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*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF PIMA**

STATE OF ARIZONA,

Plaintiff,

v.

**PAULA JOANN FOX (001),**  
*Counts 1, 2*  
**BONITH HAVYARIMANA (002),**  
*Count 3*  
**CAREY JACK CARRINGTON**  
**(003),**  
*Count 5*  
**NAOMI MBAZUMUTIMA (004),**  
*Count 6*  
**NEVIA MICHELLE SANDERS**  
**(005),**  
*Count 7*  
**KAREENA RAE TORRES-**  
**HACKWORTH (006),**  
*Count 8*  
**MARIA GUADALUPE TORRES**  
**REYES (007),**  
*Count 4*

Defendants.

Cause No:

**98 SGJ 144**

**DIRECT INDICTMENT**

CHARGING VIOLATIONS OF:  
**COUNT 1: MANSLAUGHTER**, a Class 2  
Felony, in violation of A.R.S. § 13-  
1103(A)(1)

**COUNT 2: VULNERABLE ADULT**  
**ABUSE**, a Class 2 Felony, in violation of  
A.R.S. § 13-3623(A)(1)

**COUNT 3: VULNERABLE ADULT**  
**ABUSE**, a Class 3 Felony, in violation of  
A.R.S. § 13-3623(A)(2)

**COUNTS 4, 6, 7 & 8: VULNERABLE**  
**ADULT ABUSE**, Class 5 Felonies, in  
violation of A.R.S. § 13-3623(B)(2)

**COUNT 5: VULNERABLE ADULT ABUSE**, a Class 6 Felony, in violation of A.R.S. § 13-3623(B)(3)

The State Grand Jury accuses **PAULA JOANN FOX, AND CAREY JACK CARRINGTON, AND MARIA GUADALUPE TORRES REYES, AND ASHLEY NICOLE WALLS, AND BONITH HAVYARIMANA, AND KAREENA RAE TORRES-HACKWORTH, AND NAOMI MBAZUMUTIMA, AND NEVIA MICHELLE SANDERS**, charging on this 1<sup>st</sup> day of June, 2026 that in or from PIMA County, Arizona:

**COUNT 1**

**MANSLAUGHTER, A CLASS 2 FELONY**

**PAULA JOANN FOX**, on or between September 9, 2023 and November 8, 2023, recklessly did cause the death of Holly Dale Given, in violation of A.R.S. §§ 13-1101, 13-1103(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 2**

**VULNERABLE ADULT ABUSE, A CLASS 2 FELONY**

**PAULA JOANN FOX**, on or between September 9, 2023 and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances likely to produce death or serious physical injury, intentionally or knowingly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(A)(1), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 3**

**VULNERABLE ADULT ABUSE, A CLASS 3 FELONY**

**BONITH HAVYARIMANA**, on or between September 9, 2023 and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances likely to produce death or serious physical injury, recklessly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(A)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 4**

**VULNERABLE ADULT ABUSE, A CLASS 5 FELONY**

**MARIA GUADALUPE REYES-TORRES**, on or between November 3, 2023, and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances other than those likely to produce death or serious physical injury, recklessly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(B)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 5**

**VULNERABLE ADULT ABUSE, A CLASS 6 FELONY**

**CAREY JACK CARRINGTON**, on or between November 3, 2023, and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances other than those likely to produce death or serious physical injury, with criminal negligence did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(B)(3), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

**COUNT 6**

**VULNERABLE ADULT ABUSE, A CLASS 5 FELONY**

**NAOMI MBAZUMUTIMA**, on or between September 9, 2023, and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances other than those likely to produce death or serious physical injury, recklessly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(B)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 7

VULNERABLE ADULT ABUSE, A CLASS 5 FELONY

NEVIA MICHELLE SANDERS, on or between September 9, 2023, and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances other than those likely to produce death or serious physical injury, recklessly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(B)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.


COUNT 8

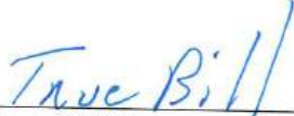
VULNERABLE ADULT ABUSE, A CLASS 5 FELONY

KAREENA RAE TORRES-HACKWORTH, on or between September 9, 2023, and November 6, 2023, having the care or custody of Holly Dale Given, a vulnerable adult, under circumstances other than those likely to produce death or serious physical injury, recklessly did cause or permit Holly Dale Given's person or health to be injured or to be placed in a situation where her person or health was endangered, in violation of A.R.S. §§ 13-3623(B)(2), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
BRETT HARAMES  
Assistant Attorney General

  
\_\_\_\_\_  
(A "True Bill")

Dated: 6/1/26  
Foreperson of the Grand Jury

  
Signature of Foreperson

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

RYAN C. DILL  
Assistant Attorney General  
State Bar No. 041128  
2005 N. Central Avenue  
Phoenix, AZ 85004-1592  
Telephone (602) 542-3881  
CRMHCFraud@azag.gov  
*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MOHAVE**

STATE OF ARIZONA,

Plaintiff,

v.

**MICHELLE RENEE ALDERMAN  
(001),**

Defendant.

Cause No:

**98 SGJ 174**

**INDICTMENT**

CHARGING VIOLATIONS OF:  
**COUNT 1: UNAUTHORIZED  
PRACTICE OF A HEALTH  
PROFESSION**, a Class 5 Felony, in  
violation of A.R.S. § 32-3227(F)

**COUNT 2: UNAUTHORIZED  
PRACTICE OF A HEALTH  
PROFESSION**, a Class 5 Felony, in  
violation of A.R.S. § 32-3227(F)

**COUNT 3: UNAUTHORIZED  
PRACTICE OF A HEALTH  
PROFESSION**, a Class 5 Felony, in  
violation of A.R.S. § 32-3227(F)

The State Grand Jury accuses **MICHELLE RENEE ALDERMAN (001)**, charging on this 22<sup>nd</sup> day of June, 2026 that in or from Mohave County, Arizona:

**COUNT 1**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5**

**FELONY**

MICHELLE RENEE ALDERMAN (001), on or about January 21, 2026, did engage in the practice of Lip Filler Injections on C.A., which requires a Nursing License, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227(F), 13-701, 13-702, and 13-801.

**COUNT 2**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5**

**FELONY**

MICHELLE RENEE ALDERMAN (001), on or between January 1, 2026 through January 31, 2026, did engage in the practice of Lip Filler Injections on A.M., which requires a Nursing License, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227(F), 13-701, 13-702, and 13-801.

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COUNT 3

UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5

FELONY

MICHELLE RENEE ALDERMAN (001), on or between February 1, 2026 through March 31, 2026, did engage in the practice of Lip Filler Injections on K.G., which requires a Nursing License, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227(F), 13-701, 13-702, and 13-801.

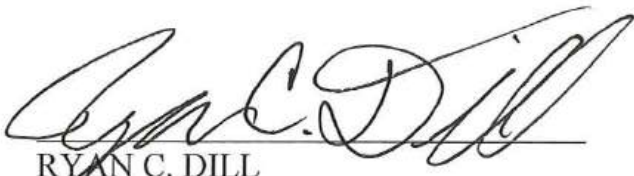
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Mohave County, Arizona.

*True Bill*

\_\_\_\_\_  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 6/22/2026



\_\_\_\_\_  
RYAN C. DILL  
Assistant Attorney General

  
\_\_\_\_\_  
Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

Clerk of the Superior Court  
FILED  
J. Hockerson, Deputy  
06/19/2026 12:50 PM

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*Attorneys for the Plaintiff*

DR # SIS-2026-0330 – Arizona Attorney General's Office  
Superior Court Precinct  
**VACATE**

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**COUNTY OF MARICOPA, EDC - DOWNTOWN**

STATE OF ARIZONA,

Plaintiff,

v.

