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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.

MELISSA MARIE PAVEY
DOB: 10/28/1972
(1 – 11)
JOLENE ELIZABETH HOUCHENS
DOB: 12/24/1979
(1-3, 5-11)
Defendants.

Case No:

82 SGJ 125

INDICTMENT

CHARGING VIOLATIONS OF:

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

COUNT 2: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

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

COUNT 4: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

COUNT 5: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

COUNT 6: THEFT, a Class 3 Felony, in violation of A.R.S. §§13-1802(A)(3)

COUNT 7: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

COUNT 8: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

COUNT 9: ~~THEFT~~, a Class 5 Felony, in violation of A.R.S. §§13-1802(A)(3), *Forgery, a class 4 Felony*
2002(A)(1) *g*

COUNT 10: TAKING IDENTITY OF ANOTHER PERSON, a Class 4 Felony, in violation of A.R.S. §13-2008(A)

COUNT 11: AGGRAVATED ASSAULT, a class 3 Dangerous Felony, in violation of A.R.S. §§ 13-1204, 13-1203(A)(1), 13-704, 13-105

The Arizona State Grand Jury accuses **MELISSA PAVEY AND JOLENE HUTCHENS**, charging on this 23rd day of April, 2018, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony

On, about, or between, July 1, 2016, and December 20, 2017, in Maricopa County and the State of Arizona, **MELISSA PAVEY AND JOLENE HUTCHENS**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 2

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On or about January 24, 2017, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, recklessly caused any physical injury to **DOMINICK BONAIUTO** using a dangerous instrument (to wit: a surgical tool), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 3

THEFT, a Class 3 Felony

On or about January 24, 2017, in Maricopa County and the State of Arizona, **MELISSA PAVEY AND JOLENE HUTCHENS**, without lawful authority, obtained property belonging to **DOMINICK BONAIUTO** by means of any material misrepresentation with intent to deprive him of that property in an amount exceeding \$4,000.00 but less than \$25,000.00, (to wit: \$6,000.00 for tooth extraction), in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

COUNT 4

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On or about March 9, 2017, in Maricopa County and the State of Arizona, **MELISSA PAVEY**, recklessly caused any physical injury to **DOMINICK BONAIUTO** using a dangerous instrument (to wit: a laser), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 5

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On or about January 17, 2017, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, recklessly caused any physical injury to JEFFREY JOHNSTON using a dangerous instrument (to wit: a drill), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 6

THEFT, a Class 5 Felony

On or about January 17, 2017, December 1, 2017, in Maricopa County and the State of Arizona, **MELISSA PAVEY AND JOLENE HUTCHENS**, without lawful authority, obtained property belonging to JEFFREY JOHNSTON by means of any material misrepresentation with intent to deprive him of that property in an amount exceeding \$2,000.00 but less than \$3,000.00, (to wit: for tooth extraction), in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

COUNT 7

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On or about December 1, 2016, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, recklessly caused any physical injury to JONATHAN BURNSIDE using a dangerous instrument (to wit: a surgical tool), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 8

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On, about, or between January 3, 2017, and January 11, 2017, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, recklessly caused any physical injury to LAYNA GEORGIA using a dangerous instrument (to wit: a surgical tool), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 13-603, 13-610, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 9

FORGERY, a Class 4 Felony

On or about January 11, 2017, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, with the intent to defraud, falsely made, completed, or altered a written instrument (to wit: prescription for Percocet for Layna Georgia), in violation of A.R.S. §§ 13-2002(A)(1), 13-2001, 13-603, 13-610, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 10

TAKING IDENTITY OF ANOTHER PERSON, a Class 4 Felony

On or about January 11, 2017, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, in Maricopa County and the State of Arizona, knowingly took and/or used any personal identifying information of **MARK MOSS, DDS** without his consent, with the intent to obtain or use his identity for any unlawful purpose (to wit: using DDS Moss's prescription pad without his permission for Layna Georgia's Percocet prescription), in violation of A.R.S. §§13-2008(A), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 11

AGGRAVATED ASSAULT, a Class 3 dangerous felony

On, about, or between June 1, 2016, and September 30, 2016, in Maricopa County and the State of Arizona, **JOLENE HUTCHENS and MELISSA PAVEY AS AN ACCOMPLICE**, recklessly caused any physical injury to ROSEMARIE ST. MICHAEL using a dangerous instrument (to wit: a surgical tool), in violation of A.R.S. §§ 13-1204(A)(2), 13-1203(A)(1), 13-704, 13-105, 13-301, 13-302, 13-303, 13-304, 13-601, 13-602, 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



Mary E. McGary
Assistant Attorney General

Sean P. Coll
Assistant Attorney General

A True Bill

(A "True Bill")

Dated: _____



Foreperson of the State Grand Jury

(HB) 6970410