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

STATE OF ARIZONA,

Plaintiff,

v.

MEGAN MONROE RACZ (001),

Defendant.

Case No:

71 SGJ 58

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 through 8: AGGRAVATED IDENTITY THEFT, Class 3 Felonies, in violation of A.R.S. § 13-2009;

COUNTS 9 and 10: IDENTITY THEFT, Class 4 Felonies, in violation of A.R.S. § 13-2008;

COUNTS 11 through 14: FORGERY, Class 4 Felonies, in violation of A.R.S § 13-2002.

The Arizona State Grand Jury accuses Defendant **MEGAN MONROE RACZ** charging on this 11th day of July, 2012 that in or from PIMA County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

Beginning on or about November 30, 2011 and ending on or about January 26, 2012, Defendant **MEGAN MONROE RACZ**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from United Health Care 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.

This conduct occurred when **MEGAN MONROE RACZ**, acting in her capacity as an insurance agent, changed multiple Medicare recipients' supplemental health insurance policies from Health Net to United Healthcare without the policyholders' consent. **MEGAN MONROE RACZ** unlawfully obtained from United Healthcare commissions for the fraudulently submitted policies.

COUNT 2: THEFT

Beginning on or about November 30, 2011 and ending on or about January 26, 2012, Defendant **MEGAN MONROE RACZ**, without lawful authority, knowingly obtained services or property from United Healthcare, in excess of twenty-five thousand dollars (\$25,000), by means of any material misrepresentation with intent to deprive United Healthcare 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 **MEGAN MONROE RACZ** obtained funds she was not entitled to, in excess of twenty-five thousand dollars (\$25,000), from United Healthcare, by means of material misrepresentations.

COUNT 3: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about November 30, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Beatrice Ard's, Flora E. Gerber's, Frederick E. Gerber's, and Mary L. Stevens' names, dates of birth, and Medicare policy numbers, without their consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 4: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about December 1, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Roosevelt Ard's, Rose Lee's, and Polly A. Mecom's names, dates of birth, and Medicare policy numbers, without their

consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 5: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about December 4, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Robert B. Birchfield's, Marlene T. Fineberg's, Judith Hendrickson's, Richard A. Hendrickson's, and Judith B. Parker's names, dates of birth, and Medicare policy numbers, without their consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 6: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about December 5, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic

loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Frank Q. Diochea's, Richard Gaver's, Earline M. Hardesty's, James A. McDevitt's, Genevieve M. Palomino's, Harriet S. Rosenberg's, and Barbara A. Tyburski's names, dates of birth, and Medicare policy numbers, without their consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 7: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about December 6, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Roberta J. Bottens', Mary S. Langham's, William W. Langham's, Beverly G. Pattengale's, Jerry E. Smith's, and Myrna D. Smith's names, dates of birth, and Medicare policy numbers, without their consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 8: AGGRAVATED TAKING IDENTITY OF ANOTHER PERSON

On or about December 7, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of three or more persons or entities, including real or fictitious persons or entities, without the consent of the other persons or entities, with the intent to obtain or use the other persons' or entities' identities for any unlawful purpose or to cause loss to the persons or entities whether or not the persons or entities actually suffered any economic loss, in violation of A.R.S. §§ 13-2009(A)(1), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Dorothea T. Heron's, Carolyn W. Knott's, Sylvia S. McMullen's, Judith A. Nied's, Jane Rasa's, and Beverly A. Rogers' names, dates of birth, and Medicare policy numbers, without their consent or knowledge, to submit applications for United Healthcare health insurance policies in order to obtain commissions to which **MEGAN MONROE RACZ** was not entitled.

COUNT 9: TAKING THE IDENTITY OF ANOTHER PERSON

On or about December 2, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person without their consent, with the intent to obtain or use the other person's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffered any economic loss, in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used Douglas S. Ham's, name, date of birth, and Medicare policy number, without his consent or knowledge, to submit an application for a United Healthcare health insurance policy in order to obtain a commission to which **MEGAN MONROE RACZ** was not entitled.

COUNT 10: TAKING THE IDENTITY OF ANOTHER PERSON

On or about December 2, 2011, Defendant **MEGAN MONROE RACZ**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of another person without their consent, with the intent to obtain or use the other person's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffered any economic loss, in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MEGAN MONROE RACZ** used James F. Hardesty's name, date of birth, and Medicare policy number, without his consent or knowledge, to submit an application for a United Healthcare health insurance policy in order to obtain a commission to which **MEGAN MONROE RACZ** was not entitled.

COUNT 11: FORGERY

On or about November 30, 2011, Defendant **MEGAN MONROE RACZ** with intent to defraud, offered or presented, whether accepted or not, to United Healthcare an application for health insurance for Steven Volgyes, 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 12: FORGERY

On or about December 5, 2011, Defendant **MEGAN MONROE RACZ** with intent to defraud, offered or presented, whether accepted or not, to United Healthcare an application for health insurance for Neva J. Rasmussens, 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 13: FORGERY

On or about December 2, 2011, Defendant **MEGAN MONROE RACZ** with intent to defraud, offered or presented, whether accepted or not, to United Healthcare an application for health insurance for William V. Cameron, 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 14: FORGERY

On or about December 2, 2011, Defendant **MEGAN MONROE RACZ** with intent to defraud, offered or presented, whether accepted or not, to United Healthcare an application for health insurance for Delores Louise Bryce, 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.


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

A "True Bill"
(A "True Bill")

THOMAS C. HORNE
ATTORNEY GENERAL
STATE OF ARIZONA



BEVERLY J. RUDNICK
Assistant Attorney General
#2702411

Dated: 7-11-12


Foreperson of the State Grand Jury