2012 through August 26, 2016, in Salt Lake County, State of Utah, the defendant did obtain or exercise unauthorized control over the property of another with a purpose to deprive thereof, and (i) the value of the property was greater than \$5,000.

COUNT 3

MISUSE OF PUBLIC MONEY, 76-8-402(1) UCA, Second Degree Felony, as follows: That on or about September 11, 2009 through March 31, 2016, in Salt Lake County, State of Utah, the defendant did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to his own use or benefit or to the use or benefit of another without authority of law;
- (b) loan or transfer the money or any portion of it without authority of law;
- (c) fail to keep the money in his possession until disbursed or paid out by authority of law;
- (d) unlawfully deposit the money or any portion in any bank or with any other person;
- (e) knowingly keep any false account or make any false entry or erasure in any account of or relating to the money;
- (f) fraudulently alter, falsify, conceal, destroy, or obliterate any such account;
- (g) willfully refuse or omit to pay over, on demand, any public money in his hands, upon the presentation of a draft, order, or warrant drawn upon such money by competent authority;
- (h) willfully omit to transfer the money when the transfer is required by law; or
- (i) willfully omit or refuse to pay over, to any officer or person authorized by law to receive it, any money received by him under any duty imposed by law so to pay over the same.

The amount or value of the money exceeds \$5,000.

COUNT 4

THEFT, 76-6-404 UCA, a Second Degree Felony, as follows: That on or about September 11, 2009 through March 31, 2016, in Salt Lake County, State of Utah, the defendant did obtain or

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exercise unauthorized control over the property of another with a purpose to deprive thereof, and (i) the value of the property was greater than \$5,000.

COUNT 5

MISUSE OF PUBLIC MONEY, 76-8-402(1) UCA, Third Degree Felony, as follows: That on or about March 25, 2017 through June 9, 2017 in Salt Lake County, State of Utah, the defendant did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to his own use or benefit or to the use or benefit of another without authority of law;
- (b) loan or transfer the money or any portion of it without authority of law;
- (c) fail to keep the money in his possession until disbursed or paid out by authority of law;
- (d) unlawfully deposit the money or any portion in any bank or with any other person;
- (e) knowingly keep any false account or make any false entry or erasure in any account of or relating to the money;
- (f) fraudulently alter, falsify, conceal, destroy, or obliterate any such account;
- (g) willfully refuse or omit to pay over, on demand, any public money in his hands, upon the presentation of a draft, order, or warrant drawn upon such money by competent authority;
- (h) willfully omit to transfer the money when the transfer is required by law; or
- (i) willfully omit or refuse to pay over, to any officer or person authorized by law to receive it, any money received by him under any duty imposed by law so to pay over the same.

COUNT 6

THEFT, 76-6-404 UCA, a Third Degree Felony, as follows: That on or about March 25, 2017 through June 9, 2017 in Salt Lake County, State of Utah, the defendant did obtain or exercise unauthorized control over the property of another with a purpose to deprive thereof, and (i) the value of the property was greater than \$1,500 but less than \$5,000.

COUNT 7

PATTERN OF UNLAWFUL ACTIVITY, 76-10-1603 UCA, a Second Degree Felony, as follows: That commencing on or about September 10, 2009, in Salt Lake County, State of Utah, the defendant did engage in conduct which constituted the commission of at least three episodes of unlawful activity as defined in 76-10-1603 UCA. The defendant did:

- (a) receive proceeds derived, directly or indirectly, from a pattern of unlawful activity more fully defined, but not limited to, counts 2, 4 and 6 above, in which he did participate as a principal and used or invested, directly or indirectly, any part of the income, or the proceeds derived from the investment or use of those proceeds, in the acquisition of any interest in, or establishment or operation of, any enterprise;
- (b) through a pattern of unlawful activity, including but not limited to, counts 2, 4 and 6 above, acquired, or maintained, directly or indirectly, any interest in or control of any enterprise;
- (c) was employed by, or associated with any enterprise and conducted or participated, whether directly or indirectly, in the conduct of that enterprise's affairs through a pattern of unlawful activity including, but not limited to, Counts 2, 4 and 6 above; or

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(d) conspired to violate any provision of 76-10-1603(1), (2) or (3).

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

Jeremy A. Walker, Thomas M. Godfrey, Joann Seghini and others.