**BRANDI LEE DEES (001),**

Defendant

Cause No: CR2026-123539-001

**DIRECT COMPLAINT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES**, a Class 2 Felony, in  
violation of A.R.S. § 13-2310

**COUNT 2: MEDICAL - PRACTICE  
WITHOUT LICENSE**, a Class 5 Felony, in  
violation of A.R.S. § 32-1455(A)(1)

**COUNT 3: PRESCRIPTION-ONLY  
DRUG POSSESSION**, a Class 1  
Misdemeanor, in violation of A.R.S. § 13-  
3406(A)(1)

The complainant herein personally appears and, being duly sworn, complains on information and belief against **BRANDI LEE DEES**, charging that in Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

**BRANDI LEE DEES**, on or between August 4, 2026 and June 18, 2026, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit of money, business, or customers, prospective or otherwise, by means of false or fraudulent pretenses, representations, promises, or material omissions, which included: falsely representing that **BRANDI LEE DEES** was properly licensed, or omitting to inform her customers that **BRANDI LEE DEES** was not properly licensed, in order to perform medical procedures to include Lip Fillers, Botox injections, and other dermal injectable medical procedures; falsely representing to her customers that the medical procedures described herein were performed using dermal fillers approved by the Federal Drug Administration, or omitting to inform her customers that the medical procedures described herein were performed using dermal fillers that were not approved by the Federal Drug Administration; as well as other false representations and material omissions in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

**COUNT 2**

**MEDICAL - PRACTICE WITHOUT LICENSE**

**BRANDI LEE DEES**, on or between August 4, 2024 and June 18, 2026, did practice medicine without being licensed or exempt from licensure under Title 32, Chapter 13, Arizona Revised Statutes, in violation of A.R.S. §§ 32-1455 (A)(1), 32-1421, 32-1401 et seq., 13-701, 13-702, and 13-801.

**COUNT 3**

**PRESCRIPTION-ONLY DRUG POSSESSION**

**BRANDI LEE DEES**, on or about June 18, 2026, knowingly did possess AMPHETAMINE SALTS, a prescription-only drug, without having obtained the



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*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF YUMA**

STATE OF ARIZONA,

Plaintiff,

v.

**BIO FAMILY CLINIC (001),**

Defendant.

Cause No:

**98 SGJ 154**

**INDICTMENT**

CHARGING VIOLATIONS OF:  
**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES \$100000 OR MORE, a**  
Class 2 Felony, in violation of A.R.S. § 13-  
2310

The State Grand Jury accuses **BIO FAMILY CLINIC (001)**, charging on this 8<sup>th</sup> day of June, 2026 that in or from YUMA County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2  
FELONY**

BIO FAMILY CLINIC, on or between July 1, 2025 through May 31, 2026, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at


\$100,000 or more from AHCCCS, by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

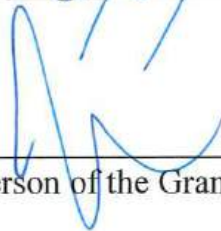
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Yuma County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 6/8/26

  
RYAN C. DILL  
Assistant Attorney General

  
Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

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*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF NAVAJO**

STATE OF ARIZONA,

Plaintiff,

v.

**CONSCIOUS CHOICES BIRTH  
CENTER (001),**

**LORRAINE P. FERRANTE (002),**

Defendant.

Cause No:

**98 SGJ 131**

**INDICTMENT**

CHARGING VIOLATIONS OF:  
**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES**, a Class 2 Felony, in  
violation of A.R.S. § 13-2310(A)

**COUNT 2: TAKING IDENTITY OF  
ANOTHER PERSON OR ENTITY**, a  
Class 4 Felony, in violation of A.R.S. § 13-  
2008(A)

**COUNT 3: PERFORMS MIDWIFERY  
WITHOUT A PROPER LICENSE**, a  
Class 6 Felony, in violation of A.R.S. § 36-  
757(A)(2)

**COUNT 4: NEGLIGENT HOMICIDE**, a  
Class 4 Felony, in violation of A.R.S. § 13-  
1102(A)

**COUNT 5: PERFORMS MIDWIFERY WITHOUT A PROPER LICENSE**, a Class 6 Felony, in violation of A.R.S. § 36-757(A)(2)

**COUNT 6: PERFORMS MIDWIFERY WITHOUT A PROPER LICENSE**, a Class 6 Felony, in violation of A.R.S. § 36-757(A)(2)

The State Grand Jury accuses **CONSCIOUS CHOICES BIRTH CENTER (001) and LORRAINE P. FERRANTE (002)**, charging on this 26<sup>th</sup> day of May that in or from NAVAJO County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

**CONSCIOUS CHOICES BIRTH CENTER (001) AND LORRAINE P. FERRANTE (002)**, on or about January 1, 2020 through December 31, 2025, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit from B.S., J.S., K.F., and D.M., among others, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, and 13-801.

**COUNT 2**

**TAKING IDENTITY OF ANOTHER PERSON OR ENTITY, A CLASS 4 FELONY**

**LORRAINE P FERRANTE (002)**, on or about January 21, 2025, knowingly did take, purchase, manufacture, record, possess or use any personal identifying information or entity identifying information of Joseph Santora, without consent, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity, in violation of A.R.S. §§ 13-2001, 13-2008(A), 13-701, 13-702, and 13-801.

**COUNT 3**

**PERFORMS MIDWIFERY WITHOUT A PROPER LICENSE, A CLASS 6**

**FELONY**

**LORRAINE P. FERRANTE (002)**, on or about January 2025, performed midwifery, on K.F., without a proper license or after the license was denied, suspended, or revoked A.R.S. §§ 36-757(A)(2), 13-701, 13-702, and 13-801.

**COUNT 4**

**NEGLIGENT HOMICIDE, A CLASS 4 FELONY**

**LORRAINE P. FERRANTE (002)**, on or about February 5, 2025, with criminal negligence, did cause the death of Elah Renee Shepherd in violation of A.R.S. §§ 13-1101, 13-1102(A), 13-701, 13-702, and 13-801.

**COUNT 5**

**PERFORMS MIDWIFERY WITHOUT A PROPER LICENSE, A CLASS 6**

**FELONY**

**LORRAINE P. FERRANTE (002)**, on or about July 26, 2024, performed midwifery, on B.S., without a proper license or after the license was denied, suspended, or revoked A.R.S. §§ 36-757(A)(2), 13-701, 13-702, and 13-801.

**COUNT 6**

**PERFORMS MIDWIFERY WITHOUT A PROPER LICENSE, A CLASS 6**

**FELONY**


**LORRAINE P. FERRANTE (002)**, on or about February 5, 2025, performed midwifery, on B.S., without a proper license or after the license was denied, suspended, or revoked A.R.S. §§ 36-757(A)(2), 13-701, 13-702, and 13-801.


Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Navajo County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 5/26/26

  
\_\_\_\_\_  
RYAN C. DILL  
Assistant Attorney General

  
\_\_\_\_\_  
Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

RYAN C. DILL  
Assistant Attorney General  
State Bar No. 041128  
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CRMHCFraud@azag.gov  
*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF YUMA**

STATE OF ARIZONA,

Plaintiff,

v.

IRFAN FAZIL,

Defendant.

