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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
COUNTY OF MARICOPA

STATE OF ARIZONA,  
Plaintiff,

v.

**TYLER JENSEN DEANE (001)**  
(Counts 1-3, 5-8, 10-14, 17-31, 34-40, 42-52, 54-68, 70-76, 78-80, 83-84)

**LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002)**  
(Counts 1-2, 4-6, 9-45, 49-80, 83-84)

████████████████████ (003)  
(Counts 1-2, 5-7, 17-24, 28-29, 54-61 65-66)

████████████████████ (004)  
(Counts 2, 5-7, 25-27, 62-64, 81)

████████████████████ (005) (28-29, 65-66, 81)

████████████████████ (006) (30-31, 67-68, 81)

████████████████████ (007) (32-

Case No: 67 SGJ 97

**INDICTMENT**

CHARGING VIOLATIONS OF:

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

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

**COUNT 3: MONEY LAUNDERING IN THE FIRST DEGREE**, a class 2 Felony in violation of A.R.S. §§ 13-2317(A)(1) & (B)(1)

**COUNT 4: MONEY LAUNDERING IN THE FIRST DEGREE**, a class 2 Felony in violation of A.R.S. §§ 13-2317(A)(1) & (B)(2)

33, 69, 81)

[REDACTED] (008) (34-36, 70-72, 81)

[REDACTED] (009) (37-38, 73-74, 81)

[REDACTED] (010) (39, 75, 81)

[REDACTED] (011) (40, 76, 81)

[REDACTED] (012) (41, 77, 81)

[REDACTED] (013) (42, 78, 81)

[REDACTED] (014) (43-44, 79-80, 81)

[REDACTED] (015) (82)

Defendants.

**COUNT 5: POSSESSION OF A NARCOTIC DRUG FOR SALE, ABOVE THE THRESHOLD**, a Class 2 Felony, in violation of A.R.S. §§ 13-3408(A)(2) & 13-3420

**COUNT 6: CONSPIRACY**, a class 2 Felony, in violation of A.R.S. § 13-1003

**COUNT 7: SALE OF A NARCOTIC DRUG IN A DRUG-FREE SCHOOL ZONE**, a class 2 Felony, in violation of A.R.S. §§ 13-3408(A)(7) & 13-3411

**COUNT 8: SALE OF A NARCOTIC DRUG**, class 2 Felonies, in violation of A.R.S. § 13-3408(A)(7)

**COUNT 9: TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE**, a class 2 Felony, in violation of A.R.S. § 13-2307

**COUNTS 10-44: ACQUISITION OF A NARCOTIC DRUG BY FRAUD**, class 3 Felonies, in violation of A.R.S. § 13-3408

**COUNT 45-48: TAKING THE IDENTITY OF ANOTHER PERSON**, a class 4 Felony, in violation of A.R.S. § 13-2008

**COUNTS 49-80: FORGERY**, class 4 Felonies, in violation of A.R.S. § 13-2002

**COUNT 81: ASSISTING IN A CRIMINAL SYNDICATE**, a class 4 Felony, in violation of A.R.S. § 13-2308(C)

**COUNT 82: POSSESSION OF A NARCOTIC DRUG**, a class 4 felony in violation of A.R.S. § 13-3408(A)(1)

**COUNT 83: CRIMINAL POSSESSION OF A FORGERY DEVICE**, a class 5 Felony, in violation of A.R.S. § 13-2003

**COUNT 84: THEFT**, a class 3 Felony, in violation of A.R.S. § 13-1802(A)(5) & (G)

The Arizona State Grand Jury accuses TYLER JENSEN DEANE (001),  
LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002),  
[REDACTED] (003), [REDACTED] (004), [REDACTED]  
[REDACTED] (005), [REDACTED] (006), [REDACTED] (007),  
[REDACTED] (008), [REDACTED] (009), [REDACTED]  
[REDACTED] (010), [REDACTED] (011), [REDACTED]  
[REDACTED] (012), [REDACTED] (013), [REDACTED] (014) –  
[REDACTED] (015), charging on this 15th day of  
September, 2010 that in or from Maricopa County, Arizona:

**COUNT 1**

**PARTICIPATING IN A CRIMINAL SYNDICATE**

On or between June 1, 2010 and September 9, 2010, TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), and [REDACTED] (003), intentionally organized, managed, directed, supervised, or financed a criminal syndicate with the intent to promote or further the criminal objectives of the syndicate in violation of A.R.S. §13-2308(A)(1), 13-2301, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

**COUNT 2**

**FRAUDULENT SCHEMES AND ARTIFICES**

On or between June 1, 2010 and September 9, 2010, TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), [REDACTED] (003) and [REDACTED] (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 A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred on or between June 1, 2010 and September 9, 2010, when TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), [REDACTED] (003) and [REDACTED] (004) entered into a scheme or artifice to defraud which entailed filling fraudulent prescriptions and having others fill fraudulent prescriptions to obtain a narcotic drug for sale.

### COUNT 3

#### MONEY LAUNDERING IN THE FIRST DEGREE

On or between June 1, 2010 and September 9, 2010, TYLER JENSEN DEANE (001) knowingly initiated, organized, planned, financed, directed, managed, supervised or was in the business of money laundering by maintaining an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds knowing or having reason to know that they were the proceeds of an offense in violation of A.R.S. §§ 13-2317(A)(1), (B)(1), (C), 13-2301, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred when TYLER JENSEN DEANE (001) knowingly used the money obtained from the sale of forged prescriptions to make purchases.

### COUNT 4

#### MONEY LAUNDERING IN THE FIRST DEGREE

On or between June 1, 2010 and September 9, 2010, LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) knowingly initiated, organized, planned, financed, directed, managed, supervised or was in the business of money laundering by making property available to another by transaction, transportation or otherwise knowing that it was intended to be used to facilitate racketeering in violation of A.R.S. §§ 13-2317(A)(1), (B)(2), (C), 13-2301, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred when LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) knowingly sold prescription pads to

TYLER JENSEN DEANE (001) to facilitate the forgery and sale of prescription drugs.

**COUNT 5**

**POSSESSION OF A NARCOTIC DRUG FOR SALE**

On or between June 1, 2010 and September 9, 2010 TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), [REDACTED] (003) and [REDACTED] (004), possessed a narcotic drug for sale, to wit: Oxycodone in an amount above the threshold in violation of A.R.S. §§13-3408(A)(2) and (B)(2), 13-3420, 13-2401, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred on or between June 1, 2010 and September 9, 2010, when TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), [REDACTED] (003) and [REDACTED] (004) each filled fraudulent prescriptions of Oxycodone in an amount above the threshold with the intent to sell those drugs.

**COUNT 6**

**CONSPIRACY**

On or between June 1, 2010 and September 9, 2010 TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), [REDACTED] (003) and [REDACTED] (004), with the intent to promote or aid the commission of an offense, such persons agreed with one or more persons that at least one of them or another person will engage in conduct constituting the offense and one of the parties commits an overt act in furtherance of the offense, in particular, Participating in/Assisting a Criminal Syndicate, in violation of A.R.S. § 13-2308; Fraudulent Schemes and Artifices, in violation of A.R.S. § 13-2310; Acquisition of a Narcotic Drug by Fraud, Deceit, Misrepresentation or Subterfuge, in violation of A.R.S. § 13-3408(a)(6); Possession of a Narcotic Drug For Sale, in violation of A.R.S. § 13-3402(A)(2); Forgery in violation of A.R.S. § 13-2002 or Theft in violation of A.R.S. § 13-1802(A)(3) & (A)(5)

In furtherance of this conspiracy and to effect the objectives thereof, defendants did commit numerous overt acts, including but not limited to, the overt acts described in Counts 1 through 86 which are incorporated herein by reference as if set out in full, in violation of A.R.S. § 13-1003, 13-2308, 13-2310, 13-2010, 13-3408(A)(6), 13-3407(A)(7), 13-2002, 13-1802, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

#### COUNT 7

##### SALE OF A NARCOTIC DRUG IN A DRUG-FREE SCHOOL ZONE

On or about September 8, 2010 TYLER JENSEN DEANE (001), [REDACTED] (003) and [REDACTED] (004) sold a Narcotic drug to wit: Oxycodone in violation of A.R.S. § 13-3407(A)(7), 13-3411, 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred when TYLER JENSEN DEANE (001), [REDACTED] (003) and [REDACTED] (004) filled a prescription for Oxycodone and then engaged in a meeting where a hand to hand sale occurred.