DECLARATION OF PROBABLE CAUSE:

Your Declarant, Lieutenant Marcos Garaycochea with the Salt Lake County District Attorney's Office, in reference to DA case no. 18016970, interviews of witnesses, and investigation by law enforcement officers, states as follows:

Introduction

1. The Utah League of Cities and Towns ("ULCT") is an interlocal entity established on or about 1912 that is constituted by various municipalities of the State of Utah. ULCT is led by a board of directors assisted by an executive committee. The individuals on the board of directors are elected public officials from the constituent municipalities. ULCT is funded primarily through grants from the State of Utah. ULCT is a political subdivision of the State of Utah. ULCT's offices are in Salt Lake City.

2. In the late 1980s, ULCT sponsored two interlocal entities called the Utah Municipal Finance Agency ("MFA") and the Utah Municipal Finance Cooperative II ("COOP"). Both MFA and COOP are constituted by various municipalities from the State of Utah. Both MFA and COOP are led by boards of directors assisted by executive committees. The individuals on the boards of directors are selected by the governing bodies from the constituent municipalities. The purpose of both MFA and COOP was to provide to their constituent member municipalities low-cost financing for public works projects throughout the State of Utah. MFA and COOP were both funded by the sale of bonds and are both political subdivisions of the State of Utah. COOP agreed to pay ULCT for the cost of ULCT services used by COOP.

3. In May 1993, COOP created a subordinate interlocal entity called the Municipal Finance Cooperative II Trust ("TRUST"). The trustees of TRUST were the executive committee of COOP. The beneficiary of TRUST was ULCT. COOP funded TRUST by transferring \$1.3 million from the COOP bond sale. In practice, COOP and TRUST were treated as interchangeable. According to the terms of TRUST documents, TRUST was to terminate no later than December 31, 2012.

Relevant Individuals

4. KENNETH HUGH BULLOCK ("BULLOCK") was appointed the administrative director of ULCT, MFA, and COOP. As director, BULLOCK sent notice of and attended the meetings of ULCT, MFA, and COOP. According to the constitutions and bylaws of ULCT, MFA, and COOP, BULLOCK had no vote in the governance of ULCT, MFA, or COOP.

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BULLOCK signed checks drawn from the bank accounts of ULCT, MFA and COOP. ULCT issued BULLOCK an American Express credit card to use for official business. ULCT paid the balances of that credit card with public funds. BULLOCK was not a trustee of TRUST.

5. EMILY ANN BULLOCK (“EMILY”) is the spouse of BULLOCK.
6. ANDREW GRIFFIN BULLOCK (“ANDREW”) is the elder son of BULLOCK and EMILY. ANDREW attended medical school in Pittsburgh.
7. ELLIOTT GREYSON BULLOCK (“ELLIOTT”) is the younger son of BULLOCK and EMILY. ELLIOTT played men’s basketball for Stanford University from 2008 to 2010 and 2012 to 2015.
8. MARIYAH MEAALII BULLOCK née NOGUEIRA (“MARIYAH”) is the spouse of ELLIOTT.
9. MICHELLE PICKERING REILLY (“REILLY”) was the Chief Financial Officer of ULCT, MFA, and COOP/TRUST. REILLY was BULLOCK’s subordinate. ULCT issued REILLY credit cards to use for official business. ULCT paid the balances of these credit cards with public funds.
10. JOANN BAGLEY SEGHINI (“SEGHINI”) was mayor of Midvale from 1997 to 2017. SEGHINI served as treasurer of ULCT, vice-chairperson of MFA and COOP, and trustee of TRUST. SEGHINI resigned from ULCT, MFA, COOP, and TRUST on January 18, 2017. SEGHINI resigned as mayor in 2017.
11. THOMAS MARTIN GODFREY (“GODFREY”) was a councilmember of Salt Lake City from 1985 to 1998. GODFREY was a member of the executive committees of MFA and COOP and was a trustee of TRUST. GODFREY continued participating in MFA, COOP, and TRUST meetings through 2016.
12. LYNN HAYMORE PACE (“PACE”) was a council member of Holladay City and, as of January 2016, was president of ULCT.
13. STEPHEN AARON HIATT (“HIATT”) was the mayor of Kaysville City and, as of January 2017, was the president of ULCT.
14. BETH ANN HOLBROOK (“HOLBROOK”) is a council member of Bountiful City and, as of January 2018, was the president of ULCT.

Background

15. During all relevant times, members of the ULCT board of directors were replaced according to the ULCT constitution and bylaws. Before TRUST was established in May 1993,

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the members of the boards of directors and executive committees of MFA and COOP were replaced according to their respective constitutions and bylaws.

