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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

vs.

DALE HENSON (001),
All Counts

KEVIN MAULSON (002),
All Counts

RUSSELL FREEMAN (003),
All Counts

PAUL FLAA (004),
All Counts

ARIEL DIX (005),
All Counts

CHARLES TEMPLE (006),
All Counts

ALLEN JETER (007),
All Counts

Case No:

89 SGJ 68

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a class 2
felony, in violation of A.R.S. §13-1003

**COUNT 2: ILLEGAL CONTROL OF AN
ENTERPRISE,** a class 3 felony, in
violation of A.R.S. §13-2312(A)

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

**COUNT 4: FRAUDULENT SCHEMES
AND ARTIFICES,** a class 2 felony, in
violation of A.R.S. §13-2310

AARON WRIGHT (008),
All Counts

TRISHA WRIGHT (009),
All Counts

KEYANA CARTER (010),
All Counts

SHARON LAWSON (011),
All Counts

THOMAS BATTLE, III (012),
All Counts

KAYLA SOL (013),
All Counts

**LUTHERAN ASSOCIATION
OF MISSIONARIES AND
PILOTS U.S., INC. d/b/a
LUTHERAN INDIAN
MINISTRIES (014),**
All Counts

**SUN VALLEY SERVICES,
LLC (015),**
All Counts

**GENTLE TOUCH
BEHAVIORAL HEALTH (016),**
All Counts

L & L INVESTMENTS, LLC (017),
All Counts

TOGETHER TIME, LLC (018),
All Counts

NEVADA FIRST CHOICE, LLC (019),
All Counts

GOOD SAMARITAN HOMES (020),
All Counts

**OHANA BEHAVIORAL HEALTH
(021),**
All Counts

A-MAKING CHANGES, LLC (022),
All Counts

**AGNES' CENTER FOR DOMESTIC
SOLUTIONS (023),**
All Counts

**BABBITT BOWERS BEHAVIORAL
HEALTH (024),**
All Counts

ANCHORED HEARTS, LLC (025),
All Counts

**MARY GROUP HOME,
a.k.a MARY GROUP HOME II (026),**
All Counts

**RISING YOUTH, LLC d/b/a
ANCHORED HEARTS (027),**
All Counts

Defendants.

The Arizona State Grand Jury accuses **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH(016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES,**

LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), charging on this 27th day of September, 2021, that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between January 1, 2019, and October 30, 2020, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH(016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027),** with the intent to promote or aid the commission of an offense, did agree with one or more persons that at least one of them or another person would engage in conduct constituting the offenses of:

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310;
- 2) **THEFT**, in violation of A.R.S. § 13-1802(A)(3);

- 3) **ILLEGAL CONTROL OF AN ENTERPRISE**, in violation of A.R.S. § 13-2312(A);
- 4) **ILLEGALLY CONDUCTING AN ENTERPRISE**, in violation of A.R.S. § 13-2312(B);
- 5) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R.S. §13- 2317(A).
- 6) **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of A.R.S. §13- 2317(B);
- 7) **FORGERY**, in violation of A.R.S. §13- 2002;
- 8) **USE OF WIRE COMMUNICATION OR ELECTRONIC COMMUNICATION RELATED TO A TITLE 13, CHAPTER 23 OFFENSE**, in violation of A.R.S. § 13-3417;
- 9) **COMPUTER TAMPERING**, a Class 3 Felony, in violation of A.R.S. § 13-2316;

In furtherance of this conspiracy and to affect the objects thereof, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), along**

with others not named, committed numerous overt acts including, but not limited to, those acts set forth in Counts 2 through 4 of this Indictment, which are incorporated herein by reference as if set out in full, in violation of A.R.S. §§ 13-1003, 13-3001, 13-1802, 13-3417, 13-2301, 13-2310, 13-2308, 13-2312, 13-2316, 13-2317, 13-2312, 13-2002, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 2

ILLEGAL CONTROL OF AN ENTERPRISE

On or between January 1, 2019, and October 30, 2020, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027)** 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 or any enterprise that the defendants knew was being conducted through racketeering.

The enterprise was a group of persons associated in fact, including but not limited to **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027);**

- 1) **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310;
- 2) **PARTICIPATING IN A CRIMINAL SYNDICATE**, in violation of A.R.S. § 13-2308(A);
- 3) **ASSISTING A CRIMINAL SYNDICATE**, in violation of A.R.S. § 13-2308(C);
- 4) **MONEY LAUNDERING IN THE FIRST DEGREE**, in violation of A.R.S. §13- 2317.
- 5) **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of A.R.S. §13- 2317;
- 6) **FORGERY**, in violation of A.R.S. §13- 2002;

in violation of A.R.S. §§ 13-2312(B), 13-2301, 13-2001, 13-2002, 13-2310, 13-2009, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

COUNT 3

THEFT

On or between January 1, 2019, and October 30, 2020, **DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027),** knowingly obtained services or property of **Arizona Health Care Cost Containment System (AHCCCS)** of a value of \$25,000 or more, by means of material misrepresentations, with the intent to deprive **Arizona Health Care Cost Containment System (AHCCCS)** of such services or property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-305, 13-306, 13-701, 13-702, 13-801 and 13-811.

COUNT 4

FRAUDULENT SCHEMES AND ARTIFICES

On or between January 1, 2019, and October 30, 2020, DALE HENSON (001), KEVIN MAULSON (002), RUSSELL FREEMAN (003), PAUL FLAA (004), ARIEL DIX (005), CHARLES TEMPLE (006), ALLEN JETER (007), AARON WRIGHT (008), TRISHA WRIGHT (009), KEYANA CARTER (010), SHARON LAWSON (011), THOMAS BATTLE, III (012), KAYLA SOL (013), LUTHERAN ASSOCIATION OF MISSIONARIES AND PILOTS U.S., INC. d/b/a LUTHERAN INDIAN MINISTRIES (014), SUN VALLEY SERVICES, LLC (015), GENTLE TOUCH BEHAVIORAL HEALTH (016), L & L INVESTMENTS, LLC (017), TOGETHER TIME, LLC (018), NEVADA FIRST CHOICE, LLC (019), GOOD SAMARITAN HOMES (020), OHANA BEHAVIORAL HEALTH (021), A-MAKING CHANGES, LLC (022), AGNES' CENTER FOR DOMESTIC SOLUTIONS (023), BABBITT BOWERS BEHAVIORAL HEALTH (024), ANCHORED HEARTS, LLC (025), MARY GROUP HOME, a.k.a MARY GROUP HOME II (026), RISING YOUTH, LLC d/b/a ANCHORED HEARTS (027), pursuant to a scheme or artifice to defraud, knowingly obtained 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, 13-801 and 13-811.

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

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA



Brett Harnes
Assistant Attorney General

#9827047

True Bill
(A "True Bill")

Dated: 9/27/21

Terese Simpsonbach
Foreperson of the State Grand Jury