

MARK BRNOVICH
Attorney General
Firm Bar No. 14000

Jarred J. McBride
State Bar No. 028914
Assistant Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926
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.

Kevin Michael McKeown
DOB: 07/26/1977

Defendant.

Case No:

81 SGJ 199

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNT 2: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 3: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 4: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 5: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 6: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 7: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 8: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 9: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 10: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 11: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 12: OBTAINING DANGEROUS DRUGS BY FRAUD, a Class 3 Felony, in violation of A.R.S. §§13-3407, 13-3407 (A)(6)

COUNT 13: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 14: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 15: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 16: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 17: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 18: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 19: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 20: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 21: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 22: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 23: FORGERY, a Class 4 Felony, in violation of A.R.S. §§13-2002, 13-2002(A)(3)

COUNT 24: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY, a Class 4 Felony, in violation of A.R.S. §13-2008

The Arizona State Grand Jury accuses **KEVIN MICHAEL MCKEOWN**, charging on this day of 18th September, 2017, that in or from Maricopa County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

On or between December 16, 2015 and January 16, 2017, **KEVIN MICHAEL MCKEOWN**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: Adderall 30 MG Tablets) by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-603, 13-610, 13-701, 13-702, 13-801, 13-804, 13-301 and 13-811.

COUNT 2: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about December 16, 2015, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 3: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about July 20, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 4: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about August 18, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 5: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about August 31, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 6: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about September 21, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 7: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about October 11, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 8: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about October 30, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 9: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about November 18, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 10: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about November 29, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 11: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about December 19, 2016, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 12: OBTAINING DANGEROUS DRUGS BY FRAUD

On or about January 16, 2017, **KEVIN MICHAEL MCKEOWN**, knowingly obtained or procured the administration of Adderall, a dangerous drug, by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. §§13-3407(A)(6), 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 13: FORGERY

On or about December 16, 2015, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 12/16/2015), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 14: FORGERY

On or about July 20, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 07/20/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 15: FORGERY

On or about August 18, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 08/18/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 16: FORGERY

On or about August 31, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 08/31/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 17: FORGERY

On or about September 21, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information

(to wit: Prescription for Adderall filled on 09/21/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 18: FORGERY

On or about October 11, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 10/11/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 19: FORGERY

On or about October 30, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 10/30/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 20: FORGERY

On or about November 18, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 11/18/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 21: FORGERY

On or about November 29, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 11/29/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 22: FORGERY

On or about December 19, 2016, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 12/19/2016), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

COUNT 23: FORGERY

On or about January 16, 2017, **KEVIN MICHAEL MCKEOWN**, offered or presented, whether accepted or not, a forged instrument or one that contained false information (to wit: Prescription for Adderall filled on 01/16/2017), in violation of 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, and 13-804.

Count 24: TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On or between December 16, 2015, and January 16, 2017, **KEVIN MICHAEL MCKEOWN**, knowingly took the identity of Doctor Salman Mamdani by knowingly taking, possessing, or using the personal identifying information of Dr. Salman Mamdani without his consent, with the intent to obtain or use his identity for an unlawful purpose (to wit: to acquire

dangerous drugs), in violation of A.R.S. §§13-2008, 13-2001, 13-603,13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

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

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Jarred J. McBride
Assistant Attorney General

#6154044

A TRUE BILL

(A "True Bill")

Dated: 9/18/2017

[Signature]
Foreperson of the State Grand Jury