16. BULLOCK used his position and control of MFA, COOP, and TRUST to misappropriate public funds for his personal benefit as well as the benefit of REILLY. BULLOCK accomplished this by 1) misusing the ULCT credit card for personal expenses, 2) improperly issuing checks to REILLY over a seven year period, and 3) issuing checks and withdrawing cash from TRUST and MFA after he resigned.

17. ULCT audited the credit card use of its employees in 2016 and discovered BULLOCK and REILLY had been using their ULCT credit cards for personal expenses. BULLOCK admitted to auditors that he used the ULCT credit card for personal travel expenses because it was convenient and claimed he immediately reimbursed ULCT.

18. The audit was presented on or about August 24, 2016. REILLY resigned August 31, 2016. BULLOCK told the ULCT board of directors that REILLY resigned for health reasons.

19. An anonymous whistleblower filed a complaint with the Utah Office of State Auditor (“OSA”) in September 2016. OSA conducted an audit into four years of credit card activity for ULCT employees. During the audit, OSA discovered payments from MFA and TRUST to BULLOCK and REILLY. BULLOCK claimed that all payments to him were reimbursements for authorized goods and services purchased using his personal credit card on behalf of TRUST.

20. According to the terms of TRUST documents, TRUST was required to present an annual accounting of TRUST finances to ULCT.

21. On January 13, 2017, HIATT stated that neither he nor members of the board of ULCT knew about COOP or TRUST before the 2016 credit card audit. HIATT further stated that in October 2016, BULLOCK approached him about BULLOCK’s use of the ULCT credit card for personal purchases.

22. On January 14, 2017, BULLOCK stated that TRUST payments to himself were reimbursements for authorized goods and services purchased using his personal credit card on behalf of TRUST. BULLOCK stated TRUST payments to REILLY were compensation for accounting and clerical services. BULLOCK stated TRUST funds were used to finance ULCT projects and equipment for which the ULCT board did not have the funds or long-term vision.

23. According to the terms of TRUST documents, the use of TRUST funds required inviting comments, views and recommendations from ULCT members or their representatives.

24. On January 27, 2017, SEGHINI stated that she was not aware of either BULLOCK or REILLY receiving compensation from TRUST besides a meeting stipend. SEGHINI stated any additional compensation BULLOCK or REILLY received was unauthorized.

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25. On January 27, 2017, GODFREY stated that he was not aware of either BULLOCK or REILLY receiving compensation from TRUST besides a meeting stipend. GODFREY stated any additional compensation BULLOCK or REILLY received was unauthorized. GODFREY stated there was discussion about if a ULCT board member were aware of the funds in TRUST, ULCT would want to take the funds. GODFREY stated he thought SEGHINI was liaison to the ULCT board and BULLOCK received instruction from the ULCT board on what projects to fund. GODFREY stated BULLOCK voted in COOP/TRUST affairs.

26. According to the terms of TRUST documents, only trustees could vote on the use of TRUST funds and only members of the COOP executive committee could be trustees. According to the terms of COOP documents, BULLOCK was not a member of the COOP executive committee and could not vote in the governance of COOP.

27. BULLOCK resigned as director of ULCT on January 18, 2017. On January 19, 2017, OSA released an audit of ULCT finding BULLOCK and REILLY misused ULCT credit cards for personal expenses. According to the audit, BULLOCK again admitted that he used ULCT credit card for personal travel expenses. The audit further found BULLOCK failed to fully reimburse ULCT for personal charges.

28. On June 27, 2018, HOLBROOK stated that the board of directors of ULCT determined that COOP funds were entirely government funds. HOLBROOK also stated after BULLOCK resigned from ULCT, he was not supposed to have any access to the COOP bank accounts. HOLBROOK stated that BULLOCK wrote at least two checks from COOP after he resigned and that the board of directors of ULCT believed that BULLOCK writing checks from COOP after he resigned was illegal.

29. On August 30, 2018, PACE stated that some members of the ULCT board of directors believed BULLOCK's use of the ULCT credit card for personal expenses was inappropriate, even if it was repaid. PACE stated BULLOCK's use of the ULCT credit card for personal expenses is ultimately what led to BULLOCK's resignation. PACE stated that BULLOCK had not repaid all of the personal expenses he put on the ULCT credit card. PACE stated that the amounts BULLOCK failed to repay were recovered from BULLOCK's final pay check.