#### COUNT 8

##### SALE OF A NARCOTIC DRUG

On or about September 9, 2010 TYLER JENSEN DEANE (001) sold a Narcotic drug to wit: Oxycodone in violation of A.R.S. § 13-3407(A)(7), 13-301, 13-302, 13-303, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

Such conduct occurred when TYLER JENSEN DEANE (001) engaged in a meeting where a hand to hand sale occurred.

#### COUNT 9

##### TRAFFICKING IN STOLEN PROPERTY IN THE FIRST DEGREE

On or between June 1, 2010 and September 9, 2010 LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) Knowingly initiated, organized, planed, financed, directed, managed or supervised the theft and trafficking in the property of another that had been stolen, to wit: prescription pads in violation of

A.R.S. § 13-2307(B) and (C), 13-2301, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

**COUNT 10**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 28, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about June 28, 2010, when TYLER JENSEN DEANE (001) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 11**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 14, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about July 14, 2010, when TYLER JENSEN DEANE (001) obtained a narcotic drug, to wit: Oxycodone by presenting a forged Prescription, provided to him by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 12**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 9, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about August 9, 2010, when TYLER JENSEN DEANE (001) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 13**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 30, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about August 30, 2010 when TYLER JENSEN DEANE (001) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 14**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about September 8, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002),

as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about September 8, 2010 when TYLER JENSEN DEANE (001) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

#### COUNT 15

#### ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about June 16, 2010, LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), 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, 13-811.

Said conduct occurred on or about June 16, 2010 when LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription to a pharmacy in Maricopa County.

#### COUNT 16

#### ACQUISITION OF A NARCOTIC DRUG BY FRAUD

On or about August 3, 2010, LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), 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, 13-811.

Said conduct occurred on or about August 3, 2010 when LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) obtained a

narcotic drug, to wit: Hydrocodone by presenting a forged prescription to a pharmacy in Maricopa County.

**COUNT 17**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 2, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 2, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 18**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 7, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 7, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 19**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 2, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about July 2, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 20**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 2, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about July 2, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 21**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 15, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about July 15, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 22**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 6, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 6, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 23**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 17, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 17, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 24**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about September 7, 2010 [REDACTED] (003) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about September 7, 2010 when [REDACTED] (003) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and

LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 25**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 9, 2010 [REDACTED] (004) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 9, 2010 when [REDACTED] (004) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 26**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 14, 2010 [REDACTED] (004) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 14, 2010 when [REDACTED] (004) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 27**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 26, 2010 [REDACTED] (004) with TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 26, 2010 when [REDACTED] (004) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 28**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 6, 2010 [REDACTED] (005) with TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about July 6, 2010 when [REDACTED] (005) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka

LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), to a pharmacy in Maricopa County.

**COUNT 29**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about July 9, 2010 [REDACTED] (005) with TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about July 9, 2010 when [REDACTED] (005) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), to a pharmacy in Maricopa County.

**COUNT 30**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 7, 2010 [REDACTED] (006) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 7, 2010 when [REDACTED] (006) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka

LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 31**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 11, 2010 [REDACTED] (006) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 11, 2010 when [REDACTED] (006) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 32**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 1, 2010 [REDACTED] (007) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 13-303.

Said conduct occurred on or about June 1, 2010 when [REDACTED] (007) obtained a narcotic drug, to wit: Hydrocodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and

LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 33**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 3, 2010 [REDACTED] (007) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as an accomplice, 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, 13-811 and 13-303.

Said conduct occurred on or about June 3, 2010 when [REDACTED] (007) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 34**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 25, 2010 [REDACTED] (008) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 25, 2010 when [REDACTED] (008) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka

LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 35**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 25, 2010 [REDACTED] (008) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 25, 2010 when [REDACTED] (008) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 36**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 16, 2010 [REDACTED] (008) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 16, 2010 when [REDACTED] (008) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka

LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 37**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 2, 2010 [REDACTED] (009) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 2, 2010 when [REDACTED] (009) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 38**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 22, 2010 [REDACTED] (009) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 22, 2010 when [REDACTED] (009) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and

LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 39**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 20, 2010 [REDACTED] (010) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 20, 2010 when [REDACTED] (010) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 40**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 3, 2010 [REDACTED] (011) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 3, 2010 when [REDACTED] (011) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 41**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about June 21, 2010 [REDACTED] (012) with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), and [REDACTED] (007), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about June 21, 2010 when [REDACTED] (012) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to her by LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (007), to a pharmacy in Maricopa County.