Cause No:

**98 SGJ 154**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES \$100000 OR MORE**, a  
Class 2 Felony, in violation of A.R.S. § 13-  
2310

**COUNT 2: ILLEGAL CONTROL OF  
AN ENTERPRISE**, a Class 3 Felony, in  
violation of A.R.S. § 13-2312(A) and (D)

**COUNT 3: THEFT**, a Class 2 Felony, in  
violation of A.R.S. § 13-1802(A)(1)

**COUNT 4: CONSPIRACY**, a Class 2  
Felony, in violation of A.R.S. § 13-1003

**COUNT 5: POSSESSION OF A  
DANGEROUS DRUG**, a Class 4 Felony,  
in violation of A.R.S. § 13-3407(A)(1)

**COUNT 6: ACQUISITION OR  
ADMINISTRATION OF DANGEROUS  
DRUGS, a Class 3 Felony, in violation of  
A.R.S. § 13-3407(A)(6)**

The State Grand Jury accuses **IRFAN FAZIL (001)**, charging on this 8th day of June 2026 that in or from YUMA County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2  
FELONY**

**IRFAN FAZIL**, on or between July 1, 2025 through May 31, 2026, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from AHCCCS, by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 2**

**ILLEGAL CONTROL OF AN ENTERPRISE, A CLASS 3 FELONY**

**IRFAN FAZIL**, on or between July 1, 2025 through May 31, 2026, through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise(s) included, but were not limited to Bio Family Clinic, and others known and/or unknown.

The racketeering included: Forgery, in violation of A.R.S. § 13-2301(D)(4)(b)(iv);, Theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v);, A scheme or artifice to defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx); and Money laundering, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi);.

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(A) and (D), 13-2301, 13-108, 13-109, 13-302, 13-304, 13-701, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314.

**COUNT 3**

**THEFT, A CLASS 2 FELONY**

**IRFAN FAZIL**, on or between July 1, 2025 through May 31, 2026, without lawful authority, knowingly did control AHCCCS's U.S. Currency, with a value of \$100,000 or more, with the intent to deprive AHCCCS of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-1802(H), 13-701, 13-702, and 13-801.

**COUNT 4**

**CONSPIRACY, A CLASS 2 FELONY**

**IRFAN FAZIL**, on or between July 1, 2025 through May 31, 2026, defendants herein, with the intent to promote or aid the commission of an offense, did agree with [REDACTED] that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Money Laundering, in violation of A.R.S. § 13-2317;
- 2) Fraudulent Schemes and Artifices over \$100,000, in violation of A.R.S. § 13-2310;
- 3) Illegal Control of an Enterprise - Acquire or Maintain by Racketeering, in violation of A.R.S. § 13-2312; and
- 4) Theft or Control of Property with Intent to Deprive over \$100,000 in violation of A.R.S. § 13-1802.

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 1-3 of this Indictment (which are incorporated

herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 5**

**POSSESSION OF A DANGEROUS DRUG, A CLASS 4 FELONY**

IRFAN FAZIL, on or about March 14, 2025 and April 21, 2025, knowingly possessed a dangerous drug, to wit: Clonazepam, in violation of A.R.S. §§ 13-3407(A)(1), 13-3401(36), 13-701, 13-702, 13-703, 13-801, and 13-811.

**COUNT 6**

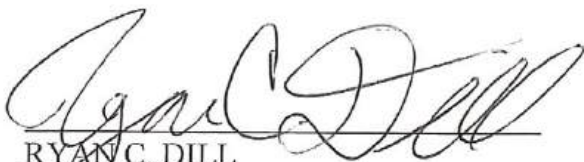
**ACQUISITION OR ADMINISTRATION OF DANGEROUS DRUGS, A CLASS 3 FELONY**

IRFAN FAZIL, on or about February 11, 2025, March 14, 2025, May 21, 2025, June 20, 2025, and July 20, 2025, did knowingly obtain or procure the administration of Clonazepam, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§ 13-3407(A)(6), 13-3418, 13-701, 13-702, 13-703, and 13-801.

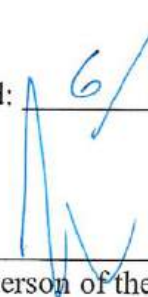
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Yuma County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
RYAN C. DILL  
Assistant Attorney General

Dated: 6/8/26

  
Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

RYAN C. DILL  
Assistant Attorney General  
State Bar No. 041128  
Pima County Computer No.:  
2005 N. Central Avenue  
Phoenix, AZ 85004-1592  
Telephone (602) 542-3881  
CRMHCFraud@azag.gov  
*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF PIMA**

STATE OF ARIZONA,

Plaintiff,

v.

**EDGAR Z TORRES (001),**

Defendant.

Cause No:

**98 SGJ 132**

**DIRECT INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: ENDANGERMENT**, a Class 6  
Felony, in violation of A.R.S. § 13-1201(A)

**COUNT 2: CRIMINAL**

**IMPERSONATION**, a Class 6 Felony, in  
violation of A.R.S. § 13-2006(A)(1)

**COUNT 3: POSSESSION OF**

**PRESCRIPTION DRUGS FOR SALE**, a  
Class 6 Felony, in violation of A.R.S. § 13-  
3406(A)(2)

**COUNT 4: UNAUTHORIZED  
PRACTICE OF A HEALTH**

**PROFESSION**, a Class 5 Felony, in  
violation of A.R.S. § 32-3227

**COUNT 5: UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION**, a Class 5 Felony, in violation of A.R.S. § 32-3227

**COUNT 6: UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION**, a Class 5 Felony, in violation of A.R.S. § 32-3227

**COUNT 7: CRIMINAL IMPERSONATION**, a Class 6 Felony, in violation of A.R.S. § 13-2006(A)(1)

The State Grand Jury accuses **EDGAR Z TORRES (001)**, charging on this 26<sup>th</sup> day of May that in or from PIMA County, Arizona:

**COUNT 1**

**ENDANGERMENT, A CLASS 6 FELONY**

**EDGAR Z TORRES (001)**, on or about July 22, 2023 recklessly did endanger **BOGAR TARAZON** with a substantial risk of imminent death, in violation of A.R.S. §§ 13-1201(A), 13-701, 13-702, 13-801, and 13-812, when he performed a penile enlargement revision procedure, while not licensed to practice medicine in the State of Arizona.

**COUNT 2**

**CRIMINAL IMPERSONATION, A CLASS 6 FELONY**

**EDGAR Z TORRES (001)**, on or about July 22, 2023, with intent to defraud **BOGAR TARAZON**, did assume a false identity, in violation of A.R.S. §§ 13-2006(A)(1), 13-701, 13-702, and 13-801, when he represented himself to be a licensed physician in the State of Arizona.

**COUNT 3**

**POSSESSION OF PRESCRIPTION DRUGS FOR SALE, A CLASS 6 FELONY**

EDGAR Z TORRES (001), on or about March 5, 2025, knowingly did possess for sale Polidocanol, Doxon Dexketoprofeno, Azithromicina, Sostenon 250 Testosterone, Ondansetron Solucion Inyectable Metoclopramida Solucion Inyectable, Metotrexato, Hierro Dextran, Diprosan Betometasona, Ponti Oftero Tetrecaina, Misoprostol, and Dysport Toxina Boutlinicia Tipo A Solucion, prescription-only drugs, without a valid license or permit, in violation of A.R.S. §§ 13-3401, 13-3406(A)(2), 13-3418, 13-701, 13-702, and 13-801.

**COUNT 4**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5  
FELONY**

EDGAR Z TORRES (001), on or about August 11, 2023, did engage in the practice of MEDICINE, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227, 13-701, 13-702, and 13-801, when he performed a penile enlargement revision procedure on BOGAR TARAZON.

**COUNT 5**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5  
FELONY**

EDGAR Z TORRES (001), on or about August 11, 2023, did engage in the practice of MEDICINE, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227, 13-701, 13-702, and 13-801, when he gave medical advice to BOGAR TARAZON.

**COUNT 6**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS**

EDGAR Z TORRES (001), on or about March <sup>2023</sup>, did engage in the practice of MEDICINE, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227, 13-701, 13-702, and 13-801, when he injected filler into Joanne Alvarez's nose.

