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Attorneys for Plaintiff

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

STATE OF ARIZONA,  
Plaintiff,

v.

**VESTINE MUKARUKUNDO (001),**  
*(Counts 1-3)*

**NASIBU BAUNI (002),**  
*(Counts 1, 2 & 4)*

**PIERRETTE KAGAME (003),**  
*(Counts 1, 2 & 5)*

**JEAN BOSCO NSABIMANA (004),**  
*(Counts 1, 2 & 6)*

**IMMACULATE NUTESI (005),**  
*(Counts 1, 2 & 7)*

**ESPOIR MUHUMURE NZABAKIZA  
(006),**  
*(Counts 1, 2 & 8)*

**WILLY RUTAYSIRE (007),**  
*(Counts 1, 2 & 9)*

**JOSE MIGUEL SATURNINO-  
CORRALES (008),**

Case No: **CR2023-152286-001 DT**  
**CR2023-152286-002 DT**  
**CR2023-152286-003 DT**  
**CR2023-152286-004 DT**  
**CR2023-152286-005 DT**  
**CR2023-152286-006 DT**  
**CR2023-152286-007 DT**  
**CR2023-152286-008 DT**  
**CR2023-152286-009 DT**  
**CR2023-152286-010 DT**  
**CR2023-152286-011 DT**  
**CR2023-152286-012 DT**  
**CR2023-152286-013 DT**  
**CR2023-152286-014 DT**  
**CR2023-152286-015 DT**  
**CR2023-152286-016 DT**  
**CR2023-152286-017 DT**  
**CR2023-152286-018 DT**  
**CR2023-152286-019 DT**  
**CR2023-152286-020 DT**  
**CR2023-152286-021 DT**

**93 SGJ 103**

**INDICTMENT**

(Counts 1, 2 & 10)

**JULIENNE SWAKA (009),**

(Counts 1, 2 & 11)

**ANGELA DAUZ TURGANO (010),**

(Counts 1, 2 & 12)

[REDACTED] (011),

(Count 13)

[REDACTED] (012),

(Count 14)

[REDACTED] (013),

(Count 15)

[REDACTED] (014),

(Count 16)

[REDACTED] (015),

(Count 17)

[REDACTED] (016),

(Count 18)

[REDACTED] (017),

(Count 19)

[REDACTED] (018),

(Count 20)

[REDACTED] (019),

(Count 21)

[REDACTED] (020),

(Count 22)

[REDACTED] (021),

(Count 23)

Defendants.

CHARGING VIOLATIONS OF:

**COUNT 1: ILLEGAL CONTROL OF ENTERPRISE**, a Class 2 Felony, in violation of A.R.S. §13-2312

**COUNT 2: CONSPIRACY**, a Class 3 Felony, in violation of A.R.S. §13-1003

**COUNTS 3-18: CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**, a Class 3 Felony in violation of A.R.S. § 13-3713

**COUNTS 19-23: SOLICITATION TO COMMIT CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**, a Class 5 Felony in violation of A.R.S. § 13-1002; 13-3713

The Arizona State Grand Jury accuses **VESTINE MUKARUKUNDO, NASIBU BAUNI, PIERRETTE KAGAME, JEAN BOSCO NSABIMANA, IMMACULATE**

NUTESI, ESPOIR MUHUMURE NZABAKIZA, WILLY RUTAYSIRE, JOSE MIGUEL SATURNINO-CORRALES, JULIENNE SWAKA, ANGELA DAUZ TURGANO, [REDACTED]

charging on this 27<sup>th</sup> day of November, 2023 that in or from Maricopa County, Arizona:

COUNT 1

ILLEGAL CONTROL OF ENTERPRISE

From on or about November 6, 2023 and continuing through on or about November 16, 2023, VESTINE MUKARUKUNDO, NASIBU BAUNI, PIERRETTE KAGAME, JEAN BOSCO NSABIMANA, IMMACULATE NUTESI, ESPOIR MUHUMURE NZABAKIZA, WILLY RUTAYSIRE, JOSE MIGUEL SATURNINO-CORRALES, JULIENNE SWAKA, and ANGELA DAUZ TURGANO, through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise was a group of persons associated in fact, including but not limited to VESTINE MUKARUKUNDO, NASIBU BAUNI, PIERRETTE KAGAME, JEAN BOSCO NSABIMANA, IMMACULATE NUTESI, ESPOIR MUHUMURE NZABAKIZA, WILLY RUTAYSIRE, JOSE MIGUEL SATURNINO-CORRALES, JULIENNE SWAKA, and ANGELA DAUZ TURGANO, and others KNOWN and/or UNKNOWN.

The racketeering includes:

- **A Scheme or Artifice to Defraud**, in violation of A.R.S. §§ 13-2310, 13-2301(D)(4)(b)(xx) (To Wit: Provided patients who were members and/or beneficiaries of the American Indian Health Plan (AIHP) which is administered by the Arizona Health Care Cost Containment System (AHCCCS) to a third party proxy for the purpose of billing AHCCCS

**for services purportedly rendered, in return for a portion of the proceeds derived);**

- **Money Laundering In The Second Degree**, in violation of A.R.S. §§13-2317, 13-2301(D)(4)(b)(xxvi);

in violation of A.R.S. §§ 13-2312(A), 13-2301, 13-2310, 13-2317, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

**COUNT 2**  
**CONSPIRACY**

From on or about October 30, 2023 and continuing through on or about November 16, 2023, **VESTINE MUKARUKUNDO, NASIBU BAUNI, PIERRETTE KAGAME, JEAN BOSCO NSABIMANA, IMMACULATE NUTESI, ESPOIR MUHUMURE NZABAKIZA, WILLY RUTAYSIRE, JOSE MIGUEL SATURNINO-CORRALES, JULIENNE SWAKA, ANGELA DAUZ TURGANO, and [REDACTED]**, with the intent to promote or aid the commission of an offense, did agree with one or more persons that at least one of them or another person would engage in conduct constituting the offenses of:

- 1) **CONSIDERATION FOR REFERRAL OF A PATIENT**, in violation of A.R.S. §13- 3713;

In furtherance of this conspiracy and to affect the objects thereof, **VESTINE MUKARUKUNDO, NASIBU BAUNI, PIERRETTE KAGAME, JEAN BOSCO NSABIMANA, IMMACULATE NUTESI, ESPOIR MUHUMURE NZABAKIZA, WILLY RUTAYSIRE, JOSE MIGUEL SATURNINO-CORRALES, JULIENNE SWAKA, ANGELA DAUZ TURGANO, and [REDACTED]** along with others not named, committed numerous overt acts including, but not limited to, those acts set forth in Counts 3-12; 18 of this Indictment, which are incorporated herein by reference as if set out in full, in violation of A.R.S. §§ 13-1003, 13-3713, 13-701, 13-702 and 13-801.

COUNT 3

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **VESTINE MUKARUKUNDO**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 4

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **NASIBU BAUNI**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 5

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **PIERRETTE KAGAME**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 6

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **JEAN BOSCO NSABIMANA**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) in return for a sum of monies**), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 7

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **IMMACULATE NUTESI**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other

consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

#### COUNT 8

##### CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **ESPOIR MUHUMURE NZABAKIZA**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

#### COUNT 9

##### CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 16, 2023, **WILLY RUTAYSIRE**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related

services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

**COUNT 10**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

On or about November 16, 2023, **JOSE MIGUEL SATURNINO-CORRALES**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

**COUNT 11**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

On or about November 16, 2023, **JULIENNE SWAKA**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian**



**Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.**

**COUNT 12**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

On or about November 16, 2023, **ANGELA DAUZ TURGANO**, knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.**

**COUNT 13**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

Between November 7, 2023 and November 16, 2023, [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to**

a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

**COUNT 14**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

Between November 9, 2023 and November 16, 2023, [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

