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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.

**JAMES LAWRENCE ROBROCK (001),
CHRISTOPHER RYAN CHILTON (002),
MATTHEW ANTHONY THIERBACH (003),
JONATHAN LAINE ZALETEL (004),**

Defendants.

Case No:

70 SGJ 52

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: PARTICIPATING IN A
CRIMINAL SYNDICATE, a Class 2
Felony, in violation of A.R.S. § 13-2308**

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

**COUNT 3: ACQUISITION OF A
NARCOTIC DRUG BY FRAUD, a
Class 3 Felony, in violation of A.R.S. §
13-3408(A)(6)**

**COUNT 4: POSSESSION OF A
NARCOTIC DRUG FOR SALE, a
Class 2 Felony, in violation of A.R.S. §
13-3408(A)(2)**

**COUNT 5: FORGERY, a Class 4
Felony, in violation of A.R.S. § 13-
2002(A)**

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**COUNT 6: TRANSPORTATION OF
A PRESCRIPTION-ONLY DRUG
FOR SALE, a Class 6 Felony, in
violation of A.R.S. § 13-3406(A)(7)**

**COUNT 7: AGGRAVATED TAKING
THE IDENTITY OF ANOTHER
PERSON OR ENTITY, a Class 3
Felony, A.R.S. § 13-2009(A)(1) and (B)**

The Arizona State Grand Jury accuses JAMES LAWRENCE ROBROCK (001), CHRISTOPHER RYAN CHILTON (002), MATTHEW ANTHONY THIERBACH (003), and JONATHAN LAINE ZALETEL (004), charging on this 14th day of February, 2012 that in Maricopa County, Arizona:

COUNT 1
PARTICIPATING IN A CRIMINAL SYNDICATE

On or between March 1, 2010, and December 22, 2011, JAMES LAWRENCE ROBROCK (001), CHRISTOPHER RYAN CHILTON (002), MATTHEW ANTHONY THIERBACH (003), and JONATHAN LAINE ZALETEL (004), intentionally organized, managed, directed, supervised or financed a criminal syndicate with the intent to promote or further the criminal objectives of the syndicate; and/or furnished advice or direction in the conduct, financing or management of a criminal syndicate's affairs with the intent to promote or further the criminal objectives of a criminal syndicate, in violation of A.R.S. §§ 13-2308, 13-603, 13-301, 13-302, 13-303, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

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COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES

On or between March 1, 2010, and December 22, 2011, JAMES LAWRENCE ROBROCK (001), CHRISTOPHER RYAN CHILTON (002), MATTHEW ANTHONY THIERBACH (003), and JONATHAN LAINE ZALETEL (004), 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, 13-2301, 13-603, 13-301, 13-302, 13-303, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 3

ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or between March 1, 2010, and December 22, 2011, JAMES LAWRENCE ROBROCK (001), CHRISTOPHER RYAN CHILTON (002), MATTHEW ANTHONY THIERBACH (003), and JONATHAN LAINE ZALETEL (004), knowingly obtained a narcotic drug by fraud, deceit, misrepresentation or subterfuge in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

COUNT 4

POSSESSION OF A NARCOTIC DRUG FOR SALE

On or between March 1, 2010, and December 22, 2011, JAMES LAWRENCE ROBROCK (001), CHRISTOPHER RYAN CHILTON (002), MATTHEW ANTHONY THIERBACH (003), and JONATHAN LAINE ZALETEL (004), possessed a narcotic drug, Oxycontin and/or Oxycodone, for sale, in violation of A.R.S. §§13-3408(A)(2), 13-3401, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, and 13-811.

1 in violation of A.R.S. §§ 13-2009(A)(1) and (B), 13-603, 13-301, 13-302, 13-303, 13-
2 701, 13-702, 13-703, 13-801, 13-804, and 13-811.

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4 _____
(A "True Bill")

5 THOMAS C. HORNE
6 ATTORNEY GENERAL
7 STATE OF ARIZONA

8
9 Dated: _____

10 _____
Jesse L. Delaney
Assistant Attorney General

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Foreperson of the State Grand Jury