

KRISTIN K. MAYES
Attorney General
Firm Bar No. 14000

VINEET MEHTA SHAW
State Bar No. 033681
Assistant Attorney General
2005 N. Central Avenue
Phoenix, Arizona 85004-1592
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.

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)

**VEMA CARE BEHAVIORAL
HEALTH, LLC (011),**

(Count 13)

████████████████████ (012),

(Count 14)

████████████████████ (013),

(Count 15)

HOPEFUL PROSPECT, LLC (014),

(Count 16)

DESERT AEGLE, LLC (015),

(Count 17)

LILIANE NYAMBO (016),

(Count 18)

████████████████████ (017),

(Count 19)

████████████████████ (018),

(Count 20)

████████████████████ (019),

(Count 21)

ELISABETH NYIRANSHUTI (020),

(Count 22)

████████████████████ (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, VEMA CARE BEHAVIORAL HEALTH LLC, [REDACTED], [REDACTED], HOPEFUL PROSPECT LLC, DESERT AEGLE LLC, LILIANE NYAMBO, [REDACTED], [REDACTED], [REDACTED], [REDACTED] ELISABETH NYIRANSHUTI, and [REDACTED], charging on this 27th 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 LILIANE NYAMBO**, 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 LILIANE NYAMBO**, 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, **VEMA CARE BEHAVIORAL HEALTH, LLC**, 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] 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, **DESERT AEGLE, LLC**, 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, **LILIANE NYAMBO**, 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, **ELISABETH NYIRANSHUTI**, 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.

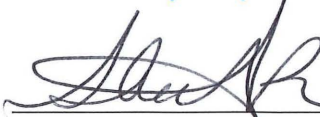
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA


VINEET MEHTA SHAW
Assistant Attorney General
#11694906



(A "True Bill")

Dated: 11/27/23


Foreperson of the Grand Jury