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

STATE OF ARIZONA,

Plaintiff,

v.

Amanda Doyle (001)
DOB: [REDACTED]/1988
(Counts 1-26)

Mark Mannor (002)
DOB: [REDACTED] 1990
(Counts 27-34)

Darcia Rohrer (003)
DOB: [REDACTED]/1997
(Counts 35-38)

Matthew Solari (004)
DOB: [REDACTED]/1987
(Counts 39-41)

Gavin Robel (005)
DOB: [REDACTED]/1992
(Counts 42-44)

Case No:

81 SGJ 198

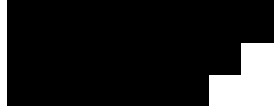

INDICTMENT


CHARGING VIOLATIONS OF:

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

COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 3: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301


Koryn Tinnell (007)
DOB: /1995
(Counts 50-52)

Jordan Waters (008)
DOB: /1996
(Counts 53-55)

Defendants.

COUNT 4: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 5: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 6: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 7: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 8: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 9: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 10: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 11: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 12: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 13: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 14: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 15: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 16: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 17: COMPUTER TAMPERING, a Class 3 Felony, in violation of A.R.S. §§13-2316(A)(1)

COUNT 18: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 19: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 20: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 21: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 22: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 23: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 24: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 25: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(1)

COUNT 26: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY, a Class 4 Felony, in violation of A.R.S. §13-2008

COUNT 27: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 28: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 29: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 30: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 31: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 32: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 33: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3), 13-301

COUNT 34: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3), 13-301

COUNT 35: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 36: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6), 13-301

COUNT 37: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 38: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3), 13-301

COUNT 39: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 40: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 41: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 42: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 43: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 44: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 45: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 46: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 47: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 48: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 49: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 50: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 51: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 52: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 53: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

COUNT 54: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 55: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

The Arizona State Grand Jury accuses **AMANDA DOYLE (001), MARK MANNOR (002), DARCIA ROHRER (003), MATTHEW SOLARI (004), GAVIN ROBEL (005), [REDACTED] [REDACTED] KORYN TINNELL (007), AND JORDAN WATERS (008)**, charging on this 25th day of September, 2017, that in or from Mohave County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

On or between October 22, 2015 and January 6, 2016, **AMANDA DOYLE (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES

On or between October 22, 2015 and January 6, 2016, **AMANDA DOYLE (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: money received for making unauthorized home visits) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 3: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about November 24, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/24/2015 by [REDACTED]), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 4: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 15, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/15/2015 by Mark Mannor), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 5: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 18, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/18/2015 by Darcia Rohrer), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 6: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 22, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/22/2015 by Jordan Waters), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 7: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 19, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/19/2015 by Gavin Robel), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 8: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 22, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/22/2015 by [REDACTED]), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 9: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 26, 2015, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 12/26/2015 by Koryn Tinnell), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 10: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about January 2, 2016, **AMANDA DOYLE (001)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets obtained on 01/02/2016 by Matthew Soleri), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301 and 13-811.

COUNT 11: COMPUTER TAMPERING

On or about November 22, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for ██████████), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 12: COMPUTER TAMPERING

On or about December 15, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for Mark Mannor), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 13: COMPUTER TAMPERING

On or about December 18, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises

(to wit: creating a fictitious patient profile for Jordan Waters), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 14: COMPUTER TAMPERING

On or about December 18, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for Darcia Rohrer), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 15: COMPUTER TAMPERING

On or about December 19, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for Gavin Robel), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 16: COMPUTER TAMPERING

On or about December 26, 2015, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for Koryn Tinnell), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 17: COMPUTER TAMPERING

On or about January 2, 2016, **AMANDA DOYLE (001)**, exceeding her authorized use, accessed any computer, computer system or network or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations, or promises (to wit: creating a fictitious patient profile for Matthew Soleri), in violation of A.R.S. §§13-2316, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 18: FORGERY

On or about November 20, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient [REDACTED]), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 19: FORGERY

On or about December 15, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Mark Mannor), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 20: FORGERY

On or about December 15, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Jordan Waters), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 21: FORGERY

On or about December 18, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Darcia Rohrer), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 22: FORGERY

On or about December 19, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Gavin Robel), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 23: FORGERY

On or about December 21, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone e made to fictitious patient [REDACTED]), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 24: FORGERY

