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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,

v.

RONALD JAY EDWIN,

Defendant.

Case No:

63 SGJ 72

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310;

COUNT 2: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802;

COUNTS 3 through 12: ACQUISITION OF NARCOTIC DRUGS BY FRAUD, Class 3 Felonies, in violation of A.R.S. § 13-3408.A.6;

COUNTS 13: AGGRAVATED TAKING THE IDENTITY OF ANOTHER PERSON, a Class 3 Felony, in violation of A.R.S. § 13-2009.A.2.

The Arizona State Grand Jury accuses RONALD JAY EDWIN, charging on this 16th day of September, 2008 that in or from Maricopa County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

Between November 17, 2006 and January 29, 2008, Defendant, RONALD JAY EDWIN, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from BLUE CROSS BLUE SHIELD OF ARIZONA by means of fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801, a class 2 felony.

COUNT 2: THEFT

Between November 17, 2006 and January 29, 2008, Defendant, RONALD JAY EDWIN, without lawful authority, knowingly obtained by means of material representation the services or property of BLUE CROSS/BLUE SHIELD OF ARIZONA, to-wit: cash, of a value of \$25,000 or more with the intent to deprive BLUE CROSS/BLUE SHIELD OF ARIZONA of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1802 (F), 13-1801, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801, a class 2 felony.

COUNT 3: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about December 15, 2006, Defendant, RONALD JAY EDWIN, knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 4: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about January 13, 2007, Defendant, RONALD JAY EDWIN, knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 5: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about February 12, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 6: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about March 7, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 7: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about April 5, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 8: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about June 22, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 9: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about October 1, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 10: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about October 23, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 11: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about November 29, 2007, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 12: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

Between January 28, 2008 and January 29, 2008, Defendant, RONALD JAY EDWIN knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 13: AGGRAVATED TAKING THE IDENTITY OF ANOTHER PERSON

Between November 17, 2006 and January 29, 2008, Defendant, RONALD JAY EDWIN, without lawful authority, knowingly obtained or used the identity of ROBERT NEWELL

NELSON, without the consent of ROBERT NEWELL NELSON, with the intent to obtain, use, sell or transfer ROBERT NEWELL NELSON's BLUE CROSS/BLUE SHIELD OF ARIZONA prescription benefits for an unlawful purpose which caused BLUE CROSS/BLUE SHIELD OF ARIZONA to suffer an economic loss of \$3,000.00 or more, in violation of A.R.S. §§ 13-2009.A.2, 13-2001, 13-701, 13-702, 13-702.01 and 13-801, a class 4 felony.

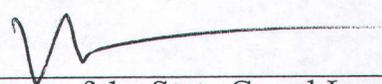
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

A True Bill
(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 9/16/2008


BEVERLY W. RUDNICK
Assistant Attorney General


Foreperson of the State Grand Jury

#279414