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17 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

18 **IN AND FOR THE COUNTY OF MARICOPA**

19 RANDI LYNN HONYUMPTewa, by and through her Court-
20 Appointed Temporary Conservator, Evelyn Williams;
21 EVELYN WILLIAMS, individually and as a single woman;
22 Evelyn Williams as Next of Friend for and on behalf of KOWIN
23 HONYUMPTewa, minor son of Randi Lynn Honyumptewa;
24 and Evelyn Williams as Next of Friend for and on behalf of
25 ARIA SPENCER, minor daughter of Randi Lynn
26 Honyumptewa;

27 PHYLLIS ROBLEDO, Personal Representative of the Estate of
28 Roshanda De'Ann Robledo [*pending*], on behalf of the
ESTATE OF ROSHANDA DE'ANN ROBLEDO and the
statutory beneficiaries of Roshanda De'Ann Robledo, deceased,
including: Phyllis Robledo, surviving mother; Berkeley Welsh,
surviving father; De'Andrea Robledo, surviving daughter;
Maria Martinez, surviving daughter; Brianna Martinez,
surviving daughter; Lily Silva, surviving daughter; Julian
Robledo, surviving son, and; Mia Silva, surviving daughter;
PHYLLIS ROBLEDO, individually and as a single woman;
BERKELEY WELSH, individually and as a single man;
DE'ANDREA ROBLEDO, individually and as a single woman;

CV2024-036198
Case No. _____

**CLASS ACTION
COMPLAINT**

1 MARIA MARTINEZ, individually and as a single woman;
2 BRIANNA MARTINEZ, individually and as a single woman;
3 Phyllis Robledo as Next of Friend for and on behalf of LILY
4 SILVA, a minor; Phyllis Robledo as Next of Friend for and on
5 behalf of JULIAN ROBLEDO, a minor; Phyllis Robledo as
6 Next of Friend for and on behalf of MIA SILVA, a minor;

7 RASHONDA BEN, Special Administrator of the Estate of
8 Randy Garrison Ben, Sr., on behalf of the ESTATE OF RANDY
9 GARRISON BEN, SR. and the statutory beneficiaries of Randy
10 Garrison Ben, Sr., deceased, including: Rashonda Ben,
11 surviving daughter, and; Randy Garrison Ben, Jr., surviving son;
12 RASHONDA BEN, individually and as a single woman; and
13 RANDY GARRISON BEN, JR., individually and as a single
14 man;

15 ANGEL CRUZ, Personal Representative of the Estate of
16 Mackenzie Luella Joseph [*pending*], on behalf of the ESTATE
17 OF MACKENZIE LUELLA JOSEPH and the statutory
18 beneficiaries of Mackenzie Luella Joseph, deceased, including:
19 Angel Cruz, surviving mother; Harlan Joseph, surviving father;
20 Ty Cleveland, surviving son; Bella Dawahoya, surviving
21 daughter, and; Berl Dawahoya, surviving son; ANGEL CRUZ,
22 individually and as a single woman; HARLAN JOSEPH,
23 individually and as a single man; TY CLEVELAND,
24 individually and as a single man; Angel Cruz as Next of Friend
25 for and on behalf of BELLA DAWAHOYA, a minor, and;
26 Angel Cruz as Next of Friend for and on behalf of BERL
27 DAWAHOYA, a minor;

28 DEBRA GARCIA, Personal Representative of the Estate of
Becenti Kyle Jones [*pending*], on behalf of the ESTATE OF
BECENTI KYLE JONES and the statutory beneficiaries of
Becenti Kyle Jones, deceased, including: Debra Garcia,
surviving mother; Starla Stokes, surviving daughter; Unique
Honey Jones, surviving daughter, and; Anavalvia Precious
Jones, surviving daughter; DEBRA GARCIA, individually and
as a single woman; Janice Soke as Next of Friend for and on
behalf of STARLA SOKE, a minor; Annalicia Thomas as Next
of Friend for and on behalf of UNIQUE HONEY JONES, a
minor; Annalicia Thomas as Next of Friend for and on behalf of
ANAVALYIA PRECIOUS JONES, a minor;

1 DESBAH REEDE, a single woman, and;

2 All of the aforesaid Plaintiffs individually and on behalf of all
3 others similarly situated,

4 Plaintiffs,

5 v.

6 STATE OF ARIZONA, a body politic; DOES I through X; ABC
7 PARTNERSHIPS I through X, and; BLACK
8 CORPORATIONS I through X,

9 Defendants.
10

11 Plaintiffs, by and through undersigned counsel, hereby respectfully allege as follows for their
12 claims and all class action claims for reasonable and just damages against Defendant State of
13 Arizona:
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15 **I.**
16 **INTRODUCTION**

17 1. The grossly negligent and indifferent misconduct of Defendant STATE OF
18 ARIZONA, including through its agencies AHCCCS¹ and AZ-DHS², caused thousands of Native
19 Americans, who are the class action Plaintiffs and proposed Class Members, to suffer and incur
20 horrific injuries, deaths, dangerous drug addictions, fraudulent mental health services,
21 homelessness, and other damages described herein that resulted in the so-called “sober living crisis.”
22 Defendant STATE OF ARIZONA is culpable for creating the crisis. But, even worse, after
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27 ¹ Arizona Health Care Cost Containment System is identified throughout this Complaint as
28 “AHCCCS.”

² Arizona Department of Health Services is identified throughout this Complaint as “AZ-DHS.”

1 Defendant STATE OF ARIZONA knew in the summer of 2019, and earlier, about the extreme
2 magnitude of the fraud and harm that was occurring, Defendant STATE OF ARIZONA knowingly
3 continued to fund and enable the fraud. Defendant STATE OF ARIZONA's actions caused the
4 crisis and harm to grow, spread, and flourish at an unprecedented catastrophic level during the years
5 of 2020, 2021, 2022, 2023 and through the present time.
6

7 2. Inconceivably, rather than stop the intertwined fraud and harm to Native Americans
8 at its early stages in 2019 and early 2020 when Defendant STATE OF ARIZONA actually knew,
9 according to its own internal records, that AHCCCS had unlawfully paid approximately \$43 million
10 dollars to phony, upstart, fraudulent addiction treatment facilities that were specifically targeting
11 and preying upon Native Americans by providing them illegitimate and falsified services, and
12 causing harm to Native Americans including controlling them with even more alcohol/drugs in
13 disreputable unlicensed sober living homes (which Defendant STATE OF ARIZONA deflectingly
14 calls "the bad actors"), Defendant STATE OF ARIZONA ignored the crisis. Despite obvious
15 indications of the crisis, Defendant STATE OF ARIZONA continued to blindly fund the fraudulent
16 treatment facilities, paying them millions of dollars in obvious fraudulent billings every month,
17 causing a massive surge of unscrupulous treatment facilities and unlicensed sober living homes,
18 fraud, and serious harm, exploitation, abuse, and death to Native Americans. The fraudulent billings
19 blindly paid by AHCCCS grew from \$43 million dollars in 2020 to a staggering \$2.8 billion dollars
20 in 2023. The fraud should have stopped at \$43 million dollars, facilities shut down, and safeguards
21 put in place so there would be no more fraudulent billing and harm to Native Americans, and to
22 deter other fraudsters from doing the same. Instead of rectifying the crisis, Defendant STATE OF
23 ARIZONA unconscionably caused the fraud and harm to grow.
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1 3. Defendant STATE OF ARIZONA’s culpability since at least January 1, 2019, created
2 a massive financial crisis that was intertwined, *from the beginning*, with the humanitarian crisis that
3 has resulted in the harm to Plaintiffs and the entire Class of Native Americans described herein.
4 Defendant STATE OF ARIZONA cannot rightfully lay blame on the State-funded fraudsters
5 because, since at least 2019, Defendant STATE OF ARIZONA knew the details of the fraudulent
6 scheme, the mode of operation of the fraudsters, the players in the scheme, and the systemic failures
7 within AHCCCS that resulted in the blind payment of fraudulent claims day after day, month after
8 month, and year after year. Simply put, Defendant STATE OF ARIZONA knew of the fraud but
9 inexplicably continued to fund it anyway, all while knowing Native Americans were being seriously
10 harmed, injured, and even killed.

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14 4. Defendant STATE OF ARIZONA’s grossly negligent acts and omissions, by and
15 through AHCCCS and AZ-DHS, ultimately created and exacerbated what the media commonly
16 refers to as the “sober living crisis.” Despite Defendant STATE OF ARIZONA unveiling the
17 financial side of the sober living crisis to the public on May 16, 2023, it was recently discovered
18 that AHCCCS, including its purportedly independent Office of the Inspector General, shockingly
19 knew about this fraudulent scheme as early as July 26, 2019. AHCCCS knew of this fraudulent
20 scheme for at least four years and did little to nothing to curtail or prevent it from blowing up into
21 a nuclear mushroom cloud of Native American injuries, deaths, additional addictions, displacement,
22 and fraudulent payments amounting to fraudulent payments well over \$2.8 billion dollars. Despite
23 having that vital, lifesaving information for years, AHCCCS and AZ-DHS continued their
24 unpardonable and inexplicable misconduct, which further worsened this tragic situation until it
25 ultimately affected, poisoned, and ruined the lives of thousands of vulnerable Native Americans
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1 who were seeking treatment and/or lured into the sober living crisis nightmare. Bad actors whom
2 AHCCCS funded and weaponized were preying on thousands of Native Americans, and Defendant
3 STATE OF ARIZONA knew about and enabled their scheme.

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5 **“The massive fraud schemes perpetuated by bad actors are the**
6 **largest that have targeted a single demographic population in**
7 **recent U.S. history,”** according to Melissa Rumley, spokesperson for
8 the Office of Inspector General at the U.S. Department of Health and
9 Human Services.³

10 5. To date, Defendant STATE OF ARIZONA has belatedly been on a mad tear trying to
11 criminally prosecute those who defrauded AHCCCS. With egg on its face with the federal
12 government, which substantially shares in the cost of the Arizona State Medicaid (AHCCCS)
13 program, Defendant STATE OF ARIZONA has launched a vengeful process to criminally
14 prosecute those who defrauded the system. Indictments, arrests, prison sentences, and mostly
15 probation sentences have been handed down, but nothing has been done to help the Native
16 Americans who, as a result of this heartbreaking process, suffered severe and chronic injuries,
17 developed additional addictions, endured displacements – or died. Someone needs to protect and
18 obtain justice for the terrible wrongs committed against this large Class of vulnerable indigenous
19 citizens—and against their survivors. Someone needs to hold Defendant STATE OF ARIZONA
20 accountable.
21

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23 6. The Arizona Attorney General’s Office admitted that the Native American population
24 is in dire need of protection:

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26 Protection of the most vulnerable among us is a foundational, bedrock
27 principle, upon which our society rests. This recognition—that if our

28 ³ <https://azcir.org/news/2024/03/14/state-leaders-misled-public-about-scope-of-medicaid-fraud-crisis/> (emphasis added).

1 community stands for anything, it must both safeguard and endeavor
2 to prevent harm to those who cannot adequately sustain or help
3 themselves – is a crucial precept which undergirds the collection
4 belief in the legitimacy of the government of our State, as well as the
5 entire nation. Thus, when vulnerable members of our community are
6 exploited, whether figuratively or literally, it represents a disturbing
7 harbinger indicative of the relative health of society is in distress,
8 generally.⁴

9 7. That language is inspiring. But something is glaringly missing—a remedy for the
10 Native Americans themselves. Defendant STATE OF ARIZONA knew of this criminal enterprise
11 in July of 2019 and failed to protect its “most vulnerable” citizens. Now, it is time to place focus
12 on the true victims of this sober living crisis—the Native Americans and their families affected by
13 this preventable travesty.

14 8. Defendant STATE OF ARIZONA, AHCCCS and AZ-DHS have recently engaged in
15 finger-pointing and half-hearted measures to respond to this ongoing problem. Yet, the exploitation
16 of, injuries to, and deaths among the Native American population continue on a daily basis in the
17 State of Arizona because of grossly incompetent management, grossly negligent lack of oversight,
18 grossly negligent licensing measures, grossly negligent failure to investigate, and gross negligence
19 in providing blind payments to fraudulent providers holding themselves out as sober living or
20 intensive outpatient facilities.

21 9. As has been well-publicized, most of the Native American victims of this fraudulent
22 scheme were incapacitated, legally incompetent, and legally vulnerable, incapacitated, and
23 incompetent (due to alcohol, drugs, mental illness, or a combination of those factors) from the time
24 of being transported to and enrolled in so-called Behavioral Health Residential Facilities (“BHRFs”)
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28 _____
⁴ State’s Sentencing Memorandum in *State of Arizona v. Ariell Dix*, CR2021-002107.

1 and various intensive outpatient programs/providers (“IOPs”) and housed in fraudulent sober living
2 homes. And, as is clearly known by Defendant STATE OF ARIZONA—by and through AHCCCS,
3 AHCCCS-OIG, and AZ-DHS—many, if not all, of these fraudulent BHRFs and IOPs (and their
4 respective associated fraudulent sober living homes) provided, and even encouraged, the use of
5 alcohol or drugs by Native Americans enrolled in the American Indian Health Program (“AIHP”).
6 By providing alcohol and drugs to Native American AIHP enrollees and/or the means to acquire
7 them, the BHRF/IOP/sober living homes were able to keep the victims in a state of inebriated and/or
8 drugged incompetence and incapacity with the despicable intention of keeping the victims in close
9 proximity (often against their will) so these entities could continually submit fraudulent billing to
10 AHCCCS, whereupon AHCCCS would in fact—through gross negligence—blindly pay despite
11 clear indications of overbilling and fraud.

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15 10. Not only was AHCCCS grossly negligent in enabling this fraudulent scheme by
16 providing outrageous payments to the IOPs and BHRFs, but AZ-DHS licensed, permitted and
17 ratified the so-called IOPs, BHRFs and sober living homes to house these Native American victims.
18 There are many instances where the IOPs and BHRFs were on AHCCCS’s “suspended” providers
19 list, yet AZ-DHS still conducted surveys of the facilities and upheld the validity of their licenses.
20 Clearly, the so-called efforts of Defendant STATE OF ARIZONA’s agencies to license, regulate,
21 oversee, and monitor these fraudulent IOPs, BHRFs and sober living homes has been “negligent at
22 best!” (*quoting from Arizona Attorney General Kris Mayes – May 16, 2023 press conference*).
23 Those efforts were not just negligent, they were grossly negligent. Indeed, they were the epitome
24 of gross negligence.
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1 11. As detailed below, Plaintiffs bring this action pursuant to Rule 23, *Arizona Rules of*
2 *Civil Procedure*, on behalf of themselves and a Class of all persons similarly situated, consisting of
3 an estimated 7,000 Native Americans, all of whom have suffered damages caused by the misconduct
4 and gross negligence of Defendant STATE OF ARIZONA, as alleged herein.
5

6 12. Plaintiffs respectfully allege that their own claims and the class actions claims against
7 Defendant STATE OF ARIZONA comply with all applicable Arizona laws and rules of civil
8 procedure, including but not limited to Rule 23, *Arizona Rules of Civil Procedure*, and Arizona
9 Revised Statutes Title 12, Chapter 7, Article 2 (“*Actions Against Public Entities or Public*
10 *Employees*”), namely A.R.S. §§ 12-821 and 12-821.01, and the other laws and rules cited below.
11

12 **II.**
13 **IDENTIFICATION OF PLAINTIFFS**

14 13. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
15 as though fully set forth in this paragraph.
16

17 14. Plaintiff RANDI LYNN HONYUMPTWEA is a single incapacitated adult woman
18 and a resident of Maricopa County, Arizona. Evelyn Honyumptewa is the duly-appointed
19 Temporary Conservator of Randi Lynn Honyumptewa; she was duly appointed by Court Order
20 entered on August 9, 2024 in *In The Matter of Randi Lynn Honyumptewa*, Maricopa County
21 Superior Court case no. PB2024-002759.
22

23 15. Plaintiff EVELYN WILLIAMS is a single adult woman, the natural mother of Randi
24 Lynn Honyumptewa, and a resident of Maricopa County, Arizona.
25

26 16. Plaintiff KOWIN HONYUMPTWEA is the minor son of Randi Lynn Honyumptewa
27 and a resident of Maricopa County, Arizona. Because Plaintiff KOWIN HONYUMPTWEA is a
28

1 minor, his claims are brought on his behalf through his Next of Friend, Plaintiff EVELYN
2 WILLIAMS.

3 17. Plaintiff ARIA SPENCER is the minor daughter of Randi Lynn Honyumtewa, and
4 a resident of Maricopa County, Arizona. Because Plaintiff ARIA SPENCER is a minor, her claims
5 are brought on her behalf through her Next of Friend, Plaintiff EVELYN WILLIAMS.
6

7 18. Roshanda De'Ann Robledo, deceased, was an unmarried woman and was a resident
8 of Maricopa County, Arizona from the summer of 2022 to September 8, 2023. Roshanda De'Ann
9 Robledo is survived by her loving parents, Plaintiffs PHYLLIS ROBLEDO and BERKELEY
10 WELSH, and her loving children, Plaintiffs DE'ANDREA ROBLEDO, MARIA MARTINEZ,
11 BRIANNA MARTINEZ, LILY SILVA, MIA SILVA, and JULIAN ROBLEDO.
12

13 19. Plaintiff PHYLLIS ROBLEDO is in the process of petitioning the Maricopa County
14 Superior Court in the matter of *In the Matter of the Estate of Roshanda De'Ann Robledo*, to be
15 appointed Personal Representative of the Estate of Roshanda De'Ann Robledo, and expects that
16 appointment to occur in February 2025.
17

18 20. Plaintiff PHYLLIS ROBLEDO is a single adult woman, the natural mother of
19 Roshanda De'Ann Robledo, and a resident of La Paz County, Arizona.
20

21 21. Plaintiff BERKELEY WELSH is a single adult man, the natural father of Roshanda
22 De'Ann Robledo, and a resident of Maricopa County, Arizona.
23

24 22. Plaintiff DE'ANDREA ROBLEDO is a single adult woman, the daughter of
25 Roshanda De'Ann Robledo, and a resident of LaPaz County.
26

27 23. Plaintiff MARIA MARTINEZ is a single adult woman, the daughter of Roshanda
28 De'Ann Robledo, and a resident of LaPaz County.

1 24. Plaintiff BRIANNA MARTINEZ is the minor daughter of Roshanda De'Ann
2 Robledo and a resident of La Paz County, Arizona. Because Plaintiff BRIANNA MARTINEZ is a
3 minor, her claims are brought on her behalf through her Next of Friend, Plaintiff PHYLLIS
4 ROBLEDO.
5

6 25. Plaintiff LILY SILVA is the minor daughter of Roshanda De'Ann Robledo and a
7 resident of La Paz County, Arizona. Because Plaintiff LILY SILVA is a minor, her claims are
8 brought on her behalf through her Next of Friend, Plaintiff PHYLLIS ROBLEDO.
9

10 26. Plaintiff JULIAN ROBLEDO is the minor son of Roshanda De'Ann Robledo and a
11 resident of La Paz County, Arizona. Because Plaintiff JULIAN ROBLEDO is a minor, his claims
12 are brought on his behalf through his Next of Friend, Plaintiff PHYLLIS ROBLEDO.
13

14 27. Plaintiff MIA SILVA is the minor daughter of Roshanda De'Ann Robledo and a
15 resident of La Paz County, Arizona. Because Plaintiff MIA SILVA is a minor, her claims are
16 brought on her behalf through her Next of Friend, Plaintiff PHYLLIS ROBLEDO.
17

18 28. The ROBLEDO PLAINTIFFS⁵ bring this action under the *Arizona Wrongful Death*
19 *Act*, A.R.S. §§ 12-611, *et seq.*, in their individual and representative capacities. Plaintiff PHYLLIS
20 ROBLEDO, as the Personal Representative [*pending*] of the Estate of Roshanda De'Ann Robledo,
21 brings this action on behalf of the Estate and all surviving statutory beneficiaries of Roshanda
22 De'Ann Robledo, deceased, including her surviving parents, Plaintiffs PHYLLIS ROBLEDO and
23 BERKELEY WELSH, and surviving children, Plaintiffs DE'ANDREA ROBLEDO, MARIA
24 MARTINEZ, BRIANNA MARTINEZ, LILY SILVA, MIA SILVA, and JULIAN ROBLEDO. In
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28 ⁵ Throughout this Complaint, for ease of reference, the Plaintiffs identified in this paragraph will sometimes be collectively identified as “the ROBLEDO PLAINTIFFS.”

1 addition, Plaintiffs PHYLLIS ROBLEDO, BERKELEY WELSH, DE'ANDREA ROBLEDO,
2 MARIA MARTINEZ, BRIANNA MARTINEZ, LILY SILVA, MIA SILVA, and JULIAN
3 ROBLEDO each bring this action in their individual capacities, as surviving parents and children,
4 and as statutory beneficiaries of Roshanda De'Ann Robledo, as permitted by A.R.S. § 12-612(A)
5 and (B).
6

7 29. Randy Garrison Ben, Sr., deceased, was an unmarried man and a resident of Maricopa
8 County, Arizona. Randy Garrison Ben, Sr. is survived by his loving children, Plaintiff
9 RASHONDA BEN and Plaintiff RANDY GARRISON BEN, JR.
10

11 30. Plaintiff RASHONDA BEN is the duly-appointed Special Administrator of the Estate
12 of Randy Garrison Ben, Sr.; she was duly appointed by Court Order entered December 9, 2024 in
13 *In the Matter of the Estate of: Randy Ben Garrison Ben, Sr.*, Maricopa County Superior Court case
14 no. PB2024-003939.
15

16 31. Plaintiff RASHONDA BEN is a single adult woman, the daughter of Randy Garrison
17 Ben, Sr., and a resident of Clark County, Nevada.
18

19 32. Plaintiff RANDY GARRISON BEN, JR. is a single adult man, the son of Randy
20 Garrison Ben, Sr., and a resident of Maricopa County, Arizona.
21

22 33. The BEN PLAINTIFFS⁶ bring this action under the *Arizona Wrongful Death Act*,
23 A.R.S. §§ 12-611, *et seq.*, in their individual and representative capacities. Plaintiff RASHONDA
24 BEN, as the Special Administrator of the Estate of Randy Garrison Ben, Sr., brings this action on
25 behalf of the Estate and all surviving statutory beneficiaries of Randy Garrison Ben, Sr., deceased,
26

27
28 ⁶ Throughout this Complaint, for ease of reference, the Plaintiffs identified in this paragraph will sometimes be collectively identified as “the BEN PLAINTIFFS.”

1 including his surviving children, Plaintiffs RASHONDA BEN and RANDY GARRISON BEN,
2 JR., each bring this action in their individual capacities, as surviving children, and as statutory
3 beneficiaries of Randy Garrison Ben, Jr., as permitted by A.R.S. § 12-612(A) and (B).
4

5 34. Mackenzie Luella Joseph, deceased, was an unmarried woman and a resident of
6 Maricopa County, Arizona. Mackenzie Luella Joseph is survived by her loving parents, Plaintiffs
7 ANGEL CRUZ and HARLAN JOSEPH, and her loving children, Plaintiffs TY CLEVELAND,
8 BELLA DAWAHOYA and BERL DAWAHOYA.
9

10 35. Plaintiff ANGEL CRUZ has petitioned the Maricopa County Superior Court in the
11 matter of *In the Matter of the Estate of Mackenzie Luella Joseph*, Maricopa County Superior Court
12 case no. PB2024-003858, to be appointed Personal Representative of the Estate of Mackenzie
13 Luella Joseph, and expects that appointment to occur in January 2025.
14

15 36. Plaintiff ANGEL CRUZ is a single adult woman, the natural mother of Mackenzie
16 Luella Joseph, and a resident of Pinal County, Arizona.
17

18 37. Plaintiff HARLAN JOSEPH is a single man, the natural father of Mackenzie Luella
19 Joseph, and a resident of Maricopa County, Arizona.
20

21 38. Plaintiff TY CLEVELAND is the minor son of Mackenzie Luella Joseph and a
22 resident of Pinal County, Arizona. Because Plaintiff TY CLEVELAND is a minor, his claims are
23 brought on his behalf through his Next of Friend, Plaintiff ANGEL CRUZ.
24

25 39. Plaintiff BELLA DAWAHOYA is the minor daughter of Mackenzie Luella Joseph
26 and a resident of Pinal County, Arizona. Because Plaintiff BELLA DAWAHOYA is a minor, her
27 claims are brought on her behalf through her Next of Friend, Plaintiff ANGEL CRUZ.
28

1 40. Plaintiff BERL DAWAHOYA is the minor son of Mackenzie Luella Joseph and a
2 resident of Pinal County, Arizona. Because Plaintiff BERL DAWAHOYA is a minor, his claims
3 are brought on his behalf through his Next of Friend, Plaintiff ANGEL CRUZ.
4

5 41. The JOSEPH PLAINTIFFS⁷ bring this action under the *Arizona Wrongful Death Act*,
6 A.R.S. §§ 12-611, *et seq.*, in their individual and representative capacities. Plaintiff ANGEL CRUZ,
7 as the Personal Representative [*pending*] of the Estate of Mackenzie Luella Joseph, brings this
8 action on behalf of the Estate and all surviving statutory beneficiaries of Mackenzie Luella Joseph,
9 deceased, including her surviving parents, Plaintiffs ANGEL CRUZ and HARLAN JOSEPH, and
10 her surviving children, Plaintiffs TY CLEVELAND, BELLA DAWAHOYA and BERL
11 DAWAHOYA, each bring this action in their individual capacities, as surviving parents and
12 children, and as statutory beneficiaries of Mackenzie Luella Joseph, as permitted by A.R.S. § 12-
13 612(A) and (B).
14
15

16 42. Becenti Kyle Jones, deceased, was an unmarried man and a resident of Maricopa
17 County, Arizona. Becenti Kyle Jones is survived by his loving mother, Plaintiff DEBRA GARCIA,
18 and his loving children, Plaintiffs STARLA SOKE, UNIQUE HONEY JONES, and ANAVALYIA
19 PRECIOUS JONES.
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22 43. Plaintiff DEBRA GARCIA is in the process of petitioning the Maricopa County
23 Superior Court in the matter of *In the Matter of the Estate of Becenti Kyle Jones*, to be appointed
24 Personal Representative of the Estate of Becenti Kyle Jones, and expects that appointment to occur
25 in February 2025.
26
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28 ⁷ Throughout this Complaint, for ease of reference, the Plaintiffs identified in this paragraph will sometimes be collectively identified as “the JOSEPH PLAINTIFFS.”

1 44. Plaintiff DEBRA GARCIA is a single woman, the natural mother of Becenti Kyle
2 Jones, and a resident of Pinal County, Arizona.

3 45. Plaintiff STARLA SOKE is the minor daughter of Becenti Kyle Jones and a resident
4 of Pinal County, Arizona. Because Plaintiff STARLA SOKE is a minor, her claims are brought on
5 her behalf through her Next of Friend, JANICE SOKE.
6

7 46. Plaintiff UNIQUE HONEY JONES is the minor daughter of Becenti Kyle Jones and
8 a resident of Pinal County, Arizona. Because Plaintiff UNIQUE HONEY JONES is a minor, her
9 claims are brought on her behalf through her Next of Friend, Plaintiff ANNALICIA THOMAS.
10

11 47. Plaintiff ANAVALYIA PRECIOUS JONES is the minor daughter of Becenti Kyle
12 Jone, and a resident of Pinal County, Arizona. Because Plaintiff ANAVALYIA PRECIOUS JONES
13 is a minor, her claims are brought on her behalf through her Next of Friend, ANNALICIA
14 THOMAS.
15

16 48. The JONES PLAINTIFFS⁸ bring this action under the *Arizona Wrongful Death Act*,
17 A.R.S. §§ 12-611, *et seq.*, in their individual and representative capacities. Plaintiff DEBRA
18 GARCIA, as the Personal Representative [*pending*] of the Estate of Becenti Kyle Jones, brings this
19 action on behalf of the Estate and all surviving statutory beneficiaries of Becenti Kyle Jones,
20 deceased, including his surviving mother, Plaintiff DEBRA GARCIA, and his surviving children,
21 Plaintiffs STARLA SOKE, UNIQUE HONEY JONES and ANAVALYIA PRECIOUS JONES,
22 each bring this action in their individual capacities, as surviving mother and children, and as
23 statutory beneficiaries of Becenti Kyle Jones, as permitted by A.R.S. § 12-612(A) and (B).
24
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28 ⁸ Throughout this Complaint, for ease of reference, the Plaintiffs identified in this paragraph will sometimes be collectively identified as “the JONES PLAINTIFFS.”

1 49. Plaintiff DESBAH REEDE is a single woman and a resident of Maricopa County,
2 Arizona.

3
4 **III.**
IDENTIFICATION OF DEFENDANTS

5 50. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
6 as though fully set forth in this paragraph.

7
8 51. Defendant STATE OF ARIZONA is a body politic that has the capacity to sue and be
9 sued.

10
11 52. The activities, affairs, operations, management, and oversight of Defendant STATE
12 OF ARIZONA are carried out by and through multiple and various administrative agencies,
13 departments, offices, and/or bureaus including, but not limited to, the Arizona Health Care Cost
14 Containment System (“AHCCCS”) and the Arizona Department of Health Services (“AZ-DHS”).
15 Plaintiffs allege, based upon information and belief, that AHCCCS and AZ-DHS, and each of them,
16 are not jural entities, and therefore, lack the legal capacity to be sued as named Defendants.
17 Plaintiffs have formed this information and belief based on representations of legal counsel in
18 related lawsuits for AHCCCS, Defendant STATE OF ARIZONA, and AZ-DHS, who have stated
19 that AHCCCS and AZ-DHS, and each of them, are not jural entities. To the extent that Defendant
20 STATE OF ARIZONA or counsel for AHCCCS and/or AZ-DHS contradict this position and
21 instead assert in this lawsuit that AHCCCS is a jural entity and/or AZ-DHS is a jural entity, Plaintiffs
22 will seek leave to amend this Complaint and relate back all claims asserted in this lawsuit.
23
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25

26 53. The officials, administrators, directors, executives, officers, managers, deputies,
27 employees, agents, and servants that hold positions within, or act at the behest of, AHCCCS and
28

1 AZ-DHS, including their respective Offices of the Inspector General (e.g. AHCCCS-OIG and AZ-
2 DHS-OIG), are employees, de-facto employees, servants, and/or agents of Defendant STATE OF
3 ARIZONA. Furthermore, at all times mentioned throughout this Complaint, all acts and omissions
4 alleged herein committed by or through the officials, administrators, directors, executives, officers,
5 managers, deputies, employees, agents, and servants that hold positions within, or act at the behest
6 of, AHCCCS and AZ-DHS, including their respective Offices of the Inspector General (e.g.
7 AHCCCS-OIG and AZ-DHS-OIG), were carried out within the course, scope, control, command,
8 and intent of the employment, service, and/or agency of Defendant STATE OF ARIZONA.
9 Additionally, all such acts and omissions allege herein were directed, ordered, authorized, approved,
10 ratified, and/or condoned by Defendant STATE OF ARIZONA along with AHCCCS, AZ-DHS,
11 and their directors, executives, and upper-echelon management. Therefore, under the legal
12 doctrines and principles of vicarious liability, *respondeat superior*, employment law, master/servant
13 law, and/or agency, Defendant STATE OF ARIZONA is liable by operation of law for all negligent,
14 and grossly negligent, acts and omissions alleged herein that were committed by or through any and
15 all officials, administrators, directors, executives, officers, managers, deputies, employees, agents,
16 and servants that hold positions within, or act at the behest of, AHCCCS and AZ-DHS, including
17 their respective Offices of the Inspector General (e.g. AHCCCS-OIG and AZ-DHS-OIG). Thus,
18 Defendant STATE OF ARIZONA is liable in this action for all proven acts and/or omissions of
19 wrongdoing, fault, errors, mismanagement, fraudulent concealment, negligence, and/or gross
20 negligence committed by or through any and all officials, administrators, directors, executives,
21 officers, managers, deputies, employees, agents, and servants that hold positions within, or act at
22 the behest of, AHCCCS and AZ-DHS, including their respective Offices of the Inspector General
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1 (e.g. AHCCCS-OIG and AZ-DHS-OIG). Furthermore, each and every act and/or omission alleged
2 herein committed by AHCCCS includes the AHCCCS Office of the Inspector General (AHCCCS-
3 OIG) and each and every act and/or omission alleged herein committed by AZ-DHS includes the
4 AZ-DHS Office of the Inspector General (AZ-DHS-OIG), for which Defendant STATE OF
5 ARIZONA is liable under the aforementioned theories and legal principles.
6

7 54. On August 16, 2024, a legally sufficient Notice of Claim was duly and properly served
8 by a process server upon Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS in strict
9 compliance with A.R.S. § 12-821.01, by service upon Shon Kirkpatrick, person authorized to accept
10 service on behalf of Kris Mayes, Attorney General for the State of Arizona; Emily Brailey, person
11 authorized to accept service on behalf of Governor Katie Hobbs, Office of the Governor; Arthur
12 Acuna, person authorized to accept service on behalf of Carmen Heredia, Executive Deputy
13 Director AHCCCS; and Stacie Gravito, person authorized to accept service on behalf of Jennie
14 Cunico, Acting Director AZ-DHS.
15
16
17

18 55. More than sixty (60) days have passed since the Notice of Claim was served;
19 therefore, pursuant to A.R.S. § 12-821.01(E), the claims asserted in the Notice of Claim are “deemed
20 denied.”
21

22 56. Defendants DOES I through X, ABC PARTNERSHIPS I through X, and BLACK
23 CORPORATIONS I through X, inclusive, are individuals, corporations, partnerships and/or
24 business entities which caused the events complained of to occur in the State of Arizona. Plaintiffs
25 do not know the true identities of these Defendants and, therefore, sue them by fictitious names.
26 Plaintiffs will amend this pleading when the names of these Defendants become known.
27
28

IV.
GENERAL ALLEGATIONS COMMON TO ALL COUNTS

1
2
3 57. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
4 as though fully set forth in this paragraph.