**COUNT 42**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 28, 2010 [REDACTED] (013) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 28, 2010 when [REDACTED] (013) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka

LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 43**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about August 23, 2010 [REDACTED] (014) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about August 23, 2010 when [REDACTED] (014) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 44**

**ACQUISITION OF A NARCOTIC DRUG BY FRAUD**

On or about September 1, 2010 [REDACTED] (014) with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), as accomplices, 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, 13-811 and 13-303.

Said conduct occurred on or about September 1, 2010 when [REDACTED] (014) obtained a narcotic drug, to wit: Oxycodone by presenting a forged prescription, provided to him by TYLER JENSEN DEANE (001), and LEANNE

DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to a pharmacy in Maricopa County.

**COUNT 45**

**TAKING THE IDENTITY OF ANOTHER**

On or between June 1, 2010 and September 9, 2010, TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that person or entity, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity; to wit, a DEA prescription identification number belonging to [REDACTED], in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811 and 13-303.

**COUNT 46**

**TAKING THE IDENTITY OF ANOTHER**

On or about September 9, 2010, TYLER JENSEN DEANE (001), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that person or entity, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity; to wit, the name and drivers license of [REDACTED], in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811 and 13-303.

**COUNT 47**

**TAKING THE IDENTITY OF ANOTHER**

On or about September 9, 2010, TYLER JENSEN DEANE (001), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that person or entity, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity; to wit, the name and drivers license of [REDACTED] in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811 and 13-303.

**COUNT 48**

**TAKING THE IDENTITY OF ANOTHER**

On or about September 9, 2010, TYLER JENSEN DEANE (001), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information or entity identifying information of another person or entity, including a real or fictitious person or entity, without the consent of that person or entity, with the intent to obtain or use the identity for any unlawful purpose or to cause loss to a person or entity; to wit, the name and drivers license of [REDACTED] in violation of A.R.S. §§ 13-2008, 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811 and 13-303.

**COUNT 49**

**FORGERY**

On or about June 28, 2010, TYLER JENSEN DEANE (001) with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as an accomplice, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when TYLER JENSEN DEANE (001) presented a forged prescription, which he obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 50**

**FORGERY**

On or about July 14, 2010, TYLER JENSEN DEANE (001) with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as an accomplice, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when TYLER JENSEN DEANE (001) presented a forged prescription, which he obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 51**

**FORGERY**

On or about August 9, 2010, TYLER JENSEN DEANE (001) with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as an accomplice, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when TYLER JENSEN DEANE (001) presented a forged prescription, which he obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in

violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 52**

**FORGERY**

On or about August 30, 2010, TYLER JENSEN DEANE (001) with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as an accomplice, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when TYLER JENSEN DEANE (001) presented a forged prescription, which he obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 53**

**FORGERY**

On or about June 16, 2010, LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) presented a forged prescription to Desert Sky Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

**COUNT 54**

**FORGERY**

On or about June 2, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Target Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 55**

**FORGERY**

On or about June 7, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 56**

**FORGERY**

On or about July 2, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka

LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Target Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 57**

**FORGERY**

On or about July 2, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 58**

**FORGERY**

On or about July 15, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 59**

**FORGERY**

On or about August 6, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 60**

**FORGERY**

On or about August 17, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002),

to Target Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 61**

**FORGERY**

On or about September 7, 2010, [REDACTED] (003), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (003) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 62**

**FORGERY**

On or about June 9, 2010, [REDACTED] (004), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (004) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy., in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 63**

**FORGERY**

On or about June 14, 2010, [REDACTED] (004), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (004) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 64**

**FORGERY**

On or about August 26, 2010, [REDACTED] (004), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (004) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 65**

**FORGERY**

On or about July 6, 2010, [REDACTED] (005), with TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (005) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 66**

**FORGERY**

On or about July 9, 2010, [REDACTED] (005), with TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (005) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001), LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (003), to Desert Sky Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

COUNT 67

FORGERY

On or about June 7, 2010 [REDACTED] (006), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (006) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Osco Drug, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

