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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,

Case No:

Plaintiff.

78 SGJ 139

v.

INDICTMENT

JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE,

CHARGING VIOLATIONS OF:

Defendant.

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

COUNT 2: FRAUDULENT SCHEMES AND PRACTICES, a Class 5 Felony, in violation of A.R.S. § 13-2311;

COUNT 3: FRAUD, a Class 6 Felony, in violation of A.R.S. § 13-3713(B);

COUNT 4: THEFT, a Class 2 Felony, in violation of A.R.S. § 13-1802(A)(3);

COUNTS 5-10: FORGERY, a Class 4 Felony, in violation of A.R.S. § 13-2009(A)(1).

The Arizona State Grand Jury accuses **JENNIFER ANN GARRETT a.k.a JENNIFER ANN HAYNIE**, charging on this 11th day of April, 2016, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or between June 25, 2010 and February 28, 2013, JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE, pursuant to a scheme or artifice to defraud, knowingly obtained any benefit from the Arizona Health Care Cost Containment System by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-701, 13-702 and 13-801.

COUNT 2

FRAUDULENT SCHEMES AND PRACTICES

On or between June 25, 2010 and February 28, 2013, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, in any matter related to the business conducted by the Arizona Health Care Cost Containment System, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed or covered up a material fact by any trick, scheme or device or made or used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement or entry, in violation of A.R.S. §§ 13-2311, 13-2301, 13-701, 13-702 and 13-801.

COUNT 3

FRAUD

On or between June 25, 2010 and February 28, 2013, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, knowingly presented false information

or misrepresented or concealed a material fact on an application for medical or health coverage pursuant to title 36, chapter 29 or § 11-291 or knowingly failed to notify the county of residence of a change in conditions that, if notification had been made, would have resulted in termination of eligibility or change in eligibility status for medical or health coverage pursuant to title 36, chapter 29 or § 11-291, in violation of A.R.S. §§ 13-3713(B), 13-701, 13-702 and 13-801.

COUNT 4

THEFT

On or between June 25, 2010 and February 28, 2013, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, without lawful authority, knowingly obtained services or property of the Arizona Health Care Cost Containment System, with a value of twenty-five thousand dollars or more, by means of any material misrepresentation with intent to deprive the Arizona Health Care Cost Containment System of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-701, 13-702 and 13-801.

COUNT 5

FORGERY

On or about June 25, 2010, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written instrument, an application submitted to Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

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COUNT 6

FORGERY

On or about October 29, 2010, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written instrument, an application submitted to the Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

COUNT 7

FORGERY

On or about April 15, 2011, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written instrument, an application submitted to the Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

COUNT 8

FORGERY

On or about October 28, 2011, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written instrument, an application submitted to the Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

COUNT 9

FORGERY

On or about April 24, 2012, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written

instrument, an application submitted to the Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

COUNT 10

FORGERY

On or about October 24, 2012, **JENNIFER ANN GARRETT a.k.a. JENNIFER ANN HAYNIE**, with intent to defraud, falsely made, completed or altered a written instrument, an application submitted to the Arizona Health Care Cost Containment System, in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 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.

	(A "True Bill")
MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA	Dated:
MICHELLE L. HOGAN Assistant Attorney General	Foreperson of the State Grand Jury

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