

2016 MAR 31 PM 3:06

1 **MARK BRNOVICH**
Attorney General
2 Firm Bar No. 14000
3 **NICHOLAS KLINGERMAN**
Assistant Attorney General
4 400 West Congress, Suite S-315
Tucson, Arizona 85701
5 Telephone No.: (520) 628-6504
Pima County Computer No.: 66455
6 State Bar No.: 028231
CRMTucson@azag.gov
7 AGO/SIS T002-2015-000259

D. WANDELL, DEPUTY

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF PIMA**

10 **STATE OF ARIZONA,**

Case No: **CR20161374-001**

11 **Plaintiff,**

260-GJ-1318

12 **v.**

INDICTMENT

13 **COURTNEY ROCHELL WARD (001),**

CHARGING VIOLATIONS OF:

14 **Defendant.**

**COUNTS 1-7: MONEY LAUNDERING IN
THE SECOND DEGREE, a Class 3 Felony,
in violation of A.R.S. § 13-2317**

**COUNTS 9-10: FRAUDULENT SCHEMES
AND ARTIFICES, a Class 2 Felony, in
violation of A.R.S. § 13-2310**

**COUNTS 11-13: FORGERY, a Class 4
Felony, in violation of A.R.S. § 13-2002**

15
16
17
18
19
20
21
22
23 The grand jurors of the County of Pima, in the name of the State of Arizona, and by its
24 authority, accuse and charge that in Pima County:
25
26
27
28

COUNT 1

CR20161374-001

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

1
2 From on or about August 2014, and continuing through on or about July 2015,
3 **COURTNEY ROCHELL WARD (001)** intentionally or knowingly falsified, concealed,
4 covered up or misrepresented or attempted to falsify, conceal, cover up or misrepresent the
5 identity of any person in connection with transactions listed in Exhibit A with Wells Fargo Bank
6 account 2375311608, in violation of A.R.S. §§ 13-2317(B)(7), 13-108, 13-109, 13-301, 13-302,
7 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT 2

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

8
9
10 From on or about August 2014, and continuing through on or about July 2015,
11 **COURTNEY ROCHELL WARD (001)** intentionally or knowingly falsified, concealed,
12 covered up or misrepresented or attempted to falsify, conceal, cover up or misrepresent the
13 identity of any person in connection with transactions listed in Exhibit A with Wells Fargo Bank
14 account 5271071069, in violation of A.R.S. §§ 13-2317(B)(7), 13-108, 13-109, 13-301, 13-302,
15 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

COUNT 3

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

16
17
18 From on or about August 2014, and continuing through on or about July 2015,
19 **COURTNEY ROCHELL WARD (001)** committed money laundering by acquiring or
20 maintaining an interest in, transacting, transferring, transporting, receiving or concealing the
21 existence or nature of racketeering proceeds knowing or having reason to know that they are the
22 proceeds of an offense; to wit: the currency retained by Courtney Ward for the transactions listed
23 in Exhibit A, in violation of A.R.S. §13-2317(B)(1), 13-2301, 13-301, 13-302, 13-303, 13-603,
24 13-701, 13-702, 13-703, 13-711, 13-801, and 13-811, 13-2313, and 13-2314.

COUNT 4

CR20161374-001

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

1
2 From on or about December 4, 2014, and continuing through on or about December 5,
3 2014, **COURTNEY ROCHELL WARD (001)** intentionally or knowingly evaded or attempted
4 to evade any reporting requirement under section 6-1241, whether by structuring transactions as
5 described in 31 Code of Federal Regulations chapter X, by causing any financial institution,
6 money transmitter, trade or business to fail to file the report, by failing to file a required report or
7 record or by any other means, as listed in Exhibit B, in violation of A.R.S. §§ 13-2317(B)(5), 13-
8 108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811,
9 13-2313, and 13-2314.

COUNT 5

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

10
11
12 From on or about January 13, 2015, and continuing through on or about January 22, 2015,
13 **COURTNEY ROCHELL WARD (001)** intentionally or knowingly evaded or attempted to
14 evade any reporting requirement under section 6-1241, whether by structuring transactions as
15 described in 31 Code of Federal Regulations chapter X, by causing any financial institution,
16 money transmitter, trade or business to fail to file the report, by failing to file a required report or
17 record or by any other means, as listed in Exhibit B, in violation of A.R.S. §§ 13-2317(B)(5), 13-
18 108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811,
19 13-2313, and 13-2314.

COUNT 6

MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

20
21
22 From on or about March 16, 2015, and continuing through on or about March 30, 2015,
23 **COURTNEY ROCHELL WARD (001)** intentionally or knowingly evaded or attempted to
24 evade any reporting requirement under section 6-1241, whether by structuring transactions as
25 described in 31 Code of Federal Regulations chapter X, by causing any financial institution,
26 money transmitter, trade or business to fail to file the report, by failing to file a required report or
27
28

1 record or by any other means, as listed in Exhibit B, in violation of A.R.S. §§ 13-2317(B)(5), 13-
2 108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811,
3 13-2313, and 13-2314.