5 58. All Defendants whether named in this pleading or designated as a “Doe” were either
6 joint tortfeasors with each other and are jointly and severally liable for the acts and omissions
7 described in this pleading, or are otherwise secondarily liable for such acts and omissions, or were
8 the agents, servants, and employees of their remaining Co-Defendants, and each was at all times
9 acting within the scope of that agency, service, and employment.
10
11

12 59. All of the acts, conduct and nonfeasance described in this pleading and carried out by
13 each and every employee or agent of each and every corporate, business, or governmental
14 Defendant was authorized, ordered and directed by the respective Defendant’s employers, officers,
15 directors and/or managing agents; that in addition thereto, those corporate, business, and
16 governmental employers, officers, directors and/or managing agents had advance knowledge of,
17 authorized and participated in the acts, conduct and nonfeasance of their employees, agents and
18 each of them, as described in this pleading; and that in addition thereto, upon the completion of
19 these acts, conduct and nonfeasance of the employees and agents, these corporate, business, and
20 governmental employers, officers, directors and/or managing agents respectively ratified, accepted
21 the benefits of, condoned and approved of each and all of these acts, conduct or nonfeasance of their
22 co-employees, employees, and agents. In addition, at all times relevant to this pleading, each
23 Defendant, whether named in this pleading or designated as a “Doe,” was a principal, master,
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1 employer and joint-venturer of every other Defendant, and every Defendant was acting within the
2 course and scope of the agency, authority, employment and joint venture.

3 60. Plaintiffs respectfully acknowledge the uncommon length of this Complaint.
4
5 However, government entities, including Defendant STATE OF ARIZONA, are known to attempt
6 dismissal on technicalities such as suggesting that insufficient facts are alleged under the Notice of
7 Claim statute and related statutes. The length of this Complaint is designed to preemptively address
8 this concern by detailing the breadth and magnitude of Defendant STATE OF ARIZONA’s
9 misconduct. Moreover, the \$2.8 billion dollars in fraudulent Medicaid payments unexplainably
10 issued by AHCCCS directly to fraudsters—which resulted in, among other things, the horrendous
11 loss of countless lives outlined in this Complaint—have been described by Defendant STATE OF
12 ARIZONA as “one of the biggest scandals” in State history. A case of this magnitude can only be
13 explained, in fairness, through a lengthy pleading.
14
15

16 61. Certain allegations concerning Defendant STATE OF ARIZONA’S misconduct are
17 made on information and belief because the misconduct has been purposely and willfully concealed
18 from the public and such facts and records are kept in records, documents, memoranda, emails, and
19 the like which are in the exclusive possession of Defendant STATE OF ARIZONA until full
20 discovery occurs.
21
22

23 **V.**
24 **JURISDICTION AND VENUE**

25 62. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
26 as though fully set forth in this paragraph.
27
28

1 63. Defendant STATE OF ARIZONA caused the events complained of herein to occur
2 in the County of Maricopa, State of Arizona. Defendant has purposefully directed its activities to
3 the State of Arizona. Furthermore, Defendant is duly authorized to do business in the State of
4 Arizona and has conducted business throughout the State of Arizona on a systematic and continuous
5 basis. Venue is proper in Maricopa County because the events described herein all occurred in
6 Maricopa County.
7

8 64. The damages sought in this action exceed \$300,000.00, qualifying this action for
9 assignment of "**Tier 3**" procedures as specified by Rule 26.2(c)(3)(C), *Arizona Rules of Civil*
10 *Procedure*, including amounts sought, if applicable, for punitive damages, interest, attorneys' fees
11 and costs. Further, as set forth below, this case qualifies for Complex Case designation procedures.
12

13 65. Plaintiffs hereby respectfully certify and designate⁹ this class action lawsuit as a
14 "complex civil action" in accordance with Rule 3.12, *Local Rules of Practice for Maricopa County*
15 (*LR*). By definition set forth in *LR* 3.12(a)(1), a "complex civil action" is "a civil action that
16 requires continuous judicial management to avoid placing unnecessary burdens on the court or the
17 litigants and to expedite the case, keep costs reasonable, and promote an effective decision-making
18 process by the court, the parties, and counsel." The intent of *LR* 3.12—from the original committee
19 in the year 2001 that studied complex case designation—was to address improved oversight and
20 management with cases such as *mass tort and class actions* to prevent unnecessary delay: "Without
21 proper judicial oversight and effective case management, disposition of complex cases **such as**
22 **mass torts and class actions** may be unnecessarily delayed." *Administrative Order No. 2001-122*
23

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28 ⁹ Plaintiffs are concurrently filing a Motion and Certification required by Rule 3.12, *Local Rules of Practice for Maricopa County*.

1 (dated December 20, 2001), Supreme Court of the State of Arizona (emphasis added). The factors
2 for complex case designation set forth in LR 3.12(a) are satisfied in this matter as demonstrated by
3 the following:

- 4 A. This class action lawsuit will involve numerous pretrial motions raising
5 difficult or novel legal issues that will be time-consuming to resolve.
- 6 B. This class action lawsuit will involve the management of a large number of
7 witnesses and a substantial amount of documentary evidence.
- 8 C. This class action lawsuit will involve coordination with four other related
9 wrongful death lawsuits¹⁰ pending in this same Court.
- 10 D. This class action lawsuit will likely require substantial post judgment judicial
11 supervision.
- 12 E. This class action lawsuit will benefit from permanent assignment to a judge
13 who will have acquired a substantial body of knowledge in a specific area of
14 law.
- 15 F. This class action lawsuit—like most class actions—will inherently involve
16 complex legal issues.
- 17 G. This class action lawsuit deserves expeditious resolution, of an otherwise
18 complex dispute, given Defendant STATE OF ARIZONA’s exploitation of the
19
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26 ¹⁰ *Largo, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-
27 004681); *Leslie, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-
28 004688); *Russell, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-007445); and *Truax, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-017933).

1 Native American community, the massive suffering that has occurred, and the
2 immediate relief that is needed.

3 H. The interests of justice for the Native American community, which is
4 historically the most vulnerable and underrepresented community, which
5 historically lacks resources, and which has suffered unimaginable tragedies set
6 forth in this lawsuit, weighs heavily in favor of complex case designation to
7 expedite fair resolution.
8
9

10 66. In the matter of *Leslie, et al. v. State of Arizona, et al.* (Maricopa County Superior
11 Court case no. CV2024-004688), Defendant STATE OF ARIZONA agreed that the filing of this
12 present class action lawsuit warrants Complex Case designation under *LR 3.12*.
13

14 67. The amount in controversy exceeds the minimum jurisdictional limits of this Court.

15 68. Plaintiffs hereby demand a trial by jury of all issues pursuant to Rule 38, *Arizona*
16 *Rules of Civil Procedure*.
17

18 **VI.**
19 **COUNT 1 – GROSS NEGLIGENCE OF DEFENDANT STATE OF ARIZONA**

20 69. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
21 as though fully set forth in this paragraph.

22 70. Defendant STATE OF ARIZONA owed a duty to Plaintiffs and the entire Class to
23 exercise reasonable care in the management and oversight of Medicaid, AIHP funds, and
24 government funds that are used to pay for substance abuse treatment services, mental health
25 services, and ancillary services for Native Americans.
26
27
28

1 “Our top priority is ensuring AHCCCS members are safe,” said
2 Carmen Heredia (AHCCCS Cabinet Executive Officer).¹¹

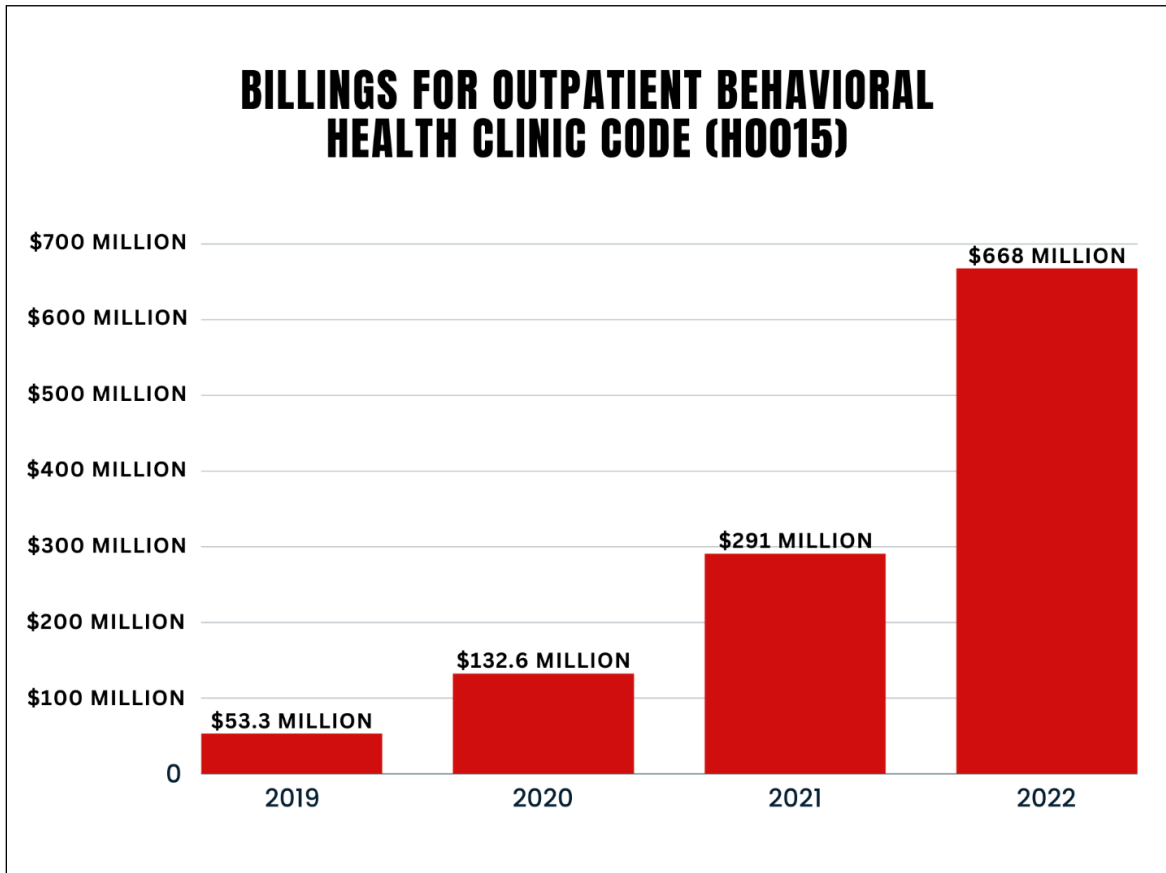
3 71. Defendant STATE OF ARIZONA breached its legal duty of care which directly and
4 proximately caused the harm, damages, and losses claimed herein. Simply put, the facts known at
5 this time—and further proof positive evidence that has been withheld from the public and will be
6 unearthed in discovery—will show that the sober living crisis developed due to the recklessness,
7 ineptitude, gross negligence, and inexcusable indifference committed by Defendant STATE OF
8 ARIZONA, including through its administrative agencies, departments, offices, and/or bureaus
9 known as AHCCCS and AZ-DHS.
10
11

12 72. There is an ongoing alcohol-related health crisis within the Native American Indian
13 community. Plaintiffs’ decedents, the injured Plaintiffs, and the Class Members (collectively
14 referred to as “the victims”) have struggled with sobriety most of their adult lives. All seek sobriety
15 and the opportunity to turn their lives around. So, a common thread connecting all claims is this:
16 When the victims entered so-called “treatment,” they were promised services that were never
17 delivered. The common driving force for this scheme was that AHCCCS would blindly pay for the
18 false services with little oversight and almost no scrutiny.
19
20

21 73. This formula worked—and it worked colossally to the running grand total of more
22 than \$2.8 billion dollars in unjustified overpayments paid out by AHCCCS for fraudulent bills
23 submitted for at least the last four to five years. AHCCCS certainly knew that fraud was occurring
24 because the increased yearly billing totals under code H0015 (outpatient behavior clinic billing
25
26
27

28 ¹¹ Source: *See AHCCCS Makes Strides, Reforms Agency in Response to Sober-Living Fraud*,
published by AHCCCS on May 16, 2024.

code) skyrocketed between 2019 through 2022. In 2019, the billing was \$53.5 million dollars. By 2022, the billing had increased to a *staggering* \$668.0 million dollars:



74. According to the Operation Rainbow Bridge website, Defendant STATE OF ARIZONA started its investigation in 2019 and became aware of fraudulent billing practices targeting Native Americans:

The AHCCCS Office of Inspector General and the Arizona Attorney General’s Office became aware of potential **fraudulent billing practices, including significant increases in billing for outpatient behavioral health services**. These circumstances triggered a multi-agency review and investigation of potential fraud, waste and abuse. This led AHCCCS to **connect the irregular billing of these services with alleged fraudulent activity targeting Indigenous peoples**, primarily Navajo individuals. Some of the practices included billing for services not provided, and “ghost billing” (using personally

1 identifying information for individuals for whom services were not
2 provided). **This investigation has been ongoing since 2019.**

3 <https://operationrainbowbridge.com/background-information/> (emphasis added).

4 75. Reportedly, the AHCCCS-OIG determined that the unjustified overpayments of more
5 than \$2 billion dollars by AHCCCS for fraudulent billing has harmed at least 7000 Native
6 Americans:
7

8 **Fraudulent billing has cost Arizona taxpayers at least \$2 billion,**
9 **with the scandal – and the state’s response – harming more than**
10 **7,000 people and disproportionately affecting Indigenous**
11 **communities.** The true breadth remains unclear, however, in part
12 because state leaders managing the response have not been
13 forthcoming with the public, including lawmakers.

14 [https://azcir.org/news/2024/03/14/state-leaders-misled-public-about-scope-of-medicaid-](https://azcir.org/news/2024/03/14/state-leaders-misled-public-about-scope-of-medicaid-fraud-crisis/)
15 [fraud-crisis/](https://azcir.org/news/2024/03/14/state-leaders-misled-public-about-scope-of-medicaid-fraud-crisis/) (emphasis added.)

16 76. In addition to the actual billing figures, Defendant STATE OF ARIZONA had
17 received outside reports from at least the summer of 2019 (if not longer ago) that this scheme was
18 occurring. At that time—more than five years ago—Defendant STATE OF ARIZONA knew of
19 the fraudulent scheme, knew exactly how and why it was being carried out, and even knew of the
20 original set of fraudsters from Nevada who started this scheme in Arizona. Worst of all, Defendant
21 STATE OF ARIZONA knew the following at least four-to-five years ago:

- 22 • Native Americans were the target of the fraudulent scheme due to the
23 availability of AIHP insurance payments;
- 24 • Native Americans were commonly being abused, drugged, intimidated,
25 harmed, raped, injured, and killed in the so-called sober living homes;
- 26
- 27
- 28

- Native Americans were commonly being hospitalized or dying in so-called sober living homes due to drug/alcohol overdoses. In a sober living environment, drug/alcohol overdoses should be decreased, not increase to unprecedented levels never seen;
- Native Americans were commonly given alcohol and drugs in the so-called sober living environments to “control” them and keep them from leaving;
- Native Americans were commonly being kidnapped and trafficked from the Reservations, and even across State lines, in white vans, taken against their will, taken while they were already incapacitated by drugs/alcohol, and then given even more alcohol and drugs during the long journeys from the Reservations to the greater metropolitan Phoenix area, most commonly; and
- Native Americans with only alcohol dependency would enter so-called sober living facilities and during the course of so-called “treatment” would take on new addictions to dangerous, hard drugs such as fentanyl and methamphetamine that were commonly being distributed throughout the sober living houses as a means to “control” the unknowing Native American victims.

77. Defendant STATE OF ARIZONA has admitted—through the Sworn Affidavit¹² signed by a Special Agent of the Arizona Attorney General’s Office—that AHCCCS and Defendant STATE OF ARIZONA first learned about the AHCCCS deception and/or fraud scheme in July of

¹² *Affidavit In Support of Seizure Warrant County of Maricopa State of Arizona*, Seizure Warrant No. SW2020-020038, signed under oath on October 20, 2020, by Special Agent Ariel Perez #439, Arizona Attorney General’s Office, Health Care Fraud and Abuse Section (“Special Agent Perez Sworn Affidavit”).

1 2019. The Sworn Affidavit was presented to a Judge to obtain a search warrant and thus Defendant
2 STATE OF ARIZONA cannot deny the contents of the Sworn Affidavit.

3 78. According to the Sworn Affidavit, a whistleblower named [John Doe]¹³ first reported
4 the fraud scheme in the summer of 2019 to Defendant STATE OF ARIZONA. Below are excerpts
5 containing the information that [John Doe] first reported to AHCCCS and Defendant STATE OF
6 ARIZONA in July of 2019 and repeatedly reported within the several months that followed:
7

8
9 **In July 2019, AHCCCS received a complaint from [John Doe].**
10 [John Doe] is the owner of an *****. [John Doe] reported that
11 he believed another company was using his AHCCCS Provider ID,
12 and his wife's, *****, **information for unauthorized billing.**
13 AHCCCS again spoke with [John Doe] in April and May 2020.
14 AHCCCS Investigations reported [John Doe] stated the following:

15 In approximately **late summer 2019**, [John Doe] began using Henson
16 Family Services, (owner's Dale and Zoila Henson), for billing
17 services at *****. He stated after he began using Henson's
18 services, his income from the **billing to AHCCCS increased**
19 **substantially**. [John Doe] stated that Henson was **billing AHCCCS**
20 **for services that were never rendered by [John Doe's] business.**

21 Special Agent Perez Sworn Affidavit at p. 41 (emphasis added).

22 [John Doe] further explained that Henson works with companies,
23 **L&L Investments, and SVS**, which are **called 'the reservation'**. He
24 stated Henson Family Services, L&L Investments, and SVS **work**
25 **with several group homes/BHRFs** around the greater Phoenix
26 metropolitan area. He stated that SVS requires a daily census sheet,
27 in order to have Henson Family Services complete the billing for the
28 office.

[John Doe] stated the first check he received after using Henson's
company was for approximately \$374,000, which was much higher
than he anticipated. **He stated he was concerned because *******
never treated any patients from SVS, and he had no medical notes

13 For purposes of privacy, the whistleblower is identified throughout this Complaint as "John Doe." Defendant STATE OF ARIZONA is aware of his true name.

1 to show services were provided at any point. He stated that he asked
2 Thomas Battle about the money, and Battle told him to **be careful,**
3 **because Henson and his colleagues are criminals, who have**
4 **already done the same thing in Las Vegas, NV.**

5 Special Agent Perez Sworn Affidavit at pp. 41-42 (emphasis added).

6 **AHCCCS investigations stated [John Doe] also mentioned the**
7 **following information:**

8 **‘The reservation’ has the valley broken into three parts.** Jeter and
9 Battle run the Phoenix area, Charles Temple (“Temple”) runs the East
10 valley, and ‘Arron” and ‘George’ run the west valley.

11 Henson’s son in law ‘David’ **travels to all the locations with a**
12 **laptop and bills for approximately half a million dollars a week to**
13 **AHCCCS.**

14 Special Agent Perez Sworn Affidavit at p. 42 (emphasis added).

15 [John Doe] began working with L&L but eventually cut ties with
16 them. **Battle told [John Doe] that L&L WERE CRIMINALS**
17 **WHO WANTED TO DEFRAUD ‘MEDICAID.’** However, “[John
18 Doe] believed Battle was still doing business with L&L. “[John Doe]
19 had an issue with L&L reference a lease on his property located at
20 *****. In approximately August 2019 [John Doe] discovered an
21 unauthorized AHCCCS claim that had been billed using the *****
22 address and under his company *****. [John Doe] **suggested it**
23 **was fraud committed by L&L.**”

24 [John Doe] **stated he reported this information to AHCCCS**
25 **_____ at the time of the concern.** To Special Agent Miller’s
26 knowledge, [John Doe] **reported at least a portion of the**
27 **information to AHCCCS beginning in approximately July of**
28 **2019.**

7/26/2019: [John Doe] **met with an AHCCCS investigator and**
reported information related, but not limited to: ***** , SVS
_____.

1 [John Doe] stated the following about L&L: ‘I discovered what
2 they had done is, they were going to, they were **GETTING**
3 **TRUCKS, MOVING TO THE RESERVATIONS, AND**
4 **BRINGING IN EVERYBODY.** And they would feed them, and
5 take their AHCCCS numbers, and they would **CHARGE THEM**
(AHCCCS) FOR SERVICES THAT OBVIOUSLY WERE NOT
BEING GIVEN.

6 Special Agent Perez Sworn Affidavit at pp. 43-44 (emphasis added).

7 79. It is self-evident from the Special Agent Perez Sworn Affidavit that all the way back
8 in July of 2019, [John Doe] perfectly laid out, *in great detail*, the AHCCCS fraud scheme, the key
9 players, and how Native Americans were being preyed upon. Inconceivably, however, [John Doe]’s
10 reports were ignored. Indeed, the Arizona Attorney General’s Office “closed” the file “without
11 further investigation.” In December of 2019, [John Doe] complained in a voicemail to the Arizona
12 Attorney General Office, that it “appears no one is dealing with it.”
13
14

15 It should be noted, the earliest applicable complaint that Special Agent
16 Miller could locate in the AZ AGO system was dated 12/24/2019.

17 On 12/24/20[19], [John Doe] reported the following via voicemail:
18 **He wants to report a crime where a group of people are**
19 **defrauding Medicare/Medicaid for millions of dollars.** It appears
20 **that NO ONE IS DEALING WITH IT.** He hoped someone at the
AZ AGO would handle it because **he believes it is wrong.**

21 On 1/8/2020, [John Doe] met with an AZ AGO duty agent. Per what
22 Special Agent Miller can determine from the notes from the duty
23 agent, [John Doe] stated he was introduced to people who wanted to
24 invest with his company *****. He reported information about
25 clients being **TRANSPORTED FROM THE RESERVATIONS**
TO THEIR CLINIC AND FRAUDULENTLY BILLING
AHCCCS FOR SERVICES NOT PERFORMED. He further
26 stated they were using ‘Dr. Parham’s’ credentials.

27 The duty agent told [John Doe] to forward any documents that could
28 prove this company as fraudulent.

1 **This report was closed, without further investigation by the AZ**
2 **AGO.** Based on the duty agent complaint, Special Agent Miller
3 believes the duty agent requested additional documents from [*John*
4 *Doe*]. There is no documentation of further follow up and the case
5 was closed, the report was closed because, ‘no threshold for follow
6 up.’

7 Special Agent Perez Sworn Affidavit at pp. 45-46 (emphasis added).

8 [*John Doe*] **further described the group as a ‘MAFIA STYLE’**
9 **ORGANIZATION.** He stated Temple and Battle were in charge of
10 the BHRFs for L&L.

11 Special Agent Perez Sworn Affidavit at p. 46 (emphasis added).

12 80. All of the proverbial “red flags” for a catastrophic financial and humanitarian crisis
13 were present more than five years ago—in 2019. Defendant STATE OF ARIZONA knew that major
14 financial fraud was occurring hand-in-hand with harm to Native Americans, and that this crisis was
15 growing at an alarming rate.

16 81. Defendant STATE OF ARIZONA knew that Arizona was a fertile target ground for
17 fraudsters because Arizona has the third largest Native American population in the country. There
18 are 22 federally recognized Tribes in Arizona with 17 Reservations situated entirely within the
19 borders of Arizona. In fact, Reservations make up over a quarter of Arizona’s land. Defendant
20 STATE OF ARIZONA knew Native Americans were being preyed upon by the fraudsters. And,
21 of course, it is well known that when the stakes are high (in the millions of dollars) for financial
22 fraud that violent crime is sure to follow.

23 82. Defendant STATE OF ARIZONA had the entire crisis laid out to it at least five years
24 ago when the fraud was at its infancy and the amount at stake was only in the low millions of dollars,
25 not billions of dollars.

1 **The way the scheme works is that operators recruit Native**
2 **Americans to enter their facilities as in-patient or out-patient clients**
3 **and then bill AHCCCS for treatment that is partially or never**
4 **provided.** The degree of fraud varies by provider. Some providers
5 partially delivered the services they billed for; **others fed tribal**
6 **members’ addictions in order to keep them under control and as**
7 **clients.** Operators or associates of the fraudulent providers are
8 believed to have targeted unhoused, low-income, alone, or intoxicated
9 Tribal Members and transported them to fraudulent facilities after
10 promising to provide food, housing and access to care. Perpetrators
11 target Tribal Members on Tribal Lands, border towns and in urban
12 areas like Phoenix. **Family and friends of the victims often don’t**
13 **know what’s happened and file missing person reports. Some**
14 **have died in the facilities and others have suffered severe**
15 **mistreatment.**¹⁴

16 83. Instead of containing and eliminating the financial fraud five years ago—and, more
17 importantly, stopping the harm to Native Americans—Defendant STATE OF ARIZONA turned a
18 blind eye, slow-walked prosecutions, and then allowed the fraud to explode into a mushroom cloud
19 during 2020, 2021, 2022, and 2023, until it rose to a staggering \$2.8 billion dollars or more. The
20 fraud and the harm were intertwined. Defendant STATE OF ARIZONA has no excuse. The fraud
21 and abuse should have been stopped in 2019 when Defendant STATE OF ARIZONA first knew
22 about it. According to the AHCCCS “Provider Participation Agreement,” AHCCCS has the legal
23 right to “terminate or suspend” the billing privileges of a provider within twenty-four (24) hours
24 after learning that a Native American is endangered:

25 **AHCCCS has the right to terminate or suspend this Agreement**
26 **upon twenty-four (24) hours written notice when AHCCCS deems**
27 **the health or welfare of a member is endangered.**

28 Paragraph 31 of the AHCCCS “Provider Participation Agreement” (emphasis added).

¹⁴ Source: <https://operationrainbowbridge.com/background-information/> (emphasis added).

1 84. Defendant STATE OF ARIZONA’s gross negligence in failing to act swiftly in 2019
2 is not only perplexing, it is unconscionable gross negligence. Defendant STATE OF ARIZONA
3 knew, at that time, that Native Americans were in danger. As mentioned above, [*John Doe*] was
4 personally reporting the existence of fraudulent activity in 2019. By its own admission, Defendant
5 STATE OF ARIZONA was aware of criminal activity and harm to Native Americans. According
6 to Federal Medicaid laws, namely 42 C.F.R. § 455.14, Defendant STATE OF ARIZONA is required
7 to conduct a “preliminary investigation” once it receives a complaint from “any source” of Medicaid
8 “fraud or abuse” or “questionable practices.”
9

11 If the agency receives a complaint of Medicaid fraud or abuse **from**
12 **any source** or identifies questionable practices, it **must** conduct a
13 **preliminary investigation** to determine whether there is sufficient
14 basis to warrant a full investigation.

15 42 C.F.R. § 455.14 (emphasis added).

16 85. Plainly, everyone can agree that if AHCCCS had truly conducted even a cursory
17 investigation in 2019, let alone a “preliminary investigation” as it was required to do under 42
18 C.F.R. § 455.14, AHCCCS certainly would have unearthed “fraud or abuse” or “questionable
19 practices” by providers triggering the requirement of AHCCCS to take swift action. Defendant
20 STATE OF ARIZONA, by and through AHCCCS, had the legal right—and legal obligation—to
21 swiftly suspend/terminate the billing privileges of providers that were “endangering” Native
22 Americans (per the clause in the “Provider Participation Agreement”) and/or to swiftly
23 suspend/terminate the billing privileges by issuing so-called “credible allegation of fraud” (“CAF”)
24 letters to providers that were submitting fraudulent bills:
25
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1 The State Medicaid agency **must suspend** all Medicaid payments to
2 a provider after the agency determines there is a credible allegation of
3 fraud for which an investigation is pending.

4 42 C.F.R. § 455.23 (emphasis added).

5 86. Defendant STATE OF ARIZONA, by and through AHCCCS, waited and waited until
6 May of 2023 to suddenly issue widespread CAF letters. Before May of 2023, CAF letters were few,
7 inconsistent, and rare. Then, throughout 2023, AHCCCS suddenly issued many, many CAF letters.
8 In total, CAF letters were issued in 2023 to more than 300 providers.

9 87. Defendant STATE OF ARIZONA, by and through AHCCCS, had the ability and
10 legal obligation to start issuing widespread CAF letters all the way back in 2019, which would have:
11 (a) stopped/contained the fraudulent billing; (b) slowed the growth of the fraud; (c) stopped/
12 contained the harm to Native Americans; and (d) deterred other providers from forming IOPs and
13 BHRFs due to the fear of being caught, shut down, and prosecuted. Because of the gross negligence
14 of Defendant STATE OF ARIZONA in failing to act swiftly in 2019, sham/fraudulent IOPs and
15 BHRFs realized that they could easily *start up overnight* and easily bill AHCCCS for millions, and
16 ultimately billions, of dollars. Defendant STATE OF ARIZONA's grossly negligent failure to act
17 in 2019 with swift and strong enforcement enabled the fraudsters, causing the AHCCCS fraud to
18 balloon to more than \$2.8 billion dollars—all the while, Native Americans were being exploited,
19 injured and even died during this known fatal fraudulent scam.

