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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,

vs.

DALE HENSON (001), X  
*All Counts*

KEVIN MAULSON (002),  
*All Counts*

RUSSELL FREEMAN (003),  
*All Counts*

PAUL FLAA (004),  
*All Counts*

ARIEL DIX (005),  
*All Counts*

CHARLES TEMPLE (006),  
*All Counts*

ALLEN JETER (007),  
*All Counts*

Case No: CR2021-002107-001

89 SGJ 68

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a class 2 felony, in violation of A.R.S. §13-1003

COUNT 2: ILLEGAL CONTROL OF AN ENTERPRISE, a class 3 felony, in violation of A.R.S. §13-2312(A)

COUNT 3: THEFT, class 3 Felony, in violation of A.R.S. § 13-1802(A)(3),

COUNT 4: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. §13-2310

**AARON WRIGHT (008),**  
*All Counts*

**TRISHA WRIGHT (009),**  
*All Counts*

**KEYANA CARTER (010),**  
*All Counts*

**SHARON LAWSON (011),**  
*All Counts*

**THOMAS BATTLE, III (012),**  
*All Counts*

**KAYLA SOL (013),**  
*All Counts*

**LUTHERAN ASSOCIATION  
OF MISSIONARIES AND  
PILOTS U.S., INC. d/b/a  
LUTHERAN INDIAN  
MINISTRIES (014),**  
*All Counts*

**SUN VALLEY SERVICES,  
LLC (015),**  
*All Counts*

**GENTLE TOUCH  
BEHAVIORAL HEALTH (016),**  
*All Counts*

**L & L INVESTMENTS, LLC (017),**  
*All Counts*

**TOGETHER TIME, LLC (018),**  
*All Counts*

**NEVADA FIRST CHOICE, LLC (019),**  
*All Counts*

**GOOD SAMARITAN HOMES (020),**  
*All Counts*

LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), charging on this 27<sup>th</sup> day of September, 2021, that in or from Maricopa County, Arizona:

**COUNT 1**

**CONSPIRACY**

On or between January 1, 2019, and October 30, 2020, DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH(016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), 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) FRAUDULENT SCHEMES AND ARTIFICES, in violation of A.R.S. § 13-2310;
- 2) THEFT, in violation of A.R.S. § 13-1802(A)(3);

- 3) **ILLEGAL CONTROL OF AN ENTERPRISE**, in violation of A.R.S. § 13-2312(A);
- 4) **ILLEGALLY CONDUCTING AN ENTERPRISE**, in violation of A.R.S. § 13-2312(B);
- 5) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R.S. §13- 2317(A).
- 6) **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of A.R.S. §13- 2317(B);
- 7) **FORGERY**, in violation of A.R.S. §13- 2002;
- 8) **USE OF WIRE COMMUNICATION OR ELECTRONIC COMMUNICATION RELATED TO A TITLE 13, CHAPTER 23 OFFENSE**, in violation of A.R.S. § 13-3417;
- 9) **COMPUTER TAMPERING**, a Class 3 Felony, in violation of A.R.S. § 13-2316;

In furtherance of this conspiracy and to affect the objects thereof, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), along**

with others not named, committed numerous overt acts including, but not limited to, those acts set forth in Counts 2 through 4 of this Indictment, which are incorporated herein by reference as if set out in full, in violation of A.R.S. §§ 13-1003, 13-3001, 13-1802, 13-3417, 13-2301, 13-2310, 13-2308, 13-2312, 13-2316, 13-2317, 13-2312, 13-2002, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

**COUNT 2**

**ILLEGAL CONTROL OF AN ENTERPRISE**

On or between January 1, 2019, and October 30, 2020, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027)** employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the conduct or any enterprise that the defendants knew was being conducted through racketeering.

The enterprise was a group of persons associated in fact, including but not limited to **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027);**

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310;
- 2) **PARTICIPATING IN A CRIMINAL SYNDICATE**, in violation of A.R.S. § 13-2308(A);
- 3) **ASSISTING A CRIMINAL SYNDICATE**, in violation of A.R.S. § 13-2308(C);
- 4) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R.S. §13- 2317
- 5) **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of A.R.S. §13- 2317;
- 6) **FORGERY**, in violation of A.R.S. §13- 2002;

in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2001, 13-2002, 13-2310, 13-2009, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

**COUNT 3**

**THEFT**

On or between January 1, 2019, and October 30, 2020, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027),** knowingly obtained services or property of **Arizona Health Care Cost Containment System (AHCCCS)** of a value of \$25,000 or more, by means of material misrepresentations, with the intent to deprive **Arizona Health Care Cost Containment System (AHCCCS)** of such services or property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

**COUNT 4**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between January 1, 2019, and October 30, 2020, DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), pursuant to a scheme or artifice to defraud, knowingly obtained pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

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



MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA



Brett Harantes  
Assistant Attorney General  
#9827047

True Bill  
(A "True Bill")

Dated: 9/27/21

Dereese Simpsonbaek  
Foreperson of the State Grand Jury