4 COUNT 7

5 MONEY LAUNDERING IN THE SECOND DEGREE, A CLASS 3 FELONY

6 From on or about May 15, 2015, and continuing through on or about May 19, 2015,
7 **COURTNEY ROCHELL WARD (001)** intentionally or knowingly evaded or attempted to
8 evade any reporting requirement under section 6-1241, whether by structuring transactions as
9 described in 31 Code of Federal Regulations chapter X, by causing any financial institution,
10 money transmitter, trade or business to fail to file the report, by failing to file a required report or
11 record or by any other means, as listed in Exhibit B, in violation of A.R.S. §§ 13-2317(B)(5), 13-
12 108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811,
13 13-2313, and 13-2314.

14 COUNT 8

15 FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

16 From on or about August 2014, and continuing through on or about March 2016,
17 **COURTNEY ROCHELL WARD (001)** pursuant to a scheme or artifice to defraud, knowingly
18 obtained any benefit from the Arizona Department of Economic Security by means of false or
19 fraudulent pretenses, representations, promises or material omissions; to wit: \$3,749.00 in
20 nutrition assistance, in violation of A.R.S. §§ 13-2310(A), 13-108, 13-109, 13-301, 13-302, 13-
21 303, 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

22 COUNT 9

23 FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

24 From on or about August 2014, and continuing through on or about March 2016,
25 **COURTNEY ROCHELL WARD (001)**, pursuant to a scheme or artifice to defraud knowingly
26 obtained any benefit from the Arizona Health Care Cost Containment System, by means of false
27
28

1 or fraudulent pretenses, representations, promises or material omissions; to wit: \$18,430.30 in
2 medical benefits, in violation of A.R.S. §§ 13-2310(A), 13-108, 13-109, 13-301, 13-302, 13-303,
3 13-304, 13-701, 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

4 **COUNT 10**

5 **FORGERY, A CLASS 4 FELONY**

6 On or about September 23, 2014, **COURTNEY ROCHELL WARD (001)**, with intent to
7 defraud the Department of Economic Security and/or the Arizona Health Care Cost Containment
8 System, falsely made, completed or altered a written instrument, and/or offered or presented,
9 whether accepted or not, a forged instrument or one that contains false information, in violation of
10 A.R.S. §§ 13-2002(A)(1), (3), & (B), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701,
11 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

12 **COUNT 11**

13 **FORGERY, A CLASS 4 FELONY**

14 On or about October 23, 2014, **COURTNEY ROCHELL WARD (001)**, with intent to
15 defraud the Department of Economic Security and/or the Arizona Health Care Cost Containment
16 System, falsely made, completed or altered a written instrument, and/or offered or presented,
17 whether accepted or not, a forged instrument or one that contains false information, in violation of
18 A.R.S. §§ 13-2002(A)(1), (3), & (B), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701,
19 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

20 **COUNT 12**

21 **FORGERY, A CLASS 4 FELONY**

22 On or about December 10, 2014, **COURTNEY ROCHELL WARD (001)** with intent to
23 defraud the Department of Economic Security and/or the Arizona Health Care Cost Containment
24 System, falsely made, completed or altered a written instrument, and/or offered or presented,
25 whether accepted or not, a forged instrument or one that contains false information, in violation of
26
27
28

1 A.R.S. §§ 13-2002(A)(1), (3), & (B), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701,
2 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

3 COUNT 13

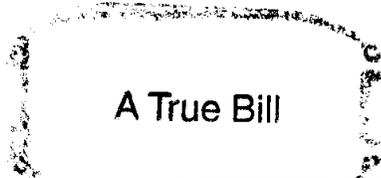
4 FORGERY, A CLASS 4 FELONY

5 On or about April 15 or 16, 2015, COURTNEY ROCHELL WARD (001), with intent to
6 defraud the Department of Economic Security and/or the Arizona Health Care Cost Containment
7 System, falsely made, completed or altered a written instrument, and/or offered or presented,
8 whether accepted or not, a forged instrument or one that contains false information, in violation of
9 A.R.S. §§ 13-2002(A)(1), (3), & (B), 13-108, 13-109, 13-301, 13-302, 13-303, 13-304, 13-701,
10 13-702, 13-703, 13-801, 13-804, 13-811, 13-2313, and 13-2314.

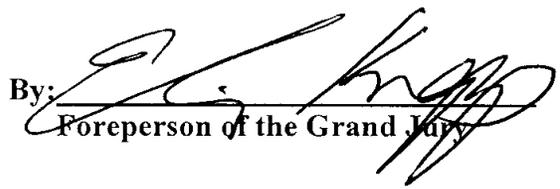
11 **BARBARA LaWALL**
12 **PIMA COUNTY ATTORNEY**

13 By: 
14 **Nicholas Klingerman**
Assistant Attorney General

15 Dated: 3/31/16


A True Bill

(A "True Bill")

16 By: 
Foreperson of the Grand Jury

17 PHX-#4978226