**COUNT 7**

**CRIMINAL IMPERSONATION, A CLASS 6 FELONY**

EDGAR Z TORRES (001), on or about March 2023, with intent to defraud JOANNE ALVAREZ, did assume a false identity, in violation of A.R.S. §§ 13-2006(A)(1), 13-701, 13-702, and 13-801, when he represented himself to be a licensed physician in the State of Arizona.

Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 5/26/26

Ryan C. Dill  
RYAN C. DILL  
Assistant Attorney General

[Signature]  
Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

Clerk of the Superior Court  
FILED  
J. Hockerson, Deputy  
06/19/2026 1:01 PM

ROBERT TOKAR  
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*Attorneys for the Plaintiff*

DR # SIS-2023-0294 – Arizona Attorney General's Office

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**COUNTY OF MARICOPA, EDC - DOWNTOWN**

STATE OF ARIZONA,

Plaintiff,

v.

**MICHAEL MAURICE JADDA(001),**

Defendant

Cause No: CR2026-000345-001

**DIRECT COMPLAINT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES**, a Class 2 Felony, in violation of A.R.S. § 13-2310A

**COUNT 2: AGGRAVATED TAKING IDENTITY FOR UNLAWFUL PURPOSE OR TO CAUSE LOSS THREE OR MORE PERSONS**, a Class 3 Felony, in violation of A.R.S. § 13-2009A1

**COUNT 3: FORGERY KNOWINGLY POSSESS FORGED INSTRUMENT**, a Class 4 Felony, in violation of A.R.S. § 13-2002A2

**COUNT 4: NARCOTIC DRUG  
TRANSPORT OR SELL TRANSPORT  
OR IMPORT NARCOTIC DRUG  
EXCEED THRESHOLD**, a Class 2  
Felony, in violation of A.R.S. § 13-  
3408(A)(7)

**COUNT 5: NARCOTIC DRUG  
TRANSPORT OR SELL TRANSPORT  
OR IMPORT NARCOTIC DRUG  
EXCEED THRESHOLD**, a Class 2  
Felony, in violation of A.R.S. § 13-  
3408(A)(7)

**COUNT 6: NARCOTIC DRUG  
TRANSPORT OR SELL TRANSPORT  
OR IMPORT NARCOTIC DRUG  
EXCEED THRESHOLD**, a Class 2  
Felony, in violation of A.R.S. § 13-  
3408(A)(7)

**COUNT 7: NARCOTIC DRUG  
TRANSPORT OR SELL TRANSPORT  
OR IMPORT NARCOTIC DRUG  
EXCEED THRESHOLD**, a Class 2  
Felony, in violation of A.R.S. § 13-  
3408(A)(7)

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The complainant herein personally appears and, being duly sworn, complains on information and belief against **MICHAEL MAURICE JADDA**, charging that in Maricopa County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

**MICHAEL MAURICE JADDA**, on or between July 30, 2021 and June 19, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit from Walmart, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

**COUNT 2**

**AGGRAVATED TAKING IDENTITY FOR UNLAWFUL PURPOSE OR TO  
CAUSE LOSS THREE OR MORE PERSONS**

MICHAEL MAURICE JADDA, on or between July 30, 2021 and June 19, 2023, knowingly did take, purchase, manufacture, record, possess or use any personal identifying information or entity identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffer any economic loss, in violation of A.R.S. §§ 13-2009, 13-2001, 13-701, 13-702, and 13-801.

**COUNT 3**

**FORGERY KNOWINGLY POSSESS FORGED INSTRUMENT**

MICHAEL MAURICE JADDA, on or between July 30, 2021 and June 19, 2023, with intent to defraud, knowingly did possess a forged instrument, to-wit: a written prescription, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

**COUNT 4**

**NARCOTIC DRUG TRANSPORT OR SELL TRANSPORT OR IMPORT  
NARCOTIC DRUG EXCEED THRESHOLD**

MICHAEL MAURICE JADDA, on or about June 8, 2023, knowingly did transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer, or offer to sell or transfer Oxycodone, a narcotic drug, having a weight or value that exceeds the statutory threshold amount (RX2249557), in violation of A.R.S. §§ 13-3408(A)(7), 13-3401, 13-3418, 13-701, 13-702, and 13-801.

**COUNT 5**

**NARCOTIC DRUG TRANSPORT OR SELL TRANSPORT OR IMPORT**

**NARCOTIC DRUG EXCEED THRESHOLD**

**MICHAEL MAURICE JADDA**, on or about June 17, 2023, knowingly did transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer, or offer to sell or transfer Oxycodone, a narcotic drug, having a weight or value that exceeds the statutory threshold amount (RX224682), in violation of A.R.S. §§ 13-3408(A)(7), 13-3401, 13-3418, 13-701, 13-702, and 13-801.

**COUNT 6**

**NARCOTIC DRUG TRANSPORT OR SELL TRANSPORT OR IMPORT**

**NARCOTIC DRUG EXCEED THRESHOLD**

**MICHAEL MAURICE JADDA**, on or about April 30 2023, knowingly did transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer, or offer to sell or transfer Oxycodone, a narcotic drug, having a weight or value that exceeds the statutory threshold amount (RX873802 CVS), in violation of A.R.S. §§ 13-3408(A)(7), 13-3401, 13-3418, 13-701, 13-702, and 13-801.

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//

**COUNT 7**

**NARCOTIC DRUG TRANSPORT OR SELL TRANSPORT OR IMPORT**

**NARCOTIC DRUG EXCEED THRESHOLD**

MICHAEL MAURICE JADDA, on or about May 2, 2023, knowingly did transport for sale, import into this state, offer to transport for sale or import into this state, sell, transfer, or offer to sell or transfer Oxycodone, a narcotic drug, having a weight or value that exceeds the statutory threshold amount (RX875009 CVS), in violation of A.R.S. §§ 13-3408(A)(7), 13-3401, 13-3418, 13-701, 13-702, and 13-801.

KRISTIN K. MAYES  
ATTORNEY GENERAL



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ROBERT TOKAR  
Assistant Attorney General

It is requested that a Summons be issued.  
It is requested that Defendant appear for fingerprint and photograph.



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#454 AZ AGO for, AGENCY: Arizona Attorney General's Office  
COMPLAINANT

SUBSCRIBED AND SWORN upon information and belief this 3rd day of June, 2026.

I, Daniel Miller #454, hereby swear under penalty of perjury that the information contained within the complaint being filed with this oath is true and correct to the best of my knowledge.

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

ROBERT TOKAR  
Assistant Attorney General  
State Bar No. 040547  
2005 N. Central Avenue  
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Telephone (602) 542-3881  
CRMHCFraud@azag.gov  
*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MOHAVE**

STATE OF ARIZONA,

Plaintiff,

v.

**DANNI DENISE OWENS (001),**  
(Counts 1-7, 11)  
**BREE KAYLYN LOBLEY (002),**  
(Counts 1, 2, 4, 5, 9)  
**AHLIA NEOLANI WONG (003),**  
(Counts 1, 2, 8, 9, 10)  
**HEATHER JANE SMITH (004),**  
(Counts 1, 2, 6-10)  
**TANYA BOEHM, aka TANYA**  
**KANTUN (005),**  
(Counts 1, 2, 6-10)  
**NATALIE DIANE REBELLOZO**  
**(006), (Counts 1, 2, 8, 9)**  
**[REDACTED] (007),**  
(Counts 1, 2, 9)  
**SLIMMING GRACE, LLC (008)**  
(Counts 1, 11)

Defendants.

