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

STATE OF ARIZONA,

Plaintiff,

 \mathbf{v}

PAMELA YVETTE O'GUINN a.k.a PAMELA YVETTE ROBINSON a.k.a. PAMELA O'GUINN ROBINSON (001),

Defendant

Case No CR2021-110305-001DT

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INDICTMENT

CHARGING VIOLATIONS OF

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

COUNT 2: PERJURY, a Class 4 Felony, in violation of A R S §13-2702

COUNTS 3, 5, 13, and 21: SALE OR TRANSFER OF NARCOTIC DRUG, Class 2 Felonies, in violation of A R S §13-3408(A)(7)

COUNTS 7, 9, 11, 15, 17, 19, 23, 25, 27, 29, 31, and 33: SALE OR TRANSFER OF DANGEROUS DRUG, Class 2 Felonies, in violation of A R S §13-3407(A)(7)

COUNTS 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, and 34: TAKING THE IDENTITY OF ANOTHER, Class 4 Felonies, in violation of A R S §13-2008

COUNTS 35 and 36: FORGERY, Class 4 Felonies, in violation of A R S §13-2002(A)(3)

The Arizona State Grand Jury accuses PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON charging on this 24th day of March, 2021 that in or from Maricopa County, Arizona

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between May 27, 2020 and February 18, 2021, pursuant to a scheme or artifice to defraud, PAMELA YVETTE O'GUINN, A K.A. PAMELA YVETTE ROBINSON, A.K.A PAMELA O'GUINN ROBINSON, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A R S §§ 13-2310, 13-303, 13-701, 13-702 and 13-801

COUNT 2

PERJURY

On or about December 4, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, in regard to a material issue, and believing it to be false, made a false sworn statement, to-wit "I am a doctorate level nurse practitioner and a clinical psychologist", in violation of A R S §§ 13-2702, 13-701, 13-702 and 13-801

COUNT 3

SALE OR TRANSFER OF NARCOTIC DRUG

On or about August 3, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold,

transferred, offered to sell or transfer a narcotic drug (to wit Hydrocodone), in violation of ARS §§ 13-3408(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 4

TAKING IDENTITY OF ANOTHER

On or about August 3, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-701, 13-702 and 13-801

COUNT 5

SALE OR TRANSFER OF NARCOTIC DRUG

On or about August 31, 2020, PAMELA YVETTE O'GUINN, A.K.A PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a narcotic drug (to wit Hydrocodone), in violation of ARS §§ 13-3408(A)(7), 13-3401, 13-701, 13-702 and 13-801

/ / /

TAKING IDENTITY OF ANOTHER

On or about August 31, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of ΛRS §§ 13-2008, 13-2001, 13-701, 13-702 and 13-801

COUNT 7

SALE OR TRANSFER OF DANGEROUS DRUG

On or about October 8, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Diazepam), in violation of ARS §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 8

TAKING IDENTITY OF ANOTHER

On or about October 8, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of

the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of ARS §§ 13-2008, 13-2001, 13-701, 13-702 and 13-801

COUNT 9

SALE OR TRANSFER OF DANGEROUS DRUG

On or about October 11, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of ARS §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 10

TAKING IDENTITY OF ANOTHER

On or about October 11, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of ARS §§ 13-2008, 13-2001, 13-701, 13-702 and 13-801

SALE OR TRANSFER OF DANGEROUS DRUG

On or about October 21, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 12

TAKING IDENTITY OF ANOTHER

On or about October 21, 2020, PAMELA YVETTE O'GUINN, A K.A PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 2022644), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 13

SALE OR TRANSFER OF NARCOTIC DRUG

On or about October 21, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold,

transferred, or offered to sell or transfer a narcotic drug (to wit Hydrocodone), in violation of ARS §§ 13-3408(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 14

TAKING IDENTITY OF ANOTHER

On or about October 21, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 2022645), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of ARS §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 15

SALE OR TRANSFER OF DANGEROUS DRUG

On or about November 11, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Modafinil), in violation of ARS §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

