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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.

**OLENA KULAKOVA (001), and
PAUL BALIKIAN (002),**
Defendants.

Case No: **64 SGJ 50**

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: CONSPIRACY, A CLASS 2
FELONY, IN VIOLATION OF A.R.S. §§
13-1003** (*Defendants 001 and 002*)

**COUNT 2: PARTICIPATING IN A
CRIMINAL SYNDICATE, A CLASS 2
FELONY, IN VIOLATION OF A.R.S. §
13-2308(A)(1)** (*Defendant 001*)

**COUNT 3: ASSISTING A CRIMINAL
SYNDICATE, A CLASS 4 FELONY, IN
VIOLATION OF A.R.S. § 13-2308(C)**
(*Defendant 002*)

**COUNT 4: FRAUDULENT SCHEMES
AND ARTIFICES, CLASS 2 FELONY, IN
VIOLATION OF A.R.S. § 13-2310**
(*Defendants 001 and 002*)

**COUNT 5: THEFT, CLASS 2 FELONY,
IN VIOLATION OF § 13-1802**
(*Defendants 001 and 002*)

COUNT 6: MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY, IN VIOLATION OF A.R.S. § 13-2317 (Defendants 001 and 002)

COUNT 7: ILLEGALLY CONDUCTING AN ENTERPRISE, A CLASS 3 FELONY, IN VIOLATION OF A.R.S. § 13-2312(B) (Defendants 001 and 002)

COUNTS 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 74, 76, 78, 80, 82, 84, 86, 88, 90, 92: FORGERY, CLASS 4 FELONY, IN VIOLATION OF A.R.S. § 13-2002 (Defendant 001)

COUNTS 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29, 31, 33, 35, 37, 39, 41, 43, 45, 47, 49, 51, 53, 55, 57, 59, 61, 63, 65, 67, 69, 71, 73: ILLEGAL ADMINISTRATION OF NARCOTIC DRUG, CLASS 4 FELONY, IN VIOLATION OF A.R.S. § 13-3408(A)(5) (Defendant 001)

COUNTS 75, 77, 79, 81, 83, 85, 87, 89, 91, 93: ILLEGAL ADMINISTRATION OF DANGEROUS DRUGS, CLASS 4 FELONY, IN VIOLATION OF A.R.S. § 13-3407(A)(5) (Defendant 001)

The Arizona State Grand Jury accuses **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, charging on this 14th day of January, 2009, that in Maricopa County, Arizona:

COUNT 1

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, 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 offense, in particular, Participating in a Criminal Syndicate, in

violation of A.R.S. § 13-2308; Money Laundering, in violation of A.R.S. § 13-2317; Illegally Conducting an Enterprise, in violation of A.R.S. § 13-2312; Assisting a Criminal Syndicate, in violation of A.R.S. § 13-2308; Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310; and Theft, in violation of A.R.S. § 13-1802.

In furtherance of this conspiracy and to effect the objectives thereof, defendants and co-conspirators did commit numerous overt acts, including but not limited to, the overt acts described in Counts 2 through 93 which are incorporated herein by reference as if set out in full, in violation of A.R.S. § 13-1003, 13-2308, 13-2310, 13-2312, 13-2317, 13-2319, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 2

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001)**, defendant, participated in a criminal syndicate, with the intent to promote or further the criminal objectives of the criminal syndicate, by intentionally organizing, managing, directing, supervising, or financing the criminal syndicate, and/or by furnishing advice or direction in the conduct, financing or management of the criminal syndicate, in violation of A.R.S. §§ 13-2308(A)(1) and/or (A)(3), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

COUNT 3

On or between May 1, 2006, through September 2007, **PAUL BALIKIAN (002)**, defendant, assisted a criminal syndicate by committing a felony offense or offenses, whether completed or preparatory, with the intent to promote or further the criminal objectives of the criminal syndicate, including but not limited to those offenses described in the other counts of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2308(C), 13-2312, 13-2317, 13-2319, 13-2301, 13-3417, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-811.

COUNT 4

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, defendants herein, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from AHCCCS/Medicaid by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§13-2310, 13-2301, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 5

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, defendants herein, knowingly obtained services or property, namely, funds from AHCCS/Medicaid, by means of material misrepresentation, of a value of \$25,000, or more, with intent to deprive AHCCS/Medicaid of such property or services, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 6

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, defendants herein, acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, in violation of A.R.S. §§ 13-2317, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 7

On or between May 1, 2006, through September 2007, **OLENA KULAKOVA (001) and PAUL BALIKIAN (002)**, defendants herein, were employed by or associated with an enterprise and knowingly conducted such enterprise's affairs through racketeering and/or knowingly participated directly or indirectly in the conduct of an enterprise that the defendant knew was being conducted through racketeering, in violation of A.R.S. §§13-

2312(B), 13-2301(D), 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, and 13-801.

