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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

LAROE S. DAVIS (001), X
(Counts 1-13, 18-21)

H. RYAN MCNEAL (002),
(Counts 1-13, 17, 22-24)

GENEICE MCNEAL (003),
(Counts 1-9)

WAYMAN WESTBROOKS (004),
(Counts 1-7, 11)

**PATRICK MICHAEL LEGENZOFF
(005),**
(Counts 1-10, 12, 14-16, 25)

KENDRA ALISE LEGENZOFF (006),
(Counts 1, 5-9, 14)

JAYDEN B. W. CAMPBELL (008),
(Counts 1, 5-6, 15)

Defendants.

Case No **CR 2024 - 007738 - 001** X
95 SGJ 11

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)

COUNTS 3: THEFT, a class 2 felony, in
violation of A R S. § 13-1802

COUNT 4: THEFT, a class 6 felony, in
violation of A R S. § 13-1802

**COUNT 5: FRAUDULENT SCHEMES
AND ARTIFICES,** a class 2 felony, in
violation of A R S § 13-2310

**COUNTS 6-7: PARTICIPATING IN A
CRIMINAL SYNDICATE,** a class 2
felony, in violation of A.R S. § 13-2308

COUNT 8: MONEY LAUNDERING, a class 2 felony, in violation of A.R.S. § 13-2317

COUNT 9: MONEY LAUNDERING, a class 3 felony, in violation of A.R.S. § 13-2317

COUNT 10: CONSIDERATION FOR REFERRAL OF A PATIENT, a class 3 felony, in violation of A.R.S. § 13-3713(A)

COUNTS 11-15: FORGERY, a class 4 felony, in violation of A.R.S. § 13-2002

COUNT 16: PERJURY, a class 4 felony, in violation of A.R.S. § 13-2702

COUNT 17: MISCONDUCT INVOLVING WEAPONS, a class 4 felony, in violation of A.R.S. § 13-3102

COUNTS 18, 22, 25, 26: FAILURE TO PAY TAX, a class 5 felony in violation of A.R.S. § 42-1127(B)(1)

COUNTS 19-20: FILING A FALSE TAX RETURN, a class 5 felony in violation of A.R.S. § 42-1127(B)(2)

COUNTS 21, 23, 24, 27: FAILURE TO FILE A TAX RETURN, a class 5 felony in violation of A.R.S. § 42-1127(B)(4)

The State Grand Jury accuses **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF, JAYDEN B. W. CAMPBELL** charging on this 16th day of September, 2024 that in or from Maricopa County, Arizona

COUNT 1
CONSPIRACY

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,**

JAYDEN B. W. CAMPBELL, Defendants herein, 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) **ILLEGAL CONTROL OF AN ENTERPRISE**, in violation of A R S. § 13-2312(A),
- 2) **ILLEGALLY CONDUCTING AN ENTERPRISE**, in violation of A R S § 13-2312(B),
- 3) **ILLEGALLY CONDUCTING AN ENTERPRISE**, in violation of A.R S § 13-2312(C),
- 4) **THEFT**, in violation of A R S § 13-1802(A)(3);
- 5) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R S. § 13-2310,
- 6) **FRAUDULENT SCHEMES AND PRACTICES**, in violation of A.R S § 13-2311,
- 7) **PARTICIPATING IN A CRIMINAL SYNDICATE**, in violation of A R.S § 13-2308;
- 8) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R S. § 13-2317(A),
- 9) **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of A.R S. § 13-2317(B),
- 10) **CONSIDERATION FOR REFERRAL OF A PATIENT**, in violation of A R S § 13-3713, and

11) **FORGERY**, in violation of A.R.S. § 13-2002

In furtherance of this conspiracy and to affect the objects thereof, Defendants, along with their co-conspirators, committed numerous overt acts including, but not limited to, those acts set forth in Counts 2 through 15 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, 13-2312, 13-1802, 13-2310, 13-2311, 13-2308, 13-2317, 13-3713, 13-2002, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 2