20 88. Perhaps the only plausible answer for Defendant STATE OF ARIZONA's gross
21 negligence in failing to act is a sinister one, in that, upon information and belief, it is alleged that
22 Defendant STATE OF ARIZONA was profiting from the sober living crisis due to federal matching
23 funds and other incentives, *all the while Defendant STATE OF ARIZONA knew that the Native*

1 *American population was suffering countless losses of lives and harm.* Perhaps Defendant STATE
2 OF ARIZONA had no incentive to stop the sober living crisis because Defendant STATE OF
3 ARIZONA was profiting from the crisis. In other words, more AIHP billing to AHCCCS meant
4 more dollars in Defendant STATE OF ARIZONA’s coffers. The more fraudulent billing meant
5 Defendant STATE OF ARIZONA would make more money from federal matching funds, federal
6 COVID funds, and higher federal budgets for the subsequent years. Only through discovery will it
7 be fully determined the extent to which Defendant STATE OF ARIZONA lined its pockets with
8 federal dollars due to the sober living crisis.
9
10

11 89. It is also alleged herein, upon information and belief, that Defendant STATE OF
12 ARIZONA knew of internal corruption within AHCCCS and AZ-DHS. Undersigned counsel has
13 uncovered specific instances and individuals who will not be named at this time so that under-oath
14 examination can be conducted. However, once AHCCCS and AZ-DHS learned of any instances of
15 corruption, this information should have been publicly revealed and the employee(s) terminated and
16 prosecuted. Moreover, the billing privileges of the involved providers should have been terminated
17 pursuant to the express terms of the AHCCCS Provider Participation Agreement:
18
19

20 AHCCCS may also terminate this Agreement if it is found that **gratuities in**
21 **the form of entertainment, gifts, or otherwise**, were offered or given by
22 the Provider or any agent or representative of the Provider **to any officer or**
23 **employee of the State with a view towards securing a contract or**
24 **securing favorable treatment with respect to a contract.**

25 Paragraph 31 of the AHCCCS “Provider Participation Agreement” (emphasis added).

26 90. While IOPs and BHRFs that bill AHCCCS for services are required to be licensed by
27 AZ-DHS, most sober living homes are unlicensed and not governed by AZ-DHS. A license is only
28 required by AZ-DHS for seven (7) or more individuals residing at a home. Oftentimes, providers

1 skirt the rules by moving people in and out of homes and motel rooms. As noted previously, the
2 function of “sober living” arrangements is to control individuals so fraudsters can continue billing
3 through the related treatment provider. It is common within this fraudulent scheme—as fully known
4 for years by Defendant STATE OF ARIZONA—that the owners and operators of the sober living
5 homes furnish alcohol or drugs to their residents to keep them incapacitated to prevent them from
6 leaving. In the Special Agent Perez Sworn Affidavit (signed in October of 2020), it is expressly
7 stated that Defendant STATE OF ARIZONA knew that Native Americans were being targeted and
8 **controlled** for purposes of defrauding AHCCCS:
9

11 **Special Agent Miller identified the following as the overall**
12 **fraudulent scheme.** Special Agent Miller stated Special Agent
13 Miller believes this is only one of many examples of fraudulent
14 activities being committed by the group. Additionally, it should be
15 noted Special Agent Miller **observed that the significant majority**
16 **of AHCCCS members targeted by this group are those which are**
17 **a part of the American Indian Health Plan** (AHCCCS #999998).
18 Special Agent Miller believes **they targeted this AHCCCS plan,**
19 **because it is paid directly by AHCCCS, and is not paid through a**
20 **3rd party, therefore there is less oversight, and the payout is faster.**

Special Agent Perez Sworn Affidavit at pp. 77-78 (emphasis added).

21 **SPECIAL AGENT MILLER BELIEVES THE CONTROL OF**
22 **THE PATIENT, RATHER THAN CARE OF THE PATIENT, IS**
23 **A KEY ASPECT TO THIS INVESTIGATION.** As noted in the
24 SVS records analysis completed by AHCCCS, several patient files
25 were incomplete, and missing the required documentation for the care
26 of the patient. **By controlling the patient’s location, the group can**
27 **ensure the patient is not being treated by another location, such**
28 **as a hospital, or living in another area of the state or nation, which**
would prove a possible issue that identifies the group’s fraudulent
scheme.

Special Agent Perez Sworn Affidavit at p. 78 (emphasis added).

1 91. Throughout 2019, 2020, and 2021, it is evident that Defendant STATE OF ARIZONA
2 was enabling and causing the sober living crisis to grow to unprecedented levels without any
3 meaningful oversight, enforcement, or change in practices. Satya Sarma, M.D. recently told her
4 story to the Arizona Republic to help the public understand how AHCCCS spent four years (from
5 2019 to 2023) writing huge checks to scammers who targeted Indigenous people to line their own
6 pockets.¹⁵
7

8 92. In 2020, Dr. Sarma landed her dream job at AHCCCS, a job she believed offered her
9 the chance to affect the lives of millions of people. Between December 2020 and October 2021,
10 she served as the Medical Director in AHCCCS's Division of Fee-For-Service Management. When
11 she started, her primary function was to focus on quality, though what she found often involved
12 possible criminal activity rather than common quality of care complaints. Stories about people in
13 white vans recruiting patients on tribal land were commonplace. **She learned that since at least
14 January 2020, AHCCCS employees had raised concerns about onsite visits to certain
15 behavioral health providers. Providers would get in trouble, and then simply turn around
16 and open a new facility under a different name.**¹⁶
17
18
19

20 93. At a work meeting in the spring of 2021, Dr. Sarma saw a photocopy of a handwritten
21 complaint from an Indigenous woman with an addiction problem. The letter was unlike anything
22 she had encountered in her career, and raised concern. The woman wrote about a Medicaid-
23
24
25

26 ¹⁵ Source: Stephanie Innes, *Arizona leaders were warned of massive Medicaid Fraud. It took them*
27 *years to grasp the problem*, THE ARIZONA REPUBLIC, June 23, 2024 at 8A.

28 ¹⁶ Source: *Id.*

1 registered mental health provider who housed her in a motel, did not provide any treatment, and, at
2 times, prevented her from leaving. Dr. Sarma reported:

3 “There is no way to call what these people were getting medical
4 care. You do not treat people with substance abuse by locking them
5 in a room.” “The only ones who complain are the ones who got out,
6 and basically not everyone who gets out is going to complain or even
7 know they can.” “It was alarming. I’ve done quality
8 management. This is not what you see.... It really stood out for me.”¹⁷

9 94. Dr. Sarma and her five-member frontline team took an interest and in June 2021, Dr.
10 Sarma requested a financial analysis. **Through that analysis, she discovered that the American
11 Indian Health Program (AIHP) comprised about 6% of all Medicaid enrollees in Arizona but
12 accounted for one-third of AHCCCS’s total outpatient behavioral health claims for the prior
13 year. Alarmed, Dr. Sarma sent the report to her bosses.**¹⁸

14 95. Dr. Sarma still possesses a July 29, 2021 e-mail from a White Mountain Apache Tribe
15 employee informing AHCCCS about three women in a van offering to pay a tribal case manager
16 \$150 for every client referred to their facility. That tribal case manager did not talk with the women
17 because he had already lost a family member under these practices the prior year. The Tribe
18 requested support from AHCCCS in reaching out to the facility and warning them that their
19 practice—patient brokering—was illegal. AHCCCS employee Leslie Short (who was subsequently
20 promoted to AHCCCS Deputy Assistant Director) issued AHCCCS’s response to such complaints.
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27 ¹⁷ Source: *Id.*

28 ¹⁸ Source: *Id.*

1 She deflected the issue and informed the Tribe to take their complaints to tribal law enforcement
2 and the Arizona Department of Health Services instead.¹⁹

3 96. On July 30, 2021, Dr. Sarma attended a meeting with her direct supervisor (Assistant
4 Director Markay Adams) and AHCCCS Office of Inspector General Sharon Ormsby to review the
5 report about exploding costs. **During the meeting, Ms. Adams told Dr. Sarma that she did not**
6 **need to concern herself with the findings and to essentially “stay in her lane.” She was**
7 **admonished to stop pulling reports and when she became insistent, she was accused of**
8 **insubordination and disrespect. She could not understand why her bosses would not listen to**
9 **her. “It did not make sense to me that (Adams) was shutting this down,” Dr. Sarma said.**
10 **“Our bosses wouldn’t listen to us. Not only that, they would fail to act to mitigate the human**
11 **cost. ... It was really bad. It was malfeasance.”²⁰**

12 97. Shockingly, Dr. Sarma described a climate of intimidation she experienced within
13 AHCCCS leadership:
14

15 “All AHCCCS leadership had to do was listen to my team and take
16 them seriously. Instead of taking decisive action, what I saw there
17 was that the **leadership delayed, deflected, ignored us, shut us**
18 **down and intimidated us.** And that calls for accountability.”²¹
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24 ¹⁹ Source: *Id.*

25 ²⁰ Source: *Id.* (emphasis added).

26 ²¹ Source: Video-recorded portion of the interview shown on the following MSN link:
27 https://www.msn.com/en-us/news/us/arizona-leaders-were-warned-of-massive-medicaid-fraud-it-took-them-years-to-grasp-the-problem/ar-BB1nFFoZ?ocid=hpmsn&pc=EUPP_&cvid=0f1c144c5df14fc8b20e87d2ad926af7&ei=22
28

1 98. About nine months into her tenure, Dr. Sarma learned AHCCCS was sending her
2 employees on law enforcement raids of providers engaging in suspected fraud, which was “totally
3 inappropriate.” The raids were all about getting records; AHCCCS did nothing to help the patients.
4 Dr. Sarma recommended sending mobile crisis teams on the raids to help the patients and protect
5 AHCCCS staff during the raids, but her suggestions were rebuffed. “They all listened to me, and it
6 never changed,” she said. “That was basically when I said, ‘I have to get out of here.’” By the end
7 of October 2021, Dr. Sarma had quit. **“Even if they hadn’t put together the extent of the
8 financial fraud, they absolutely knew people were being hurt.... They knew it from the public,
9 they knew it from tribes, and they knew it from my team,” Dr. Sarma said. According to Dr.
10 Sarma, AHCCCS could and should have terminated and suspended more providers years
11 earlier than it did.²²**

12 99. Then, in February of 2022, Defendant STATE OF ARIZONA, by and through
13 Attorney General Mark Brnovich, Brett Harames (AG’s office), and Josh Kredit (former AG’s
14 office), was again put on actual express notice of the continuing growth of the sober living crisis.
15 See “Urgent” Memorandum, dated February 7, 2022, attached hereto as **Exhibit A**. Despite
16 receiving a hand-delivered “Urgent” Memorandum outlining and describing in detail the fraudulent
17 scheme, naming potential fraudsters, and showing some of the exorbitant purchases, Defendant
18 STATE OF ARIZONA failed to take action. A quote from the Memorandum succinctly describes
19 the scheme:

20
21
22 The scheme is simple: send vans to the reservations to pick up Native
23 Americans and house them in unlicensed homes (less than 6 to avoid
24

25
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27
28 ²² Source: Stephanie Innes, *Arizona leaders were warned of massive Medicaid Fraud. It took them years to grasp the problem*, THE ARIZONA REPUBLIC, June 23, 2024 at 8A.

1 attention), drive them to a center for group each day with no licensure,
2 oversight, or credentialed staff, then bill AIHP (no contract necessary)
3 and continue to build an enterprise with a network of people who will
find the Native Americans.

4 *See Exhibit A.* This synopsis is absolutely, unequivocally, and factually accurate and true.

5 100. Since at least 2019, and with a strong entreaties by Dr. Sarma in 2021 and the
6 “Urgent” Memorandum in February of 2022, Defendant STATE OF ARIZONA, AHCCCS, and
7 AZ-DHS, and each of them, were put on notice and actually knew of a fraudulent financial scheme
8 being committed by a “tidal wave” of connected syndicate enterprises consisting of illegitimate
9 upstart substance abuse treatment centers, upstart licensed and unlicensed sober living homes, and
10 other related illegitimate providers, transportation services, and recruiters that were preying upon
11 Native Americans in countless sinister ways such as, but not limited to:
12
13

- 14 A. Picking up Native Americans in vans on and off the Indian Reservations while
15 they are intoxicated, drug-induced, and/or homeless—and then keeping them
16 mind-altered by supplying them even more alcohol/drugs during the journey
17 to Phoenix and surrounding communities—while offering the promise of free
18 substance abuse treatment, a free place to live, free food, and sobriety.
- 19 B. Signing up Native Americans for falsified health insurance coverage through
20 the American Indian Health Program (AIHP).
- 21 C. Stealing the identities of Native Americans so that false billing profiles could
22 be created to fraudulently bill AHCCCS for substance abuse treatment services
23 and related services.
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- 1 D. Employing the use of “recruiters,” and paying them a fee per person to seek
2 out homeless and/or vulnerable Native Americans solely for the purpose of
3 gaining an opportunity to fraudulently bill AHCCCS for illegitimate substance
4 abuse treatment services and ancillary services that are not actually provided.
5
- 6 E. Illegal patient “brokering” and patient “referrals” that involves selling and
7 transferring patients to other providers in bulk, for the sole purpose of
8 fraudulently billing AHCCCS.
9
- 10 F. Placing Native Americans in filthy, unsafe homes that pretended to be “sober
11 living homes,” whether licensed or unlicensed, that were nothing more than
12 sham fly-by-night operations filled with violence, drugs/alcohol, prostitution,
13 gang members, and intimidation, all of which served to keep the occupants
14 addicted and under their control so that fraudulent billing practices upon
15 AHCCCS could continue to thrive.
16
17
- 18 G. Fraudulently billing and overbilling AHCCCS for substance abuse treatment
19 services and ancillary services for Native Americans even though no services
20 were actually rendered or delivered, and in fraudulent quantities and
21 increments, such as, but not limited to, “double billing,” code stacking,
22 repeated patterns of units billed multiple times, billing beyond hours of
23 operation of a facility, and billing of services for members for the same
24 consecutive dates of service and timeframes that would not reflect services that
25 were medical necessary. These practices were easily detectable as fraudulent
26 by AHCCCS, yet they were allowed to continue.
27
28

- 1 H. Fraudulently billing AHCCCS for substance abuse treatment services and
2 ancillary services for Native Americans who were deceased or incarcerated.
- 3 I. Fraudulently billing AHCCCS for substance abuse treatment services and
4 ancillary services for Native Americans who were children, and thus, not
5 receiving any services at all.
- 6
7 J. Formation of “shell” entities and bogus LLCs that were not legitimate
8 providers of sober living housing or substance abuse treatment. These entities
9 were formed in huge numbers in the past few years for the sole purpose of
10 fraudulently billing AHCCCS for services that were promised to Native
11 Americans, but not actually delivered.

12
13
14 101. The foregoing list is non-exhaustive. Predictably and foreseeably, countless deaths of
15 Native Americans, serious injuries, missing persons, displaced persons, and homelessness have
16 directly resulted from the so-called “sober living crisis” and Medicaid fraud created and enabled by
17 the utter lack of oversight, gross negligence, recklessness, and sheer incompetence of Defendant
18 STATE OF ARIZONA through AHCCCS and AZ-DHS, including their respective OIG offices.

19
20 102. Defendant STATE OF ARIZONA and AHCCCS have belatedly acknowledged the
21 fraudulent financial schemes by publishing a list of suspended providers that have demonstrated a
22 pattern of financial fraud. Yet, in many instances, AHCCCS has suspended providers who continue
23 to operate under a license issued by AZ-DHS without any similar license suspension or censorship.
24 In other words, in many instances, AHCCCS has suspended providers who are committing fraud,
25 yet AZ-DHS continues to allow those providers to operate “business as usual” without any
26 ramifications.
27
28

1 103. Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS, including their
2 respective OIG offices, actually knew that there were scores of entities committing the Medicaid
3 fraud and billing practices described herein; that there were scores of entities, literally formed
4 overnight, that were unqualified, unsuited, unfit, and untrained to render the types of substance
5 abuse treatment services for which they were billing, in huge volumes, to AHCCCS; that there were
6 scores of entities formed overnight that should not be awarded licenses; and that AZ-DHS had a
7 practice of awarding licenses to substance abuse treatment centers/behavioral health treatment
8 providers without requiring them to provide proof that they were covered by liability insurance,
9 which was a loophole that allowed treatment centers to pop up overnight.
10

11
12 104. If only AZ-DHS had required proof of a valid liability insurance certificate, many so-
13 called substance abuse treatment centers would have been unable to even exist or bill AHCCCS
14 because they would have been vetted by private insurers who would not issue liability insurance
15 policies to these illegitimate treatment centers. Through sheer incompetence, it is outrageous that
16 Defendant STATE OF ARIZONA and AHCCCS simply allowed fraudsters to sign their name to a
17 vendor agreement (AHCCCS “Provider Participation Agreement” and/or AHCCCS Minimum
18 Subcontract Provisions—MSPs) promising that they would have insurance without requiring them
19 to provide actual proof of insurance. The actions of AHCCCS and AZ-DHS deviate from and
20 violate standard protocol and practices of other government agencies, departments, and bodies
21 including, but not limited to, the Arizona Department of Economic Security (DES) which requires
22 its providers and vendors to file a Certificate of Insurance with Defendant STATE OF ARIZONA
23 verifying liability coverage. Upon information and belief, this is standard practice by police
24 departments and nearly all types of government agencies.
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1 105. Since at least late 2019/early 2020, Defendant STATE OF ARIZONA, AHCCCS, and
2 AZ-DHS, including their respective OIG offices, and each of them, knew that massive and
3 widespread Medicaid fraud was occurring, and continuing to build, at an unprecedented and
4 alarming rate never seen before in recorded history, costing taxpayers an estimated \$2.8 billion
5 dollars, at a minimum. By May 2022, AHCCCS had not assigned for investigation 1,093 incidents
6 of potential fraud/abuse, or 77% of the 1,419 incidents of potential fraud/abuses incidents.
7

8 106. Yet, Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS continued to license
9 these fraudsters and enabled them to grow and thrive with illegal, fraudulent billing practices that
10 have resulted in the so-called “sober living crisis,” which Defendant STATE OF ARIZONA has
11 admitted is “one of the biggest scandals” in State history. Despite actual knowledge of widespread
12 fraudulent billing practices and illegal schemes, Defendant STATE OF ARIZONA, by and through
13 AHCCCS, continued to pay exorbitant rates and amounts of money to entities that were falsely
14 claiming to be substance abuse treatment providers and ancillary providers. Defendant STATE OF
15 ARIZONA has publicly admitted culpability and fault for the so-called “sober living crisis.” In a
16 public press conference on May 16, 2023, the Attorney General for the State of Arizona (Kris
17 Mayes) admitted that Defendant STATE OF ARIZONA has been “negligent at best” in its financial
18 mismanagement.
19

20 107. In the summer of 2019, Defendant STATE OF ARIZONA learned that this fraudulent
21 scheme had migrated from Nevada. According to Governor Hobbs and Arizona Attorney General
22 Kris Mayes, this fraudulent scheme originated by a Nevada-based criminal syndicate targeting
23 Medicare/Medicaid fraudulent payments. In fact, there are individuals who served prison sentences
24 in Nevada for this very crime and have since moved to Arizona and opened up fraudulent IOP/
25
26
27
28

1 BHRFs/sober living homes (some utilizing the exact same name of their suspended clinic in
2 Nevada) only to be licensed by AZ-DHS and paid by AHCCCS.

3 108. In the summer of 2019, at the infancy of the fraudulent billing practices in Arizona,
4 when there was a clear opportunity for Defendant STATE OF ARIZONA to prevent it from
5 growing, it would have been foreseeable to Defendant STATE OF ARIZONA, AHCCCS, and AZ-
6 DHS that the same fraudulent schemes happening in Nevada were sure to occur in Arizona. Yet,
7 Defendant STATE OF ARIZONA, AHCCCS and AZ-DHS, and their respective OIG offices did
8 nothing to prevent or curtail the fraud. Instead, Defendant STATE OF ARIZONA, AHCCCS and
9 AZ-DHS welcomed a tidal wave of new licenses issued to so-called substance abuse treatment
10 centers (also known as “IOPs” and “BHRFs”) and sober living facilities. AZ-DHS knew, or in the
11 exercise of reasonable care should have known, that the numerous applications for IOPs/sober living
12 homes aggressively catering and advertising to the Native American community since at least 2019
13 were sinister and fraudulent. The billing “bonanza” ensued by these upstart entities who targeted
14 Native Americans due to the high rates paid by AHCCCS over extended periods and quick payments
15 by AHCCCS for substance abuse treatment afforded to Native Americans under the American
16 Indian Health Program (AIHP).
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22 109. Under the fraudulent financial scheme, when fraudsters billed AHCCCS under AIHP,
23 the fraudsters were sure that they could bill AHCCCS—and AHCCCS would pay—excessive rates
24 for substance abuse treatment for Native Americans without any questions or oversight. In a
25 criminal Sentencing Memorandum, the Attorney General’s Office has publicly outlined AHCCCS’s
26 lack of scrutiny and oversight of its AIHP payments to providers:
27
28

1 As referenced above, the vast majority (>90%) of Defendant's
2 effective Patient census were Native American AHCCCS Members
3 of the AIHP Program. Unlike AHCCCS Managed Care Plans, where
4 a third-party private health care provider administers and oversees the
5 reimbursements for treatment services rendered to AHCCCS Patients,
6 the **AIHP Program was monitored internally by AHCCCS
managers and employees. As a result of this structural
bifurcation, AIHP was subject to reduced scrutiny in terms of
legitimacy of reimbursement requests/payouts.**

7 Source: State's Sentencing Memorandum at p. 7 in the *State of Arizona v. Ariell Dix*, CR 2021-
8 002107 (emphasis added).
9

10 110. In the same Sentencing Memorandum, Defendant STATE OF ARIZONA even
11 described one set of fraudsters as bilking AHCCCS with an "industrial-scale" scheme.

12 111. In other words, when a billing request is submitted to AHCCCS for a conventional
13 (non-Native American) AHCCCS enrollee, the bill is scrutinized by a private insurer (e.g. United
14 Health, Mercy Care, etc.)—this is known as Managed Care. In contrast, when a billing request is
15 submitted to AHCCCS for a Native American covered under AIHP, the bill is not scrutinized under
16 the Managed Care system. Instead, an AIHP bill is reviewed and paid *only by AHCCCS employees*.
17 This is known as "Fee-For-Service." In short, when an AIHP bill is submitted to AHCCCS, the bill
18 is subject to "less scrutiny" than a bill submitted to Managed Care. **Defendant STATE OF
19 ARIZONA and AHCCCS long ago became aware that fraudsters were targeting Native
20 Americans for the very reason that bills submitted under AIHP were subject to "less scrutiny."**
21
22

23 112. Indeed, since 2019, it became readily apparent to fraudsters that AHCCCS was not
24 scrutinizing AIHP bills at all because, after all, AHCCCS paid a whopping \$2.8+ billion dollars in
25 fraudulent AIHP bills over an estimated four year period. There is **proof positive evidence** that
26 AHCCCS learned of the fraud scheme in 2019 targeting AIHP Fee-For-Service billing, yet
27
28

1 AHCCCS blindly allowed the fraud to grow and explode to astronomical levels in 2020, 2021, 2022,
2 and 2023—all the while, funding/creating displacements, additional addictions, injuries, and even
3 deaths to the Native Americans.

4
5 113. Inevitably, the loopholes, mismanagement, incompetence, indifference, and sheer
6 lack of oversight by Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS of the AIHP Fee-
7 For-Service billing system caused and created a tidal wave of easy and false billing opportunities
8 for fraudsters. Defendant STATE OF ARIZONA has acknowledged that this fraudulent scheme has
9 cost the taxpayers an estimated \$2.8 billion dollars in fraudulent payments issued to substance abuse
10 treatment providers that falsely billed AHCCCS through the AIHP Fee-For-Service billing system
11 for substance abuse treatment services that were not actually rendered. Due to sheer incompetence
12 and lack of oversight, AHCCCS has blindly paid these fraudulent AIHP-Medicaid claims, with no
13 questions asked, enabling the fraudsters to grow and thrive, and ultimately causing countless deaths,
14 injuries, and other losses claimed herein by Plaintiffs and the entire Class.
15
16
17

18 114. With the massive growth of fraudulent AIHP billing and fraudulent entities, it was
19 clearly foreseeable and predictable to Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS
20 that violent crime, serious injuries, and death were sure to follow given the huge amount of money
21 at stake for the fraudsters. Indeed, the Office of the Arizona Attorney General has, itself, even
22 described the Native Americans as being treated like “investment chattel” in this scheme:
23

24
25 Defendant's motivation was obviously pecuniary. Defendant
26 generated millions of illicit proceeds for herself and all members of
27 the conspiracy. Further, Defendant used the identities, and physical
28 presence, of **vulnerable members of the Native American
community as investment chattel through which she could
defraud AHCCCS and extract millions of dollars from taxpayers,**

1 all while knowing the proceeds were derived from her continuous
2 racketeering offenses.

3 Source: State’s Sentencing Memorandum at p. 32 in the *State of Arizona v. Ariell Dix*, CR2021-
4 002107 (emphasis added).

5 115. The issues surrounding sober living were well-chronicled in a U.S. Congressional
6 hearing held on September 28, 2018—just a few short months before the sober living crisis spread
7 to Arizona. Defendant STATE OF ARIZONA should have been on high alert in 2019 given the
8 extreme warnings discussed in the Congressional hearing which was attended by Congressman
9 Andy Biggs (Arizona). Below are a few excerpts from the Congressional record “Examining Sober
10 Living Homes” discussed on September 28, 2018:
11
12

13 In the worst cases, some bad actors do not encourage recovery at all,
14 but **exploit vulnerable individuals in order to collect insurance**
15 **payments**. **This can mean life or death** for people like Tyler from
16 my district in Pasadena, California. Tyler died from an overdose after
17 a sober living home didn’t recognize the symptoms of his overdose,
18 or did they have Naloxone, the medication that can reverse an
19 overdose on hand. Tyler was only 23 years old.

20 Unfortunately, this is not an isolated incident. **I have heard from**
21 **advocates in Arizona**, Pennsylvania, Missouri, Florida, and Ohio
22 who are concerned for the **friends and family members living in**
23 **unregulated sober living facilities.**²³

24 *****

25 I have included scores of examples of what happens when operators
26 evade local regulation. **The examples turn the stomach**. **We heard**
27 **some of those headlines earlier: operators selling drugs to**
28 **residents; house managers trading drugs to residents for sex;**
rapes; resident and house manager overdoses. And that doesn’t

28 ²³ Source: 09/28/2018 Examining Sober Living Homes Hearing, 115 Congress, 2nd Session, Serial
No. 115-70, at page 5/21.

1 even get into the human trafficking and fraud problems that are
2 so common.²⁴

3 *****

4 **In recent years, however, we have had a surge of unscrupulous**
5 **individuals enrich themselves by exploiting well-intended federal**
6 **laws to prey on opioid addicts, who are often human-trafficked by**
7 **marketers, sober homes, and facilities in exchange for illicit**
8 **benefits such as cash, free rent, transportation and even drugs**
9 **themselves...**

10 Then they go to detox and patient treatment, outpatient care. The
11 money exchanges hands. **There is lots of kickbacks. There is**
12 **patient brokering. This is the corrupted model that you see, from**
13 **the corrupted providers. And everyone is making money off this**
14 **corrupted model, including rogue labs.**

15 The only bubble there that is not profitable is the sobriety. And you
16 have individuals in sober homes, even living for free in some cases,
17 because the sober home doesn't need to charge when they are getting
18 kickback from an outpatient treatment center, a market, or a lab to
19 send their residents their way.²⁵

20 116. The alarming warnings discussed in the Congressional hearing in 2018 proved to be
21 prophetic. During the sober living crisis in Arizona, Native American volunteer advocates/groups
22 in the community were regularly putting Defendant STATE OF ARIZONA on actual notice—via
23 email incident reports sent to AHCCCS almost weekly and sometimes daily together with
24 supporting printouts and evidence—that deaths, serious injuries, and missing persons were
25 occurring directly due to fraudulent substance abuse treatments centers, fraudulent sober living
26 homes, fraudulent recruiters, and others who were connected to the scheme. Simply put, volunteer

27 ²⁴ Source: *Id.* at page 12/21.

28 ²⁵ Source: *Id.* at page 14/21 (emphasis added).

1 advocates were telling AHCCCS nearly weekly/daily—and supplying printed evidence—that
2 Native Americans were dying, being abused, being assaulted/raped, being exploited, and being
3 neglected in countless fraudulent sober living facilities while AHCCCS was continuing to pay for
4 fraudulent substance abuse treatment that was not being delivered. Defendant STATE OF
5 ARIZONA’s gross negligence caused stolen benefits and stolen lives to occur at a catastrophic rate.
6 Yet, Defendant STATE OF ARIZONA and AHCCCS, and their respective OIG offices, literally
7 ignored, shunned, and marginalized the Native American advocates who were desperately and
8 tirelessly trying to solve the sober living crisis.
9
10

11 117. In the fall of 2020, Defendant STATE OF ARIZONA initiated “raids” on a group (the
12 “Vegas group”) that Defendant STATE OF ARIZONA was informed were key players in the early
13 stages of the sober living crisis. **Curiously, however, Defendant STATE OF ARIZONA did not**
14 **discover the suspected group of culprits through its own investigation or through the efforts**
15 **of AHCCCS-OIG.** Defendant STATE OF ARIZONA only learned of the Vegas group through
16 repeated reports and complaints from [John Doe]. If [John Doe] had not repeatedly complained to
17 Defendant STATE OF ARIZONA and to AHCCCS, it is a sure bet that the early fraudsters would
18 have gone unchecked and unnoticed by AHCCCS.
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22 118. Based on the raids in the fall of 2020, Defendant STATE OF ARIZONA proceeded
23 to indict and prosecute a group of 13 individuals (and affiliated companies) finally in the fall of
24 2021. However, Defendant STATE OF ARIZONA’s efforts were feeble, short-sighted, and
25 exacerbated the sober living crisis. Rather than internally correcting the billing scrutiny process
26 within AHCCCS, implementing conventional computer software rules in order to detect daily,
27 weekly, and monthly billing irregularities, and implementing other routine “fraud detection”
28

1 measures at AHCCCS, Defendant STATE OF ARIZONA proceeded with prosecuting the small
2 group of fraudsters with an emphasis on “double billing” by the BHRFs that were sending groups
3 to the IOPs for counseling and therapy services.
4

5 119. Mindlessly hoping that the problem would go away by indicting this group, Defendant
6 STATE OF ARIZONA seemingly relied upon headlines about the indictments, rather than make
7 any internal changes at AHCCCS, to solve the true billing problems and practices within AHCCCS.
8 Since at least 2012, and probably longer, AHCCCS has had the ability to utilize the vast fraud
9 detection services of Lexis/Nexis. Furthermore, in 2019, AHCCCS issued its Program Integrity
10 Plan that included strategic planning for prevention, detection, and investigation/recovery activities
11 to minimize or prevent overpayments due to Medicaid fraud, waste, or abuse. Plainly, AHCCCS
12 squandered and/or ignored the resources which could have prevented the crisis from taking off.
13
14

15 120. Defendant STATE OF ARIZONA’s strategy backfired and exacerbated the sober
16 living crisis because fraudsters came to realize (after the raids in 2020) that there was no point in
17 setting up BHRFs which were limited to modest daily “per diem” rates. Defendant STATE OF
18 ARIZONA’s actions made it clear to fraudsters that the preferable model for fraudsters was to set
19 up only IOPs (and not BHRFs) due to the enormous (almost limitless) charges that could be
20 submitted by IOPs to AHCCCS—*without scrutiny*—for “units” in increments of 15 minutes per
21 person for purported therapies, counseling, and treatment. Further, the IOPs could (and did) house
22 and control the Native Americans in *unlicensed* sober living homes rather than taking patients from
23 licensed BHRFs or licensed sober living homes. There was no point in getting an AZ-DHS license
24 for a BHRF or a sober living home when the fraudsters could easily circumvent the system with
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1 *unlicensed* sober living homes who would then send daily groups to the IOPs for “unit” billing *per*
2 *person* for every 15 minutes.