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TAKING IDENTITY OF ANOTHER

On or about November 11, 2020, PAMELA YVETTE O'GUINN, A.K.A PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 17

SALE OR TRANSFER OF DANGEROUS DRUG

On or about November 18, 2020, PAMELA YVETTE O'GUINN, A.K.A PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 18

TAKING IDENTITY OF ANOTHER

On or about November 18, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of

the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of ARS §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 19

SALE OR TRANSFER OF DANGEROUS DRUG

On or about December 2, 2020, PAMELA YVETTE O'GUINN, A.K.A PAMELA YVETTE ROBINSON, A.K.A PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of ARS §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 20

TAKING IDENTITY OF ANOTHER

On or about December 2, 2020, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

SALE OR TRANSFER OF NARCOTIC DRUG

On or about December 19, 2020, PAMELA YVETTE O'GUINN, A K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a narcotic drug (to wit Hydrocodone), in violation of A R S §§ 13-3408(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 22

TAKING IDENTITY OF ANOTHER

On or about December 19, 2020, PAMELA YVETTE O'GUINN, A K A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 23

SALE OR TRANSFER OF DANGEROUS DRUG

On or about January 4, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold,

transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 24

TAKING IDENTITY OF ANOTHER

On or about January 4, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 25

SALE OR TRANSFER OF DANGEROUS DRUG

On or between January 23, 2021 and January 26, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine in relation to prescription number 1438618), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

TAKING IDENTITY OF ANOTHER

On or between January 23, 2021 and January 26, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 1438618), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 27

SALE OR TRANSFER OF DANGEROUS DRUG

On or about January 23, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine in relation to prescription number 1438612), in violation of A.R.S. §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 28

TAKING IDENTITY OF ANOTHER

On or about January 23, 2021, PAMELA YVETTE O'GUINN, A K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took,

purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 1438612), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 29

SALE OR TRANSFER OF DANGEROUS DRUG

On or about February 10, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Zolpidem), in violation of ARS §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 30

TAKING IDENTITY OF ANOTHER

On or about February 10, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 4020811), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a

result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 31

SALE OR TRANSFER OF DANGEROUS DRUG

On or about February 10, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Diazepam), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 32

TAKING IDENTITY OF ANOTHER

On or about February 10, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP in relation to prescription number 4020812), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A R S §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

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SALE OR TRANSFER OF DANGEROUS DRUG

On or between February 18, 2021 and February 19, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly sold, transferred, or offered to sell or transfer a dangerous drug (to wit Amphetamine), in violation of A R S §§ 13-3407(A)(7), 13-3401, 13-701, 13-702 and 13-801

COUNT 34

TAKING IDENTITY OF ANOTHER

On or between February 18, 2021 and February 19, 2021, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of the victim (Pamela Robinson NP), without her consent, with the intent to obtain or use her identity for any unlawful purpose or to cause loss to a person or entity, whether or not that person or entity actually suffered any economic loss as a result of the offense, in violation of A.R.S. §§ 13-2008, 13-2001, 13-303, 13-701, 13-702 and 13-801

COUNT 35

FORGERY

On or about May 27, 2020, with the intent to defraud, PAMELA YVETTE O'GUINN, A.K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, offered or presented, whether accepted or not, a forged instrument or one that contains false

information (to wit Arizona Health Care Cost Containment System Provider Enrollment Form), in violation of A R S §§ 13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801

COUNT 36

FORGERY

On or about May 27, 2020, with the intent to defraud, PAMELA YVETTE O'GUINN, A K.A. PAMELA YVETTE ROBINSON, A.K.A. PAMELA O'GUINN ROBINSON, offered or presented, whether accepted or not, a forged instrument or one that contains false information (to wit 90 Day Emergency Waiver by Endorsement APRN), in violation of A R S §§ 13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801

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

(A "True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

Dated /\3/a4/2021

MATTHEW WILLIAMS
Assistant Attorney General

Foreperson of the State Grand Jury

#9383088