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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.

**SHAWNJERRIA NISHALLEN LUCAS
(001)**
(Counts 1, 2, and 4 - 20),

 **(002)**
(Counts 1, 2, and 4 - 20),

LAVITA RENE VERSER (003)
(Counts 1, 3, and 4 - 20),

**A BETTER YOU WELLNESS CENTER,
LLC (004)**
(Counts 4 - 20),

Defendants.

Case No:

93 SGJ 42

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

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

COUNTS 5 - 20: THEFT, as Class 2
Felonies, in violation of A.R.S. §13-
1802(A)(3)

The Arizona State Grand Jury accuses **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], [REDACTED], [REDACTED], **LAVITA RENE VERSER**, and **A BETTER YOU WELLNESS CENTER, LLC** charging on this 2nd day of October, 2023 that in or from Maricopa County, Arizona:

COUNT 1
CONSPIRACY

On or between December 1, 2021 and February 10, 2023, with the intent to promote or aid the commission of an offense **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], [REDACTED], and **LAVITA RENE VERSER** agreed with one or more persons that at least one of them or another person will engage in conduct constituting the offenses of:

- **FRAUDULENT SCHEMES AND ARTIFICES**, in violation of A.R.S. § 13-2310, and
- **THEFT**, in violation of A.R.S. § 13-1802

and one of the parties committed an overt act in furtherance of the offenses, including but not limited to the overt acts described in counts 4 - 20 of this indictment (which are incorporated herein by reference), in violation of A.R.S. §§ 13-1003, 13-2312, 13-2310, 13-2301, 13-2001, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801

COUNT 2
ILLEGAL CONTROL OF AN ENTERPRISE

On or between December 1, 2021 and February 10, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, and [REDACTED], through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise(s) include **A BETTER YOU WELLNESS CENTER, LLC**, and/or a group of persons associated in fact, including but not limited to **SHAWNJERRIA**

NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER, and others KNOWN and/or UNKNOWN.

The racketeering offenses included:

- 1) **A SCHEME OR ARTIFICE TO DEFRAUD**, in violation of A.R.S. § 13-2301(D)(4)(b)(xx);
- 2) **MONEY LAUNDERING**, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi);
- 3) **THEFT**, in violation of A.R.S. § 13-2301(D)(4)(b)(v); and
- 4) **FORGERY**, in violation of A.R.S. § 13-2301(D)(4)(b)(iv);

The alleged racketeering includes, but is not limited to the acts described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(A), 13-2310, 13-2301, 13-2001, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 3

ILLEGALLY CONDUCTING AN ENTERPRISE

On or between December 1, 2021 and February 10, 2023, **LAVITA RENE VERSER** did knowingly conduct such enterprise's affairs through racketeering or did knowingly participate directly or indirectly in the racketeering conduct or any enterprise that **LAVITA RENE VERSER** knew was being conducted through racketeering. The enterprise(s) include **A BETTER YOU WELLNESS CENTER, LLC** and/or a group of persons associated in fact, including but not limited to **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], [REDACTED], LAVITA RENE VERSER, and others KNOWN and/or UNKNOWN.**

The racketeering included:

- 1) **A SCHEME OR ARTIFICE TO DEFRAUD**, in violation of A.R.S. § 13-2301(D)(4)(b)(xx);
- 2) **MONEY LAUNDERING**, in violation of A.R.S. § 13-2301(D)(4)(b)(xxvi);

- 3) **THEFT**, in violation of A.R.S. § 13-2301(D)(4)(b)(v); and
- 4) **FORGERY**, in violation of A.R.S. § 13-2301(D)(4)(b)(iv);

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation A.R.S. §§ 13-2312(B), 13-2310, 13-2301, 13-2001, 13-701, 13-702 and 13-801.

COUNT 4

FRAUDULENT SCHEMES AND ARTIFICES

On or between December 1, 2021 and February 10, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: a financial benefit) by means of false or fraudulent pretenses, representations, promises or material omissions. The value of the financial benefit received was \$100,000 or more, in violation of A.R.S. §§ 13-2310, 13-2310 (C), 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801

COUNT 5

THEFT

On or between December 1, 2021 and January 27, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 6

THEFT

On or between December 1, 2021 and January 27, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 7

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 8

THEFT

On or between December 1, 2021 and January 27, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA**

RENE VERSER and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 9

THEFT

On or between April 8, 2022 and February 10, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 10

THEFT

On or between December 1, 2021 and January 27, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim

(**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 11

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED] with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 12

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 13

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 14

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 15

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA**

RENE VERSER and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 16

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 17

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS**, [REDACTED], **LAVITA RENE VERSER** and **A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona**

Health Care Cost Containment System) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 18

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 19

THEFT

On or between December 1, 2021 and January 20, 2023, **SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC**, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 20

THEFT

On or between December 1, 2021 and January 27, 2023, SHAWNJERRIA NISHALLEN LUCAS, [REDACTED], LAVITA RENE VERSER and A BETTER YOU WELLNESS CENTER, LLC, knowingly obtained the service or property of the victim (**The Arizona Health Care Cost Containment System**) by means of any material misrepresentation (i.e. submitting false billing claims for services purportedly rendered to beneficiary [REDACTED]) with the intent to deprive the victim (**The Arizona Health Care Cost Containment System**) of such service or property with a value of twenty-five thousand dollars or more, and in an amount that exceeds one hundred thousand dollars, in violation of A.R.S. §§ 13-1802, 13-1802(H), 13-1801, 13-305, 13-303, 13-302, 13-301, 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.

True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 10/2/23

Matthew Williams
MATTHEW WILLIAMS
Assistant Attorney General

[Signature]
Foreperson of the State Grand Jury