3 121. Defendant STATE OF ARIZONA’s strategy in prosecuting BHRFs and IOPs (for
4 “double billing”) created and spawned a paradigm shift in the fraud scheme model that pivoted to
5 using mostly IOPs instead of BHRFs due to the huge amount of money that could be fraudulently
6 earned using IOPs without any scrutiny or questions by AHCCCS. The billing bonanza really took
7 off at an even more alarming rate once “word on the street” spread that “unit” billing submitted by
8 IOPs was the easiest way to pull off the fraud scheme. The billing bonanza created by Defendant
9 STATE OF ARIZONA further increased the danger for the Native American population due to the
10 spike of unlicensed (unmonitored and unchecked) sober living homes that were integral to the IOP
11 billing model.
12

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15 122. Complaints to Defendant STATE OF ARIZONA about unlicensed sober living homes
16 spiked from 94 complaints in 2021, to 446 complaints in 2023. Moreover, in 2021, the Arizona
17 Recovery Housing Association reported complaints to the AZ-DHS about misconduct in sober
18 living homes. Remarkably, despite Defendant STATE OF ARIZONA knowing that (a) unlicensed
19 sober living homes had dramatically increased, and (b) Native Americans were being abused in
20 those homes, Defendant STATE OF ARIZONA ignored the complaints and refused to bring cease
21 and desist enforcements against the unlicensed sober living homes. For example, in 2021 Defendant
22 STATE OF ARIZONA received 94 complaints regarding unlicensed sober living homes, but
23 brought zero enforcement actions. In 2022, there were 168 complaints regarding sober living
24 homes, and Defendant STATE OF ARIZONA brought a mere five enforcement actions. By 2023,
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1 there were a staggering 446 complaints regarding sober living homes, and Defendant STATE OF
2 ARIZONA brought only seven enforcement actions.

3 123. Defendant STATE OF ARIZONA knew that “control” over the Native Americans
4 was at the heart of the fraudulent billing model. Of course, Defendant STATE OF ARIZONA knew
5 that “control” meant that Native Americans were being controlled with drugs, alcohol, intimidation,
6 and violence in the dangerous unlicensed sober living homes. Moreover, with the fraudulent billing
7 model, there was a huge rise in so-called “patient brokering” or “patient referrals” because IOPs
8 were willing to pay huge sums to “buy” blocks of patients for which they could bill AHCCCS.
9

10 124. Plainly, Defendant STATE OF ARIZONA and AHCCCS knew that IOPs were
11 cropping up at an alarming rate in 2020, 2021, and 2022, they were billing at an alarming rate, and
12 that dangerous unlicensed sober living homes were cropping up all over metropolitan Phoenix at an
13 alarming rate, *yet nothing was done to stop any of it*. Thus, while Defendant STATE OF ARIZONA
14 had raided a small group of fraudsters in the fall of 2020 and indicted the group in 2021, **the sober**
15 **living crisis was simultaneously getting much, much worse—not better**. Obviously, the
16 prosecution of the Vegas group in 2021 was little more than a political charade because in 2021 and
17 2022, Defendant STATE OF ARIZONA knew that the sober living crisis was clearly not being
18 “solved” by the prosecution of a small group of individuals.
19

20 125. Medicaid is federally funded in every state and thus, it is expected that the federal
21 Medicaid system provides information to the respective states warning them of certain illegal
22 practices, scams, and schemes, including the Native American AIHP Medicaid fraud related to
23 fraudulent IOPs/BHRFs/sober living. Undoubtedly, Defendant STATE OF ARIZONA had actual
24 notice from not only multiple sources, but also neighboring states (such as Nevada, where several
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1 of the fraudulent IOP/BHRFs/sober living homes that eventually made their way to Arizona had
2 originally started) utilizing the same federal funds that obviously share information. For example,
3 currently these fraudsters are targeting other states such as Montana, California, Oregon, New
4 Mexico, and Texas. Many Arizona public officials have been openly advising the responsible
5 Montana state agencies. There is no doubt through discovery Plaintiffs will ascertain internal
6 memos and communications confirming Defendant STATE OF ARIZONA's notice and knowledge
7 of the fraudulent scheme; yet, Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS chose
8 to ignore the warnings.
9
10

11 126. Since at least 2019, Defendant STATE OF ARIZONA, AHCCCS, and AZ-DHS, and
12 their respective OIG offices knew, or in the exercise of reasonable care should have known, that
13 countless IOPs, BHRFs, and sober living homes were nothing more than sham entities formed for
14 the sole purpose of submitting fraudulent and inflated AIHP billing invoices to AHCCCS for
15 substance abuse treatment services that are not actually rendered to patients. Defendant STATE OF
16 ARIZONA, AHCCCS, and AZ-DHS could have and should have suspended the billing privileges
17 of countless IOPs and BHRFs years ago, and indeed, a license never should have been issued to
18 countless entities at all.
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22 127. The grossly negligent acts and omissions of Defendant STATE OF ARIZONA,
23 AHCCCS, and AZ-DHS included, but are not limited to gross negligence, gross mismanagement,
24 and gross lack of oversight of licensure and billing practices of substance abuse treatment centers
25 and sober living homes, and ancillary entities, that have falsely claimed they are rendering services
26 and help to Native Americans. The gross negligence of Defendant STATE OF ARIZONA,
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1 including by and through AHCCCS and AZ-DHS, directly and proximately caused the deaths,
2 injuries, and other losses claimed herein by Plaintiffs and the Class.

3 128. Defendant STATE OF ARIZONA's liability and gross negligence in this matter are
4 clear. But for AZ-DHS's flippant, inexcusable, and grossly negligent licensing of these
5 IOPs/BHRFs/sober living homes, blind payments by AHCCCS, and grossly negligent oversight
6 (AZ-DHS inspections and AHCCCS's inability to determine blatant fraud despite openly egregious
7 billing), Plaintiffs and the entire Class would not have incurred the loss of lives, injuries,
8 displacement, homelessness, exacerbated addictions, new addictions, and the other losses and
9 damages identified herein.
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11

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13 **VII.**
14 **COUNT 2 – DEFENDANT STATE OF ARIZONA'S VIOLATION AND BREACH OF**
15 **ARIZONA'S ADULT PROTECTIVE SERVICES ACT**

16 129. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
17 as though fully set forth in this paragraph.

18 130. It is further alleged that Defendant STATE OF ARIZONA is liable under Arizona's
19 Adult Protective Services Act, namely, A.R.S. §§ 46-451, *et seq.* Plaintiffs' decedents, the injured
20 Plaintiffs, and other Class Members, defined herein, each qualify as a "vulnerable adult" which is
21 statutorily defined in the Act as follows:
22

23 'Vulnerable adult' means an individual who is eighteen years of age
24 or older and who is unable to protect himself from abuse, neglect or
25 exploitation by others because of a physical or mental impairment.
26 Vulnerable adult includes an incapacitated person as defined in
section 14-5101.

27 A.R.S. § 46-451(A)(12).
28

1 131. By incorporating A.R.S. § 14-5101 into the Act, the definition of vulnerable adult
2 includes the following:

3 **‘Incapacitated person’ means** any person who is impaired by reason
4 of mental illness, mental deficiency, mental disorder, physical illness
5 or disability, **chronic use of drugs, chronic intoxication** or other
6 cause, except minority, **to the extent that he lacks sufficient**
7 **understanding or capacity to make or communicate responsible**
8 **decisions concerning his person.**

8 A.R.S. § 14-5101(3) (emphasis added). Even the Arizona Attorney General’s Office admitted that
9 the Native American population is the “most vulnerable among us”:

10 Protection of the most vulnerable among us is a foundational, bedrock
11 principle, upon which our society rests. This recognition— – that if
12 our community stands for anything, it must both safeguard and
13 endeavor to prevent harm to those who cannot adequately sustain or
14 help themselves – is a crucial precept which undergirds the collection
15 belief in the legitimacy of the government of our State, as well as the
16 entire nation. Thus, when vulnerable members of our community are
17 exploited, whether figuratively or literally, it represents a disturbing
18 harbinger indicative of the relative health of society is in distress,
19 generally.²⁶

18 132. Plainly, as stated throughout this Complaint, Plaintiffs’ decedents, the injured
19 Plaintiffs, and Class Members were impaired by chronic use of drugs, chronic intoxication, and
20 other impairments. Plaintiffs’ decedents, the injured Plaintiffs, and Class Members were unable to
21 protect themselves from abuse, neglect, or exploitation by others by reason of a physical or mental
22 impairment, and incapacitation. Arizona’s Adult Protective Services Act defines “abuse” as: “(a)
23 *Intentional infliction of physical harm. (b) Injury caused by negligent acts or omissions. (c)*
24 *Unreasonable confinement. (d) Sexual abuse or sexual assault. (e) Emotional abuse.*” A.R.S. § 46-
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²⁶ State’s Sentencing Memorandum in *State of Arizona v. Ariell Dix*, CR2021-002107.

1 451(A)(1). The term “neglect” means “*the deprivation of food, water, medication, medical services,*
2 *shelter, supervision, cooling, heating or other services necessary to maintain a vulnerable adult’s*
3 *minimum physical or mental health.*” A.R.S. § 46-451(A)(9). The term “exploitation” is defined as
4 “*the illegal or improper use of a vulnerable adult or the vulnerable adult’s resources for another’s*
5 *profit or advantage.*” A.R.S. § 46-451(A)(6).
6

7 133. The grossly negligent acts and omissions of Defendant STATE OF ARIZONA, by
8 and through AHCCCS and AZ-DHS, constitute “abuse,” “neglect,” and “exploitation” of Plaintiffs’
9 decedents, the injured Plaintiffs, and Class Members as defined in A.R.S. §§ 46-451, *et seq.* By
10 law, Defendant STATE OF ARIZONA had a duty to immediately report neglect, abuse, and
11 exploitation to Arizona’s Adult Protective Services central intake unit (by phone or online) or to a
12 Peace Officer. Additionally, since at least October of 2020, Defendant STATE OF ARIZONA has
13 conducted criminal “raids/seizures” from time to time of IOPs, BHRFs, and others where Native
14 American patients were present and became displaced by reason of the raids. During the raids,
15 Defendant STATE OF ARIZONA abused and neglected the Native American patients by failing to
16 have Adult Protective Services present to care for the patients and coordinate future care. Moreover,
17 from time to time, Defendant STATE OF ARIZONA would conduct welfare checks and quality of
18 care site visits of IOPs and BHRFs where AHCCCS officials observed that Native American
19 patients were being neglected and abused. Again here, Defendant STATE OF ARIZONA had an
20 obligation to notify Adult Protective Services to intervene, but it failed to do so.
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26 134. Defendant STATE OF ARIZONA had actual knowledge that Plaintiffs’ decedents,
27 the injured Plaintiffs, and the Class Members (collectively referred to as “the victims”) were being
28 abused, neglected, and exploited. Yet, Defendant STATE OF ARIZONA failed to take action

1 required by the Arizona Adult Protective Services Act to protect the victims. Defendant STATE
2 OF ARIZONA cannot shift blame to the IOPs, BHRFs and sober living operators given that
3 Defendant STATE OF ARIZONA knowingly funded their entire scheme with illegal payments. By
4 funding the illegal scheme and in failing to take action to prevent harm that it knew about, Defendant
5 STATE OF ARIZONA condoned, enabled, and even ratified the acts of the IOPs, BHRFs, and sober
6 living operators.
7

8
9 135. Defendant STATE OF ARIZONA further acted in concert with the IOPs, BHRFs,
10 and sober living operators by continuing to blindly fund the fraudulent billing scheme. Therefore,
11 it is alleged that Defendant STATE OF ARIZONA is independently liable under Arizona's Adult
12 Protective Services Act, and in addition, Defendant STATE OF ARIZONA is liable by operation
13 of law under Arizona's Adult Protective Services Act for the acts committed by the IOPs, BHRFs,
14 and sober living operators under theories and principles of *respondeat superior*, vicarious liability,
15 joint and several liability, joint enterprise, joint venture, master-servant relationship, and agency
16 relationship.
17
18

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20 **VIII.**
21 **THE STATUTE OF LIMITATIONS FOR THE ENTIRE CLASS CLAIMS IS TOLLED**
22 **UNDER TOLLING STATUTES FOR INCOMPETENCY AND UNSOUND MIND**

23 136. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
24 as though fully set forth in this paragraph.

25 137. Plaintiffs affirmatively allege that the limitations period for Plaintiffs and the entire
26 class to bring the claims asserted herein is tolled under tolling statutes for incompetency and
27 unsound mind, as specifically described below.
28

1 138. It is beyond any dispute that the Native American victims of the sober living crisis
2 were vulnerable, incompetent, and incapacitated due to chronic use of drugs and/or chronic
3 intoxication and/or diagnoses of a Substance Use Disorder (SUD) and co-occurring mental illnesses
4 often associated with a SUD diagnosis.²⁷ Plaintiffs’ decedents, the injured Plaintiffs, and the Class
5 Members (collectively referred to as “the victims”) were incompetent and of unsound mind with no
6 capacity to make or communicate responsible decisions. Often, the victims were lured into “white
7 vans” driven by strangers who kidnapped and trafficked them, and then exploited them for months
8 and years.
9
10

- 11 • Only an incompetent person of unsound mind blindly hops in an unknown
12 vehicle with an unknown driver to an unknown destination, all the while being
13 fed drugs/alcohol during the journey.
- 14 • Only an incompetent person of unsound mind continues to stay in an unknown
15 residence with unknown fellow residents where drugs/alcohol are being
16 dispensed by the “house manager” who claims to be operating a “sober” living
17 home.
- 18 • Only an incompetent person of unsound mind continues to stay in a sober
19 living home where there is intimidation and “control.”
- 20 • Only an incompetent person of unsound mind is convinced to believe that
21 watching endless “YouTube” videos every day and coloring in children’s
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27 ²⁷ *Common Comorbidities with Substance Use Disorders Research Report. Bethesda (MD),*
28 NATIONAL INSTITUTES ON DRUG ABUSE (US); 2020 Apr. Available from:
<https://www.ncbi.nlm.nih.gov/books/NBK571451/>.

1 coloring books—as the purported primary means of addiction treatment—are
2 somehow legitimate forms of treatment.

- 3 • Only an incompetent person of unsound mind would ever believe that drinking
4 alcohol and taking illegal and unprescribed drugs in a “sober” living home is
5 somehow a legitimate course of attaining recovery.
6

7 139. Examples of conduct that only an incompetent person of unsound mind would
8 undertake are practically endless. Chronic alcohol/drug use, intoxication, and dependency are the
9 common threads that run through every single victim. By definition, they are all of unsound mind,
10 incompetent, and incapacitated as a matter of law.
11

12 140. It is further important to emphasize that Defendant STATE OF ARIZONA, by and
13 through AHCCCS, *approved* alcohol/drug treatment for the victims, and hence, AHCCCS has
14 already agreed that the victims were incompetent and of unsound mind due to chronic use of
15 drugs/alcohol. In other words, at the onset of substance abuse treatment services for every single
16 victim, it was required by AHCCCS rules that AHCCCS approve and adopt the finding of alcohol/
17 drug addiction. Simply put, if AHCCCS disagreed, AHCCCS would not approve payment for the
18 services.
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22 141. The fact that AHCCCS did approve substance abuse treatment services for every
23 single victim is irrefutable, **proof-positive evidence** that each and every victim did, in fact, suffer
24 from chronic drug use/alcohol addiction and was incompetent/of unsound mind at the time services
25 were purportedly rendered. In reality, if at any time AHCCCS believed that a victim was not
26 suffering from addiction, AHCCCS had the right—and obligation—to stop payments for the
27 services. Consequently, since Defendant STATE OF ARIZONA, by and through AHCCCS,
28

1 approved the payments and thereby confirmed the incompetency/incapacitation of the victims
2 throughout so-called “treatment,” Defendant STATE OF ARIZONA is now estopped from arguing
3 the opposite.

4
5 142. When a victim is incompetent or of unsound mind, as is the case with each and every
6 victim here, all statutes of limitation are tolled until the disability ceases, which is Defendant
7 STATE OF ARIZONA’s burden to establish with proof. Tolling for incompetency in notice-of-
8 claim cases is set forth in A.R.S. § 12-821.01(D):
9

10 Notwithstanding subsection A, a minor or an insane or **incompetent**
11 person may file a claim within one hundred eighty days after the
12 disability ceases.

13 A.R.S. § 12-821.01(D) (emphasis added).

14 143. The foundational statute requiring tolling for persons of unsound mind is A.R.S. § 12-
15 502, which states that:

16 If a person entitled to bring an action other than those set forth in
17 article 2 of this chapter is at the time the cause of action accrues either
18 under eighteen years of age **or of unsound mind**, **the period of such**
19 **disability shall not be deemed a portion of the period limited for**
20 **commencement of the action.** Such person shall have the same time
after removal of the disability which is allowed to others.

21 A.R.S. § 12-502 (emphasis added).

22 144. Both of these statutes toll the A.R.S. § 12-821.01(A) 180-day notice-of-claim deadline
23 as well as the A.R.S. § 12-821 one-year statute of limitations for filing a lawsuit. *See McCarthy v.*
24 *Scottsdale Unified Sch. Dist. No. 48*, 409 F.Supp.3d 789, 816 (D. Ariz. 2019) (“A.R.S. § 12-502
25 provides for the tolling of state law statutes of limitation for periods during which a plaintiff is of
26 unsound mind and applies to the limitations period for notices of claim against public entities.”).
27
28

1 145. Under A.R.S. § 12-502, if a person is of unsound mind when a cause of action accrues,
2 the statute of limitations is tolled for the period of disability. “Unsound mind” occurs when a person
3 is unable to manage his/her affairs or to understand his/her legal rights:
4

5 If a person is of unsound mind when a cause of action accrues, the
6 statute of limitations is tolled for the period of disability. Ariz. Rev.
7 Stat. § 12–502. This rule arises from the equitable principle that it is
8 unfair to bar an action in which the plaintiff is mentally disabled and
9 thus unable to appreciate or pursue his or her legal rights. In Arizona,
unsound mind occurs when the **person is unable to manage his
affairs or to understand his legal rights or liabilities.**

10 *Tavilla v. Cephalon, Inc.*, 870 F.Supp.2d 759, 766-67 (D. Ariz. 2012) (internal citations omitted)
11 (emphasis added).

12 146. “A litigant need not be institutionalized nor be adjudged legally incompetent to
13 qualify for tolling of a limitations period under Arizona's ‘unsound mind’ tolling statute.” *Cecala*
14 *v. Newman*, 532 F.Supp.2d 1118, 1144 (D. Ariz. 2007). Furthermore, it is well settled that “[t]he
15 plaintiff is not required to discredit all evidence of ability to manage her affairs—such controverting
16 evidence merely establishes that there is a jury question on an issue of material fact.” *Doe v. Roe*,
17 191 Ariz. 313, 328 (1998).
18

19 147. Here, as stated above, *each and every victim* was deemed by AHCCCS to qualify for
20 alcohol/drug addiction substance abuse treatment services. In fact, a common theme among the
21 victims was the reality that AHCCCS deemed the victims so extremely and chronically ill and
22 addicted that AHCCCS approved substance abuse treatment services *for years* without any success
23 for long-term sobriety. In other words, the victims were of such extreme unsound mind that
24 AHCCCS commonly approved payment for years or at least many months in a row.
25
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1 148. The facts confirm that the victims here are of such extreme unsound mind that they
2 qualify for being “incapacitated” by statutory definition. The definition of “incapacitated person” is
3 found in A.R.S. § 14-5101 (Conservator/Guardian proceedings) and A.R.S. § 46-451 (Vulnerable
4 Adult statute). These statutes are instructive and directly on point here to show the extent of their
5 unsound mind. A.R.S. § 14-5101(3) defines “incapacitated person” as:

7 **‘Incapacitated person’ means** any person who is impaired by reason
8 of mental illness, mental deficiency, mental disorder, physical illness
9 or disability, **chronic use of drugs, chronic intoxication** or other
10 cause, except minority, **to the extent that he lacks sufficient**
11 **understanding or capacity to make or communicate responsible**
12 **decisions concerning his person.**

12 A.R.S. § 14-5101(3) (emphasis added).

13 149. Furthermore, Arizona’s Adult Protective Services Act (A.R.S. § 46-451(A)(12))
14 defines “vulnerable adult” by incorporating the definition of “incapacitated person” found in A.R.S.
15 § 14-5101(3) and by adding the following language:

17 ‘Vulnerable adult’ means an individual who is eighteen years of age
18 or older and who is unable to protect himself from abuse, neglect or
19 exploitation by others because of a physical or mental impairment.
20 **Vulnerable adult includes an incapacitated person as defined in**
21 **section 14-5101.**²⁸

21 A.R.S. § 46-451(A)(12) (emphasis added).

22 150. There is no doubt here that the victims are not only of “unsound mind,” but they are
23 so extremely disabled that they also meet the definitions of “incapacitated person” and “vulnerable
24 adult.”
25
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²⁸ See also *Arizona’s Adult Protective Services Annual Report* at 4 (rev. June 1, 2017).

1 151. Common facts among the victims includes the reality that the victims are unable to
2 have steady access to food, water, and shelter; most of them are homeless; unable to manage
3 addictions; unable to have access to reliable transportation; unable to gain and maintain
4 employment; unable to maintain personal hygiene; unable to manage their medical conditions;
5 unable to maintain relationships with parents, siblings, relatives, and friends; unable to manage
6 money; unable to have phone/internet access to stay in touch with relatives; unable to stay in touch
7 with or even comprehend local or world events or legal rights; and, ultimately, unable to manage
8 their affairs.
9
10

11 152. Commonly, the victims end up missing, homeless on the streets, or in local jails in
12 locations where family members have no idea about their whereabouts. Victims are frequently
13 trafficked from the Reservations and, after a period of time of lucrative billing, ultimately discarded
14 from sober living homes into the Phoenix area where they are unfamiliar with their surroundings
15 and without money, family, friends, shelter, food, or transportation.
16
17

18 153. It is also a common theme that victims do not “check” themselves into rehab/sober
19 living services on their own volition. This is because they are of such unsound mind and
20 incapacitation that they do not even have the wherewithal or comprehension to understand that they
21 are addicts or that there are legitimate services available. Instead, it is common for victims to be
22 picked up in white vans by recruiters looking to exploit them. In other instances, they end up in
23 sober living environments only at the urging of family members, friends, or tribal members
24 (recruiting/receiving bribes and kickbacks in return for each person trafficked). **The bottom line**
25 **is that the victims do not have the capacity to form and make responsible decisions to battle**
26 **their addictions, or to understand their legal rights.**
27
28

1 154. Furthermore, as Defendant STATE OF ARIZONA knows, the victims did not receive
2 legitimate substance abuse treatment services. As a result, the victims remain incompetent and of
3 unsound mind. Indeed, many are worse off today because they took on new addictions such as to
4 Fentanyl and/or methamphetamine while under the “treatment” of the fraudulent providers that were
5 being blindly funded by AHCCCS.
6

7 155. Moreover, Defendant STATE OF ARIZONA has made it nearly impossible for the
8 victims to obtain any legitimate substance abuse treatment services because, as of May 16, 2023,
9 Defendant STATE OF ARIZONA initiated a misguided strategy to shut down 300+ providers—in
10 a very short period of time—without any inquiry, due diligence, or investigation to determine
11 whether each of these individual providers was legitimate or not. This decision has left the victims
12 without treatment and/or housing. As a result of Defendant STATE OF ARIZONA’s misguided
13 actions, the victims have been unable to cure their disabilities.
14
15

16 156. Suffice it to say, Defendant STATE OF ARIZONA has known of these extreme
17 impairment facts since at least the summer of 2019. With these facts, it is undisputable that the
18 180-day deadline set forth in A.R.S. § 12-821.01 and the one-year statute of limitations deadline set
19 forth in A.R.S. § 12-821 are tolled by reason of A.R.S. § 12-821.01(D) (incompetency) and A.R.S.
20 § 12-502 (unsound mind).
21
22

23 **IX.**
24 **THE STATUTE OF LIMITATION IS TOLLED UNDER THE**
25 **DISCOVERY RULE, FRAUDULENT CONCEALMENT, AND A.R.S. § 12-821.01(B)**

26 157. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
27 as though fully set forth in this paragraph.
28

1 158. Pursuant to statute and the discovery rule, Plaintiffs and the entire Class hereby
2 affirmatively allege that their service of their Notice of Claim and the filing of this lawsuit is timely
3 and that Defendant STATE OF ARIZONA is estopped from raising the statute of limitations as a
4 defense. Under A.R.S. § 12-821.01(B), “a cause of action accrues when the damaged party realizes
5 he or she has been damaged and knows or reasonably should know the cause, source, act, event,
6 instrumentality or condition that caused or contributed to the damage.” The term “accrual”
7 contained in A.R.S. § 12-821.01(B) is construed in accordance with the common law discovery
8 rule:
9
10

11 The term “accrual” is construed in accordance with the common law
12 discovery rule, which “provides that a cause of action accrues when a
13 plaintiff discovers or reasonably should have discovered the injury
14 was caused by the defendant's negligent conduct.” *Stulce v. Salt River*
15 *Project Agric. Improvement & Power Dist.*, 197 Ariz. 87, 3 P.3d 1007,
16 1010 (Ariz. Ct. App. 1999). “It is not enough that a plaintiff
17 comprehends the ‘what’; there must also be a reason to connect the
18 ‘what’ to a particular ‘who’ in such a way that a reasonable person
19 would be on notice to investigate whether the injury might result from
20 fault.” *Walk v. Ring*, 202 Ariz. 310, 44 P.3d 990, 996 (2002).

21 In *Walk*, the Arizona Supreme Court addressed when a cause of action
22 accrues. *Walk* stated that “it is not enough” for the plaintiff to
23 comprehend that something has gone wrong – referred to in *Walk* as
24 the “what” of the plaintiff's potential claim. 44 P.3d at 996. Rather,
25 “there must also be reason to connect the ‘what’ to a particular ‘who’
26 in such a way that a reasonable person would be on notice to
27 investigate whether the injury might result from fault.” *Id.*

28 *McCarthy v. Scottsdale Unified Sch. Dist. No. 48*, 409 F.Supp.3d 789, 813-14 (D. Ariz. 2019).

159. Here, Plaintiffs and the Class Members have exercised reasonable diligence to
discover the cause of their damages, the identity of all potentially culpable parties, and all potential
liability theories. Plaintiffs and the entire Class consist of Native Americans. Plaintiffs and the

1 Class Members are commonly unsophisticated and not educated or experienced in the fields of law,
2 substance-abuse treatment, AHCCCS rules/laws, and/or Medicaid-related benefits. Moreover,
3 Plaintiffs and members of the Class are often unaware that they or their loved one was even enrolled
4 in AHCCCS.
5

6 160. Furthermore, according to the Arizona Attorney General’s Office, the Native
7 American population, being vulnerable, is among the most “marginalized communities in society,”
8 and its members have suffered enduring periods of “maltreatment and/or outright exclusion.”
9

10 As the Court is undoubtedly aware, most of the persons who are
11 eligible for, or actively receive, Medicaid/AHCCCS benefits are, in a
12 colloquial sense, **vulnerable people**. Generally, AHCCCS
13 beneficiaries are vulnerable insofar as they are people **exposed to the
14 danger of severe, prolonged decrease in living standards below
15 critical thresholds, to a point of abject deprivation**. However, with
16 respect to the case at bar, the near total Native American composition
17 of those Defendant used as a means [to] defraud AHCCCS **enhanced
18 the risk to patients, as indigenous peoples are among the most
19 marginalized communities in society**. Often, Native American
20 **communities have suffered enduring periods of maltreatment
21 and/or outright exclusion**. As a consequence of these longstanding
22 inequities, indigenous persons are less likely to seek out treatment for
23 physical or mental ills, having been so exploited by Defendant.
24 Additionally, and perhaps more troubling, is the fact the same
25 **exploited citizens will be less likely to seek help from the law
26 enforcement agencies or the State in the future.**²⁹
27

28 161. Also, the lack of resources available to tribal members—such as legal and medical—
29 was well documented by a report conducted in 2020 by Defendant STATE OF ARIZONA with
30 Arizona State University and tribal leaders.

31 Yet in many cases, victims and families have no place to turn for help,
32 and the lack of resources can lead to heightened instances of self-

33 ²⁹ State’s Sentencing Memorandum at 8-9 in the *State of Arizona v. Ariell Dix*, CR 2021-002107
34 (emphasis added).

1 harm, fear, or anxiety. Indigenous communities suffer from chronic
2 underfunding and a lack of resources that can lead to further
3 victimization and trauma.

4 *****

5 Limited resources for Indigenous Peoples, on and off Tribal land,
6 increase their risk of victimization and reduce their access to help. Yet
7 those who live on Reservations often have fewer resources (e.g.,
8 medical, legal, counseling) due to severe funding disparity of Tribal
9 communities by the failure of the U.S. government to uphold their
10 federal trust responsibility.³⁰

11 162. Plaintiffs and the members of the Class commonly live in remote areas on
12 Reservations where there is little or no access to basic necessities such running water, electricity,
13 and natural gas. For example, it is estimated that, for the Navajo Nation Reservation alone, almost
14 one-third of the 170,000 inhabitants who live there do not have access to clean, reliable drinking
15 water.³¹

16 163. Likewise, it is estimated that over 40% of the Navajo Nation households do not have
17 running water in their homes:

18 **Over 40 percent of Navajo Nation households do not have running**
19 **water in their homes and must rely on hauling water to meet their**
20 **daily needs.** Thirty percent of families lack access to reliable, clean
21 drinking water. [21] The ACS data shows that Native American
22 households are 19 times more likely to lack complete plumbing than
23 white households.[22] Using the limited water reserves for regular
24 hand washing forces the family to decide between safe drinking water
25 and personal hygiene, including frequent handwashing.³²

25 ³⁰ *Reducing Missing and Murdered Indigenous Women and Girls*, Arizona’s Statewide Study in
26 Partnership with the HB2570 Legislative Study Committee at 26, 28 (Nov. 2020).

27 ³¹ <https://www.npr.org/2023/03/20/1164852475/supreme-court-navajo-nation-water-rights>

28 ³² <https://journals.library.columbia.edu/index.php/bioethics/article/view/7889> (emphasis added).

1 164. Also, within the Navajo Nation, it is estimated that 32% of the residences lack
2 electricity and 86% lack natural gas. Many solely rely on coal and firewood to heat their homes.³³

3 165. Remarkably, basic necessities—such as running water and electricity that many
4 Americans take for granted—are simply not available for Native Americans who live on
5 Reservations. To get water for drinking, cooking, and bathing, they often drive 1-1½ hours once or
6 twice a week to fill 250-gallon plastic tanks:
7

8 **Not having access to electricity has many repercussions for**
9 **Navajo families: lack of access to running water, reliable lighting,**
10 **modern forms of home heating and cooling, and appliances such**
11 **as refrigerators and microwaves.** Families in the Navajo Nation
12 drive 1-1.5 hours once or twice a week to reach watering points where
13 they can fill 250-gallon plastic tanks with water for cooking, cleaning,
14 and drinking. To keep food from perishing, families often have to use
15 portable coolers filled with ice to preserve their food.³⁴

16 166. Defendant STATE OF ARIZONA is also well-aware that tribal members have limited
17 access to cell phone service and internet. And, there are challenges with language barriers,
18 infrastructure, lack of transportation, and lack of broadcast television and radio:

19 **One of the complications faced by Tribal law enforcement in**
20 **Arizona is the lack of cell, analog, and Internet service on the**
21 **Reservations. These technological issues impact the ability of**
22 **victims to call for help and for loved ones to check on their family**
23 **members.**

24 *****

25 Despite cell phone providers' claim that signal service coverage is
26 adequate, phone users on Tribal Nations know otherwise. Broadband
27 challenges are only a start to the array of issues...Additionally, many

28 ³³ <https://sourcencm.com/2023/08/09/navajo-nation-gives-updates-on-program-to-bring-electricity-to-communities/>

³⁴ <https://www.publicpower.org/LightUpNavajo> (emphasis added).

1 Tribal communities lack public transportation infrastructure for day-
2 to-day travels. According to the National Institute of Justice (NIJ), in
3 2001, Indigenous Peoples on Reservations were less likely than the
4 majority of American to have access to phones. Geographical
5 isolation makes reporting crime and accessing services challenging.