COUNT 8

On or about June 1, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Patricia Tabloshi using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 9

On or about June 1, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Patricia Tabloshi using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 10

On or about June 1, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Mari Roberts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 11

On or about June 1, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Mari Roberts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 12

On or about June 2, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Michael

Monroe using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 13

On or about June 2, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Michael Monroe using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 14

On or about June 8, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Leena Yonan using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 15

On or about June 8, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Leena Yonan using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 16

On or about June 8, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 17

On or about June 8, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Jennifer Gilliland using the name

and prescription pad of Dr. Paul Balikian, in violation of A.R.S. 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 18

On or about June 20, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Tylenol for Danielle Verdoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 19

On or about June 20, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Tylenol for Danielle Verdoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 20

On or about June 26, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Joanne Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 21

On or about June 26, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Joanne Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 22

On or about June 29, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Maria

Garcia using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 23

On or about June 29, 2006, **OLENA KULAKOVA (001)** (001 knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Maria Garcia using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 24

On or about July 5, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Armondo Lopez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 25

On or about July 5, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Armondo Lopez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 26

On or about July 5, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Francisco Espinoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 27

On or about July 5, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Vicodin for Francisco Espinoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 28

On or about July 10, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Edward Wilkins using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 29

On or about July 10, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Edward Wilkins using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 30

On or about July 11, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Danielle Verdoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 31

On or about July 11, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Danielle Verdoza using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 32

On or about July 19, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Joni

Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 33

On or about July 19, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Joni Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 34

On or about July 24, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Deborah Lettier using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 35

On or about July 24, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Deborah Lettier using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 36

On or about July 25, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Darvocet for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 37

On or about July 25, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Darvocet for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 38

On or about August 10, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Carnell Jackson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 39

On or about August 10, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Carnell Jackson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 40

On or about August 11, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Joy Jackson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 41

On or about August 11, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Joy Jackson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 42

On or about August 14, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Lawrence

Gutierrez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 43

On or about August 14, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Lawrence Gutierrez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 44

On or about August 17, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Tawny Mott using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 45

On or about August 17, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Tawny Mott using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 46

On or about August 23, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Tylenol for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 47

On or about August 23, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Tylenol for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 48

On or about August 23, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Tylenol for Raul Bonilla using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 49

On or about August 23, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Tylenol for Raul Bonilla using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 50

On or about August 24, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Paul Smothers using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 51

On or about August 24, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Paul Smothers using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 52

On or about September 1, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Prometh for M.

Moore using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 53

On or about September 1, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Prometh for M. Moore using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 54

On or about September 5, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Edward Wilkins using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 55

On or about September 5, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Edward Wilkins using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 56

On or about September 5, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Kenneth Coutts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 57

On or about September 5, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Vicodin for Kenneth Coutts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 58

On or about September 14, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Lawrence Gutierrez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 59

On or about September 14, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Lawrence Gutierrez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 60

On or about September 14, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Joni Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 61

On or about September 14, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Joni Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 62

On or about September 18, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for

Joni Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 63

On or about September 18, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Joni Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 64

On or about September 19, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Percocet for Arturo Griego using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 65

On or about September 19, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Percocet for Arturo Griego using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 66

On or about October 2, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Kenneth Coutts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 67

On or about October 2, 2006, **OLENA KULAKOVA (001) (001)** knowingly obtained or procured the administration of a narcotic drug by fraud, deceit,

misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Kenneth Coutts using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 68

On or about October 13, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Dana Vlad using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 69

On or about October 13, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Dana Vlad using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 70

On or about January 23, 2007, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 71

On or about January 23, 2007, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Jennifer Gilliland using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 72

On or about February 2, 2007, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Vicodin for Olena

Kulakova (001) using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 73

On or about February 2, 2007, **OLENA KULAKOVA (001)** knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Vicodin for Olena Kulakova (001) using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 74

On or about May 19, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Xanax for Elizabeth Johnson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 75

On or about May 19, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Xanax for Elizabeth Johnson using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 76

On or about June 5, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Clonazepam for W. Chong Bertmeyer using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 77

On or about June 5, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Clonazepam for W. Chong Bertmeyer using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 78

On or about June 16, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Restoril for Raul Bonilla using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 79

On or about June 16, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Restoril for Raul Bonilla using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 80

On or about June 22, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Sonata for Edgar Rodriquez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 81

On or about June 22, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Sonata for Edgar Rodriquez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 82

On or about June 26, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Soma for Joanie Bentley

using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 83

On or about June 26, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Soma for Joanie Bentley using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 84

On or about August 24, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Soma for Paul Smothers using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 85

On or about August 24, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Soma for Paul Smothers using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 86

On or about October 2, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Klonopin for Joel Hunter using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 87

On or about October 2, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or

subterfuge, namely: to wit, a prescription of Klonopin for Joel Hunter using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 88

On or about October 2, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Klonopin for John Mottos using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 89

On or about October 2, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Klonopin for John Mottos using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 90

On or about October 13, 2006, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Restoril for Belinda Enriquez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 91

On or about October 13, 2006, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Restoril for Belinda Enriquez using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 92

On or about January 18, 2007, **OLENA KULAKOVA (001)**, with intent to defraud, knowingly possessed a forged instrument: to wit, a prescription of Klonopin for Patricia

Tabloshi using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 93

On or about January 18, 2007, **OLENA KULAKOVA (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge, namely: to wit, a prescription of Klonopin for Patricia Tabloshi using the name and prescription pad of Dr. Paul Balikian, in violation of A.R.S. §§ 13-3408, 13-3401, 13-701, 13-702, 13-702.01 and 13-801.

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

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

("A True Bill")
Date: January 15, 2009

PHILIP D. GARROW
ASSISTANT ATTORNEY GENERAL

FOREPERSON OF GRAND JURY

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