On or about December 26, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Koryn Tinnell), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 25: FORGERY

On or about December 30, 2015, **AMANDA DOYLE (001)**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: an electronic prescription for Oxycodone made to fictitious patient Matthew Soleri), in violation of 13-2002(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

Count 26: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On or between November 20, 2015, and December 30, 2015, **AMANDA DOYLE**, knowingly took the identity of Doctor Paul Sutera by knowingly taking, possessing, or using the personal identifying information of Dr. Paul Sutera without his consent, with the intent to obtain or use his identity for an unlawful purpose (to wit: writing unauthorized prescriptions to fictitious patients that were electronically signed by Dr. Sutera), in violation of A.R.S. §§13-2008, 13-2001, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 27: FRAUDULENT SCHEMES AND ARTIFICES

On or about December 15, 2015, **MARK MANNOR (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: 30 Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 28: FRAUDULENT SCHEMES AND ARTIFICES

On or between December 18, 2015 and December 26, 2015, **MARK MANNOR (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: 20 Oxycodone tablets as payment for recruiting) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 29: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 15, 2015, **MARK MANNOR (002)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 30: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 22, 2015, **MARK MANNOR (002)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets picked up by Jordan Waters), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301, and 13-811.

COUNT 31: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 22, 2015, **MARK MANNOR (002)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets picked up by Koryn Tinnell), in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301, and 13-811.

COUNT 32: FORGERY

On or about December 15, 2015, **MARK MANNOR (002)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 33: FORGERY

On or about December 22, 2015, **MARK MANNOR (002)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets filled by Jordan Waters), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-301, and 13-804.

COUNT 34: FORGERY

On or about December 26, 2015, **MARK MANNOR (002)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets filled by Koryn Tinnell), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-301, and 13-804.

COUNT 35: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 18, 2015, **DARCIA ROHRER (003)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: fraudulent prescription for Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 36: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 26, 2015, **DARCIA ROHRER (003)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: fraudulent prescription for Oxycodone tablets filled by Koryn Tinnell) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, 13-301, and 13-811.

COUNT 37: FORGERY

On or about December 18, 2015, **DARCIA ROHRER (003)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit:

fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 38: FORGERY

On or about December 26, 2015, **DARCIA ROHRER (003)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets filled by Koryn Tinnell), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-301, and 13-804.

COUNT 39: FRAUDULENT SCHEMES AND ARTIFICES

On or between December 30, 2015 and January 2, 2016, **MATTHEW SOLARI (004)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 40: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about January 2, 2016, **MATTHEW SOLARI (004)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 41: FORGERY

On or about January 2, 2016, **MATTHEW SOLARI (004)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 42: FRAUDULENT SCHEMES AND ARTIFICES

On or between December 18, 2015 and December 19, 2015, **GAVIN ROBEL (005)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 43: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 19, 2015, **GAVIN ROBEL (005)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 44: FORGERY

On or about December 19, 2015, **GAVIN ROBEL (005)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 45: FRAUDULENT SCHEMES AND ARTIFICES

On or between November 20, 2015 and December 22, 2015, [REDACTED], pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 46: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about November 24, 2015, [REDACTED] knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone

tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 47: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 22, 2015, [REDACTED] knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 48: FORGERY

On or about November 24, 2015, [REDACTED] offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 49: FORGERY

On or about December 22, 2015, [REDACTED] offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 50: FRAUDULENT SCHEMES AND ARTIFICES

On or about December 26, 2015, **KORYN TINNELL (007)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: money as payment) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 51: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 26, 2015, **KORYN TINNELL (007)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 52: FORGERY

On or about December 26, 2015, **KORYN TINNELL (007)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 53: FRAUDULENT SCHEMES AND ARTIFICES

On or between December 18, 2015 and December 22, 2015, **JORDAN WATERS (008)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Oxycodone tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 54: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 26, 2015, **JORDAN WATERS (008)**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Oxycodone tablets) in violation of A.R.S. §§13-3408(A)(6), 13-3401, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 55: FORGERY

On or about December 26, 2015, **JORDAN WATERS (008)**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit:

fraudulent prescription for Oxycodone tablets), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

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

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

(A "True Bill")

Dated: _____

Jarred J. McBride
Assistant Attorney General

Foreperson of the State Grand Jury

#6168563