COUNTS 1 & 2
(ULCT credit card used for personal expenses)

30. BULLOCK used his position to pay for personal expenses. From September 2012 to September 2016, BULLOCK used the ULCT credit card to make personal purchases for him and his family.

31. The particulars of these charges are as follows:

Date	Amount	Vendor	Purchase
09/10/2012	\$455.80	Delta Air Lines	ELLIOTT to San Jose on 9/15/12

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09/11/2012	\$4.99	Delta Air Lines	ELLIOTT Airflight Insurance
09/11/2012	\$9.95	Delta Air Lines	ELLIOTT Baggage Insurance
09/11/2012	\$509.60	Delta Air Lines	BULLOCK to San Jose on 9/15/12
09/12/2012	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
09/12/2012	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
09/15/2012	\$85.62	Apple Store	Technology in Palo Alto on Saturday
09/19/2012	\$150	Delta Air Lines	BULLOCK Additional Collection
09/22/2012	\$150	Delta Air Lines	BULLOCK Additional Collection
12/27/2012	\$571.60	Delta Air Lines	BULLOCK to San Jose on 12/28/12
12/28/2012	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
12/28/2012	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
12/29/2012	\$41.18	Apple Store	Technology in Palo Alto
01/02/2013	\$391.80	Delta Air Lines	BULLOCK to San Jose on 1/12/13
01/03/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/03/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/05/2013	\$338.80	Delta Air Lines	BULLOCK to San Jose on 1/19/13
01/06/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/06/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/19/2013	\$43.40	Apple Store	Technology in Palo Alto
03/05/2013	\$450.20	Delta Air Lines	BULLOCK Additional Collection
03/22/2013	\$5	Delta Air Lines	ELLIOTT Additional Collection
04/08/2013	\$211.50	Golf Merch	Golf Equipment
04/18/2013	\$884.67	AT&T	Cellular Phone
04/19/2013	\$726.56	AT&T	Cellular Phone
06/08/2013	\$5	Delta Air Lines	ELLIOTT Additional Collection
07/21/2013	\$864.10	Delta Air Lines	BULLOCK to Minneapolis on 7/29/13: paid an extra \$864.10 for multi-stop ticket to see ANDREW
07/21/2013	\$570.30	Delta Air Lines	EMILY from Pittsburgh to SLC on
07/23/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
07/23/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
08/18/2013	\$501.80	Delta Air Lines	BULLOCK to San Jose on 8/23/13
08/18/2013	\$501.80	Delta Air Lines	EMILY to San Jose on 8/23/13
08/19/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
08/19/2013	\$9.95	Delta Air Lines	EMILY Baggage Insurance
08/19/2013	\$4.99	Delta Air Lines	EMILY Airflight Insurance
08/19/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
09/16/2013	\$1,940.80	Delta Air Lines	BULLOCK to Minneapolis on 9/20/13: paid an extra \$1,940.89 for multi-stop ticket to see ANDREW

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09/17/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
09/17/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
10/17/2013	\$532	Al Rounds	Painting to BULLOCK home
10/31/2013	\$1,766.18	Delta Air Lines	BULLOCK to Seattle on 11/11/13: paid extra \$1,766.18 for multi-stop ticket to see ELLIOTT
11/01/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/01/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/12/2013	\$38.01	Speck	Cell phone case in Palo Alto
11/19/2013	\$463.80	Delta Air Lines	BULLOCK to San Jose on 11/21/13
11/19/2013	\$25	Christopherson	Travel agency fee
11/20/2013	\$1,043.55	Delta Air Lines	BULLOCK to NYC on 11/23/13
11/21/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/21/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/21/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/21/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/28/2013	\$967.80	Delta Air Lines	BULLOCK to San Jose on 12/01/13
11/30/2013	\$405.80	Delta Air Lines	BULLOCK to San Jose on 12/14/13
12/01/2013	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
12/01/2013	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
12/06/2013	\$39	Delta Air Lines	ANDREW Miscellaneous Fee
12/06/2013	\$29	Delta Air Lines	ANDREW Miscellaneous Fee
12/06/2013	\$19	Delta Air Lines	ANDREW Miscellaneous Fee
12/06/2013	\$59	Delta Air Lines	ANDREW Miscellaneous Fee
12/06/2013	\$1,657	Delta Air Lines	ANDREW to NYC to SLC on 12/17/13
12/07/2013	\$4.99	Delta Air Lines	ANDREW Airflight Insurance
12/07/2013	\$9.95	Delta Air Lines	ANDREW Baggage Insurance
12/07/2013	\$761.77	Delta Air Lines	ELLIOTT to SLC on 12/15
12/07/2013	\$2,180.54	Sheraton	NYC from 12/17 through 12/22
12/08/2013	\$4.99	Delta Air Lines	ELLIOTT Airflight Insurance
12/08/2013	\$9.95	Delta Air Lines	ELLIOTT Baggage Insurance
12/26/2013	\$987.80	Delta Air Lines	BULLOCK to San Jose on 12/29/13
12/28/2013	\$1,007.80	Delta Air Lines	BULLOCK to San Jose on 1/2/14
01/06/2014	\$988	Delta Air Lines	BULLOCK to San Jose on 1/15/14
01/08/2014	\$508	Delta Air Lines	BULLOCK to San Jose on 1/18/14
01/09/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/09/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/09/2014	\$662	Delta Air Lines	BULLOCK to Eugene on 1/11/14
01/17/2014	\$948	Delta Air Lines	BULLOCK to San Jose on 1/29/14
01/29/2014	\$822	Delta Air Lines	BULLOCK to San Jose on 1/31/14