ILLEGAL CONTROL OF AN ENTERPRISE

On or between January 2, 2020, and July 28, 2022, **LAROE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF,** Defendants herein, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the racketeering conduct or any enterprise Defendants, knew was being conducted through racketeering. The enterprise(s) included, but were not limited to, **A PATH OF RESILIENCE, A PATH OF RESILIENCE LLC, A PATH OF RESILIENCE APRBHS-ROSE HOUSE LLC, A PATH OF RESILIENCE APRBHS-CHERYL HOUSE LLC, SOLUTIONS OF SOBRIETY LLC, SOLUTIONS OF SOBRIETY APRBHS LLC, SOLUTIONS OF SOBRIETY BHS LLC, HELPING HANDS REALTY, LS DAVIS LLC, and MARILYN'S HOUSE LLC** and/or a group of persons associated in fact within **A PATH OF RESILIENCE, A PATH OF RESILIENCE LLC, A PATH OF RESILIENCE APRBHS-ROSE HOUSE LLC, A PATH OF RESILIENCE APRBHS-CHERYL HOUSE LLC, SOLUTIONS OF SOBRIETY LLC, SOLUTIONS OF SOBRIETY APRBHS LLC, SOLUTIONS OF SOBRIETY BHS LLC, HELPING HANDS**

REALTY, LS DAVIS LLC, and MARILYN'S HOUSE LLC and others known and/or unknown

The racketeering included:

- 1) a scheme or artifice to defraud, in violation of A.R.S. § 13-2301(D)(4)(b)(xx),
- 2) theft, in violation of A.R.S. § 13-2301(D)(4)(b)(v),
- 3) participating in a criminal syndicate, in violation of A.R.S. § 13-2301(D)(4)(b)(xin),
- 4) money laundering, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi), and
- 5) forgery, in violation of A.R.S. § 13-2301(D)(4)(b)(iv)

The alleged racketeering includes, but is not limited to the acts of racketeering described in Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-2312(A), (B), (C), and (D), 13-2301, 13-108, 13-109, 13-301, 13-302, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, 13-2314

COUNT 3

THEFT

On or between January 2, 2020, and July 28, 2022, **LAROE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF,** 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. §§ 13-1003, 13-1802(A)(3), 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

THEFT

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF,** knowingly obtained services or property of **Damien Houser** of a value of \$1,000 or more, by means of material misrepresentations, with the intent to deprive **Damien Houser** of such services or property, in violation of A R S §§ 13-1003, 13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

COUNT 5

FRAUDULENT SCHEMES AND ARTIFICES

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,**

JAYDEN B. W. CAMPBELL 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. §§ 13-1003, 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811

COUNT 6

PARTICIPATING IN A CRIMINAL SYNDICATE

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,**

JAYDEN B. W. CAMPBELL participated in or assisted a criminal syndicate by intentionally organizing, managing, directing, supervising, or financing a criminal syndicate with the intent to promote or further the objectives of the criminal syndicate, in violation of A R S. §§ 13-1003, 13-2308(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 7

PARTICIPATING IN A CRIMINAL SYNDICATE

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, WAYMAN WESTBROOKS, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,**

participated in or assisted a criminal syndicate by hiring, engaging or using a minor for any conduct preparatory to or in completion of furthering the criminal objectives of a criminal syndicate, in violation of A.R S. §§ 13-1003, 13-2308(A)(5), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 8

MONEY LAUNDERING (1ST DEGREE)

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,** knowingly initiated, organized, planned, financed, directed, managed, supervised or is in the business of money laundering in violation of A R S §§ 13-1003, 13-2317(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

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COUNT 9

MONEY LAUNDERING (2ND DEGREE)

On or between January 2, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL, GENEICE MCNEAL, PATRICK MICHAEL LEGENZOFF, KENDRA ALISE LEGENZOFF,** and _____ acquired or maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds, knowing or having reason to know that the money was the proceeds of an offense, in violation of A.R.S. §§ 13-1003, 13-2317(B)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 10

CONSIDERATION FOR REFERRAL OF A PATIENT

On or between June 29, 2020, and July 28, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL,** and **PATRICK MICHAEL LEGENZOFF** 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, in violation of A.R.S. §§ 13-1003, 13-1003, 13-3713, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 11

FORGERY

On or between August 9, 2021, and May 17, 2022, **LAROIE S. DAVIS, H. RYAN MCNEAL,** and **WAYMAN WESTBROOKS** falsely made, completed or altered a written instrument, with intent to use it or to aid or permit another to use it for purposes of forgery including, but not limited to medical records, patient notes, patient

information, and/or employment records relating to April Claw, in violation of A.R.S. §§ 13-1003, 13-2002(A)(1), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 12

FORGERY

On or between May 10, 2021, and August 29, 2021, **LAROE S. DAVIS, H. RYAN MCNEAL, PATRICK MICHAEL LEGENZOFF,**

falsely made, completed or altered a written instrument, with intent to use it or to aid or permit another to use it for purposes of forgery including, but not limited to medical records, patient notes patient information, and/or employment records relating to relating to Maria Hanagarne, in violation of A.R.S. §§ 13-1003, 13-2002(A)(1), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801.

