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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.

**FRANK SALMAN (001),**

Defendant.

Case No:

**71 SGJ 111**

**INDICTMENT**

CHARGING VIOLATIONS OF:

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

**COUNT 2: THEFT**, a Class 2 Felony, in  
violation of A.R.S 13-1802;

**COUNTS 3, 4, and 5: FORGERY**, Class 4  
Felonies, in violation of A.R.S § 13-2002;

**COUNTS 6, 7, 8 and 9: PERJURY**, class 4  
felonies. in violation of A.R.S § 13-2702.

The Arizona State Grand Jury accuses, **FRANK SALMAN (001)**, charging on this 14<sup>th</sup>  
day of August, 2012, that in or from MARICOPA County, Arizona:

**COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES**

Between May 1, 2007 and March 31, 2012, Defendant **FRANK SALMAN (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the Arizona Health Care Cost Containment System (AHCCCS) by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§13-2310, 13-2301, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **FRANK SALMAN (001)**, misrepresented his income to the Arizona Department of Economic Security and received health insurance benefits, for himself, his spouse and children, through AHCCCS for which they were not entitled.

**COUNT 2: THEFT**

Between May 1, 2007 and March 31, 2012, Defendant **FRANK SALMAN (001)**, without lawful authority, knowingly obtained services or property from the Arizona Health Care Cost Containment System (AHCCCS), in excess of twenty-five thousand dollars (\$25,000), by means of any material misrepresentation with intent to deprive AHCCCS of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **FRANK SALMAN (001)** obtained AHCCCS health insurance coverage for himself, his spouse and his children by means of material misrepresentations.

**COUNT 3: FORGERY**

On or about January 21, 2011, Defendant **FRANK SALMAN (001)**, with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security a Verification of Employment History Form, a forged instrument or one that contained false information, 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: FORGERY**

On or about December 18, 2009, Defendant **FRANK SALMAN (001)**, with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security a letter from "NBMS" stating **FRANK SALMAN's** gross pay from NBMS was \$1,677.99, a forged instrument or one that contained false information, 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 5: FORGERY**

On or about December 10, 2008, Defendant **FRANK SALMAN (001)**, with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security an Assistance Application, a forged instrument or one that contained false information, 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: PERJURY**

On or about September 9, 2008, Defendant **FRANK SALMAN (001)**, made a false sworn statement in regard to a material issue, believing it to be false in violation of ARS §§ 13-2702, 13-2701, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **FRANK SALMAN (001)**, made false statements on an Arizona Department of Economic Security AHCCCS Health Insurance Form when he failed to report and/or falsely reported household income.

**COUNT 7: PERJURY**

On or about July 30, 2008, Defendant **FRANK SALMAN (001)**, made a false sworn statement in regard to a material issue, believing it to be false in violation of ARS §§ 13-2702, 13-2701, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **FRANK SALMAN (001)**, made false statements on an Arizona Department of Economic Security AHCCCS Health Insurance Form when he failed to report and/or falsely reported household income.

**COUNT 8: PERJURY**

On or about August 30, 2007, Defendant **FRANK SALMAN (001)**, made a false sworn statement in regard to a material issue, believing it to be false in violation of ARS §§ 13-2702, 13-2701, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **FRANK SALMAN (001)**, made false statements on an Arizona Department of Economic Security AHCCCS Health Insurance Form when he failed to report and/or falsely reported household income.

**COUNT 9: PERJURY**


On or about May 31, 2007, Defendant **FRANK SALMAN (001)**, made a false sworn statement in regard to a material issue, believing it to be false in violation of ARS §§ 13-2702, 13-2701, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

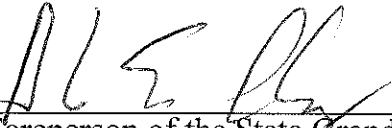
Said conduct occurred when **FRANK SALMAN (001)**, made false statements on an Arizona Department of Economic Security AHCCCS Health Insurance Form when he failed to report and/or falsely reported household income.

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")

THOMAS C. HORNE  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
\_\_\_\_\_  
BEVERLY J. RUDNICK  
Assistant Attorney General  
Document #2798884

Dated: 8-14-12  
  
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Foreperson of the State Grand Jury