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

STATE OF ARIZONA,
Plaintiff,

v.

JAMISON FOSTER
DOB: 12/20/1976

Defendant.

Case No:

81 SGJ 197

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNT 2: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

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

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)

COUNT 5: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

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)

COUNT 7: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

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)

COUNT 9: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

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)

COUNT 11: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 12: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

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

COUNT 14: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 15: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 16: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 17: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 18: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 19: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 20: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 21: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 22: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 23: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 24: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 25: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 26: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 27: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 28: ACQUISITION OF A NARCOTIC DRUG BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3408, 13-3408(A)(6)

COUNT 29: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 30: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY, a Class 4 Felony, in violation of A.R.S. §13-2008

The Arizona State Grand Jury accuses **JAMISON FOSTER**, charging on this 25TH day of September, 2017, that in or from Maricopa County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

On or between June 4, 2016 and May 5, 2017, **JAMISON FOSTER**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Narcotic and Dangerous Drugs) 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: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about June 4, 2016, **JAMISON FOSTER**, knowingly obtained Hydrocodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 06/04/2016), 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 3: FORGERY

On or about June 4, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Hydrocodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 4: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about July 23, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 07/23/2016), 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 5: FORGERY

On or about July 23, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 6: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about August 18, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 08/16/2016), 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 7: FORGERY

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On or about ~~July 23, 2016~~, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 8: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about September 29, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 09/29/2016), 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 9: FORGERY

On or about September 29, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription

for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 10: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about October 23, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 10/23/2016), 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 11: FORGERY

On or about October 23, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 12: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about November 7, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 11/07/2016), 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 13: FORGERY

On or about November 7, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 14: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about December 2, 2016, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 12/02/2016), 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 15: FORGERY

On or about December 2, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 16: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about December 27, 2016, **JAMISON FOSTER**, knowingly obtained or procured the administration of Zolpidem, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled 12/27/2016), in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 17: FORGERY

On or about December 27, 2016, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Zolpidem), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 18: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about January 28, 2017, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled

on 01/28/2017), 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 19: FORGERY

On or about January 28, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 20: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about February 13, 2017, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 02/13/2017), 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 21: FORGERY

On or about February 13, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 22: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about March 2, 2017, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 03/02/2017), 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 23: FORGERY

On or about March 2, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 24: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about April 1, 2017, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 04/01/2017), 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 25: FORGERY

On or about April 1, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 26: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about April 11, 2017, **JAMISON FOSTER**, knowingly obtained or procured the administration of Zolpidem, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled 04/11/2017), in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 27: FORGERY

On or about April 11, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Zolpidem), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 28: ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about May 5, 2017, **JAMISON FOSTER**, knowingly obtained Oxycodone, a narcotic drug, by fraud, deceit, misrepresentation, or subterfuge (to wit: Fraudulent prescription filled on 05/07/2017), 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 29: FORGERY

On or about May 5, 2017, **JAMISON FOSTER**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Oxycodone), in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

Count 30: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

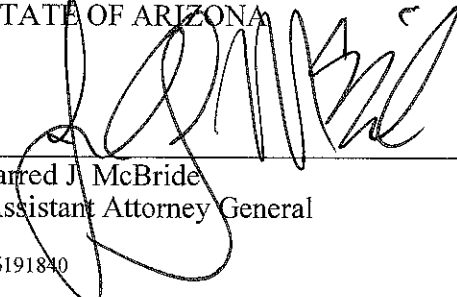
On or between June 4, 2016, and May 5, 2017, ~~KEVIN MICHAEL MCKEOWN~~ ^{JAMISON FOSTER}, knowingly took the identity of Doctor Caren Borjeson by knowingly taking, possessing, or using the personal identifying information of Dr. Caren Borjeson without ^{HER} ~~his~~ consent, with the intent to obtain or use ^{HER} ~~his~~ identity for an unlawful purpose (to wit: to acquire dangerous drugs), 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.

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

A TRUE BILL


(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA


Jarred J. McBride
Assistant Attorney General

#6191840

Dated: 9/25/2017


Foreperson of the State Grand Jury