COUNT 68

FORGERY

On or about June 11, 2010 [REDACTED] (006), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (006) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Desert Sky Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 69**

**FORGERY**

On or about June 3, 2010 [REDACTED] (007), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as an accomplice, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (007) presented a forged prescription, which he obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Desert Sky Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 70**

**FORGERY**

On or about June 25, 2010 [REDACTED] (008), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (008) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 71**

**FORGERY**

On or about June 25, 2010 [REDACTED] (008), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (008) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Safeway Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 72**

**FORGERY**

On or about August 16, 2010 [REDACTED] (008), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (008) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 73**

**FORGERY**

On or about June 2, 2010 [REDACTED] (009), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (009) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Fry's Food and Drug, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 74**

**FORGERY**

On or about June 22, 2010 [REDACTED] (009), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (009) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to MG Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 75**

**FORGERY**

On or about August 20, 2010 [REDACTED] (010), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (010) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 76**

**FORGERY**

On or about June 3, 2010 [REDACTED] (011), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (011) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Fry's Food and Drug, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 77**

**FORGERY**

On or about June 21, 2010 [REDACTED] (012), with LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (007) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (012) presented a forged prescription, which she obtained from LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) and [REDACTED] (007), to Valley of the Sun Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 78**

**FORGERY**

On or about August 28, 2010 [REDACTED] (013), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (013) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 79**

**FORGERY**

On or about August 23, 2010 [REDACTED] (014), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (014) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 80**

**FORGERY**

On or about September 1, 2010 [REDACTED] (014), with TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) as accomplices, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information.

Said conduct occurred when [REDACTED] (014) presented a forged prescription, which he obtained from TYLER JENSEN DEANE (001) and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002), to Paradise Valley Pharmacy, in violation of A.R.S. §§ 13-2002, 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01, 13-801 and 13-303.

**COUNT 81**

**ASSISTING IN A CRIMINAL SYNDICATE**

On or between June 1, 2010 and September 9, 2010, [REDACTED] (004), [REDACTED] (005), [REDACTED] (006), [REDACTED] (007), [REDACTED] (008), [REDACTED] (009), [REDACTED] (010), [REDACTED] (011), [REDACTED] (012), [REDACTED] (013), [REDACTED] (014) assisted a criminal syndicate by committing a felony offense or offenses, whether completed or preparatory, with the intent to promote or further the criminal objectives of the criminal syndicate, including but not limited to those offenses described in the other counts of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2308(C), 13-2301, 13-2310, 13-3408(A)(6), 13-3407(A)(6), 13-301, 13-302, 13-303, 13-701, 13-702, 13-703, 13-801, 13-804 and 13-811.

**COUNT 82**

**POSSESSION OF A NARCOTIC DRUG**

On or about September 9, 2010 [REDACTED] (015) possessed a narcotic drug, to wit: Oxycodone in violation of A.R.S. §§ 13-3408(A)(1) 13-3401 13-901.01 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

**COUNT 83**

**CRIMINAL POSSESSION OF A FORGERY DEVICE**

On or between June 1, 2010 and September 9, 2010 TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) possessed blank prescription pads adaptable for use in forging written prescriptions, with intent to use it or to aid or permit another to use it for

purposes of forgery, in violation of A.R.S. §§ 13-2003(A)(2), 13-2001, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

**COUNT 84**

**THEFT**

On or between June 1, 2010 and September 9, 2010 TYLER JENSEN DEANE (001), and LEANNE DURIVAGE aka LEANNE ROXBERRY aka LEANNE DUDLEY (002) controlled property of another knowing, or having reason to know that the property was stolen to wit: blank prescriptions in violation of A.R.S. §§ 13-1802(A)(5), 13-1801, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-702.01 and 13-801.

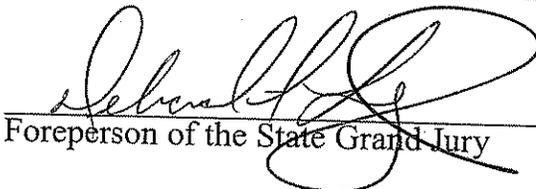
Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

A True Bill  
(A "True Bill")

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA

Dated: 9/15/10

  
James Parker  
Assistant Attorney General

  
Foreperson of the State Grand Jury