

KRISTIN K. MAYES
Attorney General
Firm Bar No. 14000

BRETT HARAMES
Assistant Attorney General
State Bar No. 024701
2005 N. Central Ave.
Phoenix, Arizona 85004
Telephone: 602-542-3881
crmhcfraud@azag.gov

Attorneys for Plaintiff

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

STATE OF ARIZONA,
Plaintiff,

v.

ROBERT ALDRIN KAYONGO (001),
Defendant.

Case No: **CR2023-139157-001DT**

93 SGJ 13

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a class 3 felony,
in violation of A.R.S. §13-1003

**COUNT 2: ATTEMPT TO COMMIT
CONSIDERATION FOR REFERRAL OF
PATIENT, CLIENT OR CUSTOMER**, a
class 4 felony A.R.S. §§ 13-3713

**COUNT 3: ATTEMPT TO COMMIT
CONSIDERATION FOR REFERRAL OF
PATIENT, CLIENT OR CUSTOMER**, a
class 5 felony A.R.S. §§ 13-3713

The Arizona State Grand Jury accuses **ROBERT ALDRIN KAYONGO**, charging on this 5th the day of September 2023, that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between August 10, 2023, and August 30, 2023, **ROBERT ALDRIN KAYONGO**, 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, **ROBERT ALDRIN KAYONGO**, along with others not named, committed numerous overt acts including, but not limited to, those acts set forth in Counts 2 and 3 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 2

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

On or between August 28, 2023, and August 30, 2023, **ROBERT ALDRIN KAYONGO**, knowingly attempted to offer, deliver, receive, or accept any rebate, refund commission, preference, or other consideration greater than one thousand dollars (\$1,000) as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-1001, 13-3713, 13-701, 13-702 and 13-801.

COUNT 3

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

On or about August 10, 2023, **ROBERT ALDRIN KAYONGO**, knowingly attempted to offer, deliver, receive, or accept any rebate, refund commission, preference,

or other consideration having a value of greater than one hundred dollars (\$100), but less than one thousand dollars (\$1,000), as compensation for referring a patient, client customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-1001,13-3713,13-701,13-702 and 13-801.

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")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



BRETT HARAMES
Assistant Attorney General

#11497941

Dated: 9/5/23

Stacy H
Foreperson of the State Grand Jury