6 *****

7 Challenges with infrastructure include: (1) lack of signs/billboards on
8 the roadways in Indian Country, (2) **radio and television stations**
9 **may not broadcast in remote areas**, (3) Tribal cell phone carriers
10 may not provide cell phone alerts, (4) **language barriers when radio**
11 **and television are broadcast in English rather than Native**
12 **language...**³⁵

13 167. Plaintiffs and the Class Members had no reason to even suspect that grossly negligent
14 and other unlawful actions and inaction of Defendant STATE OF ARIZONA were the actionable
15 cause of their losses and damages. Plaintiffs and the Class Members were unaware, as was the
16 general public, that Native Americans were being preyed upon by fraudulent substance abuse
17 treatment providers who, in turn, were being funded by AHCCCS. The Class Members were further
18 unaware that Defendant STATE OF ARIZONA had knowledge of the fraudulent substance abuse
19 treatment providers yet was failing to shut down their illicit scheme. Native Americans, who largely
20 have no access to even running water and electricity, cannot be expected to learn of, comprehend,
21 understand, and reach the conclusion that a cause of action exists against Defendant STATE OF
22 ARIZONA. It is unreasonable to expect Plaintiffs and the Class Members to understand
23 Medicaid/AHCCCS fraud and then take the additional step of legal sophistication to conclude that
24 Defendant STATE OF ARIZONA is responsible.
25
26
27

28 ³⁵ *Reducing Missing and Murdered Indigenous Women and Girls*, Arizona's Statewide Study in
Partnership with the HB2570 Legislative Study Committee at 26, 28 (Nov. 2020) (emphasis added).

1 168. As stated in *Walk v. Ring*, 202 Ariz. 310, 316 ¶ 22 (2002), “there must also be reason
2 to connect the ‘what’ to a particular ‘who’ in such a way that a reasonable person would be on notice
3 to investigate whether the injury might result from fault.” Plainly, Plaintiffs and this Native
4 American Class lack the legal sophistication and resources to connect *Defendant STATE OF*
5 *ARIZONA* to the harm and losses described herein. In most instances, Plaintiffs’ decedents, the
6 injured Plaintiffs, and the Class Members (collectively referred to as “the victims”) and their family
7 members have no idea that “fraudulent” billing was occurring for their “treatment.” They also don’t
8 even know the names of the IOPs and BHRFs.
9
10

11 169. Nor are they aware that “patient brokering” exists, let alone the fact that it is an illegal
12 and predatory practice. At best, a victim or their family member might eventually come to suspect,
13 after many months or years, that a sober living home operator and/or IOP was committing abuse.
14 However, it is an unrealistic step for a victim or their family member to suspect that an unknown
15 and identified IOP was fraudulently billing AHCCCS. And, it is an even further unrealistic step for
16 them to suspect that *Defendant STATE OF ARIZONA* is culpable. Again, Plaintiffs and the Class
17 Members and their families lack the legal sophistication and resources to form these conclusions.
18 Plaintiffs and a Class that largely lacks running water and electricity cannot possibly be expected
19 to “discover” that Defendant STATE OF ARIZONA was ultimately at fault for their losses.
20
21
22

23 170. Indeed, it has been uncovered that Defendant STATE OF ARIZONA concealed, for
24 at least four years, that it was overpaying BHRFs and IOPs. Since at least the summer of 2019,
25 Defendant STATE OF ARIZONA knew that AHCCCS was grossly negligent in squandering away
26 taxpayer money.
27
28

1 171. On May 16, 2023, Arizona Attorney General Kris Mayes held a press conference in
2 which she and other public officials selectively revealed that Defendant STATE OF ARIZONA was
3 being financially defrauded by substance abuse treatment centers. The focus was on the loss of
4 taxpayer money, period. At no time has Defendant STATE OF ARIZONA suggested, intimated,
5 or even hinted at the concept that it was responsible for harm caused to Native Americans, including
6 Plaintiffs and the Class Members. Plainly, even the most diligent person would not have reached
7 the conclusion that Defendant STATE OF ARIZONA is liable in tort for the losses suffered by the
8 Native American community.
9
10

11 172. Under the discovery rule, a cause of action does not “accrue” until a plaintiff discovers
12 or by the exercise of reasonable diligence should have discovered that he or she has been injured by
13 the defendant’s negligent conduct. *Anson v. American Motors Corp.*, 155 Ariz. 420, 423 (App.
14 1987). Here, the facts that causally connect Defendant STATE OF ARIZONA to the fraudulent
15 payments to substance abuse treatment providers are entirely within the government’s control and
16 not accessible by Class Members or anyone else acting with reasonable diligence.
17
18

19 173. Furthermore, Defendant STATE OF ARIZONA has fraudulently concealed the
20 existence of the scheme that has been occurring for several years and to this day, Defendant STATE
21 OF ARIZONA has only publicly revealed select facts, mostly focusing on financial fraud. Had
22 Plaintiffs and the Class been aware of the facts which Defendant STATE OF ARIZONA
23 misrepresented and fraudulently concealed, and continues to do so, they would have commenced
24 suit against Defendant STATE OF ARIZONA before the purported running of any statute of
25 limitations that Defendant STATE OF ARIZONA may argue apply in this case. Therefore, under
26
27
28

1 applicable authorities and the discovery rule, Plaintiffs and the entire Class are still well within the
2 applicable limitations period for bringing this lawsuit.

3
4 **X.**
THIS LAWSUIT IS TIMELY UNDER APPLICABLE CLASS ACTION PRECEDENT

5 174. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
6 as though fully set forth in this paragraph.
7

8 175. Plaintiffs affirmatively allege that under applicable precedent, this lawsuit is timely
9 without the need of the above-referenced tolling statutes. Notably, in *City of Phoenix v. Fields*, 219
10 Ariz. 568 (2009), the Arizona Supreme Court provided guidance on whether Class members in an
11 A.R.S. § 12-821.01(A) notice-of-claim situation may include persons who have failed to file
12 separate administrative claims setting out separate sum certain amounts. *Fields*, 219 Ariz. at 573 ¶
13 20.
14

15 176. The Arizona Supreme Court stated that its construction of A.R.S. § 12-821.01(A) in
16 *Fields* corresponded with its treatment of a class action refund claim in *Arizona Department of*
17 *Revenue v. Dougherty (Ladewig)*, 200 Ariz. 515 (2001). *Fields*, 219 Ariz. at 573 ¶ 20.
18

19 177. The Arizona Supreme Court explained that the “issue in *Ladewig* was whether, as a
20 prerequisite to a class action asserting claims to tax refunds, each class member was required to file
21 a separate administrative claim for refund” with ADOR under A.R.S. § 42-1118(E). *Fields*, 219
22 Ariz. at 573 ¶ 20. The Supreme Court noted “that A.R.S. § 42-1118(E) and the notice of claim
23 statute ‘share enough functional similarities that the reasoning applied in *Arena* may extend not
24 only to class actions in tax court but also to the administrative claims process.” *Fields*, 219 Ariz.
25 at 573 ¶ 20 (quoting *Arena*, 200 Ariz. at 520 ¶ 16).
26
27
28

1 178. In *Ladewig*, the Supreme Court held: “[T]he putative class representative’s refund
2 claim, which identified the amount of refund she sought individually and noted her intent to pursue
3 claims on behalf of a class if her claim was denied, sufficed to preserve the class claims.” *Fields*,
4 219 Ariz. at 573 ¶ 20.

5
6 179. So, because of the similarities between the two administrative-claim statutes—A.R.S.
7 § 42-1118(E) and A.R.S. § 12-821.01(A)—the Supreme Court adopted the same approach used in
8 *Ladewig* and held that “a class claim meets the settlement demand requirement of [A.R.S.] § 12-
9 821.01(A) if it identifies the amount for which an individual putative class representative would
10 settle his own claim and puts the governmental entity on notice of the claimant’s intention to pursue
11 a class action if his claim does not settle.” *Fields*, 219 Ariz. at 573 ¶ 21.

12
13
14 180. Like *Ladewig* and *Arena*, under *Fields*, there is no need or requirement under A.R.S.
15 § 12-821.01(A) for individual Class Members to have presented their own timely administrative
16 notices of claim setting out the amount of their separate monetary sum certain claims in order to
17 become members of the Class and to have the Class representatives present Class claims (on their
18 behalf and for their benefit) for the full amount of the specific personal injury and/or wrongful death
19 damages that the individual Class Members have suffered.

20
21
22 181. Finally, for tolling purposes, it does not matter that the persons who are now in charge
23 of pursuing claims for injured living victims are competent guardians and/or are conservators of the
24 injured living victims. What matters is the incompetency of the victims.

25
26 182. “The incompetent possesses a right guaranteed by Article 18, Section 6, of the
27 Arizona Constitution, but cannot assert it unless someone else, over whom the incompetent has no
28

1 control, learns about it, understands it, is aware of the need to take prompt action, and in fact takes
2 such action.” *Kiley v. Jennings, Strouss & Salmon*, 187 Ariz. 136, 140 (App. 1996).

3 183. So, “the controlling consideration under Arizona law is the inability of the injured
4 individual to bring an action on his own behalf, not the possibility that a guardian or parent will
5 assert his rights. This is in accord with Arizona’s clear policy of protecting the disabled from
6 statutes of limitations.” *Sahf v. Lake Havasu City Ass'n for the Retarded and Handicapped*, 150
7 Ariz. 50, 55 (App. 1986). “Obviously, the effect of preventing a guardian from bringing an action
8 would be to punish the incapacitated person. This argument has been rejected expressly or
9 implicitly in other jurisdictions where guardians have been permitted to bring actions on behalf of
10 their wards after a period of limitations has run.” *Id.* at 56.

14 184. In short, statutes of limitations are tolled while the victim is incompetent, regardless
15 of whether that victim has an appointed guardian or conservator.

16 **XI.**
17 **FACTUAL EVENTS AND DAMAGES – HONYUMPTewa PLAINTIFFS**

18 185. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
19 as though fully set forth in this paragraph.

21 186. December 24, 2022, was the day that the lives of Plaintiff RANDI LYNN
22 HONYUMPTewa, her two children (Plaintiffs KOWIN HONYUMPTewa and ARIA
23 SPENCER), and her mother (Plaintiff EVELYN WILLIAMS) (collectively, “the
24 HONYUMPTewa PLAINTIFFS”) were tragically and irreversibly changed.

26 187. It is well known that there is an ongoing alcohol-related health crisis with the Native
27 American Indian community. Plaintiff RANDI HONYUMPTewa (“Randi”) was no exception;
28

1 she struggled with sobriety much of her adult life. She wanted to get sober and turn her life around.
2 Instead, she sustained significant permanent life-altering injuries due to the grossly negligent acts
3 and omissions of Defendant STATE OF ARIZONA as alleged herein.
4

5 188. Randi was residing in a fraudulent sober living home located at 9347 West Glenrosa
6 Avenue within the gated community of Western Enclave—a single community that, according to
7 AZ-DHS, shockingly contained about 20 licensed group homes. She was detoxing from an alcohol
8 binge that was allowed in the “sober” living home. A “staff” member gave her an unidentified pill
9 to “help her feel better.” As it turns out, that pill was Fentanyl. Randi immediately went into cardiac
10 arrest and sustained a traumatic brain injury. According to the “house manager,” the home was
11 associated with an unidentified IOP in Mesa, Arizona, and Vestine Mukarukundo was Randi’s
12 “doctor.”
13
14

15 189. On December 6, 2023, Attorney General Kris Mayes released to following
16 announcement related to Vestine Mukarukundo and others ([https://www.azag.gov/press-
17 release/attorney-general-mayes-announces-grand-jury-indictments-10-individuals-alleged](https://www.azag.gov/press-release/attorney-general-mayes-announces-grand-jury-indictments-10-individuals-alleged)):
18

19 *Wednesday, December 6, 2023*

20 **PHOENIX** – Attorney General Kris Mayes today announced that the State Grand Jury has indicted the following 10 individuals with
21 Illegal Control of an Enterprise, and other charges related to patient brokering: Vestine Mukarukundo, Nasibu Bauni, Pierrette
22 Kagame, Jean Bosco Nsabimana, Immaculate Nutesi, Espoir Muhumure Nzabakiza, Willy Rutaysire, Jose Miguel Saturnino-
23 Corrales, Julianne Swaka, Angela Dauz Turgano.



24 The Defendants allegedly ran unlicensed sober living or transitional living homes around the Valley. The indictment alleges that
25 they agreed to send 75 of their patients, many on the American Indian Health Plan (AIHP) administered by the Arizona Health Care
26 Cost Containment System (AHCCCS), to a fake behavioral healthcare facility while expecting the fake facility to pay the
27 Defendants \$300 per-person each week.

28 Unaware the behavioral healthcare facility was fake, the Defendants are accused of transporting their patients to the “Grand
Opening” of the fake facility on November 16, 2023. Investigators from the Attorney General’s Office along with AHCCCS
investigators and AHCCCS quality care staff were on scene to ensure that the patients received care and an opportunity to move
to licensed facilities that will provide legitimate care and housing.

The investigation that led to the indictment was conducted by Special Agents of the Attorney General’s Office and investigators
from the AHCCCS Office of Inspector General.

Assistant Attorney General Vineet Mehta Shaw is prosecuting this case. All defendants are presumed innocent until convicted in a
court of law.

A copy of the indictment and photos of the defendants are available below.

 Arrest Photos for Defs 001-010 ref. 11-27-2023 true bill.pdf	434.34 KB
 MUKARUKUNDO ET AL TRUE BILL Redacted.pdf	1.86 MB

1 190. As a result of her cardiac arrest and resulting traumatic brain injury, Randi has
2 sustained a significant loss of cognition, significant left-sided weakness, is incontinent, cannot
3 swallow, requires a feeding tube, cannot walk, and has no dexterity. Since the injury-producing
4 event, Randi has received significant ongoing intensive inpatient medical care and has never been
5 discharged from inpatient medical care. As a result of her severe traumatic brain injury, Randi has
6 the competency of a child and is unable to communicate. She will never be able to care for herself
7 or her children again, is wheelchair- and bed-bound, and will require 24-hour care for the rest of her
8 life.
9
10

11 191. As a direct and proximate result of the gross negligence of Defendant STATE OF
12 ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff RANDI LYNN
13 HONYUMPTTEWA sustained permanent, serious, painful, lasting, disfiguring, and disabling
14 injuries and tremendous shock to her nervous system. Randi has suffered and will continue to
15 endure and experience tremendous physical and mental pain and suffering and loss of enjoyment of
16 activities for the rest of her natural life. Randi has been required to make numerous and diverse
17 expenditures for surgery, medical care, and medical treatment and she will continue to incur
18 expenses for future surgeries, hospitalization, medical care, medical treatment, therapies, attendant
19 care, and home modifications for the rest of her natural life. The HONYUMPTTEWA PLAINTIFFS
20 allege these medical and related expenses were and are reasonable, necessary, and caused by the
21 grossly negligent acts and omissions of Defendant STATE OF ARIZONA, including through its
22 agencies AHCCCS and AZ-DHS.
23
24
25
26

27 192. As a further direct and proximate result of the gross negligence of Defendant STATE
28 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff RANDI LYNN

1 HONYUMPTWEA’s earning capacity is permanently impaired from the date of injury, all to the
2 detriment and damage of Randi in a sum that is reasonable and just in the premises. Since the injury,
3 Randi has been totally incapacitated and incapable of working in any capacity. She is totally and
4 permanently unemployable and incapable of earning any income. As a result, Randi has suffered
5 past loss of income and she will continue to suffer loss of income for the rest of her pre-injury work-
6 life expectancy.
7

8
9 193. As a further direct and proximate result of the gross negligence of Defendant STATE
10 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff RANDI LYNN
11 HONYUMPTWEA is entitled to full monetary damages for the value of the full cost for legitimate
12 services that she was entitled to receive but did not receive, and for general and special damages
13 suffered due to ongoing addiction and new addictions attributable to the service providers’ failure
14 to render legitimate services and for AHCCCS’s failure to ensure legitimate services were rendered.
15

16
17 194. As a further direct and proximate result of the gross negligence of Defendant STATE
18 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, and their breach of A.R.S.
19 §§ 46-451, *et seq.*, Plaintiff RANDI LYNN HONYUMPTWEA is entitled to all damages set forth
20 herein, for Defendant STATE OF ARIZONA’s abuse and neglect committed under Arizona’s Adult
21 Protective Services Act (commonly known as “APSA”), A.R.S. §§ 46-451, *et seq.*
22

23
24 195. As a further direct and proximate result of the gross negligence of Defendant STATE
25 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff RANDI LYNN
26 HONYUMPTWEA has suffered loss of household services which will continue for the rest of her
27 natural life.
28

1 196. As a further direct and proximate result of the gross negligence of Defendant STATE
2 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff RANDI LYNN
3 HONYUMPTTEWA has sustained serious and permanent loss of consortium injuries and damages
4 in her relationships with her mother and children. Randi’s serious, permanent, and disabling injuries
5 have permanently interfered with the parent-child relationship in a substantially gratifying way.
6 These injuries and losses are permanent.
7

8 197. As a further direct and proximate result of gross negligence of Defendant STATE OF
9 ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiffs KOWIN
10 HONYUMPTTEWA and ARIA SPENCER have sustained serious and permanent loss of consortium
11 injuries and damages due to the serious, permanent, and disabling injuries to their mother, Plaintiff
12 RANDI LYNN HONYUMPTTEWA, which have permanently interfered with the parent-child
13 relationship in a substantially gratifying way. These injuries and losses are permanent.
14

15 198. As a further direct and proximate result of gross negligence of Defendant STATE OF
16 ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff EVELYN
17 WILLIAMS has sustained serious and permanent loss of consortium injuries and damages due to
18 the serious, permanent, and disabling injuries to her daughter, Plaintiff RANDI LYNN
19 HONYUMPTTEWA, which have permanently interfered with the parent-child relationship in a
20 substantially gratifying way. These injuries and losses are permanent.
21

22 199. As a further direct and proximate result of gross negligence of Defendant STATE OF
23 ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff EVELYN
24 WILLIAMS has sustained loss of income, and she will continue to sustain loss of future income,
25 having to care and attend to her daughter, Plaintiff RANDI LYNN HONYUMPTTEWA.
26
27
28

1 Additionally, Plaintiff EVELYN WILLIAMS has incurred expenses, and she will continue to incur
2 expenses in the future, for medical care and services for her daughter, Plaintiff RANDI LYNN
3 HONYUMPTWEA.

4
5 200. As a further direct and proximate result of gross negligence of Defendant STATE
6 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, the HONYUMPTWEA
7 PLAINTIFFS are entitled all damages set forth in RAJI (CIVIL) 7th, Personal Injury Damages 1,
8 Measure of Damages.
9

10 **XII.**
11 **FACTUAL EVENTS AND DAMAGES – THE ROBLEDO PLAINTIFFS**

12 201. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
13 as though fully set forth in this paragraph.

14
15 202. Plaintiffs’ decedent, ROSHANDA ROBLEDO (“Roshanda”), struggled with sobriety
16 for most of her adult life. As is a common thread throughout the Class, Roshanda wanted to get
17 sober. Instead of finding sobriety, Roshanda faced neglect, abuse, and coercion at the hands of
18 these fraudulent so-called sober living facilities and eventually died a tragic death after consuming
19 methamphetamine.
20

21 203. On September 8, 2023, Roshanda and her five children were abruptly kicked out of a
22 fraudulent sober living home located at 8914 West Encanto Boulevard in Phoenix. The ROBLEDO
23 PLAINTIFFS have come to learn that Roshanda had been kept in that fraudulent sober living home
24 by Helping The Community, LLC, an entity suspended by AHCCCS nearly four months earlier on
25 May 15, 2023. After being abruptly kicked out, Roshanda and her children were transported back
26
27 to their Reservation in Parker, Arizona.
28

1 for help with her alcohol addiction, and walked out with a methamphetamine addiction that
2 ultimately ended her life.

3 206. Roshanda is survived by her parents, Plaintiffs PHYLLIS ROBLEDO and
4 BERKELEY WELSH, and her children, Plaintiffs DE'ANDREA ROBLEDO, MARIA
5 MARTINEZ, BRIANNA MARTINEZ, LILY SILVA, JULIAN ROBLEDO, and MIA SILVA
6 (collectively, "the ROBLEDO PLAINTIFFS").
7

8 207. As a direct and proximate result of the grossly negligent acts and omissions of
9 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS,
10 Roshanda was injured and perished due to those injuries. Roshanda's injuries necessitated medical
11 care and treatment. Roshanda incurred medical expenses for services of physicians and other
12 medical professionals for those injuries. The ROBLEDO PLAINTIFFS allege these medical
13 expenses incurred by Roshanda were reasonable, necessary, and caused by the grossly negligent
14 acts and omissions of Defendant STATE OF ARIZONA, including through its agencies AHCCCS
15 and AZ-DHS.
16
17
18

19 208. Under Arizona law, a personal injury action survives the death of a decedent and can
20 be brought on behalf of Roshanda Robledo's Estate pursuant to A.R.S. § 14-3110, commonly
21 known as the "Survival Statute." Plaintiff PHYLLIS ROBLEDO is in the process of being duly
22 appointed by the Maricopa County Superior Court as the Limited Scope Personal of the Estate of
23 Roshanda Robledo, with the power and authority to bring the present claim for medical expenses
24 incurred by Roshanda.
25
26

27 209. As a further direct and proximate result of the grossly negligent acts and omissions of
28 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS,

1 Roshanda died on September 10, 2023. Consequently, the ROBLEDO PLAINTIFFS have
2 sustained the loss of their loving daughter and mother. Due to the death of Roshanda, the
3 ROBLEDO PLAINTIFFS are grief-stricken and will continue to suffer the loss of decedent. The
4 ROBLEDO PLAINTIFFS have been deprived of the love, affection, companionship, care,
5 protection and guidance of Roshanda since her death, and these losses are expected to continue
6 forever.
7

8
9 210. Furthermore, the ROBLEDO PLAINTIFFS have experienced tremendous pain, grief,
10 sorrow, anguish, stress, shock, and mental suffering since the death of Roshanda, and these
11 devastating injuries are expected to continue forever.
12

13 211. Moreover, the ROBLEDO PLAINTIFFS have sustained loss of income and services
14 since the death of Roshanda, and future economic losses are reasonably expected.
15

16 212. Additionally, the ROBLEDO PLAINTIFFS have incurred reasonable funeral, burial,
17 and medical expenses. The ROBLEDO PLAINTIFFS further assert that they are entitled to any
18 and all other damages allowed by law, including but not limited to the aggravating circumstances
19 attending the wrongful acts committed by Defendant STATE OF ARIZONA.
20

21 213. The monetary damages sought are for the surviving statutory beneficiaries (the
22 ROBLEDO PLAINTIFFS and personal representative of the Estate) of wrongful death damages
23 allowed under the *Arizona Wrongful Death Act*, A.R.S. §§ 12-611, *et seq.*, including but not limited
24 to the damages set forth in RAJI (CIVIL) 7th, Personal Injury Damages 3, *Damages for Wrongful*
25 *Death of Spouse, Parent, or Child*.
26

27 214. As a further direct and proximate result of the gross negligence of Defendant STATE
28 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, and their breach of A.R.S.

1 §§ 46-451, *et seq.*, the ROBLEDO PLAINTIFFS are entitled to all damages set forth herein, for
2 Defendant STATE OF ARIZONA’s abuse and neglect committed in violation of Arizona’s Adult
3 Protective Services Act (commonly known as “APSA”), A.R.S. §§ 46-451, *et seq.*
4

5 215. Additionally, under Arizona law, an action for a decedent’s conscious pain and
6 suffering pursuant to the Adult Protective Services Act (commonly known as “APSA”), A.R.S. §§
7 46-451, *et seq.* survives the death of the decedent and can be brought on behalf of the decedent’s
8 Estate pursuant to A.R.S. § 46-455(P). Plaintiff PHYLLIS ROBLEDO is in the process of being
9 duly appointed by the Maricopa County Superior Court as the Limited Scope Personal of the Estate
10 of Roshanda Robledo, with the power and authority to bring the present claim for Roshanda’s
11 conscious pain and suffering.
12

13
14 **XIII.**
15 **FACTUAL EVENTS AND DAMAGES – THE BEN PLAINTIFFS**

16 216. Plaintiffs re-allege and incorporate by reference all prior and subsequent allegations
17 as though fully set forth in this paragraph.

18 217. Plaintiffs’ decedent, Randy Garrison Ben, Sr. (“Randy”), struggled with sobriety
19 much of his adult life. He entered a fraudulent so-called sober living facility for help. Instead of
20 receiving the help he was promised, Randy was found dead on March 18, 2024, in an adult
21 behavioral health residential facility operated by BSS Care, LLC (“BSS”), located at 3435 West
22 Saint Kateri Drive in Phoenix.
23

24
25 218. The Phoenix Police Department’s online database for 2024 Calls for Service reflects
26 a call to the residence for a “dead body.”
27
28

2024 Calls for Service

URL: https://www.phoenixopendata.com/dataset/64a60154-3b2d-4583-8fb5-6d5e1b469c28/resource/e6417a83-fcad-4cad-803c-423de3ad2d92/download/calls-for-service_2024-calls-for-service_callsforsvc2024.csv

A CSV file which is updated daily by 11am that includes police calls for service for 2022. All citizen-generated dispatched calls for police service are included. Officer self-initiated calls and non dispatched calls such as transferred to other departments such as FIRE for response are not included.

Data Table

Add Filter

Show 10 entries

Showing 1 to 1 of 1 entries (filtered from 347,234 total entries)

_id	INCIDENT_NUM	DISP_CODE	DISPOSITION	FINAL_RADIO_CODE	FINAL_CALL_TYPE	CALL_RECEIVED	HUNDREDBLOCKADDR	GRID
126437	202400400791	R	DEPARTMENTAL REPORT	901H	DEAD BODY	3/18/2024 7:32:09PM	34XX W ST KATERI DR	AC21

219. BSS has been licensed as an adult behavioral health residential facility by the Arizona Department of Health Services (AZ-DHS) since December 20, 2022. See <https://hsapps.AZ-DHS.gov/ls/sod/Provider.aspx?ProviderName=bss+care>. Throughout its licensure, AZ-DHS has cited BSS for numerous deficiencies. In fact, in February 2024, BSS entered into an Enforcement Agreement related to deficiencies found during a December 21, 2023 inspection. According to that Enforcement Agreement (<https://hsapps.AZ-DHS.gov/ls/sod/Facility.aspx?FacId=BH8149>) (which was signed by an AZ-DHS Compliance officer Supervisor on February 26, 2024, AZ-DHS’s Bureau Chief on February 26, 2024, and AZ-DHS’s Assistant Director on March 1, 2024), AZ-DHS had concerns about the “[s]kills and knowledge ... for four BHTs; [and] no RN present or on-call.” BSS agreed to pay a \$1,250.00 civil fine and return a Plan of Correction for all violations noted in the Statement of Deficiencies to AZ-DHS within ten days.

220. On March 18, 2024, Randy Garrison Ben, Sr. was found dead at BSS.

221. In conjunction with its on-site investigation of a complaint conducted on March 21, 2024, March 22, 2024 and April 1, 2024, AZ-DHS issued a Statement of Deficiencies (<https://hsapps.AZ-DHS.gov/ls/sod/Facility.aspx?FacId=BH8149>) outlining fourteen citations issued to BSS based on its findings:

- 1 A. Based on observation and interview, the administrator failed to designate, in
2 writing, an individual who was present on the behavioral health residential
3 facility's premises and accountable for the behavioral health residential facility
4 when the administrator was not present on the behavioral health residential
5 facility's premises. The deficient practice posed a risk as an individual was not
6 designated to act on behalf of the governing authority if the administrator is
7 not present.
8
9
10 B. Based on documentation review, observation, record review, and interview,
11 the administrator failed to implement policies and procedures for behavioral
12 health services to cover assistance in the self-administration of medication.
13 The deficient practice posed a health and safety risk to the residents.
14
15 C. Based on record review, documentation review, and interview, the
16 administrator failed to provide written notification to the Department of a
17 resident's accident, within two working days after the resident had an accident
18 which required immediate intervention by an emergency medical services
19 provider. The deficient practice posed a risk as the Department was unable to
20 assess if there was an immediate health and safety concern for the other
21 residents residing in the behavioral health facility.
22
23
24 D. Based on documentation review, record review and interview, the
25 administrator failed to ensure personnel members provided evidence of
26 freedom from infectious tuberculosis (TB) as specified in R9-10-113(B), for
27 four of five behavioral health technicians (BHTs) sampled. The deficient
28

1 practice posed a TB exposure risk to residents, and the Department was
2 provided false and misleading documentation.

3 E. Based on observation, documentation review, record review and interview, the
4 administrator failed to ensure a personnel record was maintained throughout
5 an individual's period of providing services in or for the behavioral health
6 residential facility. The deficient practice posed a risk as the Department was
7 unable to verify required information for one personnel member providing
8 services for the behavioral health residential facility.
9

10
11 F. Based on observation and interview, the administrator failed to ensure at least
12 one personnel member was present at the behavioral health residential facility
13 when a resident was on the premises. The deficient practice posed a risk as no
14 personnel member was present to meet a resident's needs and ensure the health
15 and safety of the residents.
16

17
18 G. Based on documentation review, observation, and interview, the administrator
19 failed to ensure a resident's behavioral health issue and treatment needs were
20 within the behavioral health residential facility's scope of services. The
21 deficient practice posed a risk as a resident remained at the behavioral health
22 residential facility who required a high level of care.
23

24 H. Based on record review and interview, the administrator failed to ensure a
25 medical practitioner performed a medical history and physical examination or
26 a registered nurse performed a nursing assessment on a resident within 30
27 calendar days before admission or within 72 hours after admission, for four
28

1 residents sampled. The deficient practice posed a risk as the required
2 information is needed to assess a resident's needs prior to treatment and for the
3 development and implementation of a treatment plan, per R9-10-708.A.1.
4

5 I. Based on record review and interview, the administrator failed to ensure a
6 resident provided evidence of freedom from infectious tuberculosis (TB)
7 before or within seven calendar days after the resident's admission and as
8 specified in R9-10-113, for three of four residents sampled. The deficient
9 practice posed a health risk to residents.
10

11 J. Based on observation, interview, and record review the administrator failed to
12 ensure a treatment plan was updated when a resident had a significant change
13 in condition or experienced an event which affected treatment. The deficient
14 practice posed a risk as a treatment plan directs the service to be provided to a
15 resident.
16

17 K. Based on documentation review, observation and interview, the administrator
18 failed to ensure a resident was discharged from the behavioral health
19 residential facility when the resident's treatment needs were not consistent
20 with the services the behavioral health residential facility was authorized and
21 able to provide. The deficient practice posed a risk to the health and safety of
22 the residents.
23

24 L. Based on observation, record review, and interview, the administrator failed to
25 ensure a resident's medical record contained progress notes, for four of four
26
27
28

1 residents sampled. The deficient practice posed a risk if false or misleading
2 information was provided to the Department.

3 M. Based on record review, observation, and interview, the administrator failed to
4 ensure a resident did not share a space with another resident which may have
5 presented a threat to the resident's health or safety, based on the other
6 resident's documented diagnoses, treatment needs, and personal history. The
7 deficient practice posed a risk as an intoxicated resident remained at the facility
8 with sober residents.
9

10 N. Based on observation, record review and interview, the administrator failed to
11 ensure assistance in the self-administration of medication provided to a
12 resident was documented in the resident's medical record, for two of three
13 current residents sampled. The deficient practice posed a health and safety risk
14 to residents.
15
16
17

18 222. In conjunction with this same on-site investigation, AZ-DHS issued another
19 Statement of Deficiencies outlining twenty-one citations and noting eighteen uncorrected
20 deficiencies from a compliance and complaint inspection conducted December 21, 2023:
21

22 A. [*uncorrected deficiency from compliance and complaint inspection conducted*
23 *December 21, 2023*] Based on documentation review, record review, and
24 interview, the manager failed to ensure the health care institution developed
25 and administered a training program for all staff regarding fall prevention and
26 fall recovery. The deficient practice posed a risk if facility staff were not
27
28

1 properly trained to assist a resident who had fallen and was unable to recover
2 independently.