Cause No:

98 SGJ 161

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES**  
**AND ARTIFICES**, a Class 2 Felony, in  
violation of A.R.S. § 13-2310A

**COUNT 2: CONSPIRACY**, a Class 2  
Felony, in violation of A.R.S. § 13-1003

**COUNT 3: PARTICIPATION IN A**  
**CRIMINAL SYNDICATE, MANAGE**  
**OR FINANCE**, a Class 2 Felony, in  
violation of A.R.S. § 13-2308(A)(1)

**COUNT 4: AGGRAVATED TAKING**  
**IDENTITY FOR UNLAWFUL**  
**PURPOSE OR TO CAUSE LOSS,**  
**THREE OR MORE PERSONS**, a Class 3  
Felony, in violation of A.R.S. § 13-2009A1

**COUNT 5: FORGERY, MAKE, COMPLETE OR ALTER WRITTEN INSTRUMENT**, a Class 4 Felony, in violation of A.R.S. § 13-2002A1

**COUNT 6: PRESCRIPTION-ONLY DRUG MANUFACTURE, SELL OR DISTRIBUTE MISBRANDED DRUGS**, a Class 4 Felony, in violation of A.R.S. § 13-3406A9

**COUNT 7: PRESCRIPTION-ONLY DRUG TRANSPORT OR IMPORT FOR SALE**, a Class 6 Felony, in violation of A.R.S. § 13-3406A7

**COUNT 8: ADMINISTRATION OF PRESCRIPTION-ONLY DRUGS**, a Class 1 Misdemeanor, in violation of A.R.S. § 13-3406A5

**COUNT 9: ASSISTING A CRIMINAL SYNDICATE**, a Class 4 Felony, in violation of A.R.S. § 13-2308(C)

**COUNT 10: UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION**, a Class 5 Felony, in violation of A.R.S. § 32-3227F

**COUNT 11: ILLEGAL CONTROL OF A CRIMINAL ENTERPRISE, ACQUIRE OR MAINTAIN BY RACKETEERING**, a Class 3 Felony, in violation of A.R.S. § 13-2312A

The State Grand Jury accuses **DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN (005), NATALIE DIANE REBELLOZO**

(006), [REDACTED] (007), and SLIMMING GRACE, LLC (008) charging on this 15th day of June, 2026 that in or from MOHAVE County, Arizona:

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY**

On or between January 26, 2024 and February 25, 2025, pursuant to scheme or artifice to defraud, DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), [REDACTED] (007), and SLIMMING GRACE, LLC (008) knowingly did obtain a benefit from Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock Charlie Smith, Toria Thomlinson, and Adriana Vides, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

**COUNT 2**

**CONSPIRACY, A CLASS 2 FELONY**

DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), and [REDACTED] (007), on or between January 26, 2024 and February 25, 2025, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least

one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **Aggravated Identity Theft** in violation of A.R.S. § 13-2009(A)(1);
- 2) **Forgery** in violation of A.R.S. § 13-2002(A)(1); and
- 3) **Sale of Misbranded Drugs** in violation of A.R.S. § 13-3406.
- 4) **Fraud Schemes** in violation of A.R.S. § 13-2310

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 1, 6, and 8 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

### COUNT 3

#### PARTICIPATION IN A CRIMINAL SYNDICATE, MANAGE OR FINANCE, A CLASS 2 FELONY

**DANNI DENISE OWENS (001)**, on or between January 26, 2024 and February 25, 2025, participated in a criminal syndicate by intentionally did organize, manage, direct, supervise, or finance Slimming Grace, LLC, a criminal syndicate, with the intent to promote or further the criminal syndicate, in violation of A.R.S. §§ 13-2301, 13-2308(A)(1), 13-701, 13-702, and 13-801.

### COUNT 4

#### AGGRAVATED TAKING IDENTITY FOR UNLAWFUL PURPOSE OR TO CAUSE LOSS, THREE OR MORE PERSONS, A CLASS 3 FELONY

On or between January 26, 2024 and February 25, 2025, **DANNI DENISE**

**OWENS (001), and BREE KAYLYN LOBLEY (002), knowingly took, purchased, manufactured, recorded, possessed, or used any personal identifying information of three or more other persons or entities, to wit: Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock, Charlie Smith, Toria Thomlinson, and Adriana Vides, without consent, with the intent to obtain or use those other persons' identity for any unlawful purpose, in violation of A.R.S §§ 13-2001, 13-2009, 13-701, 13-702, and 13-801.**

**COUNT 5**

**FORGERY, MAKE COMPLETE OR ALTER WRITTEN INSTRUMENT, A CLASS 4 FELONY**

On or between January 26, 2024 and February 25, 2025, **DANNI DENISE OWENS (001), and BREE KAYLYN LOBLEY (002),** with the intent to defraud, falsely made and altered a written instrument and knowingly possessed a forged instrument, in violation of A.R.S. §§13-2002, 13-2001, 13-701, 13-702, and 13-801.

**COUNT 6**

**PRESCRIPTION-ONLY DRUG MANUFACTURE SELL OR DISTRIBUTE MISBRANDED DRUGS, A CLASS 4 FELONY**

**DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), and TANYA BOEHM, aka TANYA KANTUN (005),** on or between January 26, 2024 and February 25, 2025, knowingly did manufacture, sell, or distribute various prescription-only medications that had their labels altered such that they were a misbranded drug, in violation of A.R.S. §§ 13-3401, 13-3406(A)(9), 13-3418, 32-1967, 13-701, 13-702, and 13-801.

**DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002),**

**HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005)** ordered various weight loss drugs, skin creams, hair restoring drugs and numerous other prescription-only medications under identities stolen from Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock, Charlie Smith, Toria Thomlinson, and Adriana Vides. **DANNI DENISE OWENS (001), and BREE KAYLYN LOBLEY (002)** removed or obscured the names and other information of the prescribed persons, and **DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005)** sold the misbranded drugs to members of the public.

**COUNT 7**

**PRESCRIPTION-ONLY DRUG TRANSPORT OR IMPORT FOR SALE, A CLASS 6 FELONY**

**DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005),** on or between January 26, 2024 and February 25, 2025, knowingly did transport for sale, import into this state, or offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer “Clear Revive Blemish Cream”, a prescription-only drug, without a valid prescription, in violation of A.R.S. §§ 13-3401, 13-3406(A)(7), 13-3418, 13-701, 13-702, and 13-801.

**COUNT 8**

**ADMINISTRATION OF PRESCRIPTION-ONLY DRUGS, A CLASS 1 MISDEMEANOR**

**HEATHER JANE SMITH (004), AHLIA NEOLANI WONG (003), TANYA BOEHM, aka TANYA KANTUN (005), and NATALIE DIANE REBELLOZO (006),**

on or between January 26, 2024 and February 25, 2025, knowingly did administer Tirzepatide, a prescription-only drug, to many patients without a valid consultation or prescription, including Amy Posie, Juanita Contreras, Tory Mortensen, Chaz Morris, Maxine Hart, Alexis Hercenberg, Sandra Hernandez, Harold Meeker, Christi Meeker, Christopher Demme, Katie Lee Demme, Donna Diamant, Jenny Narro, and Shelly Griffith, whose possession or use of Tirzepatide, violated A.R.S. § 13-3406, in violation of A.R.S. §§ 13-3401, 13-3406(A)(5), 13-3418, 13-707, and 13-802.

**COUNT 9**

**ASSISTING A CRIMINAL SYNDICATE, A CLASS 4 FELONY**

**BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), AND [REDACTED] (007),** on or between January 26, 2024 and February 25, 2025, did commit **Fraud Schemes and Artifices §13-2310, Conspiracy §13-1003, Aggravated Identity Theft §13-2009, Forgery §13-2002, Sales of Misbranded Drugs §13-3406, and/or Unauthorized Practice of a Health Profession §32-3227,** all felony offenses, with the intent to promote or further the criminal objectives of **DANNI DENISE OWENS (001)** and **SLIMMING GRACE LLC,** a criminal syndicate, in violation of A.R.S. §§ 13-2301, 13-2308(C), 13-701, 13-702, and 13-801.