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01/29/2014	\$822	Delta Air Lines	EMILY to San Jose on 1/31/14
01/30/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/30/2014	\$4.99	Delta Air Lines	EMILY Airflight Insurance
01/30/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/30/2014	\$9.95	Delta Air Lines	EMILY Baggage Insurance
02/03/2014	\$482	Delta Air Lines	BULLOCK to San Jose on 2/5/14
02/03/2014	\$25	Christopherson	Travel agency fee
02/06/2014	\$28.28	Authors	Meal in San Jose
02/13/2014	\$802	Delta Air Lines	BULLOCK to San Jose on 2/20/14
02/13/2014	\$802	Delta Air Lines	EMILY to San Jose on 2/20/14
02/14/2014	\$4.99	Delta Air Lines	EMILY Airflight Insurance
02/14/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/14/2014	\$9.95	Delta Air Lines	BULLOCK Airflight Insurance
02/14/2014	\$9.95	Delta Air Lines	EMILY Baggage Insurance
03/01/2014	\$940	Delta Air Lines	BULLOCK to Tucson on 3/2/14
03/02/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/02/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/02/2014	\$998	Delta Air Lines	BULLOCK to San Jose on 3/5/14
03/05/2014	\$718	Delta Air Lines	BULLOCK to DC on 3/7/14: paid extra \$718.00 for multi-stop ticket to stop in San Jose to see ELLIOTT
03/05/2014	\$25	Christopherson	Travel agency fee
03/06/2014	\$28.28	Authors	Meal in San Jose
03/07/2014	\$25	Christopherson	Travel agency fee
03/07/2014	\$1,717.00	Delta Air Lines	BULLOCK to DC on 3/7/14
03/08/2014	\$30.41	Speck	Cell phone case in Palo Alto
03/10/2014	\$522	Delta Air Lines	BULLOCK to Vegas on 3/12/14
03/11/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/11/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/14/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/14/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/14/2014	\$526	Delta Air Lines	BULLOCK to Vegas on 3/13/14
03/19/2014	\$1,099	Delta Air Lines	BULLOCK to St. Louis on 3/20/14
03/20/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/20/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/23/2014	\$200	Delta Air Lines	BULLOCK Additional Collection
03/25/2014	\$1,882.50	Delta Air Lines	BULLOCK to Memphis on 3/26/14
03/28/2014	\$569	Delta Air Lines	BULLOCK Additional Collection
03/28/2014	\$1,632.50	Delta Air Lines	ELLIOTT to SLC to San Jose on 3/28/14
03/29/2014	\$4.99	Delta Air Lines	ELLIOTT Airflight Insurance