3 B. [*uncorrected deficiency from compliance and complaint inspection conducted*
4 *December 21, 2023*] Based on record review, documentation review, and
5 interview, the administrator failed to ensure documentation of current
6 contracted services was maintained, for one contracted registered nurse (RN)
7 and one registered dietitian (RD) sampled.
8

9
10 C. [*uncorrected deficiency from compliance and complaint inspection conducted*
11 *December 21, 2023*] Based on documentation review, record review, and
12 interview, the administrator failed to ensure a personnel member's skills and
13 knowledge were verified and documented before the personnel member
14 provided behavioral health services, and according to policies and procedures,
15 for one of eight personnel sampled. The deficient practice posed a risk if the
16 employees did not have the skills and knowledge necessary to meet a resident's
17 needs, and the Department was provided false and misleading information.
18

19
20 D. [*uncorrected deficiency from compliance and complaint inspection conducted*
21 *December 21, 2023*] Based on documentation review, record review, and
22 interview, the administrator failed to ensure a personnel record was maintained
23 for each personnel member to include documentation of the individual's
24 education and experience applicable to the individual's job duties, for one of
25 eight personnel members sampled. The deficient practice posed a risk if the
26
27
28

1 personnel member did not have the required education and experience to meet
2 the needs of residents.

3 E. *[uncorrected deficiency from compliance and complaint inspection conducted*
4 *December 21, 2023]* Based on documentation review, record review, and
5 interview, the administrator failed to ensure a personnel record was maintained
6 for each personnel member to include documentation of the individual's
7 completed orientation as required by policies and procedures, for one of eight
8 personnel members sampled. The deficient practice posed a risk if the
9 employees were unable to meet resident's needs.

10 F. *[uncorrected deficiency from compliance and complaint inspection conducted*
11 *December 21, 2023]* Based on record review and interview, the administrator
12 failed to ensure a personnel record containing all required items per Arizona
13 Administrative Code (A.A.C.) R9-10-706(G) was maintained for each
14 personnel member, employee, volunteer, or student, for one of eight personnel
15 members sampled. The deficient practice posed a risk as required information
16 could not be verified for the personnel members.

17 G. *[uncorrected deficiency from compliance and complaint inspection conducted*
18 *December 21, 2023]* Based on observation, documentation review, and
19 interview, the administrator failed to ensure there was a daily staffing schedule
20 which indicated the date, scheduled work hours, and name of each employee
21 assigned to work, including on-call personnel members, and included
22 documentation of the employees who worked each calendar day and the hours
23
24
25
26
27
28

1 worked by each employee. The deficient practice posed a risk as there was no
2 current documentation to identify if qualified staff were present each day to
3 ensure the health and safety of residents.
4

5 H. [*uncorrected deficiency from compliance and complaint inspection conducted*
6 *December 21, 2023*] Based on documentation review, observation, record
7 review, and interview, the administrator failed to ensure a behavioral health
8 professional (BHP) was present at the behavioral health residential facility or
9 on-call. The deficient practice posed a risk as there was no record of an
10 individual to be contacted to provide an immediate response to the facility.
11

12 I. [*uncorrected deficiency from compliance and complaint inspection conducted*
13 *December 21, 2023*] Based on record review and interview, the administrator
14 failed to ensure a registered nurse (RN) was present at the facility or on call.
15 The deficient practice posed a risk if there was no RN available when needed.
16
17

18 J. [*uncorrected deficiency from compliance and complaint inspection conducted*
19 *December 21, 2023*] Based on documentation review, record review, and
20 interview, the administrator failed to ensure general consent was obtained from
21 an adult resident or the resident's representative before or at the time of
22 admission, for three of three residents sampled. The deficient practice posed
23 a risk if residents did not consent to receive treatment at the facility.
24

25 K. Based on record review and interview, the administrator failed to ensure a
26 treatment plan was reviewed and updated on an ongoing basis according to the
27 review date specified in the treatment plan, for one of four residents sampled.
28

1 The deficient practice posed a risk if the treatment plan did not accurately
2 reflect the current treatment needs of the resident.

3 L. Based on documentation review, record review, and interview, the
4 administrator failed to ensure at the time of admission, a resident or the resident
5 representative received a written copy of the requirements in subsection (B)
6 and the resident rights in subsection (E), for four of four residents sampled.
7 The deficient practice posed a risk if residents were unaware of their rights.
8

9
10 M. [*uncorrected deficiency from compliance and complaint inspection conducted*
11 *December 21, 2023*] Based on documentation review, record review, and
12 interview, the administrator failed to ensure a resident's medical record
13 contained documentation of behavioral health services provided to the
14 resident, for three of three residents sampled. The deficient practice posed a
15 risk if a resident did not receive sufficient treatment to cure, improve, or
16 palliate their behavioral health issue(s).
17
18

19 N. [*uncorrected deficiency from compliance and complaint inspection conducted*
20 *December 21, 2023*] Based on record review and interview, the administrator
21 failed to ensure counseling was provided according to the frequency identified
22 in the resident's treatment plan, for two of three residents sampled. The
23 deficient practice posed a risk if a resident did not receive sufficient treatment
24 to cure, improve, or palliate their behavioral health issue(s).
25
26

27 O. Based on observation, record review, and interview, the administrator failed to
28 ensure assistance in the self-administration of medication provided to a

1 resident was in compliance with an order, for one of three residents sampled.
2 The deficient practice posed a risk if a resident experienced a change in
3 condition due to improper assistance in the self-administration of medication.
4

5 P. *[uncorrected deficiency from compliance and complaint inspection conducted*
6 *December 21, 2023]* Based on record review and interview, the administrator
7 failed to ensure a registered dietitian (RD) was employed full-time, part-time,
8 or as a consultant. The deficient practice posed a risk of not meeting residents'
9 dietary and nutritional needs.
10

11 Q. *[uncorrected deficiency from compliance and complaint inspection conducted*
12 *December 21, 2023]* Based on documentation review, record review,
13 observation, and interview, the registered dietitian (RD) or director of food
14 services failed to ensure meals and snacks provided by the behavioral health
15 residential facility were served according to posted menus. The deficient
16 practice posed a risk of not meeting residents' dietary and nutritional needs.
17
18

19 R. *[uncorrected deficiency from compliance and complaint inspection conducted*
20 *December 21, 2023]* Based on documentation review and interview, the
21 administrator failed to ensure a disaster drill for employees was conducted on
22 each shift at least once every three months. The deficient practice posed a risk
23 if employees were unable to implement a disaster plan.
24

25 S. *[uncorrected deficiency from compliance and complaint inspection conducted*
26 *December 21, 2023]* Based on documentation review and interview, the
27 administrator failed to ensure an evacuation drill for employees and residents
28

1 on the premises was conducted at least once every six months on each shift.
2 The deficient practice posed a risk if facility staff were unable to safely
3 evacuate residents from the facility in an emergency.
4

5 T. [*uncorrected deficiency from compliance and complaint inspection conducted*
6 *December 21, 2023*] Based on observation and interview, the administrator
7 failed to ensure poisonous or toxic materials stored by the behavioral health
8 residential facility were in a locked area and inaccessible to residents. The
9 deficient practice posed a risk to the physical health and safety of residents
10 with access to the materials.
11

12 U. Based on observation and interview, the administrator failed to ensure a
13 clothing rod or hook in a resident’s bedroom was designed to minimize the
14 opportunity for a resident to cause self-injury. The deficient practice posed a
15 risk to the physical health and safety of residents with access to the bedroom.
16
17

18 223. As were most of the Native American victims of this fraudulent scheme, Randy
19 Garrison Ben, Sr. was alcoholically and chemically incapacitated from the time he was picked up,
20 transported, and enrolled in various intensive outpatient programs/providers (“IOPs”) and housed
21 in respective fraudulent sober living homes and adult behavioral health residential facilities until
22 his death on March 18, 2024. While he was alive, Randy was unable to provide his family with the
23 names and addresses of the various IOPs in which he was enrolled. In fact, the BEN PLAINTIFFS
24 do not yet know the exact names and addresses of those various facilities and IOPs.
25
26

27 224. As noted previously, Defendant STATE OF ARIZONA has long known that so-called
28 sober living operators and IOPs have been controlling individuals so fraudsters can continue billing

1 through the respective facility. It is common within this fraudulent scheme that the owners and
2 operators of sober living homes furnish alcohol and drugs to their residents to keep them
3 incapacitated so they won't leave. It was this practice that ultimately caused Randy's death, all
4 while he was trying to get sober.
5

6 225. Randy was found dead in a licensed adult behavioral health residential facility that
7 AZ-DHS clearly and unequivocally knew was fraudulent and posed a substantial risk of harm and
8 death to its residents.
9

10 226. Randy is survived by his children, Plaintiffs RASHONDA BEN and RANDY
11 GARRISON BEN, JR. (collectively, "the BEN PLAINTIFFS").
12

13 227. As a direct and proximate result of the grossly negligent acts and omissions of
14 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Randy
15 was injured and perished due to those injuries. Randy's injuries necessitated medical care and
16 treatment. Randy incurred medical expenses for services of physicians and other medical
17 professionals for those injuries. The BEN PLAINTIFFS allege these medical expenses incurred by
18 Randy were reasonable, necessary, and caused by the grossly negligent acts and omissions of
19 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS.
20
21

22 228. Under Arizona law, a personal injury action survives the death of the decedent and
23 can be brought on behalf of the decedent's Estate pursuant to A.R.S. § 14-3110, commonly known
24 as the "Survival Statute." Plaintiff RASHONDA BEN has been duly appointed by the Maricopa
25 County Superior Court in case no. PB2024-003939 as the Special Administrator of the Estate of
26 Randy Garrison Ben, Sr., with the power and authority to bring the present claim for medical
27 expenses incurred by Randy.
28

1 229. As a direct and proximate result of the grossly negligent acts and omissions of
2 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Randy
3 died on March 18, 2024. Consequently, the BEN PLAINTIFFS have sustained the loss of their
4 loving father. Due to the death of Randy, the BEN PLAINTIFFS are grief-stricken and will
5 continue to suffer the loss of decedent. The BEN PLAINTIFFS have been deprived of the love,
6 affection, companionship, care, protection and guidance of Randy since his death, and these losses
7 are expected to continue forever.
8

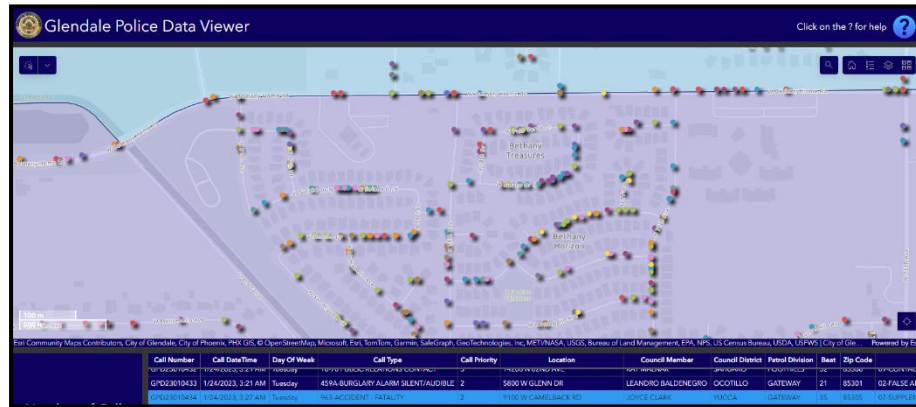
9
10 230. Furthermore, the BEN PLAINTIFFS have experienced tremendous pain, grief,
11 sorrow, anguish, stress, shock, and mental suffering since the death of Randy, and these devastating
12 injuries are expected to continue forever.
13

14 231. Moreover, the BEN PLAINTIFFS have sustained loss of income and services since
15 the death of Randy, and future economic losses are reasonably expected.
16

17 232. Additionally, the BEN PLAINTIFFS have incurred reasonable funeral, burial, and
18 medical expenses. The BEN PLAINTIFFS further assert that they are entitled to any and all other
19 damages allowed by law, including but not limited to the aggravating circumstances attending the
20 wrongful acts committed by Defendant STATE OF ARIZONA.
21

22 233. The monetary damages sought are for the surviving statutory beneficiaries (the BEN
23 PLAINTIFFS and personal representative of the Estate) of wrongful death damages allowed under
24 the *Arizona Wrongful Death Act*, A.R.S. §§ 12-611, *et seq.*, including but not limited to the damages
25 set forth in RAJI (CIVIL) 7th, Personal Injury Damages 3, *Damages for Wrongful Death of Spouse,*
26 *Parent, or Child.*
27
28

1 of methamphetamine and Delta-9 Carboxy THC and Delta-9 THC (the active and inactive
 2 metabolites of marijuana).



11 GPD23010434 1/24/2023, 3:27 AM Tuesday 963 ACCIDENT - FATALITY 2 9100 W CAMELBACK RD

13 238. Mackenzie was alcoholically and chemically incapacitated from the time she was
 14 picked up, transported, and enrolled in various intensive outpatient programs (“IOPs”)
 15 and housed in respective fraudulent sober living homes until her death on January 24, 2023. While
 16 she was alive, Mackenzie was unable to provide her family with the names and addresses of the
 17 various IOPs in which she was enrolled. In fact, the JOSEPH PLAINTIFFS do not yet know the
 18 exact names and addresses of those various IOPs.

21 239. Defendant STATE OF ARIZONA has long known that so-called sober living
 22 operators and IOPs have been controlling individuals so fraudsters can continue billing through the
 23 respective facility. It is common within this fraudulent scheme that the owners and operators of
 24 sober living furnish alcohol and drugs to their residents to keep them incapacitated so they won’t
 25 leave.

1 240. Mackenzie is survived by her parents, Plaintiffs ANGEL CRUZ and HARLAN
2 JOSEPH, and her children, Plaintiffs TY CLEVELAND, BELLA DAWAHOYA, and BERL
3 DAWAHOYA (collectively, “the JOSEPH PLAINTIFFS”).
4

5 241. As a direct and proximate result of the grossly negligent acts and omissions of
6 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS,
7 Mackenzie was injured and perished due to those injuries. Mackenzie’s injuries necessitated
8 medical care and treatment. Mackenzie incurred medical expenses for services of physicians and
9 other medical professionals for those injuries. The JOSEPH PLAINTIFFS allege these medical
10 expenses incurred by Mackenzie were reasonable, necessary, and caused by the grossly negligent
11 acts and omissions of Defendant STATE OF ARIZONA, including through its agencies AHCCCS
12 and AZ-DHS.
13
14

15 242. Under Arizona law, a personal injury action survives the death of the decedent and
16 can be brought on behalf of the decedent’s Estate pursuant to A.R.S. § 14-3110, commonly known
17 as the “Survival Statute.” Plaintiff ANGEL CRUZ is in the process of being duly appointed by the
18 Maricopa County Superior Court to serve as the Limited Scope Personal Representative of the
19 Estate of Mackenzie Luella Joseph, with the power and authority to bring the present claim for
20 medical expenses incurred by Mackenzie.
21
22

23 243. As a direct and proximate result of the grossly negligent acts and omissions of
24 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS,
25 Mackenzie died on January 24, 2023. Consequently, the JOSEPH PLAINTIFFS have sustained the
26 loss of their loving daughter and mother. Due to the death of Mackenzie, the JOSEPH PLAINTIFFS
27 are grief-stricken and will continue to suffer the loss of decedent. The JOSEPH PLAINTIFFS have
28

1 been deprived of the love, affection, companionship, care, protection and guidance of Mackenzie
2 since her death, and these losses are expected to continue forever.

3 244. Furthermore, the JOSEPH PLAINTIFFS have experienced tremendous pain, grief,
4 sorrow, anguish, stress, shock, and mental suffering since the death of Mackenzie, and these
5 devastating injuries are expected to continue forever.
6

7 245. Moreover, the JOSEPH PLAINTIFFS have sustained loss of income and services
8 since the death of Mackenzie, and future economic losses are reasonably expected.
9

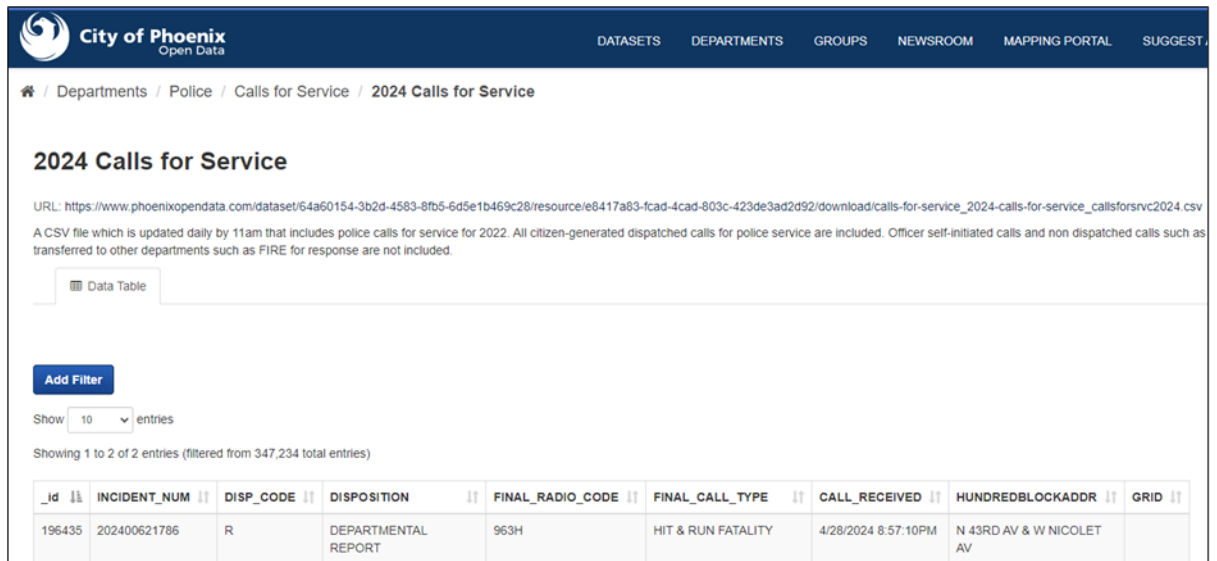
10 246. Additionally, the JOSEPH PLAINTIFFS have incurred reasonable funeral, burial, and
11 medical expenses. The JOSEPH PLAINTIFFS further assert that they are entitled to any and all
12 other damages allowed by law, including but not limited to the aggravating circumstances attending
13 the wrongful acts committed by Defendant STATE OF ARIZONA.
14

15 247. The monetary damages sought are for the surviving statutory beneficiaries (the
16 JOSEPH PLAINTIFFS and personal representative of the Estate) of wrongful death damages
17 allowed under the *Arizona Wrongful Death Act*, A.R.S. §§ 12-611, *et seq.*, including but not limited
18 to the damages set forth in RAJI (CIVIL) 7th, Personal Injury Damages 3, *Damages for Wrongful*
19 *Death of Spouse, Parent, or Child*.
20

21 248. As a further direct and proximate result of the gross negligence of Defendant STATE
22 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, and their breach of A.R.S.
23 §§ 46-451, *et seq.*, the JOSEPH PLAINTIFFS are entitled to all damages set forth herein, for
24 Defendant STATE OF ARIZONA's abuse and neglect committed in violation of Arizona's Adult
25 Protective Services Act (commonly known as "APSA"), A.R.S. §§ 46-451, *et seq.*
26
27
28

1 addresses of those various IOPs. The JONES PLAINTIFFS believe Becenti resided in
2 approximately four different fraudulent sober living houses during the approximate six months
3 before his death, and that the IOPs kept moving him from house to house.
4

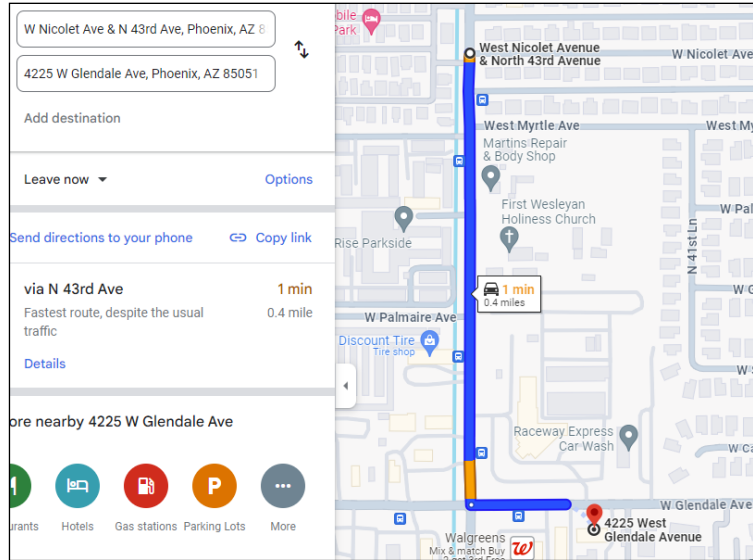
5 253. According to the Office of the Maricopa County Medical Examiner, Becenti died on
6 Sunday, April 28, 2024 due to significant blunt force trauma after being struck while crossing the
7 road. None of Becenti’s statutory beneficiaries were notified of his death; rather, police provided
8 an aunt with only basic information about Becenti’s death – that Becenti was struck and killed at or
9 near the intersection of 43rd Avenue and Glendale Avenue between 8:00 p.m. and 9:00 p.m. by a
10 driver who fled the scene. This information matches the following entry in the Phoenix Police
11 Department’s online database for 2024 Calls for Service – a hit & fatality call at 8:57:10 p.m. at N
12 43rd Av & W Nicolet Ave:
13
14



The screenshot shows the City of Phoenix Open Data website. The breadcrumb trail is: Home / Departments / Police / Calls for Service / 2024 Calls for Service. The page title is "2024 Calls for Service". Below the title, there is a URL and a description of the CSV file. A "Data Table" button is visible. Below the button, there is an "Add Filter" button and a "Show 10 entries" dropdown. The table shows 1 to 2 of 2 entries (filtered from 347,234 total entries). The table has the following columns: _id, INCIDENT_NUM, DISP_CODE, DISPOSITION, FINAL_RADIO_CODE, FINAL_CALL_TYPE, CALL_RECEIVED, HUNDREDBLOCKADDR, and GRID. The entry shown is: 196435, 202400621786, R, DEPARTMENTAL REPORT, 963H, HIT & RUN FATALITY, 4/28/2024 8:57:10PM, N 43RD AV & W NICOLET AV.

_id	INCIDENT_NUM	DISP_CODE	DISPOSITION	FINAL_RADIO_CODE	FINAL_CALL_TYPE	CALL_RECEIVED	HUNDREDBLOCKADDR	GRID
196435	202400621786	R	DEPARTMENTAL REPORT	963H	HIT & RUN FATALITY	4/28/2024 8:57:10PM	N 43RD AV & W NICOLET AV	

25 254. At the time of his death, Becenti was residing in a fraudulent sober living home
26 located at 3628 West Harmont Drive in Phoenix. This home is located approximately 1.7 miles
27 away from the accident site.
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255. After his death, individuals associated with the home told Becenti’s family to contact Teneesha Ray to collect Becenti’s property. According to NPI Registry, Ms. Ray’s contact information is 4225 West Glendale Avenue, Suite A200 in Phoenix. This address is less than a half-mile from the accident site.

NPIdb
Lookup NPI Numbers from the NPI Registry
Home / Doctors / Other Service Providers / Other Service Providers

TENEESHA M RAY
Other Service Providers
NPI Profile for **TENEESHA M RAY** in PHOENIX, AZ.
Individuals certified to perform peer support services through a training process defined by a government agency, such as department/certification/licensing authority.

Contact Information
TENEESHA M RAY
4225 W GLENDALE AVE STE A200
PHOENIX, AZ 85051-8134
Phone: 480-957-5627

NPI Profile & details for TENEESHA M RAY	
NPI Number	1568214864
Status	Active
Credentials	
Entity	Individual

256. What Becenti was doing at nearly 9:00 p.m. at night near the office of Teneesha Ray, and nearly two miles from the alleged “sober living” home in which he resided, is unknown at this

1 time. What is known is that Becenti had recently partaken of one of his addictions—marijuana. He
2 certainly was not “sober” while residing in a fraudulent sober living facility.

3 257. Becenti is survived by his mother, Plaintiff DEBRA GARCIA, and his children,
4 Plaintiffs STARLA SOKE, UNIQUE HONEY JONES, and ANAVALYIA PRECIOUS JONES
5 (collectively, “the JONES PLAINTIFFS”).
6

7 258. As a direct and proximate result of the grossly negligent acts and omissions of
8 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Becenti
9 was injured and perished due to those injuries. Becenti’s injuries necessitated medical care and
10 treatment. Becenti incurred medical expenses for services of physicians and other medical
11 professionals for those injuries. The JONES PLAINITFFS allege these medical expenses incurred
12 by Becenti were reasonable, necessary, and caused by the grossly negligent acts and omissions of
13 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS.
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16 259. Under Arizona law, a personal injury action survives the death of the decedent and
17 can be brought on behalf of the decedent’s Estate pursuant to A.R.S. § 14-3110, commonly known
18 as the “Survival Statute.” Plaintiff DEBRA GARCIA is in the process of being duly appointed by
19 the Maricopa County Superior Court to serve as the Limited Scope Personal Representative of the
20 Estate of Becenti Kyle Jones, with the power and authority to bring the present claim for medical
21 expenses incurred by Becenti.
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24 260. As a direct and proximate result of the grossly negligent acts and omissions of
25 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Becenti
26 died on April 28, 2024. Consequently, the JONES PLAINTIFFS have sustained the loss of their
27 loving son and father. Due to the death of Becenti, the JONES PLAINTIFFS are grief-stricken and
28

1 will continue to suffer the loss of decedent. The JONES PLAINTIFFS have been deprived of the
2 love, affection, companionship, care, protection and guidance of Becenti since his death, and these
3 losses are expected to continue forever.

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5 261. Furthermore, the JONES PLAINTIFFS have experienced tremendous pain, grief,
6 sorrow, anguish, stress, shock, and mental suffering since the death of Becenti, and these devastating
7 injuries are expected to continue forever.

8
9 262. Moreover, the JONES PLAINTIFFS have sustained loss of income and services since
10 the death of Becenti, and future economic losses are reasonably expected.

11 263. Additionally, the JONES PLAINTIFFS have incurred reasonable funeral, burial, and
12 medical expenses. The JONES PLAINTIFFS further assert that they are entitled to any and all other
13 damages allowed by law, including but not limited to the aggravating circumstances attending the
14 wrongful acts committed by Defendant STATE OF ARIZONA.

15
16 264. The monetary damages sought are for the surviving statutory beneficiaries (the
17 JONES PLAINTIFFS and personal representative of the Estate) of wrongful death damages allowed
18 under the *Arizona Wrongful Death Act*, A.R.S. §§ 12-611, *et seq.*, including but not limited to the
19 damages set forth in RAJI (CIVIL) 7th, Personal Injury Damages 3, *Damages for Wrongful Death*
20 *of Spouse, Parent, or Child*.

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23 265. As a further direct and proximate result of the gross negligence of Defendant STATE
24 OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, and their breach of A.R.S.
25 §§ 46-451, *et seq.*, the JONES PLAINTIFFS are entitled to all damages set forth herein, for
26 Defendant STATE OF ARIZONA's abuse and neglect committed in violation of Arizona's Adult
27 Protective Services Act (commonly known as "APSA"), A.R.S. §§ 46-451, *et seq.*
28

1 importantly—their sobriety. Desbah had to leave the fraudulent sober living home to become sober
2 and ultimately, she put herself on Methadone.

3 270. To entice Desbah to move back into the fraudulent sober living home, the alleged
4 owner (known to Desbah as “Anicet”) promised that if she moved back in, Desbah would be able
5 to drive a company van to sweat lodges and her preferred Native-focused AA meetings. During her
6 first week back at the home, Desbah was bullied by a “staff” member and then “staff” attempted to
7 force her to ingest alleged psychiatric medications that were purportedly prescribed by a doctor’s
8 office located near 27th Avenue and Cactus Road that was either co-owned by Anicet or his wife
9 who worked there.
10

11
12 271. Desbah struggled, successfully, to remain sober. Ultimately, due to the continued
13 drug use in the home and lack of treatment, Desbah was forced to leave the fraudulent sober living
14 home in early-June 2024. Desbah continues her struggle to receive legitimate professional services,
15 services she should have been provided years earlier.
16

17
18 272. As a direct and proximate result of the grossly negligent acts and omissions of
19 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff
20 DESBAH REED has suffered and will continue to endure and experience tremendous anxiety,
21 mental suffering, and resulting physical injuries.
22

23 273. As a further direct and proximate result of the grossly negligent acts and omissions of
24 Defendant STATE OF ARIZONA, including through its agencies AHCCCS and AZ-DHS, Plaintiff
25 DESBAH REED has incurred damages for the value of the full cost for legitimate professional
26 services she was entitled to receive but did not receive.
27
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1 present, who sustained damages by reason of receiving, being recruited to receive, or
2 being promised to receive purported “substance abuse treatment services”³⁶ in
3 Arizona that AHCCCS funded through its gross negligence using AIHP payments to
4 fraudulent providers who failed to render legitimate services,³⁷ or who engaged in
5 fraudulent billing practices (e.g. “double-billing,” or submitting claims with billing
6 codes that do not correlate to services purportedly rendered). Within the Class are the
7 following Subclasses that sustained damages:
8

9
10 A. **Services Not Rendered Subclass:** Plaintiff DESBAH REEDE, for and on
11 behalf of herself and as Class representative for and on behalf of others
12 similarly situated who are Native Americans who were enrolled in AHIP on or
13 after January 1, 2019 to present, whose personal information was used by
14 service providers to bill and collect payments from AHCCCS for purported
15 “substance abuse treatment services,” which AHCCCS funded through its
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19 ³⁶ The phrase “substance abuse treatment services” is intended to describe inpatient or outpatient
20 services, including but not limited to evaluation, diagnosis, counseling, therapy, and transportation,
21 for the treatment of substance abuse disorders offered by an entity licensed by AZ-DHS to provide
22 services as a Behavioral Health Residential Facility (BHRF) or Intensive Outpatient (IOP) facility.
23 The Substance Abuse and Mental Health Services Administration (SAMHSA) defines substance
24 abuse disorders as occurring when: “the recurrent use of alcohol and/or drugs causes clinically
25 significant impairment, including health problems, disability, and failure to meet major
26 responsibilities at work, school, or home.” <https://www.samhsa.gov/find-help/disorders>

27 ³⁷ The phrase “legitimate services” refers to “substance abuse treatment services” actually rendered
28 by licensed and/or qualified substance abuse treatment professionals consistent with the appropriate
standards of care as outlined by the SAMHSA, the American Society of Addiction Medicine
(ASAM), and AZ-DHS. *See, e.g.,* Ariz. Dept. of Health and Human Servs., *Substance Abuse
Standard of Care*, (Eff. April 1, 2018) (Reviewed March 2019), <https://www.AZ-DHS.gov/documents/preparedness/epidemiology-disease-control/disease-integrated-services/hiv-care/sa-soc.pdf>.

1 gross negligence with AIHP payments to the services provider, that were not
2 actually rendered to the enrollees.

