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Attorneys for Plaintiff

DR # 209A-PX-5039330 – FBI
Downtown JP

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA, RCC – DOWNTOWN**

STATE OF ARIZONA,

Plaintiff,

v.

**CHALICE RENEE ZEITNER AKA
CHALICE ZEITNER-HUTCHINSON AKA
CHALICE R. VEITNER-HUTCHINSON
AKA AL HUTCHINSON AKA AL
ZEITNER AKA AL SERKEZ,**

Defendant.

Case No:

DIRECT COMPLAINT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT
SCHEMES AND ARTIFICES,** a Class
2 Felony, in violation of A.R.S. § 13-
2310;

COUNT 2: THEFT, a Class 3 Felony,
in violation of A.R.S. § 13-1802;

**COUNT 3: FRAUDULENT
SCHEMES AND PRACTICES,** a Class
5 Felony, in violation of A.R.S. § 13-
2311;

**COUNTS 4-5: TAKING THE
IDENTITY OF ANOTHER PERSON
OR ENTITY,** Class 4 Felonies, in
violation of A.R.S. § 13-2008;

COUNT 6; FORGERY, a Class 4
Felony, in violation of A.R.S. § 13-2002.

The complainant herein personally appears and, being duly sworn, complains on information and belief against **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, charging that in Maricopa County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

On, about, or between February 17, 2010 and April 9, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit, TO WIT: a termination of pregnancy, paid for by the Arizona Health Care Cost Containment System, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310(A), 13-701, 13-702, and 13-801.

COUNT 2

THEFT

On, about, or between February 17, 2010 and April 9, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, obtained services or property of another, the Arizona Health Care Cost Containment System, TO WIT: payment for a termination of pregnancy in the amount of \$6,346.68, by means of any material misrepresentation with intent to deprive the Arizona Health Care Cost Containment System, of such property or services, in violation of A.R.S. §§ 13-1801, 13-1802(A)(3), 13-701, 13-702, and 13-801.

COUNT 3

FRAUDULENT SCHEMES AND PRACTICES

On, about, or between February 17, 2010 and April 9, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, in matters related to the business conducted by any department or agency of this state or any political subdivision thereof, TO WIT: Arizona Health Care Cost Containment System, pursuant to a scheme or artifice to defraud or deceive, knowingly falsified, concealed, or covered up a material fact by an trick, scheme, or device, or made or used a false writing or document, knowing such writing or document contained a false, fictitious, or fraudulent statement, in violation of A.R.S. §§ 13-2311, 13-701, 13-702, and 13-801.

COUNT 4

TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On or about April 1, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, knowingly took, manufactured, possessed or used any entity identifying information of Brigham and Women's Hospital, TO WIT: the entity's name, address, and/or telephone number name, without the consent of Brigham and Women's Hospital, with the intent to obtain or use Brigham and Women's Hospital's identity for any unlawful purpose, in violation of A.R.S. §§13-2008, 13-2001, 13-701, 13-702, and 13-801.

COUNT 5

TAKING IDENTITY OF ANOTHER PERSON OR ENTITY

On or about April 1, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, knowingly took, manufactured, possessed or used any entity identifying information of Doctor Graham McMahon, TO WIT: his name, telephone number, employer, and/or employment information address, without the consent of Doctor Graham McMahon, with the intent to obtain or use Doctor Graham McMahon's identity for any unlawful purpose, in violation of A.R.S. §§13-2008, 13-2001, 13-701, 13-702, and 13-801.

COUNT 6

FORGERY

On or about April 1, 2010, **CHALICE RENEE ZEITNER AKA CHALICE ZEITNER-HUTCHINSON AKA CHALICE R. VITNER-HUTCHINSON AKA AL HUTCHINSON AKA AL ZEITNER AKA AL SERKEZ**, with intent to defraud, presented to Doctor Steven Nelson, a forged instrument or one that contains false information, TO WIT: a letter from Doctor Graham McMahon recommending that Chalice R. Veitner-Hutchinson receive an urgent second term PG induction, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702, and 13-801.

MARK BRNOVICH
ATTORNEY GENERAL



Scott W. Blake
Assistant Attorney General
Criminal Division

It is requested that a **Warrant** be issued.
It is requested that Defendant appear for fingerprints and photograph.



Special Agent Heather Rivera, COMPLAINANT

AGENCY: Federal Bureau of Investigation

SUBSCRIBED AND SWORN upon information and belief this 5 day of May,
2015.

#4448401