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Attorneys for Plaintiff

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

STATE OF ARIZONA,

Plaintiff,

v.

HOWARD JONES,

Defendant.

No.

INDICTMENT

55 SGJ 96

CHARGING VIOLATIONS OF:

Count 1

FRAUDULENT SCHEMES AND ARTIFICES

A.R.S. § 13-2310

Class 2 Felony

Count 2

THEFT

A.R.S. § 13-1802

Class 2 Felony

Count 3

ACQUISITION OF A NARCOTIC DRUG

A.R.S. § 13-3408

Class 3 Felony

The Arizona State Grand Jury accuses **HOWARD JONES**, charging on this 20th day of October, 2004 that in or from Mohave, Arizona:

COUNT 1

On or between January 1, 2002 and March 6, 2004, **HOWARD JONES**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions.

This occurred when **HOWARD JONES** obtained and/or diverted drugs without authorization and/or billed insurance companies for non-dispensed drugs in order to increase his prescription sales volume, in violation of A.R.S. §§13-2310, 13-2301, 13-702, 13-702.01, and 13-801.

COUNT 2

On or between January 1, 2002 and March 6, 2004, **HOWARD JONES**, without lawful authority knowingly converted for an unauthorized term or use services or property of another entrusted to the defendant or placed in the defendant' s possession for a limited, authorized term or use with intent to deprive such person of the property or services, such property having a value of twenty-five thousand dollars \$25,000.00 or more.

This occurred when **HOWARD JONES** diverted and/or obtained drugs to which he and others were not entitled, and billed insurance companies for the cost of the drugs or caused Smith Drugs to suffer a loss, and also billed insurance companies for non-dispensed drugs, having a value of approximately \$291,201.26, in violation of A.R.S. §§13-1801, 13-1802, 13-701, 13-702, 13-702.01, and 13-801.

COUNT 3

On or between January 1, 2002 and March 6, 2004, **HOWARD JONES**, without lawful authority, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge.

This occurred when **HOWARD JONES** obtained or procured narcotic and opiate drugs, including: Lortab, Lorcet, Norco, and Tylenol with Codeine in violation of A.R.S. §§ 13-3408(A) (6), 13-701, 13-702, 13-702.01, and 13-801.

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

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

PAMELA SVOBODA
Assistant Attorney General

("A True Bill")

Dated: _____

Foreperson of the State Grand Jury