COUNT 13

FORGERY

On or between March 1, 2021, and May 30, 2022, **LAROE S. DAVIS and H. RYAN MCNEAL** falsely made, completed or altered a written instrument, with intent to use it or to aid or permit another to use it for purposes of forgery, to wit, medical records, patient notes and/or patient information, including, but not limited to.

- medical records, patient notes and/or patient information relating to Jonathan Begay for medical care/services purportedly rendered on or between March 1, 2021 and March 7, 2021,
- medical records, patient notes and/or patient information relating to Davin Talker for services purportedly rendered on or about June 17, 2021,
- medical records, patient notes and/or patient information relating to Myrus Begay for medical care/services purportedly rendered on or between July 5, 2021 and August 1, 2021;

- medical records, patient notes and/or patient information relating to Darrell Cassadore for medical care/services purportedly rendered on or between September 5, 2021 and November 14, 2021;
- medical records, patient notes and/or patient information relating to Taylor Brown for medical care/services purportedly rendered on or between March 7, 2022 and March 20, 2022,
- medical records, patient notes and/or patient information relating to Tony Yellowhorse for medical care/services purportedly rendered on or between April 18, 2022 and May 1, 2022

in violation of A.R.S. §§ 13-1003, 13-2002(A)(1), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 14

FORGERY

On or between December 4, 2021, and May 16, 2022, **PATRICK MICHAEL LEGENZOFF** and **KENDRA ALISE LEGENZOFF** falsely made, completed or altered a written instrument, with intent to use it or to aid or permit another to use it for purposes of forgery, to wit, medical records, patient notes and/or patient information, including, but not limited to medical records, patient notes and/or patient information relating to medical care/services provided by Kendra Alise Legenzoff in violation of A.R.S. §§ 13-1003, 13-2002(A)(1), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 15

FORGERY

On or between December 12, 2021, and May 12, 2022, **PATRICK MICHAEL LEGENZOFF** and **JAYDEN B. W. CAMPBELL** falsely made, completed or altered a written instrument, with intent to use it or to aid or permit another to use it for purposes of forgery, to wit, medical records, patient notes and/or patient information, including,

but not limited to medical records, patient notes and/or patient information relating to medical care/services provided by Jayden Campbell, in violation of A R S §§ 13-1003, 13-2002(A)(1), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702 and 13-801

COUNT 16

PERJURY

On or about October 31, 2022, **PATRICK MICHAEL LEGENZOFF** made a false sworn statement in regard to a material issue, believing it to be false, or made a false unsworn declaration, certificate, or statement in regard to a material issue that the person subscribes as true under penalty of perjury, believing it to be false. Said conduct occurred when **PATRICK MICHAEL LEGENZOFF** made false statements in medical and/or business records, including but not limited to false statements regarding medical providers and patient services, and/or false statements in patient notes (to wit statement regarding the type of services and/or care provided by Jayden B. W. Campbell and/or Jenifer Sneed and/or Kendra Legenzoff), in violation of A R S §§ 13-2702, 13-2701, 13-701, 13-702 and 13-801.

COUNT 17

MISCONDUCT INVOLVING WEAPONS

On or about May 7, 2024, **H. RYAN MCNEAL**, a prohibited possessor, knowingly possessed a deadly weapon, namely. PA-15 Rifles, Arrow Precision Rifle, Taurus .38 Special Revolver, Taurus 9mm, S&W 40 Caliber, and/or Champion 12-gauge shotgun, in violation of A.R.S §§ 13-3102(A)(4), 13-3101, 13-701, 13-702 and 13-801.

COUNT 18

FAILURE TO PAY TAX

On or between January 1, 2020 and December 31, 2022, **LAROIE S. DAVIS** knowingly failed to pay any tax administered pursuant to this article due pursuant to Article 3, Chapter 1 in Title 42, due or believed due by **LAROIE S. DAVIS**, with intent to evade the tax, to wit Arizona Individual Income Tax, in violation of A R S §§ 42-1127(B)(1), 42-1101.01, 43-301, 13-306, 13-701, 13-702, and 13-801

COUNT 19

FILING A FALSE TAX RETURN

On or about October 15, 2021, **LAROIE S. DAVIS** knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or required to present the return, affidavit, claim or document, to-wit: Arizona income tax return for tax year 2020, in violation of A R.S §§ 42-1127(B)(2), 42-1101.01, 43-301, 13-701, 13-702, and 13-801.