**COUNT 15**

**CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

Between November 13, 2023 and November 16, 2023, [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 16

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

Between November 13, 2023 and November 16, 2023, [REDACTED], [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 17

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

Between November 15, 2023 and November 16, 2023, [REDACTED], [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 **(To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more)**, in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 18

CONSIDERATION FOR REFERRAL OF PATIENT, CLIENT OR CUSTOMER

Between October 30, 2023 and November 7, 2023, [REDACTED], knowingly offered, delivered, received, or accepted any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-3713, 13-701, 13-702 and 13-801.

COUNT 19

SOLICITATION TO COMMIT CONSIDERATION FOR  
REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 7, 2023, [REDACTED], with intent to promote or facilitate the commission of an offense, **To Wit: Consideration for Referral of patient, client or customer, a Class 3 Felony**, solicited another to engage in specific conduct which would constitute the commission of the offense by knowingly offering, delivering, receiving, or accepting any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a**

value of one thousand dollars or more), in violation of A.R.S. §§ 13-1002, 13-3713, 13-701, 13-702 and 13-801.

**COUNT 20**

**SOLICITATION TO COMMIT CONSIDERATION FOR  
REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

On or about November 7, 2023, [REDACTED], with intent to promote or facilitate the commission of an offense, **To Wit: Consideration for Referral of patient, client or customer, a Class 3 Felony**, solicited another to engage in specific conduct which would constitute the commission of the offense by knowingly offering, delivering, receiving, or accepting any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-1002, 13-3713, 13-701, 13-702 and 13-801.

**COUNT 21**

**SOLICITATION TO COMMIT CONSIDERATION FOR  
REFERRAL OF PATIENT, CLIENT OR CUSTOMER**

On or about November 13, 2023, [REDACTED], with intent to promote or facilitate the commission of an offense, **To Wit: Consideration for Referral of patient, client or customer, a Class 3 Felony**, solicited another to engage in specific conduct which would constitute the commission of the offense by knowingly offering, delivering, receiving, or accepting any rebate, refund commission, preference, or other consideration

as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-1002, 13-3713, 13-701, 13-702 and 13-801.

COUNT 22

SOLICITATION TO COMMIT CONSIDERATION FOR  
REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 13, 2023, [REDACTED], with intent to promote or facilitate the commission of an offense, **To Wit: Consideration for Referral of patient, client or customer, a Class 3 Felony**, solicited another to engage in specific conduct which would constitute the commission of the offense by knowingly offering, delivering, receiving, or accepting any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-1002, 13-3713, 13-701, 13-702 and 13-801.

COUNT 23

SOLICITATION TO COMMIT CONSIDERATION FOR  
REFERRAL OF PATIENT, CLIENT OR CUSTOMER

On or about November 13, 2023, [REDACTED], with intent to promote or facilitate the commission of an offense, **To Wit: Consideration for Referral of patient, client or customer, a Class 3 Felony**, solicited another to engage in specific conduct which would constitute the commission of the offense by knowingly offering, delivering, receiving, or accepting any rebate, refund commission, preference, or other consideration as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services or items pursuant to title 11, chapter 2, article 7 or title 36, chapter 29 (**To Wit: Referred patients that were members and/or beneficiaries of the American Indian Health Plan (AIHP) administered by the Arizona Health Care Cost Containment System (AHCCCS) to a clinic or health care institution in return for a sum of monies with a value of one thousand dollars or more**), in violation of A.R.S. §§ 13-1002, 13-3713, 13-701, 13-702 and 13-801.

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

True Bill  
(A "True Bill")

KRISTIN K. MAYES  
ATTORNEY GENERAL  
STATE OF ARIZONA

Vineet M. Shaw  
VINEET MEHTA SHAW  
Assistant Attorney General  
#11694906

Dated: 11/27/23  
[Signature]  
Foreperson of the Grand Jury