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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.

HARINDER KUMAR TAKYAR (001),
(COUNTS 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12,
13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24,
25, 26, 28, 31, 34, 37, 40, 43, 46, 49, 52, 55,
58, 61, 64, 67, 70, 72)

 **(002),**
(COUNTS 27, 29, 32, 35, 38, 41, 44, 47, 50,
53, 56, 59, 62, 65, and 68)

 **(003),**
(COUNTS 30, 33, 36, 39, 42, 45, 48, 51, 54,
57, 60, 63, 66, and 69)

 **(004),**
(COUNTS 71 and 73)

Defendants.

79 SGJ 81

**INDICTMENT
CHARGING VIOLATIONS OF:**

**COUNTS 1, 6, 12, 16, and 22:
FRAUDULENT SCHEMES AND
ARTIFICES, Class 2 Felonies, in violation
of A.R.S. §13-2310**

**COUNTS 2, 7, 13, 17 and 23:
ADMINISTRATION OF A NARCOTIC
DRUG, Class 2 Felonies, in violation of
A.R.S. §13-3408(A)(5)**

**COUNTS 4, 9, and 19:
ADMINISTRATION OF A DANGEROUS
DRUG, Class 2 Felonies, in violation of
A.R.S. §13-3407(A)(5)**

**COUNTS 3, 8, 14, 18, and 24: OBTAINING
A NARCOTIC DRUG BY FRAUD, Class 3
Felonies, in violation of A.R.S. §§13-
3408(A)(6), 13-303, 13-302, and 13-301**

COUNTS 5, 10, and 20: OBTAINING A DANGEROUS DRUG BY FRAUD, Class 3 Felonies, in violation of A.R.S. §§13-3407(A)(6), 13-303, 13-302, and 13-301

COUNTS 11, 15, 21, and 25: FORGERY, Class 4 Felonies, in violation of A.R.S. §13-2002

COUNTS 26, 27, 43, 44, 46, 47, 49, 50, 52, 53, 55, 56, 58, 59, 61, 62, 67,68, 70, 71, 72, and 73: CONSIDERATION FOR REFERRAL OF PATIENT, Class 4 Felonies, in violation of A.R.S. § 13-3713(A)

COUNTS 42, 45, 48, 51, 54, 57, 60, and 63: CONSIDERATION FOR REFERRAL OF PATIENT, Class 4 Felonies, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, and 13-301

COUNTS 28, 29, 31, 32, 34, 35, 37, 38, 40, 41, 64 and 65: CONSIDERATION FOR REFERRAL OF PATIENT, Class 6 Felonies, in violation of A.R.S. § 13-3713(A)

COUNTS 30, 33, 36, 39, 66, and 69: CONSIDERATION FOR REFERRAL OF PATIENT, Class 6 Felonies, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, and 13-301

The Arizona State Grand Jury accuses **HARINDER KUMAR TAKYAR (001)**,

[REDACTED] (002), **[REDACTED]** aka

[REDACTED] (003), **[REDACTED] (004)** charging on this

20th day of July, 2016, that in or from Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On or about September 10, 2014, **HARINDER KUMAR TAKYAR (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: financial) by means of false

or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT 2

ADMINISTRATION OF A NARCOTIC DRUG

On or about September 10, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Oxycodone, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 3

OBTAINING A NARCOTIC DRUG BY FRAUD

On or about September 10, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge, to wit: Oxycodone, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 4

ADMINISTRATION OF A DANGEROUS DRUG

On or about September 10, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a dangerous drug, to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

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COUNT 5

OBTAINING A DANGEROUS DRUG BY FRAUD

On or about September 10, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge., to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 6

FRAUDULENT SCHEMES AND ARTIFICES

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: financial) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT 7

ADMINISTRATION OF A NARCOTIC DRUG

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Oxycodone, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

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COUNT 8

OBTAINING A NARCOTIC DRUG BY FRAUD

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge a narcotic drug, to wit: Oxycodone, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 9

ADMINISTRATION OF A DANGEROUS DRUG

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 10

OBTAINING A DANGEROUS DRUG BY FRAUD

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge., to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 11

FORGERY

On or about October 8, 2014, **HARINDER KUMAR TAKYAR (001)**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: medical record, in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702 and 13-801.

COUNT 12

FRAUDULENT SCHEMES AND ARTIFICES

On or about October 22, 2014, **HARINDER KUMAR TAKYAR (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: financial) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

COUNT 13

ADMINISTRATION OF A NARCOTIC DRUG

On or about October 22, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Hydrocodone (Vicodin), to [REDACTED] (Attorney General Office Special Agent), in violation of A.R.S. §§ 13-3408(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

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COUNT 14

OBTAINING A NARCOTIC DRUG BY FRAUD

On or about October 22, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge a narcotic drug, to wit: Hydrocodone (Vicodin), to [REDACTED] (Attorney General Office Special Agent), in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 15

FORGERY

On or about October 22, 2014, **HARINDER KUMAR TAKYAR (001)**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: medical record, in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702 and 13-801.