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03/29/2014	\$9.95	Delta Air Lines	ELLIOTT Baggage Insurance
04/09/2014	\$5	Delta Air Lines	EMILY Additional Collection
08/04/2014	\$582	Delta Air Lines	BULLOCK PIT to SLC on 8/11/14
08/05/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
08/05/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
08/09/2014	\$47.03	Apple Store	Technology in Pittsburgh on Saturday
08/24/2014	\$11.20	Delta Air Lines	BULLOCK Additional Collection
09/15/2014	\$110.61	Soldier Hollow	Golf Fees
10/04/2014	\$45.76	Hudson News	Entertainment in LA
10/17/2014	\$29.00	Delta Air Lines	Delta Club Membership Fee
10/24/2014	\$69.39	Riverside Country Club	Golf Equipment
10/30/2014	\$240	Riverside Country Club	Golf Fees
10/30/2014	\$42.69	Riverside Country Club	Golf Equipment
11/09/2014	\$397.20	Delta Air Lines	EMILY to San Jose on 11/14/14
11/09/2014	\$673.20	Delta Air Lines	EMILY to NYC on 11/20/14
11/09/2014	\$330.20	Delta Air Lines	BULLOCK to San Jose on 11/14/14
11/09/2014	\$792.80	Delta Air Lines	MARIYAH San Jose to NYC on 11/19
11/09/2014	\$1,484.30	Delta Air Lines	BULLOCK to Austin on 11/19: paid extra \$1,484.30 for multi-stop ticket to stop in NYC to see ELLIOTT, EMILY, and MARIYAH
11/10/2014	\$9.95	Delta Air Lines	EMILY Baggage Insurance
11/10/2014	\$9.95	Delta Air Lines	MARIYAH Baggage Insurance
11/10/2014	\$9.95	Delta Air Lines	EMILY Baggage Insurance
11/10/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/10/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/10/2014	\$4.99	Delta Air Lines	EMILY Airflight Insurance
11/10/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/10/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/10/2014	\$4.99	Delta Air Lines	MARIYAH Airflight Insurance
11/10/2014	\$4.99	Delta Air Lines	EMILY Airflight Insurance
11/16/2014	\$5.60	Delta Air Lines	BULLOCK Additional Collection
11/17/2014	\$15.18	Salt Lake City	BULLOCK Parking Ticket
11/18/2014	\$1,492.06	American Express	Hotel Vacation Package
11/19/2014	\$658.57	American Express	Hotel Vacation Package
11/24/2014	\$684.70	Delta Air Lines	BULLOCK to Chicago on 11/30/14
11/24/2014	\$797.20	Delta Air Lines	BULLOCK to San Francisco on 11/25/14
11/25/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance

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11/25/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
11/25/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/25/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/25/2014	\$52.35	San Francisco Taxi	Transit in San Francisco while visiting ELLIOTT
12/11/2014	\$640.20	Delta Air Lines	BULLOCK to San Jose 12/17
12/12/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
12/12/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
12/17/2014	\$1,048.20	Delta Air Lines	BULLOCK to Austin on 12/23/14
12/17/2014	\$39	Shell Oil	Fuel in Palo Alto
12/18/2014	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
12/18/2014	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/01/2015	\$1,755.00	Delta Air Lines	BULLOCK Purchase frequent flyer
01/06/2015	\$55.68	Salt Lake City	BULLOCK Parking Ticket
01/10/2015	\$1,014.20	Delta Air Lines	BULLOCK to San Jose on 1/14/15
01/11/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/11/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/11/2015	\$670.20	Delta Air Lines	BULLOCK to San Jose on 1/17/15
01/12/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/12/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/14/2015	\$114.80	Apple Store	Technology in Palo Alto
01/16/2015	\$1,014.20	Delta Air Lines	BULLOCK to San Jose on 1/22/15
01/16/2015	\$362.20	Delta Air Lines	BULLOCK to San Jose on 1/24
01/17/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/17/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
01/17/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
01/17/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/04/2015	\$584.20	Delta Air Lines	BULLOCK to San Jose on 2/8/15
02/04/2015	\$1,172.20	Delta Air Lines	BULLOCK to San Jose on 2/5/15
02/05/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/05/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/05/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/05/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/15/2015	\$748.20	Delta Air Lines	BULLOCK to San Jose on 2/21/15
02/16/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/16/2015	\$4.49	Delta Air Lines	BULLOCK Airflight Insurance
02/18/2015	\$1,014.20	Delta Air Lines	BULLOCK to San Jose on 2/26/15
02/19/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/19/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/22/2015	\$27.19	Hudson News	Entertainment in San Jose

