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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.

CRAIG ALLEN SCHERF,
Defendant.

Case No:

80 SGJ 144

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-12: UNLAWFUL PRACTICE
OF MEDICINE**, Class 5 Felonies in
violation of A.R.S. § 32-1455

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

**COUNT 14: FRAUDULENT SCHEMES
AND PRACTICES**, a Class 5 Felony in
violation of A.R.S. § 13-2311

COUNT 15: THEFT, a Class 3 Felony in
violation of A.R.S. § 13-1802

**COUNT 16: ILLEGALLY
CONDUCTING AN ENTERPRISE**, a
Class 3 Felony in violation of A.R.S. § 13-
2312(B)

**COUNT 17: TAKING THE IDENTITY
OF ANOTHER PERSON OR ENTITY**, a
Class 4 Felony in violation of A.R.S. § 13-
2008

COUNTS 18-29: ENDANGERMENT, a
Class 1 misdemeanor in violation of A.R.S. §
13-1201

The Arizona State Grand Jury accuses **CRAIG ALLEN SCHERF**, charging on this 14th day of March, 2017, that in or from Maricopa County, Arizona:

COUNT 1

UNLAWFUL PRACTICE OF MEDICINE

On or between January 3, 2015, and February 15, 2015, and on or between August 15, 2015, and August 29, 2015, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments on Theresa Carroll's face and neck for the treatment of skin wrinkles.

COUNT 2

UNLAWFUL PRACTICE OF MEDICINE

On or between January 1, 2015, and October 31, 2015, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments on Ori Jones's face and neck for the treatment of skin wrinkles.

COUNT 3

UNLAWFUL PRACTICE OF MEDICINE

On or between September 1, 2015, and October 31, 2015, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments upon Jesse Jones's body to correct and remove stretch marks.

COUNT 4

UNLAWFUL PRACTICE OF MEDICINE

On or between September 29, 2016, and December 27, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Jennifer Bellinger's face with a chemical, believed to be Dysport and/or Juvederm, for the treatment of facial wrinkles and a lip deformity.

COUNT 5

UNLAWFUL PRACTICE OF MEDICINE

On or between October 10, 2016, and October 20, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Mario Della Casa's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 6

UNLAWFUL PRACTICE OF MEDICINE

On or about November 18, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Sharon Kirby's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 7

UNLAWFUL PRACTICE OF MEDICINE

On or about November 23, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-

1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Dawn Azizeh's face with a chemical, believed to be Botox and/or Dysport, for the treatment of facial wrinkles.

COUNT 8

UNLAWFUL PRACTICE OF MEDICINE

On or about December 5, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Tracie Carmel's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 9

UNLAWFUL PRACTICE OF MEDICINE

On or about December 28, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Kelly Kassa's face with a chemical, believed to be Botox, for the treatment of facial wrinkles.

COUNT 10

UNLAWFUL PRACTICE OF MEDICINE

On or about between December 1, 2016, and December 31, 2016, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Stephanie Shull's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 11

UNLAWFUL PRACTICE OF MEDICINE

On or about January 5, 2017, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Siobahn Collins's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 12

UNLAWFUL PRACTICE OF MEDICINE

On or about January 7, 2017, **CRAIG ALLEN SCHERF** did practice medicine while not being licensed or exempt from licensure, in violation of A.R.S. §§ 32-1455(A), 32-1401, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Kimberly Lambert's face with a chemical, believed to be Botox, for the treatment of facial wrinkles.

COUNT 13

FRAUDULENT SCHEMES AND ARTIFICES

On or between January 1, 2015, and January 7, 2017, **CRAIG ALLEN SCHERF**, 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. § 13-2310, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** represented to patients that he was a doctor, when in fact, he was not licensed to practice medicine or exempt from licensure.

COUNT 14

FRAUDULENT SCHEMES AND PRACTICES

On or between January 1, 2015, and January 7, 2017, **CRAIG ALLEN SCHERF**, in matters related to the business conducted by any department or agency of the State of Arizona or any political subdivision thereof, pursuant to a scheme or artifice to defraud to 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, 13-701, 13-702, and 13-801.

COUNT 15

THEFT

On or between January 1, 2015, and January 7, 2017, **CRAIG ALLEN SCHERF** obtained services or property of another by means of any material misrepresentation with intent to deprive the other person of such property or services, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** misrepresented his experience, qualifications, certifications, and status as a doctor to his patients. As a consequence, **CRAIG ALLEN SCHERF** obtained monies from the following individuals, in exchange for treatments: Sharon Kirby, Kimberly Lambert, Mario Della Casa, Siobhan Collins, Dutch Jones, Jesse Jones, Ori Jones, Theresa Carroll, Jennifer Bellinger, Kelly Kassa, Tracie Carmel, Dawn Azizeh, and Stephanie Shull. The monies obtained unlawfully by **CRAIG ALLEN SCHERF** had an aggregate value of \$4,000 or more but less than \$25,000.