- 3 • In this Subclass, the monetary damages sought are for the value of the
4 full cost for legitimate services that each member of the entire Class was
5 entitled to receive but did not receive, and for general and special
6 damages suffered due to ongoing addiction and new addictions
7 attributable to the service providers' failure to render legitimate services
8 and for AHCCCS's failure to ensure legitimate services were rendered.
9

10
11 B. **Personal Injury Subclass:** Plaintiff RANDI LYNN HONYUMPTEWA, by
12 and through her Court-appointed Temporary Conservator Evelyn Williams, for
13 and on behalf of herself and as Class representative for and on behalf of others
14 similarly situated who are Native Americans who were enrolled in AIHP on or
15 after January 1, 2019 to present, who sustained a personal injury negligently
16 or intentionally caused by anyone while the enrollee was under the care or
17 custody of a "substance abuse treatment services" provider or a
18 licensed/unlicensed sober living home arising from the rendering of, or lack of
19 rendering of, purported "substance abuse treatment services;" or while the
20 enrollee was fleeing from the control and custody of the "substance abuse
21 treatment services" provider or a licensed/unlicensed sober living home; or
22 while the enrollee was being transported by any entity or person for the benefit
23 of a "substance abuse treatment services" provider or a licensed/unlicensed
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1 sober living home; or due to the lack of rendering of “substance abuse
2 treatment services” within the applicable standard of care.

- 3 • In this Subclass, the monetary damages sought are for personal injury
4 damages suffered by the victims, including but not limited to, past and
5 future medical bills, the nature and extent of the personal injury, pain
6 and suffering, loss of past/future earnings, loss of earning capacity, loss
7 of consortium suffered by a spouse, parent, and/or child of any victim,
8 loss of household services, loss of enjoyment of life, and all damages
9 set forth in RAJI (CIVIL) 7th, Personal Injury Damages 1, *Measure of*
10 *Damages*.

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14 **C. Wrongful Death Subclass:** Plaintiff PHYLLIS ROBLED0, individually and
15 as natural mother of decedent Roshanda De’Ann Robledo, for and on behalf
16 of herself and as Class representative for and on behalf of others similarly
17 situated who are Native Americans who were enrolled in AIHP on or after
18 January 1, 2019 to present, who sustained death negligently or intentionally
19 caused by anyone while the enrollee was under the supervision or custody of a
20 purported “substance abuse treatment services” provider or a
21 licensed/unlicensed sober living home, arising from the rendering of, or lack
22 of rendering of, purported “substance abuse treatment services;” or while the
23 enrollee was fleeing from the control and custody of the purported “substance
24 abuse treatment services” provider or a licensed/unlicensed sober living home;
25 or while the enrollee was being transported by any entity or person for the
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1 benefit of a “substance abuse treatment services” provider or a
2 licensed/unlicensed sober living home; or due to the lack of rendering of
3 “substance abuse treatment services” within the applicable standard of care.

- 4 • In this Subclass, the monetary damages sought are for surviving
5 statutory beneficiaries (spouses, children, parents, and/or personal
6 representative of the Estate) of wrongful death damages allowed under
7 the Arizona Wrongful Death Act, A.R.S. §§ 12-611, *et seq.*, including
8 but not limited to the damages set forth in RAJI (CIVIL) 7th, Personal
9 Injury Damages 3, *Damages for Wrongful Death of Spouse, Parent, or*
10 *Child*. Further damages sought include the reasonable cost of medical
11 expenses incurred by the decedent prior to death under Arizona’s
12 “Survival Statute,” A.R.S. § 14-3110 and damages for decedent’s
13 conscious pain and suffering pursuant to Arizona’s Adult Protective
14 Services Act, A.R.S. §§ 46-451, *et seq.*

15 D. **Displaced Subclass:** Plaintiff DESBAH REEDE, for and on behalf of herself
16 and as Class representative for and on behalf of others similarly situated who
17 are Native Americans who were enrolled in AHIP on or after January 1, 2019
18 to present, who became displaced and homeless by reason of a
19 licensed/unlicensed sober living home being abandoned or closed while the
20 enrollee was enrolled to receive purported inpatient or outpatient “substance
21 abuse treatment,” or who became displaced and homeless by reason of a
22 licensed/unlicensed sober living home constructively or actually evicting the
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1 enrollee while the enrollee was enrolled to receive purported inpatient or
2 outpatient “substance abuse treatment.”

- 3 • In this Subclass, the monetary damages sought are for the anxiety,
4 mental suffering, resulting physical injuries, medical expenses,
5 expenses for transportation and meals, out-of-pocket expenses, and
6 reasonable cost of suitable replacement housing.
7

8
9 278. The Primary Class consists of all named Plaintiffs and all those Class Members
10 similarly situated, as described.

11 279. The “Services Not Rendered” Subclass consists of Plaintiff RANDI
12 HONYUMPTTEWA and her relatives, namely, Plaintiffs EVELYN WILLIAMS, KOWIN
13 HONYUMPTTEWA, and ARIA SPENCER; Plaintiff DESBAH REEDE, and; all those Class
14 Members similarly situated, as described.
15

16 280. The “Personal Injury” Subclass consists of Plaintiff RANDI HONYUMPTTEWA and
17 her relatives, namely, Plaintiffs EVELYN WILLIAMS, KOWIN HONYUMPTTEWA, and ARIA
18 SPENCER, and all those Class Members similarly situated, as described.
19

20 281. The “Wrongful Death” Subclass consists of the ROBLEDO PLAINTIFFS, the BEN
21 PLAINTIFFS, the JOSEPH PLAINTIFFS, the JONES PLAINTIFFS, and all those Class Members
22 similarly situated, as described.
23

24 282. The “Displaced” Subclass consists of Plaintiff DESBAH REEDE, and all those Class
25 Members similarly situated, as described.
26

27 283. There is no denying that there are common threads linking the Plaintiffs and the entire
28 Class. All are Native Americans. All have alcohol/drug dependency. All were falsely promised

1 substance abuse treatment services. All substance abuse treatment services are paid by AHCCCS
2 through AIHP. The common facts go on and on.

3 284. The commonality presented here fits the textbook definition for a class action claim.
4 The legal concept of a “class action claim” which is governed by Rule 23, *Ariz.R.Civ.P.*, was
5 developed for the very purpose of adjudicating the Class Claims presented here. It is self-evident
6 that many, many thousands of Native American victims have been affected and harmed by the same
7 common set of operative facts. The applicable threshold requirements for a class action are
8 contained in Rule 23, *Ariz. R. Civ .P.*, which is set forth below:
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10

11 **(a) Prerequisites.** One or more members of a class may sue or be sued
12 as representative parties on behalf of all members only if:

13 (1) the class is so numerous that joinder of all members is
14 impracticable;

15 (2) there are questions of law or fact common to the class;

16 (3) the claims or defenses of the representative parties are typical
17 of the claims or defenses of the class; and

18 (4) the representative parties will fairly and adequately protect the
19 interests of the class.

20 **(b) Types of Class Actions.** A class action may be maintained if Rule
21 23(a) is satisfied and if:

22 (1) prosecuting separate actions by or against individual class
23 members would create a risk of:

24 (A) inconsistent or varying adjudications with respect to
25 individual class members that would establish incompatible
26 standards of conduct for the party opposing the class; or

27 (B) adjudications with respect to individual class members
28 that, as a practical matter, would be dispositive of the interests
of the other members not parties to the individual adjudications

1 or would substantially impair or impede the other members’
2 ability to protect their interests;

3 (2) the party opposing the class has acted or refused to act on
4 grounds that apply generally to the class, so that final injunctive
5 relief or corresponding declaratory relief is appropriate for the
6 class as a whole; or

7 (3) the court finds that the questions of law or fact common to class
8 members predominate over any questions affecting only
9 individual members, and that a class action is superior to other
10 available methods for fairly and efficiently adjudicating the
11 controversy. The matters pertinent to these findings include:

12 (A) the class members’ interests in individually controlling the
13 prosecution or defense of separate actions;

14 (B) the extent and nature of any litigation concerning the
15 controversy already begun by or against class members;

16 (C) the desirability or undesirability of concentrating the
17 litigation of the claims in the particular forum; and

18 (D) the likely difficulties in managing a class action.

19 Rule 23, *Ariz. R. Civ. P.* (emphasis added).

20 285. All of the prerequisites set forth in Rule 23(a) for a class action are met here. First,
21 the Class consists of the Native American population that has been affected by this crisis. There are
22 many thousands of Native Americans that belong to the Class who can be identified from Defendant
23 STATE OF ARIZONA’s records. Joinder of many thousands of claims of the Native American
24 victims is impracticable. *See Ferrara v. 21st Century N. Am. Ins. Co.*, 245 Ariz. 377, 380, ¶ 8 (App.
25 2018) (“[W]hile there is no fixed numerosity rule, ‘generally less than twenty-one is inadequate,
26 more than forty adequate, with numbers between varying according to other factors.’”) (quoting
27 *Cox v. Am. Cast Iron Pipe Co.*, 784 F.2d 1546, 1553 (11th Cir. 1986)). Thus, the first prong of Rule
28 23(a) is easily present here.

1 286. The second prong of Rule 23(a) is also easily met. Common facts and common
2 questions of law plainly exist here. Though the exact factual circumstances of each Class Member’s
3 damages may differ, all Class Members are Native American AIHP enrollees who suffered damages
4 proximately caused by Defendant STATE OF ARIZONA’s gross negligence and utter failure to
5 protect the Class from the fraud, abuse, neglect, and coercion carried out by fraudulent entities.
6 This satisfies the “commonality” requirement of Rule 23(a). *Stratton v. Am. Med. Sec., Inc.*, 266
7 F.R.D. 340, 346 (D. Ariz. 2009) (“Even though class members’ claims could differ factually, th[e]
8 common issue [of whether defendants made false promises and misrepresentations] is sufficient to
9 meet the minimal requirements for commonality.”).³⁸
10
11

12 287. The third prong of Rule 23(a) is also met. The Class representatives have claims that
13 are typical of the entire Class. Deaths, injuries, displacement, and the failure to provide legitimate
14 services are present for the Class Members in the Primary Class and Subclasses. *See Arnold v.*
15 *Arizona Dept. of Health Services*, 160 Ariz. 593, 608 (1989) (affirming the trial court’s decision to
16 certify a class of 4,500 impoverished people with chronic mental illness in a special action against
17 the State because, though each class member had individualized needs, they collectively met the
18 “typicality” requirement). Furthermore, there are four (4) pending wrongful death cases³⁹ in this
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23 ³⁸ Arizona Courts view cases interpreting Rule 23 of the Federal Rules of Civil Procedure as
24 authoritative when analyzing whether the elements of Rule 23 of the Arizona Rules of Civil
25 Procedure are met. *See Ferrara*, 245 Ariz. 377 at ¶ 6.

26 ³⁹ *Largo, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-
27 004681); *Leslie, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no. CV2024-
28 004688); *Russell, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case no.
CV2024-007445); and *Truax, et al. v. State of Arizona, et al.* (Maricopa County Superior Court case
no. CV2024-017933).

1 Court, all of which involve the same misconduct allegations and same legal theories against
2 Defendant STATE OF ARIZONA stemming from the so-called “sober living crisis” which is at
3 issue in this class action lawsuit.

4
5 288. As for the fourth prong of Rule 23(a), the Class representatives and the undersigned
6 attorneys will fairly protect the interests of the Class. The BrewerWood law firm has devoted
7 significant resources and time for more than one and one-half years to investigating and developing
8 the claims presented here. Prior to bringing this Class claim, BrewerWood had already filed four
9 (4) wrongful death lawsuits stemming directly from the sober living crisis.³⁷ To the knowledge of
10 BrewerWood, no other law firm has devoted similar resources or time to recover damages for the
11 Native American population for the sober living crisis. And, to the knowledge of BrewerWood, no
12 other law firm has filed the number of lawsuits on this issue. The attorneys at BrewerWood, namely
13 John Brewer and Dane Wood, have nearly sixty (60) years of combined experience litigating tort
14 matters, with an emphasis on catastrophic injuries and wrongful death.

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18 289. Furthermore, BrewerWood is joined by the national law firm of McCoy Leavitt
19 Laskey LLC, a law firm with more than forty (40) attorneys in nine (9) offices located in California,
20 New Mexico, Texas, Kansas, Wisconsin, Michigan, Illinois, Florida, and Maine. H. Brook Laskey,
21 a partner in the firm, has been practicing since 1996. He has extensive experience in litigating
22 catastrophic matters. He is the managing partner of the firm’s Albuquerque, New Mexico office.
23 Mr. Laskey frequently litigates matters in Arizona. Mr. Laskey and other members of his firm are
24 experienced in litigating class action matters. Plaintiffs and their attorneys are fully vested in this
25 matter and they are well-funded.
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1 290. The factors set forth in Rule 23(b) are also easily met here. Prosecuting individualized
2 lawsuits would carry the risk of inconsistent or varying adjudications. Moreover, adjudications in
3 individual lawsuits would undoubtedly be dispositive of the interests of the other Class Members
4 not parties to the individual adjudications or would substantially impair or impede the other Class
5 Members' ability to protect their interests.
6

7 291. Lastly, it is readily apparent that common facts and common questions of law
8 predominate over any interest of individual Class Members. The so-called "sober living crisis" has
9 affected many thousands of Native Americans through the same set of operative facts. At the heart
10 of the matter is the common fact that all Native Americans of the Class were promised false
11 substance abuse treatment services that were not delivered. All Class Members were used as pawns
12 so that fraudsters could fraudulently bill AHCCCS under AIHP. The misconduct of Defendant
13 STATE OF ARIZONA, by and through AHCCCS and AZ-DHS, is the common denominator—the
14 common nucleus—that exists throughout the so-called "sober living crisis" from the very beginning
15 in creating the crisis, funding the crisis, growing the crisis, and failing to deter and stop the crisis.
16 Inconceivably, AHCCCS and Defendant STATE OF ARIZONA knew since 2019 that massive
17 fraud and harm were occurring **only** to *Native Americans with AIHP insurance enrolled in a*
18 *substance abuse program*—as a purposefully targeted class—yet Defendant STATE OF ARIZONA
19 knowingly continued to fund the crisis and make it grow at an even higher rate for the subsequent
20 four years before making any effort to deter/stop the fraud and the harm after it was far too late.
21 The same common nucleus of operative facts exists for all Class Members. A class action is the
22 superior method for fairly and efficiently adjudicating this matter.
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- 1 C. Grant Plaintiffs and the Rule 23 Class Members awards of damages in such
2 amounts to be determined at trial or as provided by applicable law;
- 3 D. That Judgment be entered against Defendant STATE OF ARIZONA in
4 favor of Plaintiffs and the Class Members;
- 5
6 E. For a sum that is reasonable and just for Plaintiff RANDI LYNN
7 HONYUMPTWEA's past, present, and future physical and mental pain
8 and suffering, and loss of enjoyment of life's activities;
- 9
10 F. For the reasonable value of the special damages incurred to date and those
11 to be incurred in the future for necessary surgeries, hospitalization, medical
12 care, medical treatment, therapies, attendant care, and home modifications
13 for the rest of Plaintiff RANDI LYNN HONYUMPTWEA's natural life;
- 14
15 G. For the reasonable value of Plaintiff RANDI LYNN HONYUMPTWEA's
16 past loss of income and loss of income for the rest of her pre-injury work-
17 life expectancy;
- 18
19 H. For the reasonable value of Plaintiff RANDI LYNN HONYUMPTWEA's
20 loss of household services which will continue for the rest of her natural
21 life;
- 22
23 I. For the reasonable value of the full cost for legitimate services that Plaintiff
24 RANDI LYNN HONYUMPTWEA and Plaintiff DESBAH REEDE were
25 entitled to receive but did not receive, and for general and special damages
26 suffered due to ongoing addiction and new addictions;
- 27
28

- 1 J. For a sum that is reasonable and just as and for the abuse and neglect of
2 Plaintiff RANDI LYNN HONYUMPTWEA pursuant to the Adult
3 Protective Services Act (APSA), A.R.S. §§ 46-451, *et seq.*;
- 4 K. For the reasonable value of the loss of consortium injuries sustained by the
5 HONYUMPTWEA PLAINTIFFS in the past and future;
- 6 L. For a sum that is reasonable and just for Plaintiff EVELYN WILLIAMS's
7 past loss of income and loss of future income;
- 8 M. On behalf of each of the ESTATE PLAINTIFFS⁴⁰, for the reasonable value
9 of the special damages incurred by each Estate's decedent and each
10 respective Estate for the necessary medical attention and care received by
11 each Estate's decedent;
- 12 N. On behalf of the ROBLEDOS PLAINTIFFS, the BEN PLAINTIFFS, the
13 JOSEPH PLAINTIFFS, and the JONES PLAINTIFFS, and each of them,
14 for sums that are reasonable and just as and for their respective damages
15 incurred under the Arizona Wrongful Death Act, A.R.S. §§ 12-611, *et seq.*;
- 16 O. On behalf of the ROBLEDOS PLAINTIFFS, the BEN PLAINTIFFS, the
17 JOSEPH PLAINTIFFS, and the JONES PLAINTIFFS, and each of them,
18 for the reasonable value of the special damages incurred to date, including
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27 ⁴⁰ The "ESTATE PLAINTIFFS" refers to the Estate of Roshanda De'Ann Robledo, the Estate of
28 Randy Garrison Ben, Sr., the Estate of Mackenzie Luella Joseph, and the Estate of Becenti Kyle Jones.

1 the loss of earnings, the future loss of earnings, funeral expenses, and burial
2 expenses;

3 P. On behalf of each of the ESTATE PLAINTIFFS, for sums that are
4 reasonable and just as and for the conscious pain and suffering of each
5 Estate's decedent pursuant to the Adult Protective Services Act (APSA),
6 A.R.S. §§ 46-451, *et seq.*;

7
8 Q. For a sum that is reasonable and just for Plaintiff DESBAH REEDE's past,
9 present, and future anxiety, mental suffering, and resulting physical
10 injuries;

11
12 R. For the reasonable value of the special damages incurred by Plaintiff
13 DESBAH REEDE to date and those to be incurred in the future for medical
14 expenses, expenses for transportation and meals, out-of-pocket expenses,
15 and reasonable cost of suitable replacement housing;

16
17 S. For general compensatory damages in a just and reasonable amount for
18 Plaintiffs and the Class Members;

19
20 T. For Plaintiffs' costs and the Class Members' costs incurred in this matter;
21 and

22
23 U. For such other and further relief to Plaintiffs and the Class Members as the
24 Court and jury may deem just and proper in the premises.
25
26
27
28

URGENT – Arizona Office of the Attorney General

TO: Mark Brnovich, Brett Harames and Josh Kredit
2005 N. Central Avenue
Phoenix, Arizona 85004

This packet of information is being delivered to Mark Brnovich, Brett Harames and Josh Kredit and the agency that brought charges to 13 individuals and 14 related business entities on October 20, 2021, on criminal charges of Illegal Control of an Enterprise, Theft, Conspiracy, and Fraudulent Schemes and Artifices alleging fraudulent billing of the state's Medicaid agency, Arizona Health Care Cost Containment System (AHCCCS), for millions of dollars of services they claim to have provided to AHCCCS patients.

The information below has been gathered in the last few months and is very similar to the case noted above and in addition to defrauding AHCCCS, it also includes rampant patient brokering and housing of Native Americans in unsafe and unlicensed homes in the valley (at least 31 homes as of today). Through our research, it is apparent that the individuals, Laroie Davis, Patrick Legenzoff (Haney-Legenzoff), Tamara L. Allen, Jerome Davis along with their 45+ related business entities have fraudulently billed the state's Medicaid agency (AHCCCS) and American Indian Health Plan (AIHP) millions of dollars for services they claim were provided, and if provided, were out of unlicensed locations. They have set up two non-profits (attached) to hide the brokering and the "donating of housing" to help the homeless. The billing scheme, we believe, is headed up by Laroie Davis who currently works at the Arizona Department of Health Services. We believe, because they have been able to operate undetected for so long, there is collusion among employees of AzDHS, and Laroie Davis to defraud AIHP.

The scheme is simple: send vans to the reservations to pick up Native Americans and house them in unlicensed homes (less than 6 to avoid attention), drive them to a center for group each day with no licensure, oversight, or credentialed staff, then bill AIHP (no contract necessary) and continue to build an enterprise with a network of people who will find the Native Americans, send them to Solutions of Sobriety and/or A Path of Resilience and get paid for them.

It is nearly impossible to gather all the information – just tracing the sheer number of related business entities and homes they have purchased has been difficult. This is not an exhaustive list of individuals and related business entities – there are several more involved but in the interest of time and for the safety of the Native Americans – we believe there is enough here for your office to investigate. Once you find the AzDHS licensed/unlicensed facilities owned/operated or hiding behind a related business entity of Laroie Davis or a relative a Laroie Davis, you have found the fraud. They are growing rapidly and adding houses by the week for Native Americans. As of 2/1/2022 there were 31 homes as best we could tell. Laroie Davis, in the last 90 days has purchased \$4,251,050 in real estate for his personal use (see attached records) on a AzDHS salary of approx. \$52,000 a year (most recent public record). Patrick Legenzoff, at least \$1m that we could find but there are several others in this scheme that are buying real estate with LLC's and cash faster then we can track (watch his Tik Tok videos and www.soberinvestor.net). Just follow the vans, then follow the money for the real estate transactions and you will find the brokers and the billing fraud.

Dated: February 7, 2022

Most importantly, please contact AzRHA to understand a complaint filed by a Native American family member that resulted in revoking certification of Patrick Legenzoff - as we were not able to obtain a copy. This a tragedy for the Native American people. Profiting from their struggles with alcohol and drug abuse through body brokering and fraudulent billing where they continue to be victims of abuse, exploitation, and greed. They have no voice.

Address: 13832 N. 32nd Street C136 Phoenix AZ 85032

AzDHS License: None confirmed 2/3/22

AzDHS License Name: None confirmed 2/3/22

AHCCCS ID: None

NPI: 1083371769

Entity (ACC): Solutions of Sobriety APRBHS LLC – Manager: LS Davis LLC (Laroie Davis), inc. 8/16/21

Entity (ACC): Solutions of Sobriety LLC – Tamara L Allen, inc. 8/2/2020

Entity (ACC): Solutions of Sobriety BHS – Tamara Allen, Patrick Legenzoff, inc. 11/4/21

Facts: Confirmed 2/3/22 with AzDHS Solutions of Sobriety (SOS) is not licensed as an Outpatient Treatment Center (OTC) but is in the process of licensing - they are required to send back paperwork (they had unpermitted construction work done at the site and cannot get a CofO) which has not been received by AzDHS as well as they have not completed a survey. We believe the fraudulent billing and illegal operations of these homes started on or about May 2020.

Details: Laroie Davis, Tamara Allen, Patrick Legenzoff and wife Kendra directs, either Kendra's mother or Patrick's mother, (who works case management on the reservation) and arranges vans to pick up Native Americans from San Carlos and the four corners area and transports Native Americans to one of the 31 unlicensed sober homes in the valley. Then, once Native Americans are in the sober living homes, (they call them transitional housing, so they think it avoids having to license them) vans transport the Native Americans from the homes to SOS, 13832 N. 32nd Street C136 and pull in the alley way to drop off Native Americans in the back of suite C136 for IOP groups and/or case management– which they in turn bill AIHP (unlicensed, with no licensed therapists and no documentation of credentials of any staff). We have a video of the back-alley way and Native Americans being dropped off. One of their business development reps indicated they do telehealth from one of the 30+ sober living houses if they can't transport them - possibly due to Covid or to minimize the traffic at the unlicensed OTC on 32nd street. This location is getting a lot of attention and questions by people and family members. As of 2/4/21 we did not see the vans in back (T/W/TH 9am -12:30pm, M 1-4pm but it constantly changes) and they likely have moved locations. To find the new location, follow any van from any one of the sober living homes noted here or any home owned by Patrick or Laroie or any related entity and you will find the new location.

Billing: No AHCCCS ID when researching this NPI, but they are billing AHCCCS AIHP and receiving at least \$1800 per day per native. Look into the billing – they are likely billing out of one of Laroie's facilities that is licensed by DHS but not viewable -and billing millions per month and paying for hundreds of Native Americans. They are native only program. They do not accept any other plans from AHCCCS because they are not contracted, nor could they survive the scrutiny of the credentialing process of the other Plans (Mercy Care, Banner etc) under AHCCCS. Anyone with an AHCCCS ID can provide services and bill AIHP because they do not require a contract.

Unlicensed Sober Living Homes: Keeping the number of residents under 6 so to avoid having to register with City of Phoenix and other cities as to not draw attention. Possibly 2-3 sober homes are licensed although not sure as this is confidential information that is held by AzDHS. AzRHA, in 2021, removed Patrick Legenzoff's membership and pulled certification on 3529 W. Paseo Way in Laveen, due to complaint from a family member alleging harm to residents and house managers doing drugs. Membership revoked after unannounced site visit by AzRHA. Contact AzRHA for confirmation, President of AzRHA is Jeff Marsh phone number 480-748-0356.

Other homes with activity - 4813 W Belmont Avenue in Glendale – called the “Mommy and me house”. 6726 W. Bloomfield Road, Peoria. See his website for other homes – he took most of them down and removed the street addresses when people started to investigate where their loved ones were being housed. www.aprbhs.com. Update: as of 2/4/22, www.solutionsofsobriety.com website is down.

Patrick Lenenzoff has 13+ LLC's - purchased at least \$1m in assets that we could track – through billing AHCCCS and housing Native Americans. His wife is a realtor also he does deals (and videos) with Zachary Kepes. Could not keep up with the number of LLC's and transactions they have created but have attached quite a few. They all do it under the disguise of nonprofits – he has two: Soul Revival Inc. and Helping Hands Recovery LLC that we could find.

People and Brokering: James Kilosky – felon for phone schemes. Works for Patrick. Tamara Allen partners with Patrick and Laroie – watch the YouTube video called Solutions of Sobriety Commercial #1 - the middle of the video states the partners. Tamara Allen, husband is Chad Everett Allen, has state and federal indictments - convicted of fraud connected to Jen Shah, Real Housewives of SLC. Everyone connected to these people and programs are profiting and paying for Native Americans. Their website is www.aprbhs.com outlines selling franchises? For Medicaid contracts? For \$250,000 initial investment. See attached. These people are dangerous, hence the reason for this anonymous information provided to your office.

Additional info and not sure of the relevancy: Two additional NPI's come up Susan Harrell NP 1760775837 and Delia Consentino LISAC 1972962082 possibly to bill under those NPI's? these practitioners, however, only show they currently work at Crossroads so not sure of the connection to SOS. Listed as "legacy" on SOS NPI info page. They could be trying to bill under these provider NPI's.

Address: 2258 W. Wayland Road Phoenix AZ 85041

AzDHS License: Outpatient Treatment Center (OTC) License # OTC10206, BH6251

AzDHS License Name: APRBHS-ROSE HOUSE

AHCCCS ID #079577 - Start date 5/21/2020, NPI 1497372908, Provider Type BH77

Entity: A Path of Resilience, LLC

Arizona Corporation Commission (ACC): Manager, Laroie Davis, Jerome Davis, Robert McNeal

Date Incorporated: 6/12/2015

FACTS: This AzDHS license was NOT accessible to the public through AZ Care Check Online Tool or employees of AzDHS. When it was brought to the attention of the Bureau Chief, Odette Colburn in early December 2021 – she could not access it either until a screenshot was provided. Now as of 2/2/22 the public can see the license on Az Care Check when searched (see attached). We think this sparked an unannounced site visit. Interesting that the citation was closed after Provider information was received noting the hours of operation (there were no staff present, a resident answered the door, and the DHS was not allowed in). Please read attached investigation and citation. How was this residential home in a residential neighborhood ever approved as an outpatient treatment center? This is not allowed per AzDHS and when prompted a representative in licensing at AzDHS said, ""some slip through the cracks". This location is loaded with AHCCCS #079577 and may be used to bill AIHP AHCCCS as the place of service when no services are being delivered at this location. See attached.

TAX RECORDS: Owned by LAROE S & TAMMY A DAVIS. Tax mailing address Laroie S & Tammy A Davis, 1709 E Carter Rd, Phoenix AZ 85042 - this address is connected to Jerome Davis' (google search says he is a social worker) work address, a manager of the LLC.

TAX RECORDS: Also shows 2245 W. Wayland Road in Phoenix which is across the street from this location (above) and is listed on tax records as an address for Laroie Davis (this may be where his staff works or a home office). Owned by OTIS AND JANET HOLLOWAY TRUST, not sure why Laroie Davis' mail goes there. (several LLC's on Arizona Corporation Commission have this address as well as the property tax bills). Could be his billing office.

Laroie Davis, Manager of the LLC, appears to currently work for AzDHS (made \$52,000 at AzDHS in 2019 in Quality Assurance Department) and has for several years. How does he own behavioral health residential facilities and an outpatient treatment center and work for the organization that regulates and provides oversight?

We believe there is possible collusion and more employees involved as part of this scheme. Without collusion how is it that Laroie Davis' affiliations can be hidden from DHS, able to have locations inspected and licensed under criteria that runs afoul of the licensing requirements, not able to see any of his licensed facilities (there could be more) as well as a complaint and site visit that was quieted and closed out without any further investigation as to what was going on here. How is that protecting the public? And how is AzDHS protecting a vulnerable class? The investigation was closed 1/6/22.

Dated: February 7, 2022

Laroie Davis has at least 17+ LLC's, most notably A Path of Resilience LLC, but its nearly impossible to know all of the entities and if there are other licensed facilities in which he has some financial connection to.

Update: 2/4/22 – It appears that Laroie Davis' LLC named "Is davis, llc" is the statutory agent for at least 5 LLC's that have been incorporated with ACC – and includes several relatives, names of his children that are now "managers" of these LLC's possibly to start moving the personal assets that he just acquired totaling \$4.2m. Most recent purchase was 1/31/22 – Chateaux on Central – a condo for \$1.6m.

Address: 6102 South 37th Lane Phoenix, AZ 85041

AzDHS License: None confirmed 2/2/22

AzDHS License Name: None confirmed 2/2/22

AHCCCS ID #194917, Start date 9/16/2016, NPI 1992254338, B8 Behavioral Health Residential Facility (BHRF)

Entity: A Path of Resilience, LLC

Arizona Corporation Commission (ACC): Manager, Laroie Davis, Jerome Davis, Robert McNeal

Date Incorporated: 6/1/2015

Facts: NO LICENSE IN AZ CARE CHECK AND CALLED DHS ON 2/2 TO CONFIRM. POSSIBLY INTENTIONALLY LOADED SO AS TO NOT BE ABLE TO SEARCH IT BY PUBLIC OR EMPLOYEE (SIMILAR TO WHAT WAS DONE TO LICENSE OTC10206) OR INACTIVE. IT IS AN ACTIVE AHCCCS REGISTRATION AND THEREFORE BILLING CAN OCCUR IN THIS B8 FOR AIHP. See attached.

Laroie Davis opened this location as a BHRF in 2016 (per AHCCCS public information). This house was owned by Jerome Davis and sold on 5/25/21 to ROBIN M & KENNETH J DEAN MARYAM A SHAMSID DEEN. There are several LLC's under Jerome Davis (15+ LLC's on ACC) that are used as either a BHRF or sober houses, or "intake houses" the Native Americans have reported.

This location appears to have been in operation in the past or it is simply being used as a location (loaded with AHCCCS) to bill out of. We suspect It was in Jerome's name as to not draw any attention to Laroie as an employee of AzDHS. Unable to determine the relationship to Jerome Davis - if he is related/or alive. Only record of Jerome L. Davis – deceased 4/4/2021 but a sale of this property by Jerome took place in May of 2021, (after death) to Maryam Shamsid Deen, (as her sole and separate property) which is the wife of Robert (Ryan) McNeal, who is the COO of A Path of Resilience, LLC. See attached detail of the transaction and the signatures (public records) of Jerome Davis in 2015 compared to the signature in May of 2021 (when the house was sold) which does not match.

AzDHS License Information and Registration Information from AHCCCS portal.



Medical Facilities Report

[New Search](#) [Provider List](#)

This report is published by the Arizona Department of Health Services (ADHS) Division of Licensing Services. For assistance, please contact the Office of Medical Facilities at Phone (602) 364-3030; Fax (602) 364-4764.