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02/24/2015	\$652.20	Delta Air Lines	EMILY to San Jose on 2/28/15
02/24/2015	\$652.20	Delta Air Lines	BULLOCK to San Jose on 2/28/15
02/25/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
02/25/2015	\$9.95	Delta Air Lines	EMILY Baggage Insurance
02/25/2015	\$4.99	Delta Air Lines	EMILY Airflight Insurance
02/25/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/27/2015	\$441.20	Delta Air Lines	BULLOCK to Phoenix on 3/5/15
02/28/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
02/28/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/03/2015	\$992.20	Delta Air Lines	BULLOCK to Tucson on 3/7/15
03/03/2015	\$30.37	Salt Lake City	BULLOCK Parking Ticket
03/04/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/04/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/12/2015	\$580.20	Delta Air Lines	BULLOCK to Vegas on 3/11/15
03/13/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/13/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/13/2015	\$590.20	Delta Air Lines	BULLOCK to Vegas on 3/12/15
03/14/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/14/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/17/2015	\$1,602.20	Delta Air Lines	BULLOCK to San Jose on 3/17/15
03/18/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/18/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/20/2015	\$32.03	Apple iTunes	Entertainment
03/22/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
03/22/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/27/2015	\$11.20	Delta Air Lines	BULLOCK Additional collection
04/30/2015	\$41.81	Wall Street Journal	Entertainment
05/19/2015	\$532.11	Apple Store	Technology
06/09/2015	\$686.70	Vegas.com	Hotel Booking
06/20/2015	\$843.67	Evergreen	Frames on Saturday
06/21/2015	\$31.32	REI	Rope on Sunday
07/01/2015	\$11.20	Delta Air Lines	BULLOCK Additional Collection
07/01/2015	\$38.40	Paradies	Airport Purchase in SLC
07/21/2015	\$11.20	Delta Air Lines	BULLOCK Additional Collection
07/21/2015	\$11.20	Delta Air Lines	EMILY Additional Collection
08/04/2015	\$140.00	Delta Air Lines	BULLOCK Additional Collection
08/20/2015	\$115.13	Eaglewood	Golf Fees
09/07/2015	\$28.08	Original Pancake House	Meal on Labor Day

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09/09/2015	\$17.31	Wall Street Journal	Entertainment
10/10/2015	\$658.20	Delta Air Lines	BULLOCK to Baltimore on 10/17/15: paid an extra \$658.20 for multi-stop ticket to stop in PIT to see ANDREW
10/11/2015	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
10/11/2015	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
11/07/2015	\$133.49	Delta Air Lines	BULLOCK Additional Collection
11/11/2015	\$113.98	Market Street Oyster Bar	Meal on Veteran's Day
11/26/2015	\$1.38	Apple iTunes	Entertainment
02/29/2016	\$1,561.70	Delta Air Lines	BULLOCK to DC on 3/4/16: paid extra \$1,561.70 for multi-stop ticket to PIT to see ANDREW
03/01/2016	\$4.99	Delta Air Lines	BULLOCK Airflight Insurance
03/01/2016	\$9.95	Delta Air Lines	BULLOCK Baggage Insurance
05/20/2016	\$8.69	Apple iTunes	Entertainment
06/01/2016	\$14.20	Apple iTunes	Entertainment
08/01/2016	\$5.60	Delta Air Lines	BULLOCK Additional Collection
08/10/2016	\$154.36	Niketown	Sports Apparel
08/26/2016	\$5.60	Delta Air Lines	BULLOCK Additional Collection

32. The total amount of the above-listed 240 personal charges to the ULCT credit card is \$69,550.91.

Partial Reimbursement

33. From August 2013 to September 2016, BULLOCK wrote personal checks to reimburse ULCT for some personal charges to the ULCT credit card.

34. The particulars of the partial reimbursement checks are as follows:

Date	Amount	Drawee	Check	Personal Charges	Balance Owed
08/26/2013	\$1,001.12	Zions Money Market	220	\$8,028.25	\$7,027.13
12/10/2013	\$2,200	Wells Fargo	5794	\$12,032.83	\$16,859.96
01/30/2014	\$7,200	Zions Checking	102	\$6,790.42	\$16,450.38
02/07/2014	\$8,200	Zions Checking	104	\$535.28	\$8,785.66
06/09/2014	\$10,789	Zions Money Market	261	\$13,076.27	\$11,072.93
03/30/2015	\$15,000	JP Morgan Chase	610	\$24,792.65	\$20,865.58
06/05/2015	\$903	Wells Fargo	5949	\$1,023.92	\$20,986.50
04/25/2016	\$464	Wells Fargo	6033	\$4,882.84	\$25,405.34
06/03/2016	\$100	Wells Fargo	6045	\$188.45	\$25,493.79

35. The total amount of the nine reimbursement checks from BULLOCK to ULCT was \$45,857.12.

COUNTS 3 & 4
(Unauthorized compensation to Reilly)

36. Between 2009 and 2016, BULLOCK improperly authorized the issuance of checks to REILLY originating from one of the three ULCT bank accounts: ULCT, COOP and MFA. The checks were written for various amounts ranging between \$100 to \$20,000. The majority of these checks contained either little or no explanation as to for what they were being used. All of the checks were issued separately from REILLY's regular salary payments.