COUNT 16

ILLEGALLY CONDUCTING AN ENTERPRISE

On or between January 1, 2015, and January 7, 2017, **CRAIG ALLEN SCHERF**, who was employed by or associated with an enterprise, did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in

the conduct of any enterprise that the defendant knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-1802, 13-2310, 13-2311, 13-701, 13-702, and 13-801.

The enterprise consisted of one or more legal entities, including My MD Clinic, My Laser Centers, and My Body Laser Lipo. The racketeering activities included theft, and a scheme or artifice to defraud.

COUNT 17

TAKING THE IDENTITY OF ANOTHER PERSON OR ENTITY

On or between January 1, 2015, and January 7, 2017, **CRAIG ALLEN SCHERF**, knowingly took, purchased, manufactured, recorded, possessed, or used any personal identifying information or entity identifying information of Rocky Mountain Laser College, without the consent of Rocky Mountain Laser College, with the intent to obtain or use Rocky Mountain Laser College's identity for any unlawful purpose or to cause loss to a person or entity whether or not the person or entity actually suffers any economic loss as a result of the offense, or with the intent to obtain or continue employment, in violation of A.R.S. § 13-2008, 13-701, 13-702, and 13-801.

COUNT 18

ENDANGERMENT

On or between January 3, 2015, and February 15, 2015, and on or between August 15, 2015, and August 29, 2015, **CRAIG ALLEN SCHERF** recklessly endangered Theresa Carroll with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments on Theresa Carroll's face and neck for the treatment of skin wrinkles.

COUNT 19

ENDANGERMENT

On or between January 1, 2015, and October 31, 2015, **CRAIG ALLEN SCHERF** recklessly endangered Ori Jones with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments on Ori Jones's face and neck for the treatment of skin wrinkles.

COUNT 20

ENDANGERMENT

On or between September 1, 2015, and October 31, 2015, **CRAIG ALLEN SCHERF** recklessly endangered Jesse Jones with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** administered laser treatments upon Jesse Jones's body to correct and remove stretch marks.

COUNT 21

ENDANGERMENT

On or between September 29, 2016, and December 27, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Jennifer Bellinger with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Jennifer Bellinger's face with a chemical, believed to be Dysport and/or Juvederm, for the treatment of facial wrinkles and a lip deformity.

COUNT 22

ENDANGERMENT

On or between October 10, 2016, and October 20, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Mario Della Casa with a substantial risk of imminent death or physical

injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Mario Della Casa's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 23

ENDANGERMENT

On or about November 18, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Sharon Kirby with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Sharon Kirby's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 24

ENDANGERMENT

On or about November 23, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Dawn Azizeh with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Dawn Azizeh's face with a chemical, believed to be Botox and/or Dysport, for the treatment of facial wrinkles.

COUNT 25

ENDANGERMENT

On or about December 5, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Tracie Carmel with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Tracie Carmel's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 26

ENDANGERMENT

On or about December 28, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Kelly Kassa with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Kelly Kassa's face with a chemical, believed to be Botox, for the treatment of facial wrinkles.

COUNT 27

ENDANGERMENT

On or about between December 1, 2016, and December 31, 2016, **CRAIG ALLEN SCHERF** recklessly endangered Stephanie Shull with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Stephanie Shull's face with a chemical, believed to be Dysport; for the treatment of facial wrinkles.

COUNT 28

ENDANGERMENT

On or about January 5, 2017, **CRAIG ALLEN SCHERF** recklessly endangered Siobahn Collins with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Siobahn Collins's face with a chemical, believed to be Dysport, for the treatment of facial wrinkles.

COUNT 29

ENDANGERMENT

On or about January 7, 2017, **CRAIG ALLEN SCHERF** recklessly endangered Kimberly Lambert with a substantial risk of imminent death or physical injury, in violation of A.R.S. §§ 13-1201, 13-701, 13-702, 13-703, and 13-801.

This offense occurred when **CRAIG ALLEN SCHERF** injected Kimberly Lambert's face with a chemical, believed to be Botox, for the treatment of facial wrinkles.

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

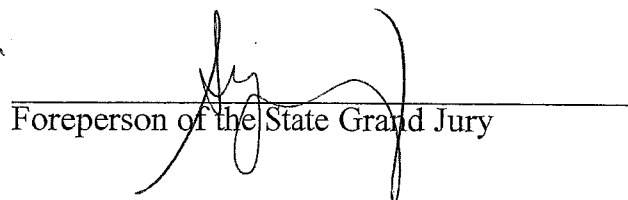
MARK BRNOVICH
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STATE OF ARIZONA



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Assistant Attorney General
#5781415

A True Bill
(A "True Bill")

Dated: March 14, 2017



Foreperson of the State Grand Jury