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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.

JOHN WICK NATHAN,

Defendant.

Case No:

CR2022 - 001666 - 001

90 SGJ 109

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES
AND ARTIFICES**, a class 2 felony, in
violation of A.R.S. §§ 13-2310, 13-2301

COUNT 2: THEFT, Class 3 Felony, in
violation of A.R.S. § 13-1802(A)(3)

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

**COUNTS 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 &
15: MONEY LAUNDERING IN THE
FIRST DEGREE**, Class 2 Felonies, in
violation of A.R.S. § 13-2317(A)

COUNTS 16, 17 & 18: FORGERY, class 4

felonies, in violation of A.R.S. §§ 13-2001, 13-2002

The Arizona State Grand Jury accuses **JOHNWICK NATHAN**, charging on this day of, June 6 2022, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between September 30, 2019, and August 26, 2021, **JOHNWICK NATHAN**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2301, 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 2

THEFT

On or between September 30, 2019, and August 26, 2021,, **JOHNWICK NATHAN**, 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, and 13-801.

COUNT 3

ILLEGAL CONTROL OF AN ENTERPRISE

On or between September 30, 2019, and August 26, 2021, **JOHNWICK NATHAN** 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 defendant knew was being conducted through racketeering.

The enterprise was a group of persons associated in fact, including but not limited to **JOHNWICK NATHAN and Safe Keepings Counseling, LLC d/b/a Harbor Health Integrated Care, LLC;**

The racketeering included:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310;
- 2) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R.S. §13- 2317
- 3) **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, 13-2317 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

COUNT 4

MONEY LAUNDERING IN THE FIRST DEGREE

On or about April 21, 2021, **JOHNWICK NATHAN**, knowing or having reason to know that U.S Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member J.E.

COUNT 5

MONEY LAUNDERING IN THE FIRST DEGREE

On or about May 19, 2021, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction,

transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member J.E.

COUNT 6

MONEY LAUNDERING IN THE FIRST DEGREE

On or about June 18, 2021, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member J.E.

COUNT 7

MONEY LAUNDERING IN THE FIRST DEGREE

On or about June 30, 2021, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member J.E.

COUNT 8

MONEY LAUNDERING IN THE FIRST DEGREE

On or about August 17, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member K.L.

COUNT 9

MONEY LAUNDERING IN THE FIRST DEGREE

On or about November 7, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member K.L.

COUNT 10

MONEY LAUNDERING IN THE FIRST DEGREE

On or about November 7, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member W.R.

COUNT 11

MONEY LAUNDERING IN THE FIRST DEGREE

On or about July 25, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member E.N.

COUNT 12

MONEY LAUNDERING IN THE FIRST DEGREE

On or about December 11, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member L.Y.

COUNT 13

MONEY LAUNDERING IN THE FIRST DEGREE

On or about March 5, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized,

planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member K.T.

COUNT 14

MONEY LAUNDERING IN THE FIRST DEGREE

On or about February 10, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member T.H

COUNT 15

MONEY LAUNDERING IN THE FIRST DEGREE

On or about December 11, 2020, **JOHNWICK NATHAN**, knowing or having reason to know that U.S. Currency was the proceeds of an offense, knowingly initiated, organized, planned, financed, directed, or supervised the acquisition, or maintained an interest in, transaction, transference, transportation, receipt, or concealment of the existence or nature of racketeering proceeds, in violation of A.R.S. §§ 13-2317, 13-2301, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN** submitted a billing request for reimbursement to AHCCCS for treatment services purportedly rendered to AHCCCS Member W.S.

COUNT 16

FORGERY

On or about September 30, 2019, **JOHNWICK NATHAN**, with the intent to defraud, offered or presented a forged instrument or one that contained false information, in violation of A.R.S. §§13-2002, 13-2001, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN**, offered or presented an AHCCCS PROVIDER REGISTRATION FORM, with the intent to defraud AHCCCS

COUNT 17

FORGERY

On or about January 24, 2020, **JOHNWICK NATHAN**, with the intent to defraud, offered or presented a forged instrument or one that contained false information, in violation of A.R.S. §§13-2002, 13-2001, 13-701, 13-702, and 13-801.

Said conduct occurred when **JOHNWICK NATHAN**, certified and presented a BANK OF AMERICA SIGNATURE CARD WITH SUBSTITUTE FORM W-9 containing the forged signature of Sade Collins.

COUNT 18

FORGERY

On or about May 4, 2020, **JOHNWICK NATHAN**, with the intent to defraud, offered or presented a forged instrument or one that contained false information, in violation of A.R.S. §§13-2002, 13-2001, 13-701, 13-702, and 13-801

Said conduct occurred when **JOHNWICK NATHAN**, certified and presented an ARTICLES OF AMENDMENT OF ORGANIZATION – SHORLINE containing the forged signature of Sade Collins.

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

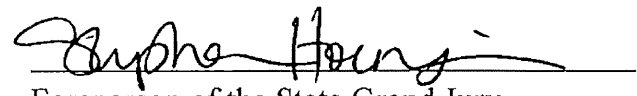
True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



BRETT HARAMES
Assistant Attorney General

Dated: 6/6/2022



Foreperson of the State Grand Jury