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

STATE OF ARIZONA,

Plaintiff,

v.

ELIZABETH ANNE TRUSHEL,

Defendant.

Case No:

79 SGJ 189

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-2: FRAUDULENT
SCHEMES AND ARTIFICES, Class 2
Felonies, in violation of A.R.S. § 13-2310;**

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

**COUNTS 4-5: FORGERY, Class 4
Felonies, in violation of A.R.S. § 13-2002;**

**COUNT 6: TAKING IDENTITY OF
ANOTHER PERSON OR ENTITY, a
Class 4 Felony, in violation of A.R.S. § 13-
2008;**

**COUNTS 7-8: FRAUDULENT
SCHEMES AND PRACTICES, Class 5
Felonies, in violation of A.R.S. § 13-2311;**

COUNT 9: UNLAWFUL USE OF FOOD STAMPS, a Class 6 Felony, in violation of A.R.S. § 13-3701(A)(1);

COUNT 10: APPLICATION FRAUD, a Class 6 Felony, in violation of A.R.S. § 13-3713(B);

COUNT 11: THEFT, a Class 6 Felony, in Violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **ELIZABETH ANNE TRUSHEL**, charging on this 20th day of September, 2016, that in or from Coconino County, Arizona:

COUNT 1

FRAUDULENT SCHEMES & ARTIFICES

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, TO WIT: Medical benefits, 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

FRAUDULENT SCHEMES & ARTIFICES

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the ARIZONA DEPARTMENT OF ECONOMIC SECURITY, TO WIT: nutritional assistance benefits, 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 3

THEFT

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, without lawful authority, knowingly obtained services or property of the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, with a value of four thousand dollars (\$4,000) or more but less than twenty-five thousand (\$25,000), by means of any material misrepresentation with the intent to deprive the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM of such property or services, in violation of A.R.S. §§ 13-1801, 13-1802(A)(3), 13-701, 13-702, and 13-801.

COUNT 4

FORGERY

On or about August 19, 2013, **ELIZABETH ANNE TRUSHEL**, with intent to defraud, presented to the ARIZONA DEPARTMENT OF ECONOMIC SECURITY, a forged instrument or one that contains false information, TO WIT: a handwritten letter, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

COUNT 5

FORGERY

On or about September 4, 2013, **ELIZABETH ANNE TRUSHEL**, with intent to defraud, presented to the ARIZONA DEPARTMENT OF ECONOMIC SECURITY, a forged instrument or one that contains false information, TO WIT: a letter from the Department of Social Development and Housing, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

COUNT 6

TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On or about September 4, 2013, **ELIZABETH ANNE TRUSHEL**, knowingly took, manufactured, possessed or used any personal identifying information of

ELIZABETH PERLINES, TO WIT: her name and employment information, without the consent of ELIZABETH PERLINES, with the intent to obtain or use ELIZABETH PERLINES' identity for any unlawful purpose, in violation of A.R.S. §§13-2008, 13-2001, 13-701, 13-702 and 13-801.

COUNT 7

FRAUDULENT SCHEMES AND PRACTICES

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, in a matter related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement or entry, in violation of A.R.S. §§ 13-2301, 13-2311, 13-701, 13-702, and 13-801.

COUNT 8

FRAUDULENT SCHEMES AND PRACTICES

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, in a matter related to the business conducted by the ARIZONA DEPARTMENT OF ECONOMIC SERVICES, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement or entry, in violation of A.R.S. §§ 13-2301, 13-2311, 13-701, 13-702, and 13-801.

COUNT 9

UNLAWFUL USE OF FOOD STAMPS

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, knowingly used, transferred, acquired, possessed or redeemed food stamps

with a value over one hundred dollars (\$100) by means of a false statement or representation, a material omission or the failure to disclose a change in circumstances, by any other fraudulent device or in any other manner not authorized by law or by the department of economic security, in violation of A.R.S. §§ 13-3701(A)(1), 13-701, 13-702, and 13-801.

COUNT 10

APPLICATION FRAUD

On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, knowingly presented false information or misrepresented or concealed a material fact on an application for medical or health coverage pursuant to title 36, chapter 29 or knowingly failed to notify the county of residence of a change in conditions that, if notification had been made, would have resulted in termination of eligibility or change in eligibility status for medical or health coverage pursuant to title 36, chapter 29, in violation of A.R.S. §§ 13-3713(B), 13-701, 13-702, and 13-801.

COUNT 11

THEFT


On or between August of 2013 and January of 2015, **ELIZABETH ANNE TRUSHEL**, without lawful authority, knowingly obtained services or property of the ARIZONA DEPARTMENT OF ECONOMIC SECURITY, with a value of one thousand dollars (\$1,000) or more but less than two thousand (\$2,000), by means of any material misrepresentation with the intent to deprive the ARIZONA DEPARTMENT OF ECONOMIC SECURITY of such property or services, in violation of A.R.S. §§ 13-1801, 13-1802(A)(3), 13-701, 13-702, and 13-801.

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

True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9-20-2016



Scott W. Blake
Assistant Attorney General



Foreperson of the State Grand Jury

#5235169