COUNT 20

FILING A FALSE TAX RETURN

On or about October 14, 2022, **LAROIE S. DAVIS** knowingly prepared, presented or aided, procured or advised in preparing or presenting any return, affidavit, claim or other document which is fraudulent or is false as to any material matter, whether or not the falsity or fraud is with the knowledge or consent of the taxpayer authorized or

required to present the return, affidavit, claim or document, to-wit: Arizona income tax return for tax year 2021, in violation of A.R.S. §§ 42-1127(B)(2), 42-1101.01, 43-301, 13-701, 13-702, and 13-801

COUNT 21

FAILURE TO FILE A TAX RETURN

On or about April 18, 2023, **LAROIE S. DAVIS** knowingly failed to file a return or supply required information, or knowingly falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability, to-wit failed to report the amount of taxable income subject to state income tax and the amount of tax due for tax year 2022, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101 01, 43-301, 13-701, 13-702, and 13-801

COUNT 22

FAILURE TO PAY TAX

On or between January 1, 2021 and December 31, 2022, **H. RYAN MCNEAL** knowingly failed to pay any tax administered pursuant to this article due pursuant to Article 3, Chapter 1 in Title 42, due or believed due by **H. RYAN MCNEAL**, with intent to evade the tax, to wit Arizona Individual Income Tax, in violation of A.R.S. §§ 42-1127(B)(1), 42-1101 01, 43-301, 13-306, 13-701, 13-702, and 13-801

COUNT 23

FAILURE TO FILE A TAX RETURN

On or about April 18, 2022, H. RYAN MCNEAL knowingly failed to file a return or supply required information, or knowingly falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability, to-wit: failed to report the amount of taxable income subject to state income tax and the amount of tax due for tax year 2022, in violation of A.R.S. §§ 42-1127(B)(4), 42-1101 01, 43-301, 13-701, 13-702, and 13-801

COUNT 24

FAILURE TO FILE A TAX RETURN

On or about April 18, 2023, H. RYAN MCNEAL knowingly failed to file a return or supply required information, or knowingly falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability, to-wit. failed to report the amount of taxable income subject to state income tax and the amount of tax due for tax

year 2022, in violation of A R S §§ 42-1127(B)(4), 42-1101 01, 43-301, 13-701, 13-702, and 13-801

COUNT 25

FAILURE TO PAY TAX

On or between January 1, 2020 and December 31, 2022, **PATRICK MICHAEL LEGENZOFF** knowingly failed to pay any tax administered pursuant to this article due pursuant to Article 3, Chapter 1 in Title 42, due or believed due by **PATRICK MICHAEL LEGENZOFF**, with intent to evade the tax, to wit Arizona Individual Income Tax, in violation of A.R.S. §§ 42-1127(B)(1), 42-1101 01, 43-301, 13-306, 13-701, 13-702, and 13-801.

COUNT 26

FAILURE TO PAY TAX

On or between January 1, 2021 and December 31, 2022,
knowingly failed to pay any tax administered pursuant to this article due pursuant to Article 3, Chapter 1 in Title 42, due or believed due by
with intent to evade the tax, to wit Arizona Individual Income Tax, in violation of A R S §§ 42-1127(B)(1), 42-1101.01, 43-301, 13-306, 13-701, 13-702, and 13-801

COUNT 27

FAILURE TO FILE A TAX RETURN


On or about April 18, 2023, **TAMARA LYN ALLEN** knowingly failed to file a return or supply required information, or knowingly falsified or concealed a material fact, document or record, made a false, fictitious or fraudulent statement or representation or made or used a false writing or document knowing it to contain a false, fictitious or

fraudulent statement or entry, with intent that the department rely on the false, fictitious or fraudulent statement or entry in determining tax liability, to-wit failed to report the amount of taxable income subject to state income tax and the amount of tax due for tax year 2022, in violation of A R S §§ 42-1127(B)(4), 42-1101.01, 43-301, 13-701, 13-702, and 13-801

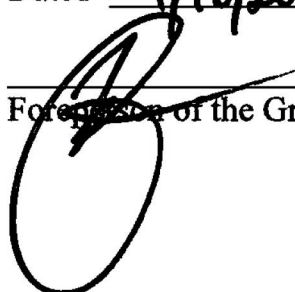
Pursuant to A.R.S. § 21-425, the Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona

A "True Bill"
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



Suzanne Reed
Assistant Attorney General

Dated 9/16/2024


Foreperson of the Grand Jury

#12110234