Date	Amount	Drawee	Check Number
9/11/2009	\$750	TRUST	1755
12/21/2009	\$1,000	MFA	1289
2/28/2010	\$400	ULCT	31095
3/06/2010	\$1,000	TRUST	1770
3/19/2010	\$1,000	MFA	1296
3/25/2010	\$400	ULCT	31122
6/25/2010	\$1,000	TRUS	1780
9/13/2010	\$1,000	TRUST	1783
10/28/2010	\$1,000	TRUST	1781
11/12/2010	\$20,000	ULCT	31667
1/28/2011	\$1,000	MFA	1196
2/02/2011	\$1,000	MFA	1204
3/07/2011	\$400	ULCT	31914
3/25/2011	\$1,000	TRUST	1599
4/15/2011	\$1,000	MFA	1203
6/02/2011	\$1,000	MFA	1207
6/30/2011	\$600	ULCT	32172
7/29/2011	\$1,000	MFA	1209
8/24/2011	\$1,000	TRUST	1608
10/07/2011	\$1,000	MFA	1209
10/31/2011	\$2,000	TRUST	1627
11/22/2011	\$1,000	MFA	1204
12/23/2011	\$100	TRUST	1630
2/02/2011	\$1,000	MFA	1219
3/07/2012	\$400	ULCT	32725
3/12/2013	\$1,000	TRUST	1672
3/5/2013	\$1,000	MFA	1222
4/13/2012	\$1,000	TRUST	1228
4/20/2012	\$2,000	ULCT	32811

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5/01/2012	\$1,000	MFA	1229
9/10/2012	\$1,000	TRUST	1646
6/09/2013	\$2,000	TRUST	1676
7/15/2013	\$600	ULCT	33825
7/29/2013	\$3,000	TRUST	1679
9/13/2013	\$7,000	TRUST	1685
11/13/2013	\$10,000	TRUST	1694
3/05/2014	\$350	ULCT	34312
5/30/2014	\$600	ULCT	34531
9/30/2014	\$150	ULCT	34767
6/01/2015	\$10,000	TRUST	1750
6/30/2015	\$450	ULCT	35366
12/24/2015	\$1,500	TRUST	1767
3/31/2016	\$275	ULCT	35993

37. The total amount received by REILLY in unauthorized compensation was \$83,975.

COUNTS 5 & 6
(Unauthorized Checks and Withdrawals)

38. After he resigned, BULLOCK continued signing checks and withdrawing cash from TRUST and MFA accounts for personal use. From January 19, 2017, to June 12, 2017, BULLOCK signed checks drawn from TRUST that were made payable to himself and withdrew cash from MFA.

39. The particulars of the checks and withdrawals are as follows:

Date	Amount	Drawee	Check	Payee
03/25/2017	\$2,722.91	TRUST	1815	Kenneth Bullock
04/25/2017	\$520.00	MFA	CASH	Kenneth Bullock
06/09/2017	\$891.43	TRUST	1821	Kenneth Bullock

40. The total amount of the checks to himself and cash withdrawals that BULLOCK made after his resignation was \$4,134.24.

COUNTS 7
(Pattern of Unlawful Activity)

41. Beginning in September 2009, BULLOCK engaged in conduct which constituted multiple episodes of unlawful activity. These episodes were not isolated and were interrelated by distinguishing characteristics. These episodes constituted continuing unlawful conduct and were all related. BULLOCK engaged in multiple acts of theft as set forth above.

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Pursuant to Utah Code Annotated § 78B-5-705
(2008) I declare under criminal penalty of the State
of Utah that the foregoing is true and correct to the
best of my belief and knowledge.

Executed on: _____

Marcos Garaycochea
Declarant

Authorized for presentment and filing
SIM GILL, District Attorney

Deputy District Attorney
____ day of January 2019
KFD/DA Case No. 18016970