Each of the subjects, **BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), AND [REDACTED]**

██████████ (007) committed the felonies listed below:

**BREE KAYLYN LOBLEY (002)** - selected names of random patients to place on prescription orders from Slimming Grace to Strive Pharmacy without their permission thereby stealing their identity for illegal purposes.

**AHLIA NEOLANI WONG (003)** – sold and administered prescription only medication to clients without a prescription and without a valid medical consultation, fraudulently misleading the clients to believe she was a qualified medical assistant.

**HEATHER JANE SMITH (004)** – Engaging in the unauthorized practice of a health profession by giving patient consultations and injections of prescription-only medications.

**TANYA BOEHM, aka TANYA KANTUN(005)** - Engaging in the unauthorized practice of a health profession by giving patient consultations and injections of prescription-only medications.

**NATALIE DIANE REBELLOZO (006)** – Filling and Distributing syringes filled with unlabeled prescription only medications and fraudulently holding herself out as a medical professional authorized to administer prescription only medication.

██ (007) – As sales representative for Strive Pharmacy, knowingly selling prescription only medications near their expiration dates for use by **DANNI DENISE OWENS (001)** and **SLIMMING GRACE LLC** thereby furthering and assisting their fraud scheme for monetary gain.

**COUNT 10**

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5  
FELONY**

AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005) on or between January 26, 2024 and February 25, 2025, did engage in the practice of Medical Assistant, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227, 13-701, 13-702, and 13-801.

**COUNT 11**

**ILLEGAL CONTROL OF A CRIMINAL ENTERPRISE, ACQUIRE OR  
MAINTAIN BY RACKETEERING, A CLASS 3 FELONY**

DANNI DENISE OWENS (001) and SLIMMING GRACE, LLC (008), on or between January 26, 2024 and February 25, 2025, through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise(s) included, but were not limited to BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), and [REDACTED] (007), and others known and/or unknown.

The racketeering included:

- 1) **Aggravated Identity Theft** in violation of A.R.S. § 13-2009(A)(1);
- 2) **Forgery** in violation of A.R.S. § 13-2002(A)(1); and
- 3) **Sale of Misbranded Drugs** in violation of A.R.S. § 13-3406.
- 4) **Fraud Schemes** in violation of A.R.S. § 13-2310

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(A) and (D), 13-2301, 13-108, 13-109, 13-302, 13-304, 13-305, 13-701, 13-703, 13-801, 13-804, 13-803, 13-811, 13-2313, 13-2314.

Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Mohave County, Arizona.

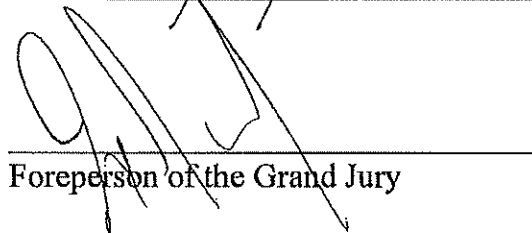
True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA



ROBERT TOKAR  
Assistant Attorney General

Dated: 8/15/26



Foreperson of the Grand Jury

KRISTIN K. MAYES  
Attorney General  
Firm State Bar No. 14000

RYAN C. DILL  
Assistant Attorney General  
State Bar No. 041128  
2005 N. Central Avenue  
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Telephone (602) 542-3881  
[CRMHCFraud@azag.gov](mailto:CRMHCFraud@azag.gov)  
*Attorney for the Plaintiff*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

**NEWSTART INTEGRATED CLINIC**

**(001),**

(Counts 2, 3 & 4)

**ANALIZA DE PEDRO (002),**

(Counts 1, 5, 6, 7, 8, 9, 10 & 11)

**MARIA ROSARIO ROXAS (003),**

(Counts 1, 12, 13 & 14)

**EMELINE TABUJARA (004),**

(Counts 1, 15, 16 & 17)

**ANGELINA RENAE KEY (005),**

(Counts 1, 18, 19 & 20)

**LEMUEL DEPEDRO (006),**

(Counts 21, 22, 23, 24 & 25)

**JULIUS MUGUMYA (007),**

(Counts 26, 27, 28, 29 & 30)

Cause No:

**98 SGJ 33**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY**, a Class 2  
Felony, in violation of A.R.S. § 13-1003

**COUNT 2: PATIENT/CLIENT  
REFERRAL FRAUD**, a Class 3 Felony,  
in violation of A.R.S. § 13-3713

**COUNT 3: MONEY LAUNDERING IN  
THE SECOND DEGREE**, a Class 3  
Felony, in violation of A.R.S. § 13-  
2317(B)(1)

**COUNT 4: FRAUDULENT SCHEMES  
AND ARTIFICES \$100000 OR MORE**,  
a Class 2 Felony, in violation of A.R.S.  
§ 13-2310(A)

**COUNT 5: PATIENT/CLIENT  
REFERRAL FRAUD**, a Class 3 Felony,  
in violation of A.R.S. § 13-3713

**JEAN B. NSABIMANA (008),**

(Counts 31, 32, 33, 34 & 35)

**ANNET UWAMAHORO (009),**

(Counts 31, 36, 37, 38 & 39)

**YORDANOS YORI HADDIS (010),**

(Counts 40, 41, 42, 43 & 44)

**ASMARA HADDIS (011),**

(Counts 40, 45, 46, 47 & 48)

**SAMER AKRAM MOHAMMED AL**

**KHAFAJI (012),**

(Counts 49, 50, 51, 52 & 53)

**JOSUE D. ROSALES (013),**

(Counts 54, 55, 56, 57 & 58)

**[REDACTED] (014),**

(Counts 59, 60, 61, 62 & 63)

**ABDULHAQ RAHIMI (015),**

(Counts 64, 65, 66, 67 & 68)

**[REDACTED] (016),**

(Counts 69, 70, 71, 72 & 73)

**IBRAHIM M. DARMAS (017),**

(Counts 74, 75, 76, 77 & 78)

**[REDACTED] (018),**

(Counts 74, 79, 80, 81 & 82)

**URLICH BUSOKOZA (019),**

(Counts 83, 84, 85, 86 & 87)

Defendants.

**COUNT 6: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 7: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 8: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 9: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 10: FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE**, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

**COUNT 11: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 12: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 13: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 14: FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE**, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

**COUNT 15: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 16: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 17: FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE**, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

**COUNT 18: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 19: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 20: FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE**, a Class 2 Felony, in violation of A.R.S. § 13-2310(A)

**COUNT 21: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 22: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 23: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 24: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 25: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 26: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 27: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 28: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 29: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 30: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 31: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 32: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 33: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 34: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 35: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 36: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 37: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 38: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 39: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 40: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 41: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 42: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 43: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 44: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 45: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 46: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 47: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 48: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 49: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 50: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 51: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 52: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 53: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 54: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 55: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 56: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 57: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 58: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 59: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 60: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 61: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 62: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 63: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 64: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 65: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 66: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 67: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 68: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 69: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 70: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 71: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 72: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 73: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 74: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 75: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 76: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 77: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 78: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 79: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 80: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 81: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 82: MONEY LAUNDERING IN THE SECOND DEGREE**, a Class 3 Felony, in violation of A.R.S. § 13-2317(B)(1)

**COUNT 83: CONSPIRACY**, a Class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 84: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 85: PATIENT/CLIENT REFERRAL FRAUD**, a Class 3 Felony, in violation of A.R.S. § 13-3713

