

MARK BRNOVICH  
Attorney General  
Firm Bar No. 14000  
Matthew Williams  
State Bar No. 029059  
Assistant Attorney General  
2005 North Central Avenue  
Phoenix, Arizona 85004  
Telephone 602-542-3881  
[crmhcfraud@azag.gov](mailto: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.

**ROBERT BRIAN KEMPLE,**

Defendant.

Case No:

**83 SGJ 22**

**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(A)(1)

**COUNT 3: TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE**, a Class 2 Felony, in violation of A.R.S. §13-2307(B)

**COUNTS 4 - 33: COMPUTER TAMPERING**, Class 3 Felonies, in violation of A.R.S. § 13-2316(A)(1)

The Arizona State Grand Jury accuses **ROBERT BRIAN KEMPLE**, charging on this

11<sup>th</sup> day of June, 2018, that in or from Maricopa County, Arizona:

///

///

**COUNT 1**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between March 2017 and September 2017, **ROBERT BRIAN KEMPLE**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, with a value of one hundred thousand dollars or more, 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**

**THEFT**

On or between March 2017 and September 2017, **ROBERT BRIAN KEMPLE**, knowingly obtained the service or property of the victim (CVS Pharmacy) by means of any material misrepresentation with the intent to deprive the victim of such service or property with a value of one hundred thousand dollars or more, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-701, 13-702 and 13-801.

**COUNT 3**

**TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE**

On or about August 8, 2017, **ROBERT BRIAN KEMPLE**, knowingly initiated, organized, planned, financed, directed, managed or supervised the theft and trafficking in the property of the victim (CVS Pharmacy) that had been stolen, in violation of A.R.S. §§ 13-2307, 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 4**

**COMPUTER TAMPERING**

On or about March 6, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7796149304), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 5**

**COMPUTER TAMPERING**

On or about March 13, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7797377101), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 6**

**COMPUTER TAMPERING**

On or about March 20, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7798565538), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 7**

**COMPUTER TAMPERING**

On or about April 3, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7800999613), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 8**

**COMPUTER TAMPERING**

On or about May 1, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7805832732), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 9**

**COMPUTER TAMPERING**

On or about May 15, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7808239330), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 10**

**COMPUTER TAMPERING**

On or about May 22, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7809458785), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 11**

**COMPUTER TAMPERING**

On or about June 5, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7811776731), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 12**

**COMPUTER TAMPERING**

On or about June 5, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7811777124), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 13**

**COMPUTER TAMPERING**

On or about June 12, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7813020873), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 14**

**COMPUTER TAMPERING**

On or about June 13, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7813242093), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 15**

**COMPUTER TAMPERING**

On or about June 26, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7815429910), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///



**COUNT 16**

**COMPUTER TAMPERING**

On or about June 26, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7815429902), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 17**

**COMPUTER TAMPERING**

On or about July 3, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 781665641), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 18**

**COMPUTER TAMPERING**

On or about July 10, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7817761435), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 19**

**COMPUTER TAMPERING**

On or about July 17, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7818999242), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 20**

**COMPUTER TAMPERING**

On or about July 31, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7821550599), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 21**

**COMPUTER TAMPERING**

On or about August 1, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7821776103), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 22**

**COMPUTER TAMPERING**

On or about August 4, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7822475629), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 23**

**COMPUTER TAMPERING**

On or about August 15, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7824251988), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 24**

**COMPUTER TAMPERING**

On or about August 18, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7824950965), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 25**

**COMPUTER TAMPERING**

On or about August 21, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7825248218), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 26**

**COMPUTER TAMPERING**

On or about August 23, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7825707192), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 27**

**COMPUTER TAMPERING**

On or about September 1, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7827413999), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 28**

**COMPUTER TAMPERING**

On or about September 5, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7827810079), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 29**

**COMPUTER TAMPERING**

On or about September 6, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7828047049), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///

**COUNT 30**

**COMPUTER TAMPERING**

On or about September 8, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7828543033), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

**COUNT 31**

**COMPUTER TAMPERING**

On or about September 11, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7828864886), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///



COUNT 32

COMPUTER TAMPERING

On or about September 12, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7829098295), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 13-701, 13-702 and 13-801.

///

///


COUNT 33

COMPUTER TAMPERING

On or about September 15, 2017, **ROBERT BRIAN KEMPLE**, acting without authority or exceeding his authorization of use, accessed, altered, damaged or destroyed any computer, computer system or network, or any part of a computer, computer system or network, with the intent to devise or execute any scheme or artifice to defraud or deceive, or to control property or services by means of false or fraudulent pretenses, representations or promises (to wit: in relation to the creation of McKesson Invoice 7829820810), in violation of A.R.S. §§ 13-2316(A)(1), 13-2301, 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.

MARK BRNOVICH  
ATTORNEY GENERAL  
STATE OF ARIZONA

  
Matthew K. Williams  
Assistant Attorney General

TRUE BILL  
(A "True Bill")

Dated: 6.11.18

  
Foreperson of the State Grand Jury

#7059458