COUNT 16

FRAUDULENT SCHEMES AND ARTIFICES

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: financial) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

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COUNT 17

ADMINISTRATION OF A NARCOTIC DRUG

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Oxycodone (Percocet), to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 18

OBTAINING A NARCOTIC DRUG BY FRAUD

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge a narcotic drug, to wit: Oxycodone, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 19

ADMINISTRATION OF A DANGEROUS DRUG

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

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COUNT 20

OBTAINING A DANGEROUS DRUG BY FRAUD

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a dangerous drug by fraud, deceit, misrepresentation or subterfuge a narcotic drug, to wit: Alprazolam, to [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-3407(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 21

FORGERY

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: medical record of [REDACTED] [REDACTED] (Drug Enforcement Administration Special Agent), in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702 and 13-801.

COUNT 22

FRAUDULENT SCHEMES AND ARTIFICES

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit (to wit: financial) by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§ 13-2310, 13-603, 13-701, 13-702, 13-801, 13-804, and 13-811.

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COUNT 23

ADMINISTRATION OF A NARCOTIC DRUG

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly administered a narcotic drug, to wit: Hydrocodone, to [REDACTED] (Attorney General Office Special Agent), in violation of A.R.S. §§ 13-3408(A)(5), 13-3401, 13-3412, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 24

OBTAINING A NARCOTIC DRUG BY FRAUD

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly obtained or procured the administration of a narcotic drug by fraud, deceit, misrepresentation or subterfuge a narcotic drug, to wit: Hydrocodone (Vicodin), to [REDACTED] (Attorney General Office Special Agent), in violation of A.R.S. §§ 13-3408(A)(6), 13-3401, 13-3412, 13-303, 13-302, 13-301, 13-105, 13-603, 13-701, 13-702, and 13-801.

COUNT 25

FORGERY

On or about November 5, 2014, **HARINDER KUMAR TAKYAR (001)**, with intent to defraud, falsely made, completed or altered a written instrument, to wit: medical record, in violation of A.R.S. §§ 13-2002, 13-2001, 13-701, 13-702 and 13-801.

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COUNT 26

CONSIDERATION FOR REFERRAL OF PATIENT

On or about August 26, 2013, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$500.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 27

CONSIDERATION FOR REFERRAL OF PATIENT

On or about August 26, 2013, [REDACTED] (**002**), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$500.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 28

CONSIDERATION FOR REFERRAL OF PATIENT

On or about October 9, 2013, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 29

CONSIDERATION FOR REFERRAL OF PATIENT

On or about October 9, 2013, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 30

CONSIDERATION FOR REFERRAL OF PATIENT

On or about October 9, 2013, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 31

CONSIDERATION FOR REFERRAL OF PATIENT

On or about December 7, 2013, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 32

CONSIDERATION FOR REFERRAL OF PATIENT

On or about December 7, 2013, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 33

CONSIDERATION FOR REFERRAL OF PATIENT

On or about December 7, 2013, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 34

CONSIDERATION FOR REFERRAL OF PATIENT

On or about January 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 35

CONSIDERATION FOR REFERRAL OF PATIENT

On or about January 8, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 36

CONSIDERATION FOR REFERRAL OF PATIENT

On or about January 8, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 37

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 4, 2014, HARINDER KUMAR TAKYAR (001), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 38

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 4, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 39

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 4, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 40

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 10, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 41

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 10, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 42

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 10, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$100.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 43

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 14, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 44

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 14, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 45

CONSIDERATION FOR REFERRAL OF PATIENT

On or about February 14, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 46

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 4, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$450.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 47

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 4, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$450.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 48

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 4, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$450.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 49

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 8, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 50

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 8, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 51

CONSIDERATION FOR REFERRAL OF PATIENT

On or about March 8, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$400.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 52

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 2, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$600.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 53

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 2, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$600.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 54

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 2, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$600.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 55

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 12, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 56

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 12, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 57

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 12, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 58

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 27, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$250.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 59

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 27, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$250.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 60

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 27, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$250.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 61

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 62

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 63

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 64

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 65

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 66

CONSIDERATION FOR REFERRAL OF PATIENT

On or about May 30, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$50.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 67

CONSIDERATION FOR REFERRAL OF PATIENT

On or about June 13, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 68

CONSIDERATION FOR REFERRAL OF PATIENT

On or about June 13, 2014, [REDACTED] (002), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 69

CONSIDERATION FOR REFERRAL OF PATIENT

On or about June 13, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$200.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-303, 13-302, 13-301, 13-701, 13-702 and 13-801.

COUNT 70

CONSIDERATION FOR REFERRAL OF PATIENT

On or about September 25, 2014, **HARINDER KUMAR TAKYAR (001)**, knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 71

CONSIDERATION FOR REFERRAL OF PATIENT

On or about September 25, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 72

CONSIDERATION FOR REFERRAL OF PATIENT

On or about October 10, 2014, HARINDER KUMAR TAKYAR (001), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 13-701, 13-702 and 13-801.

COUNT 73

CONSIDERATION FOR REFERRAL OF PATIENT

On or about October 10, 2014, [REDACTED] (003), knowingly offered, delivered, received or accepted any rebate, refund, commission, preference or other consideration (to wit: \$300.00) as compensation for referring a patient, client or customer to any individual, pharmacy, laboratory, clinic or health care institution providing medical or health-related services, in violation of A.R.S. §§ 13-3713(A), 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")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 7-20-2014



Brian Boyd
Assistant Attorney General



Foreperson of the State Grand Jury

#5206469