**COUNT 86: MONEY LAUNDERING  
IN THE SECOND DEGREE**, a Class 3  
Felony, in violation of A.R.S. § 13-  
2317(B)(1)

**COUNT 87: MONEY LAUNDERING  
IN THE SECOND DEGREE**, a Class 3  
Felony, in violation of A.R.S. § 13-  
2317(B)(1)

The State Grand Jury accuses **NEWSTART INTEGRATED CLINIC (001), AND ANALIZA DE PEDRO (002), AND MARIA ROSARIO ROXAS (003), AND EMELINE TABUJARA (004), AND ANGELINA RENAE KEY (005), AND LEMUEL DEPEDRO (006), AND JULIUS MUGUMYA (007), AND JEAN B NSABIMANA (008), AND ANNET UWAMAHORO (009), AND YORDANOS YORI HADDIS (010), AND ASMARA HADDIS (011), AND SAMER AKRAM MOHAMMED AL KHAFAJI (012), AND JOSUE D ROSALES (013), AND JOHN [REDACTED] (014), ABDULHAQ RAHIMI (015), [REDACTED] (016), AND IBRAHIM M DARMAS (017), AND [REDACTED] (018), AND URLICH BUSOKOZA (019)**, charging on this 8<sup>th</sup> day of June 2026 that in or from MARICOPA County, Arizona:

**COUNT 1**

**CONSPIRACY, A CLASS 2 FELONY**

**ANALIZA DE PEDRO (002), MARIA ROSARIO ROXAS (003), EMELINE TABUJARA (004), and ANGELINA RENAE KEY (005)**, on or between April 1, 2023 through October 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. § 13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. § 13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 2-87 of this Indictment (which are

incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

## COUNT 2

### PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY

On or between April 1, 2023 through October 31, 2023, **NEWSTART INTEGRATED CLINIC (001)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: NewStart Integrated Health Clinic paid monetary consideration, in exchange for the referral of patients, to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC.**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

## COUNT 3

### MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

**NEWSTART INTEGRATED CLINIC (001)**, on or between April 1, 2023 through December 31, 2023, knowing or having reason to know that monetary funds transferred to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC., were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 4**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2  
FELONY**

**NEWSTART INTEGRATED CLINIC (001)**, on or between April 1, 2023 through October 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from AHCCCS, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 5**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about April 3, 2023, **ANALIZA DE PEDRO (002)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred E.S., L.K., D.K., and C.B. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 6**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ANALIZA DE PEDRO (002)**, on or about December 5, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1087, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 7**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or between April 1, 2023 through October 31, 2023, **ANALIZA DE PEDRO (002)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she paid monetary consideration, in exchange for the referral of patients, to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC.**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 8**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ANALIZA DE PEDRO (002)**, on or between April 1, 2023 through December 31, 2023, knowing or having reason to know that monetary funds provided to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC., were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 9**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ANALIZA DE PEDRO (002)**, on or about June 15, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 136, were the proceeds of an offense, did acquire or maintain an interest

in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 10**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2  
FELONY**

**ANALIZA DE PEDRO (002)**, on or between April 1, 2023 through October 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from AHCCCS, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 11**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 5, 2023, **ANALIZA DE PEDRO (002)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred R.R. and C.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 12**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or between April 1, 2023 through October 31, 2023, **MARIA ROSARIO ROXAS (003)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article

7 or title 36, chapter 29 (**To Wit: she paid monetary consideration, in exchange for the referral of patients, to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC.**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 an 13-801.

**COUNT 13**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**MARIA ROSARIO ROXAS (003)**, on or between April 1, 2023 through December 31, 2023, knowing or having reason to know that monetary funds provided to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC., were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 14**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2 FELONY**

**MARIA ROSARIO ROXAS (003)**, on or between April 1, 2023 through October 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from AHCCCS, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 15**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or between April 1, 2023 through October 31, 2023, **EMELINE TABUJARA (004)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: she paid monetary consideration, in exchange for the referral of patients, to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC.)**, in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 16**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**EMELINE TABUJARA (004)**, on or between April 1, 2023 through December 31, 2023, knowing or having reason to know that monetary funds provided to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC., were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 17**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2 FELONY**

**EMELINE TABUJARA (004)**, on or between April 1, 2023 through October 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at

\$100,000 or more from AHCCCS, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 18**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or between April 1, 2023 through October 31, 2023, **ANGELINA RENAE KEY (005)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she paid monetary consideration, in exchange for the referral of patients, to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC.**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 19**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ANGELINA RENAE KEY (005)**, on or between April 1, 2023 through December 31, 2023, knowing or having reason to know that monetary funds provided to Welcoming Behavioral Home LLC, Social Recovery, LLC., Brilliant Arrows, LLC., Destiny Empowers Residence, LLC., Sun Group, LLC., Angel Care Recovery LLC., Save the People, LLC., Gifted Homes, LLC., Power of Hope, LLC., Hope Fund Izere, LLC., and MJ Living, LLC., were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 20**

**FRAUDULENT SCHEMES AND ARTIFICES \$100000 OR MORE, A CLASS 2  
FELONY**

ANGELINA RENAE KEY (005), on or between April 1, 2023 through October 31, 2023, pursuant to scheme or artifice to defraud, knowingly did obtain a benefit valued at \$100,000 or more from AHCCCS, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2310(C), 13-701, 13-702, and 13-801.

**COUNT 21**

**CONSPIRACY, A CLASS 2 FELONY**

LEMUEL DE PEDRO (006), on or between April 1, 2023 through May 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with ANALIZA DE PEDRO (002), MARIA ROSARIO ROXAS (003), EMELINE TABUJARA (004), and ANGELINA RENAE KEY (005), that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. § 13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. § 13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 22-25 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 22**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about April 3, 2023, LEMUEL DE PEDRO (006), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual,

pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred E.S., L.K., D.K., and C.B. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

### **COUNT 23**

#### **PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 5, 2023, **LEMUEL DE PEDRO (006)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred R.R. and C.B. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

### **COUNT 24**

#### **MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**LEMUEL DE PEDRO (006)**, on or about June 15, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 136, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

### **COUNT 25**

#### **MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**LEMUEL DE PEDRO (006)**, on or about December 5, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1087, were the proceeds of an offense, did acquire or maintain an interest

in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 26**

**CONSPIRACY, A CLASS 2 FELONY**

**JULIUS MUGUMYA (007)**, on or between August 1, 2023 through September 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-231;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 27-30 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 27**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about August 9, 2023, **JULIUS MUGUMYA (007)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred G.K., M.D., H.B., M.R., C.C., and E.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 28**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about September 12, 2023, **JULIUS MUGUMYA (007)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred G.K., M.D., H.B., M.R., C.C., and E.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 29**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**JULIUS MUGUMYA (007)**, on or about September 25, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 210, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 30**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**JULIUS MUGUMYA (007)**, on or about November 7, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 405, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 31**

**CONSPIRACY, A CLASS 2 FELONY**

**JEAN B. NSABIMANA (008) and ANNET UWAMAHORO (009)**, on or between July 1, 2023 through July 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002), MARIA ROSARIO ROXAS (003), EMELINE TABUJARA (004), and ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 32-39 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 32**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 17, 2023, **JEAN B. NSABIMANA (008)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred T.R. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 33**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 25, 2023, **JEAN B. NSABIMANA (008)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred K.K. and T.R. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 34**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**JEAN B. NSABIMANA (008)**, on or about July 25, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 193, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 35**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**JEAN B. NSABIMANA (008)**, on or about November 4, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1075, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 36**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 17, 2023, **ANNET UWAMAHORO (009)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred T.R. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 37**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or between July 25, 2023, **ANNET UWAMAHORO (009)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred K.K. and T.R. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 38**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ANNET UWAMAHORO (009)**, on or about July 25, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 193, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 39**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

ANNET UWAMAHORO (009), on or about November 4, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1075, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 40**

**CONSPIRACY, A CLASS 2 FELONY**

YORDANOS YORI HADDIS (010) and ASMARA HADDIS (011), on or between May 1, 2023 through October 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree ANALIZA DE PEDRO (002), MARIA ROSARIO ROXAS (003), EMELINE TABUJARA (004), and ANGELINA RENAE KEY (005), that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 41-48 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 41**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about October 31, 2023, YORDANOS YORI HADDIS (010), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any

individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred D.A. and S.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 42**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 15, 2023, **YORDANOS YORI HADDIS (010)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred L.T., K.H., and M.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 43**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**YORDANOS YORI HADDIS (010)**, on or about June 9, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 195, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 44**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**YORDANOS YORI HADDIS (010)**, on or about November 10, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1049, were the proceeds of an offense, did acquire or maintain an interest

in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

#### **COUNT 45**

##### **PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 15, 2023, **ASMARA HADDIS (011)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred L.T., K.H., and M.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

#### **COUNT 46**

##### **PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about October 31, 2023, **ASMARA HADDIS (011)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: she referred D.A. and S.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

#### **COUNT 47**

##### **MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ASMARA HADDIS (011)**, on or about June 9, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 175, were the proceeds of an offense, did acquire or maintain an interest in,

transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 48**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ASMARA HADDIS (011)**, on or about November 10, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1049, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 49**

**CONSPIRACY, A CLASS 2 FELONY**

**SAMER AKRAM MOHAMMED AL KHAFAJI (012)**, on or between May 1, 2023 through July 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 50-53 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 50**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 7, 2023, **SAMER AKRAM MOHAMMED AL KHAFAJI (012)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred D.E., N.E., A.T., P.T., C.H., L.N., A.S., B.G., M.M., F. A., and T.S. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 51**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 27, 2023, **SAMER AKRAM MOHAMMED AL KHAFAJI (012)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred D.E., N.E., A.T., P.T., C.H., L.N., A.S., B.G., M.M., F. A., and T.S. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 52**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**SAMER AKRAM MOHAMMED AL KHAFAJI (012)**, on or about July 27, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 135, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the

existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 53**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**SAMER AKRAM MOHAMMED AL KHAFAJI (012)**, on or about October 24, 2023 knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 345, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 54**

**CONSPIRACY, A CLASS 2 FELONY**

**JOSUE D. ROSALES (013)**, on or between May 1, 2023 through June 30, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 55-58 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 55**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 30, 2023, **JOSUE D. ROSALES (013)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred C.B., R.O., and J.R.M. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 56**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 7, 2023, **JOSUE D. ROSALES (013)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred S.M., C.B., R.O., I.U., J.C., and J.R.M. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 57**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**JOSUE D. ROSALES (013)**, on or about August 21, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 129, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 58**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

JOSUE D. ROSALES (013), on or about November 7, 2023 knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1072, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 59**

**CONSPIRACY, A CLASS 2 FELONY**

██████████ (014), on or between May 31, 2023 through June 30, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with ANALIZA DE PEDRO (002), MARIA ROSARIO ROXAS (003), EMELINE TABUJARA (004), and ANGELINA RENAE KEY (005), that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 60-63 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 60**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 15, 2023, ██████████ (014), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related

services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred S.R., V.T., and T.B.H to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 an 13-801.

#### COUNT 61

##### PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY

On or about June 12, 2023, [REDACTED] (014), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred S.R., J.B.E., and J.L. to NewStart Integrated Health Clinic for monetary consideration**) , in violation of A.R.S. §§ 13-3713, 13-704, 13-702 an 13-801.

#### COUNT 62

##### MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

[REDACTED] (014), on or about June 6, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 103, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

#### COUNT 63

##### MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

[REDACTED] (014), on or about October 22, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1022, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 64**

**CONSPIRACY, A CLASS 2 FELONY**

**ABDULHAQ RAHIMI (015)**, on or between May 1, 2023 through June 30, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. § 13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. § 13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 65-68 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 65**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 18, 2023, **ABDULHAQ RAHIMI (015)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred G.T., S.C., N.C., and Q.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 66**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 6, 2023, **ABDULHAQ RAHIMI (015)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other

consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred G.T., S.C., N.C., and Q.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 67**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ABDULHAQ RAHIMI (015)**, on or about July 28, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 126, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 68**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**ABDULHAQ RAHIMI (015)**, on or about November 24, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1063, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 69**

**CONSPIRACY, A CLASS 2 FELONY**

**[REDACTED] (016)**, on or between June 1, 2023 through July 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. § 13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317; and

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 70-72 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

### COUNT 70

#### PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY

On or about May 5, 2023, [REDACTED] (016), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: she referred M.S., H.S., and M.L. to NewStart Integrated Health Clinic for monetary consideration)**, in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

### COUNT 71

#### PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY

On or about June 27, 2023, [REDACTED] (016), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: she referred M.S., C.B., N.H., D.J., M.L., and B.F. to NewStart Integrated Health Clinic for monetary consideration)**, in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 72**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

██████████ (016), on or about May 5, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 141, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 73**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

██████████ (016), on or about November 17, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1027, the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 74**

**CONSPIRACY, A CLASS 2 FELONY**

**IBRAHIM M. DARMAS (017)** and ██████████ (018), on or between May 1, 2023 through July 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EMELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-2317; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 75-82 of this Indictment which are

incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 75**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 19, 2023, **IBRAHIM M. DARMAS (017)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred T.M. D.D. A.H., L.M., I.J., and C.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 76**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 5, 2023, **IBRAHIM M. DARMAS (017)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred T.M. D.D. A.H., L.M., and I.J. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 77**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**IBRAHIM M. DARMAS (017)**, on or about July 26, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 122, were the proceeds of an offense, did acquire or maintain an interest

in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 78**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

**IBRAHIM M. DARMAS (017)**, on or about November 1, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1038, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 79**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about June 19, 2023, [REDACTED] (018), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred T.M., D.D., A.H., L.M., I.J., and C.M. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 80**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 5, 2023, [REDACTED] (018), knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit:**

he referred T.M., D.D., A.H., L.M., and I.J. to NewStart Integrated Health Clinic for monetary consideration), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 81**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

██████████ (018), on or about July 26, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 122, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 82**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

██████████ (018), on or about November 1, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1038, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 83**

**CONSPIRACY, A CLASS 2 FELONY**

**URLICH BUSOKOZA (019)**, on or between May 1, 2023 through July 31, 2023, defendants herein, with the intent to promote or aid the commission of an offense, did agree with **ANALIZA DE PEDRO (002)**, **MARIA ROSARIO ROXAS (003)**, **EVELINE TABUJARA (004)**, and **ANGELINA RENAE KEY (005)**, that at least one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) Consideration for Referral of Patient, in violation of A.R.S. §13-3713A1; and
- 2) Money Laundering, in violation of A.R.S. §13-2317;

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 84-87 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 84**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about May 22, 2023, **URLICH BUSOKOZA (019)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred V.R., H.M., and E.T. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 85**

**PATIENT/CLIENT REFERRAL FRAUD, A CLASS 3 FELONY**

On or about July 31, 2023, **URLICH BUSOKOZA (019)**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: he referred H.M., and Y.B. to NewStart Integrated Health Clinic for monetary consideration**), in violation of A.R.S. §§ 13-3713, 13-704, 13-702 and 13-801.

**COUNT 86**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

URLICH BUSOKOZA (019), on or about July 26, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 190, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

**COUNT 87**

**MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY**

URLICH BUSOKOZA (019), on or about November 21, 2023, knowing or having reason to know that monetary funds provided by NewStart Integrated Health Clinic, in Check Number 1047, were the proceeds of an offense, did acquire or maintain an interest in, transact, transfer, transport, receive, or conceal the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317(B)(1), 13-701, 13-702, and 13-801.

Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Ryan C. Dill  
RYAN C. DILL  
Assistant Attorney General

Dated: 6/8/26  
[Signature]  
Foreperson of the Grand Jury