[Provider Type Info](#)



Name: **APRBHS-ROSE HOUSE**

Address: **2258 WEST WAYLAND ROAD**
PHOENIX, AZ 85041

Phone: (602) 281-0704

Fax: () -

Facility ID: BH6251

License Effective: 5/1/2021

License Expires: 4/30/2022

Licensee: **A PATH OF RESILIENCE, LLC**

License: OTC10206

Provider Type: **OUTPATIENT TREATMENT CENTER**

The table below displays the Survey dates for all Inspections for the above provider. The Survey dates displayed are all inspections in the last three years from today's date.

	Survey Date	
Select	5/21/2020	Export to PDF
Select	12/20/2021	Export to PDF

No Enforcement Actions for this Provider.



APRBHS-ROSE HOUSE [Export to PDF](#)

2258 WEST WAYLAND ROAD
PHOENIX, AZ 85041
(602) 281-0704

Survey Date - 12/20/2021

[New Search](#) [Facility Info](#)

Health Survey Comments

There were deficiencies found during the unannounced onsite State Compliance survey conducted on December 20, 2021. Based on the State rules found in R9-10 Article 19: Counseling Facility, the Department is approving the facility to continue operating as a Counseling Facility and to provide the following authorized services: Behavioral Health Services. Stephanie Carmona, MPH 12/20/2021.

Findings Report Summary

Date Corrected	Findings	Rule/Statute	Title
01/06/2022	Citation1	Changes Affecting a License	R9-10-109.A.1.b.i-ii

[Privacy Policy](#) | [Questions or Comments](#) | [ADHS Webmaster](#) | [HHPAA](#)

150 N. 18th Avenue, Phoenix AZ 85007 Phone: (602) 542-1025 Fax: (602) 542-0883
2007-2021 Arizona Department of Health Services. All rights reserved. Last Modified: 01/08/2021

Survey Findings/Facility Response

Facility : APRBHS-ROSE HOUSE

Survey Date - 12/20/2021 - Citation1

Survey Findings

Based on review of facility documents and observation onsite, the Department determined that the administrator failed to ensure that the Department was notified at least 30 calendar days prior to a change in their hours of operation. This failure poses the potential risk that the Counseling Facility clients will be not have access to counseling services when needed.

Findings include

Review of the initial license application, the Clinic hours are Saturday through Sunday 24 hours.

The surveyor arrived at the facility on 12/20/21 at 1018 hours. Upon approaching the facility it was observed that there were no lights on inside the house, or there is a no "closed" sign or any other form of closure notification placed on the front door. After knocking on front door, a house resident opened front door and notified surveyor that no staff was present on site but did provide staff information.

Staff was contacted to notify of the Department's arrival and stated no one could conduct the survey until Wednesday 12/23/21.

As of this writing on 12/20/21 the Department has not been notified in writing (textile or electronic) of a change in the facility's hours of operation.

Rule/Statute

R9-10-109.Changes Affecting a License

A. A licensee shall ensure that:

1. The Department is notified in writing at least 30 calendar days before the effective date of:
- b. A change in the hours of operation:
 - i. Of an administrative office, or
 - ii. For providing physical health services or behavioral health services to patients of the health care institution;

Facility Response

The date (01/06/2022) represents when the facility corrected the citation and was confirmed by the Department to be back in compliance. A facility is required to submit a Plan of Correction (POC) for each citation identified during a survey. This Plan of Correction describes how the facility is going to make corrections, the facility representative responsible for making the corrections, and what systems are in place to prevent recurrence. Once the facility has submitted an acceptable Plan of Correction, the Department confirms that the citation is corrected.

For a copy of the Plan of Correction, please contact the facility or the Department of Health Services.

Spelling?

Enrollment Info

Provider: 194917 A PATH OF RESILIENCE, LLC
NPI: 1992254338
Provider Type: B8 BEHAVIORAL HEALTH RESIDENTIAL FACILITY

Provider Status: A ACTIVE
Enroll Beg Date: 09/16/2016
Enroll End Date:

Address Info

Address 1: 6102 S 37TH LN
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone: 602-535-4525
Emergency Phone: 602-281-0704

Location Code: 01
Address Type: CORRESPONDENCE
Attention: LAROE DAVIS
Date Begin: 09/16/2016
Date End:
Tax ID:

Address 1: 6102 S 37TH LN
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone: 602-535-4525
Emergency Phone:

Location Code: 01
Address Type: PAY TO
Attention:
Date Begin: 09/16/2016
Date End:
Tax ID:

Address 1: 6102 S 37TH LN
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone: 602-535-4525
Emergency Phone:

Location Code: 02
Address Type: SERVICE
Attention:
Date Begin: 01/23/2020
Date End:
Tax ID:

Provider Affiliations

Provider ID	Provider Name	Begin Date	End Date
929752	DAVIS/JEROME	01/23/2020	01/23/2020

Group Affiliations

RECORD(S) NOT FOUND

Care Coordination Agreement (CCA) Affiliations

RECORD(S) NOT FOUND

Service Info

Code	Description	Begin Date	End Date
26	RESPITE CARE SERVICES	09/16/2016	
47	MENTAL HEALTH SERVICES	09/16/2016	

AZ AHCCCS ONLINE: Provider Information*Spelling***Enrollment Info**

Provider: 079577 A PATH OF RESILIENCE
NPI: 1497372908
Provider Type: 77 BH OUTPATIENT CLINIC

Provider Status: A ACTIVE
Enroll Beg Date: 05/21/2020
Enroll End Date:

Address Info

Address 1: 2258 W WAYLAND RD
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone: 602-281-0704
Emergency Phone:

Location Code: 01
Address Type: CORRESPONDENCE
Attention:
Date Begin: 05/21/2020
Date End:
Tax ID:

Address 1: 2258 W WAYLAND RD
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone:
Emergency Phone:

Location Code: 01
Address Type: PAY TO
Attention:
Date Begin: 05/21/2020
Date End:
Tax ID:

Address 1: 2258 W WAYLAND RD
Address 2:
City State Zip: PHOENIX AZ 85041
County: MARICOPA
Business Phone:
Emergency Phone:

Location Code: 01
Address Type: SERVICE
Attention:
Date Begin: 05/21/2020
Date End:
Tax ID:

Provider Affiliations

RECORD(S) NOT FOUND

Group Affiliations

RECORD(S) NOT FOUND

Care Coordination Agreement (CCA) Affiliations

RECORD(S) NOT FOUND

Service Info

Code	Description	Begin Date	End Date
01	MEDICINE	05/21/2020	
16	OUT-PATIENT FACILITY FEES	05/21/2020	
26	RESPIRE CARE SERVICES	05/21/2020	
31	NON-EMERGENCY TRANSPORTATION	07/10/2020	
39	PERSONAL CARE SERVICES	05/21/2020	
47	MENTAL HEALTH SERVICES	05/21/2020	

Enrollment Info

Provider: 929752 DAVIS/JEROME
NPI: 1275942955
Provider Type: A5 BEHAVIORAL HEALTH THERAPEUTIC HOME

Provider Status: A ACTIVE
Enroll Beg Date: 07/31/2014
Enroll End Date:

Address Info

Address 1: HUMAN SERVICES CONSULTANT
Address 2: PO BOX 16906
City State Zip: PHOENIX AZ 85011
County: MARICOPA
Business Phone: 602-279-1427
Emergency Phone: 602-524-9406

Location Code: 01
Address Type: CORRESPONDENCE
Attention: SHANNON KIRWAN
Date Begin: 07/31/2014
Date End:
Tax ID:

Address 1: HUMAN SERVICES CONSULTANT
Address 2: PO BOX 16906
City State Zip: PHOENIX AZ 85011
County: MARICOPA
Business Phone: 602-279-1427
Emergency Phone: 602-524-9406

Location Code: 01
Address Type: PAY TO
Attention: SHANNON KIRWAN
Date Begin: 07/31/2014
Date End:
Tax ID:

Address 1: 3212 W. MELODY DR
Address 2:
City State Zip: LAVEEN AZ 85339
County: MARICOPA
Business Phone: 602-279-1427
Emergency Phone: 602-524-9406

Location Code: 01
Address Type: SERVICE
Attention: SHANNON KIRWAN
Date Begin: 07/31/2014
Date End:
Tax ID:

Provider Affiliations

RECORD(S) NOT FOUND

Group Affiliations

Group ID	Group Name	Begin Date	End Date
707911	HUMAN SERVICES CONSULTANT	07/31/2014	

Care Coordination Agreement (CCA) Affiliations

RECORD(S) NOT FOUND

Service Info

Code	Description	Begin Date	End Date
26	RESPITE CARE SERVICES	07/31/2014	
35	ADULT FOSTER CARE	07/31/2014	
47	MENTAL HEALTH SERVICES	07/31/2014	

Real Estate Owned and Recent Purchases

Real Estate Purchased:

Tax MLS Foreclosures Quick Search

New Recent Saved

Quick Search **laroie davis**

Search Clear Save

Ⓐ \$4,251,050

Export Labels Options List Of Results Print

Cards Rows Map Sort by Price: High to Low

Showing 1 - 7 of 7 properties (0 selected).

Select Page 1

	Year Built	Lot Size	Sqft	APN	Sold	Price	Date
1. LAROIE S DAVIS 301 E JOMAX RD Phoenix, AZ 85085 Maricopa	1989	237,172	2,368	APN 210-14-034-F MLS 6252987	<input type="checkbox"/>	\$1,841,050	11/23/2021
2. LAROIE S DAVIS 2013 N 1ST AVE Phoenix, AZ 85003 Maricopa	2008	2,368	4,831	APN 118-51-136 MLS 6294960	<input type="checkbox"/>	\$1,600,000	01/31/2022
3. LAROIE S DAVIS , AZ Maricopa	0	53,641	0	APN 203-37-004-H MLS 6107469	<input type="checkbox"/>	\$100,000	12/29/2021
4. LAROIE S DAVIS , AZ Maricopa	0	53,776	0	APN 203-37-004-G MLS 6107471	<input type="checkbox"/>	\$100,000	12/29/2021
5. LAROIE S DAVIS , AZ Maricopa	0	53,866	0	APN 203-37-004-F MLS 6107459	<input type="checkbox"/>	\$100,000	12/29/2021
6. LAROIE S DAVIS , AZ Maricopa	0	53,938	0	APN 203-37-004-E MLS 6107463	<input type="checkbox"/>	\$100,000	12/29/2021
7. LAROIE S & TAMMY A DAVIS 2258 W WAYLAND RD Phoenix, AZ 85041 Maricopa	1973	7,153	1,475	APN 105-75-426-A	<input type="checkbox"/>		

→ next page

Personal Property

Maricopa Assessor Parcel # 210-14-034-F



Property Information

Property Owner	LAROE S DAVIS
Property Address	301 E Jomax Rd Phoenix, AZ 85085-0665 Maricopa County
Tax Mailing Address	Laroe S Davis 301 E Jomax Rd Phoenix, AZ 85085-0665
Property Type	(8714) SFR ON 5+ AC, RURAL NON-SUBDIV
Legal Class	(03-01) OWNER OCCUPIED RESID
Lot/Block/Tract	-/-

Area Information

Subdivision	
Section/Town/Range	5/4N/3E
Census Tract	612300
Census Block	1004
Latitude	33.7252188630795
Longitude	-112.069194038572
Tax Area	970000
Tax Municipality	Maricopa - County
School Districts	Deer Valley Unified District#97

Legal Description

Abbr. Legal Description	N/A
Full Legal Description	LOTS 7 & 8 SEC 5 IN NE4 EX N 90F TH/OF & ALSO N 100F OF LOT 33 SD SEC & EX A POR LOT 7 SEC 5 T 4N T 3E DAF COM NW COR GLO LOT 7 TH E 253.53F POB TH S 01D 14M E 229.95F TH W 189.37F TH N 01D 14M W 229. 79F TH E 189.37 TO POB P/F 07-0141848

Land Areas

Lot	County Zone
Size: 5.445 acres / 237,172 sqft	[R-43] RESIDENTIAL WITH 43,000 SF MINIMUM: 100%
<ul style="list-style-type: none"> Mountain Premium View 	

Structure:

(8714) SFR ON 5+ AC, RURAL NON-SUBDIV Class:: CLASS R4, ABOVE AVERAGE

Structure Information

Bathroom Fixtures:	11
Living Area:	2,368 sqft
Year Built:	1989
Stories:	S

Construction

Roof Material:	CONCRETE TILE
Heat:	YES
Construction:	OTHER
Pool:	650 sqft
Added Attached:	None

Additional Features

A/C:	REFRIGERATION
Patio:	SLAB & COVERED
Covered Parking:	GARAGE - 4
Added Detached:	927 sqft

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
11/23/2021	LAROE S DAVIS	BRYAN BARRETT	\$1,841,050	\$393,692	\$1,472,840	Warranty	Fannie/Freddie	Normal Sale	20211253493
04/19/2019	BRYAN BARRETT	PRESTON L & KAREE BARRETT	\$0	\$0	\$0	Special Warranty			20190278625
01/05/2018	BRYAN BARRETT	BRYAN BARRETT	\$0	\$0	\$0	Warranty			20180012160
05/27/2014	BRYAN BARRETT	MORENO TEWAHAY INC	\$700,000	\$137,500	\$562,500	Warranty	Conventional	Normal Sale	20140342616

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
11/23/2021	LAROE S DAVIS	ACC MORTGAGE INC	\$1,472,840	Conventional	20211253494

Subdivision -

Subdivision Details

Improved Lots:	657
Year Built Range:	1943 - 2020
With Pool:	216 (33%)

Stories

Single Story:	562
Multiple Story:	95

Average House

Sqft:	4,179
Lot Sqft:	119,714
Fixtures:	8

Personal Property

Maricopa Assessor Parcel # 118-51-136



Property Information		Area Information	
Property Owner	LAROE S DAVIS	Subdivision	CHATEAUX ON CENTRAL
Property Address	2013 N 1St Ave Phoenix, AZ 85003-1156 Maricopa County	Section/Town/Range	32/2N/3E
Tax Mailing Address	Laroe S Davis 2245 W Wayland Phoenix, AZ 85041	Census Tract	111800
Property Type	(8560) TOWNHOUSES - (GRADED 850-6) DEFAULT	Census Block	2015
Legal Class	(03-XX) OWNER OCCUPIED RESID	Latitude	33.4698931973799
Lot/Block/Tract	171/-	Longitude	-112.075623127841
MCR Number	072232	Tax Area	011300
		Tax Municipality	Phoenix
		School Districts	Phoenix Elementary District#01 Phoenix Union High School District#210

Legal Description	
Abbr. Legal Description	LOT 17 CHATEAUX ON CENTRAL MCR 072232
Full Legal Description	CHATEAUX ON CENTRAL MCR 722-32

Land Areas

Lot	County Zone	City Zone
Size: 0,054 acres / 2,368 sqft	[R-MX] RESIDENTIAL, MIXED: 100%	[UR] Urban Residential (May Apply Between 7th Ave. 100% To 7th St. & Lincoln St. To Grand Canal):

Structure:

(8560) TOWNHOUSES - (GRADED 850-6) DEFAULT	Class::	CLASS R6, CUSTOM
--	---------	------------------

Structure Information	Construction	Additional Features
Bathroom Fixtures: 18	Roof Material: METAL	A/C: REFRIGERATION
Living Area: 4,831 sqft	Heat: YES	Patio: COVERED
Year Built: 2008	Construction: BRICK	Covered Parking: GARAGE - 2
Stories: M	Added Attached: None	Added Detached: None
Builder Name: ROWLAND		

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
01/31/2022	LAROE S DAVIS	MSI WEST INVESTMENTS LLC	\$1,600,000	\$330,560	\$0	Miscellaneous			20220092064
06/14/2010	MSI WEST INVESTMENTS LLC	ML SERVICING CO INC	\$0	\$0	\$0	Correction			20100503105
03/12/2010	MSI WEST INVESTMENTS LLC	ML SERVICING CO INC	\$0	\$0	\$0	Special Warranty			20100212646
03/12/2010	ML SERVICING CO INC ML MANAGER LLC	RONALD L KOHNER	\$0	\$0	\$0	Quit Claim			20100212644
03/12/2010	ML SERVICING CO INC ML MANAGER LLC	WILLIAM C LEWIS	\$0	\$0	\$0	Quit Claim			20100212643
03/12/2010	ML SERVICING CO INC ML MANAGER LLC	SUN VALLEY ARTHRITIS CENTER LTD	\$0	\$0	\$0	Quit Claim			20100212642
03/12/2010	ML SERVICING CO INC ML MANAGER LLC	ROBERT V & KATHLEEN A RUSSO	\$0	\$0	\$0	Quit Claim			20100212641
05/21/2008	MORTGAGES LTD	CENTRAL PHX PARTNERS LLC	\$0	\$0	\$0	Special Warranty			20080450341

No Loan History: \$

Subdivision - CHATEAUX ON CENTRAL

Subdivision Details

Improved Lots: 17
 Year Built Range: 2008 - 2012
 With Pool: 0 (0%)

Stories

Single Story: 0
 Multiple Story: 17

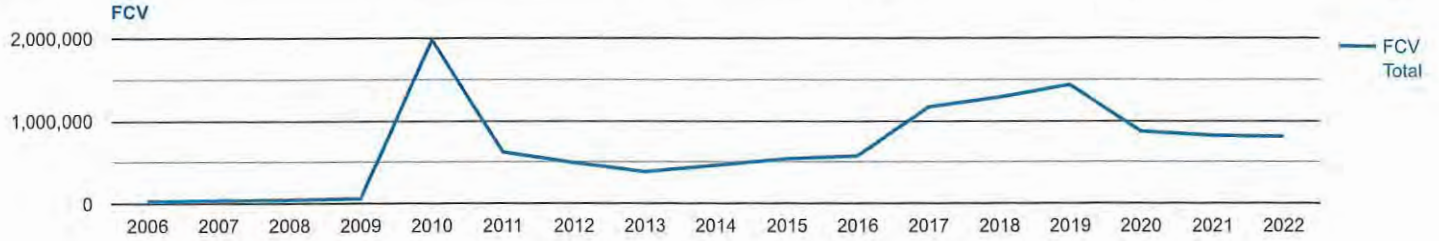
Average House

Sqft: 5,114
 Lot Sqft: 3,074
 Fixtures: 18

Tax Assessment History

Full Cash Value (FCV) Limited Property Value based on Proposition 117 (2012) (LPV) Year over Year (YoY)

	2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement	\$1,020,800	\$1,139,600	\$693,900	\$654,300	\$643,300
FCV Land	\$255,200	\$284,900	\$173,400	\$163,500	\$160,800
FCV Total	\$1,276,000	\$1,424,500	\$867,300	\$817,800	\$804,100
FCV YoY Change	10%	12%	-39%	-6%	-2%
Assessed FCV	\$127,600	\$142,450	\$86,730	\$81,780	\$80,410
LPV Total	\$910,429	\$955,950	\$867,300	\$817,800	\$804,100
State Aid	\$0	\$0	\$0	\$0	\$0
Tax Amount	\$16,120	\$16,400	\$14,194	\$12,601	\$0

**Flood Information**

Map Number: 04013C2205L
 Map Date: 2013-10-16
 Panel: 2205L
 FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

OTC

Maricopa Assessor Parcel # 105-75-426-A

Parcel Dimensions Download Map

Property Information		Area Information	
Property Owner	LAROE S & TAMMY A DAVIS	Subdivision	PARK PHOENIX 3
Property Address	2258 W Wayland Rd Phoenix, AZ 85041-3753 Maricopa County	Section/Town/Range	25/1N/2E
Tax Mailing Address	Laroe S & Tammy A Davis 1709 E Carter Rd Phoenix, AZ 85042-5753	Census Tract	115600
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV	Census Block	1017
Legal Class	(03-01) OWNER OCCUPIED RESID	Latitude	33.3943686814835
Lot/Block/Tract	398/-/-	Longitude	-112.105961894808
MCR Number	009720	Tax Area	661300
		Tax Municipality	Phoenix
		School Districts	Roosevelt Elementary District#66 Phoenix Union High School District#210

Legal Description

Abbr. Legal Description	LOT 398 PARK PHOENIX 3 MCR 009720
Full Legal Description	PARK PHOENIX 3 LOT 398

Land Areas

Lot	County Zone	City Zone
Size: 0.164 acres / 7,153 sqft	[R-6] RESIDENTIAL WITH 6,000 SF MINIMUM: 100%	[R1-6] Single Family Residence (Density Range Of 5 100% To 5.5 Or 6.5 W/Bonus):

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV	Class: CLASS R3, AVERAGE	
Structure Information	Construction	Additional Features
Rooms: 5	Roof Material: ASPHALT SHINGLE	A/C: EVAPORATIVE COOLING
Bathroom Fixtures: 6	Heat: YES	Patio: COVERED
Living Area: 1,475 sqft	Construction: 8" PAINTED BLOCK	Covered Parking: GARAGE - 2
Year Built: 1973	Added Attached: None	Added Detached: None
Stories: S		

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
08/04/2006	LAROE S & TAMMY A DAVIS	LEE O CONNER JR	\$0	\$0	\$88,000	Warranty	Fannie/Freddie		20061044183
03/04/2004	LEE O CONNER JR	LEE O CONNER JR	\$0	\$0	\$0	Quit Claim			20040226590
10/02/1998	LEE O & ROSE M CONNER JR	LEE O CONNER JR	\$0	\$0	\$0	Joint Tenancy			1998 0885157
06/02/1989	GEORGE SIMONDS		\$0	\$0	\$37,393	Miscellaneous	Fha		1989 0253631

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
04/29/2013	DAVIS,LAROE S	WELLS FARGO BANK	\$149,392	Fha	20130387550
04/30/2008	DAVIS,LAROE S	WELLS FARGO BANK	\$159,101	Fha	20080380589
08/04/2006	DAVIS,LAROE S & TAMMY A	WELLS FARGO BANK	\$88,000	Fannie/Freddie	20061044184

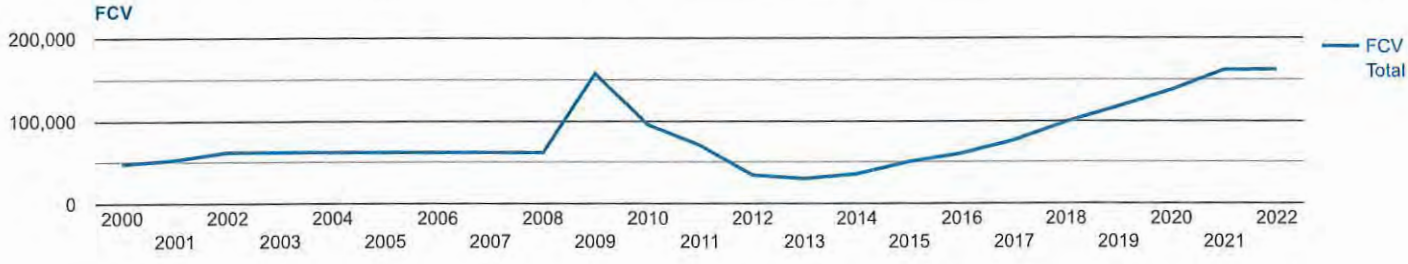
Subdivision - PARK PHOENIX 3

Subdivision Details	Stories	Average House
Improved Lots: 212	Single Story: 211	Sqft: 1,631
Year Built Range: 1960 - 2017	Multiple Story: 1	Lot Sqft: 7,074
With Pool: 3 (1%)		Fixtures: 5

Tax Assessment History

Full Cash Value (FCV)	Limited Property Value based on Proposition 117 (2012) (LPV)	Year over Year (YoY)
2018 Final	2019 Final	2020 Final
		2021 Final
		2022 Prelim

FCV Improvement	\$78,200	\$93,100	\$109,400	\$128,700	\$129,100
FCV Land	\$19,500	\$23,200	\$27,300	\$32,100	\$32,200
FCV Total	\$97,700	\$116,300	\$136,700	\$160,800	\$161,300
FCV YoY Change	29%	19%	18%	18%	0%
Assessed FCV	\$9,770	\$11,630	\$13,670	\$16,080	\$16,130
LPV Total	\$39,177	\$41,136	\$43,193	\$45,353	\$47,621
State Aid	\$73	\$74	\$75	\$76	\$0
Tax Amount	\$659	\$678	\$702	\$711	\$0

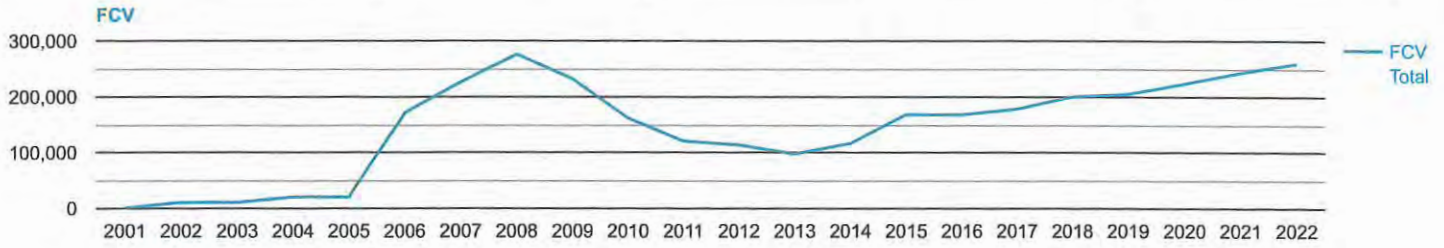


Flood Information

Map Number: 04013C2215L
 Map Date: 2013-10-16
 Panel: 2215L
 FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

FCV Improvement	\$160,400	\$164,000	\$179,000	\$194,900	\$207,700
FCV Land	\$40,100	\$41,000	\$44,700	\$48,700	\$51,900
FCV Total	\$200,500	\$205,000	\$223,700	\$243,600	\$259,600
FCV YoY Change	12%	2%	9%	9%	7%
Assessed FCV	\$20,050	\$20,500	\$22,370	\$24,360	\$25,960
LPV Total	\$130,364	\$136,882	\$143,726	\$150,912	\$158,458
State Aid	\$242	\$245	\$249	\$252	\$0
Tax Amount	\$2,271	\$2,388	\$2,381	\$2,446	\$0



Flood Information

Map Number: 04013C2660L
Map Date: 2013-10-16
Panel: 2660L
FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

Maricopa Assessor Parcel # 105-75-311-

A



Property Information

Property Owner ODIS D & JANET L HOLLOWAY HOLLOWAY FAMILY LIVING TRUS

Property Address 2245 W Wayland Rd Phoenix, AZ 85041-3752 Maricopa County

Tax Mailing Address Odis D & Janet L Holloway 2245 W Wayland Rd Phoenix, AZ 85041-3752

Property Type (0131) SFR GRADE 010-3 URBAN SUBDIV

Legal Class (03-01) OWNER OCCUPIED RESID

Lot/Block/Tract 372/-/-

MCR Number 009720

Area Information

Subdivision PARK PHOENIX 3

Section/Town/Range 25/1N/2E

Census Tract 115600

Census Block 1013

Latitude 33.3945277701917

Longitude -112.105404928696

Tax Area 661300

Tax Municipality Phoenix

School Districts Roosevelt Elementary District#66 Phoenix Union High School District#210

Legal Description

Abbr. Legal Description LOT 372 PARK PHOENIX 3 MCR 009720

Full Legal Description PARK PHOENIX 3 LOT 372

Land Areas

Lot	County Zone	City Zone
Size: 0.171 acres / 7,466 sqft	[R-6] RESIDENTIAL WITH 6,000 SF MINIMUM: 100%	[R1-6] Single Family Residence (Density Range Of 5 100% To 5.5 Or 6.5 W/Bonus):

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV Class: CLASS R3, AVERAGE

Structure Information

Rooms: 7
 Bathroom Fixtures: 6
 Living Area: 1,996 sqft
 Year Built: 1973
 Stories: S

Construction

Roof Material: ASPHALT SHINGLE
 Heat: YES
 Construction: SLUMP BLOCK
 Added Value: None
 Added Attached: None

Additional Features

A/C: REFRIGERATION
 Patio: COVERED
 Covered Parking: GARAGE - 2
 Land Premium: None
 Added Detached: None

Deed History

Sale Date	Buyer	Seller	Sale			Deed	Financing	Transaction	Doc #
			Price	Down	Mortgage				
06/15/2021	ODIS D & JANET L HOLLOWAY HOLLOWAY FAMILY LIVING TRUST	ODIS D & JANET LAYNETTE HOLLOWAY	\$0	\$0	\$0	Special Warranty			20210657805
11/27/1985	ODIS D & JANET LAYNETTE HOLLOWAY		\$57,500	\$0	\$0	Miscellaneous			1985 0567341

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
08/31/2021	HOLLOWAY, JANET L	AMERIFIRST FINANCIAL INC	\$150,000	Conventional	20210942562

Subdivision - PARK PHOENIX 3

Subdivision Details

Improved Lots: 212
 Year Built Range: 1960 - 2017
 With Pool: 3 (1%)

Stories

Single Story: 211
 Multiple Story: 1

Average House

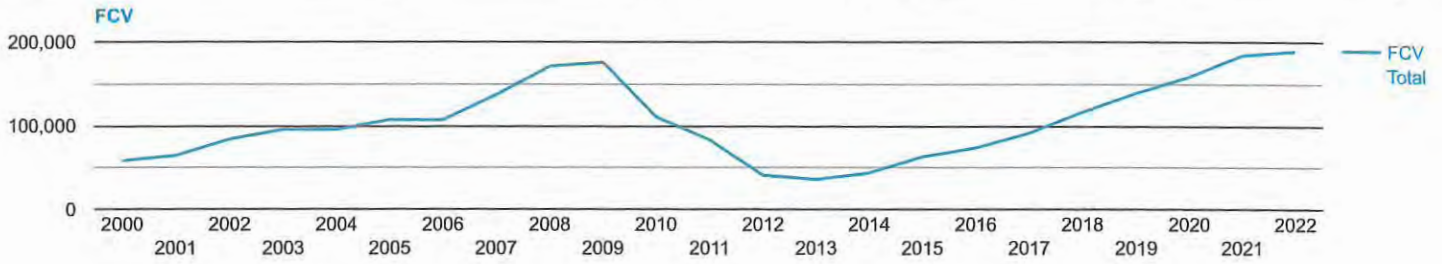
Sqft: 1,631
 Lot Sqft: 7,074
 Fixtures: 5

Tax Assessment History

Full Cash Value (FCV) Limited Property Value based on Proposition 117 (2012) (LPV) Year over Year (YoY)

	2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement	\$92,900	\$111,200	\$126,900	\$147,400	\$151,400

FCV Land	\$23,200	\$27,800	\$31,700	\$36,800	\$37,800
FCV Total	\$116,100	\$139,000	\$158,600	\$184,200	\$189,200
FCV YoY Change	27%	20%	14%	16%	3%
Assessed FCV	\$11,610	\$13,900	\$15,860	\$18,420	\$18,920
LPV Total	\$48,134	\$50,541	\$53,068	\$55,721	\$58,507
State Aid	\$89	\$90	\$92	\$93	\$0
Tax Amount	\$809	\$833	\$863	\$873	\$0



🔥 Flood Information

Map Number: 04013C2215L
Map Date: 2013-10-16
Panel: 2215L
FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

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Price: High to Low

Showing 1 - 2 of 2 properties (0 selected).

Quick Search

maryam-shamsid deen

Search

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Select Page 1

Robert (Ryan) McNeal's wife.

This registered with AHCCCS but not AZDHS.

1. ROBIN M & KENNETH J DEAN MARYAM A SHAMSID DEEN	Year Built	Lot Size	Sqft	APN 105-90-811	Sold
6102 S 37TH LN Phoenix, AZ 85041 Maricopa	2005	6,170	2,656	MLS 5769665	\$350,000 05/25/2021
2. ROBERT MCNEAL MARYAM A SHAMSID-DEEN	Year Built	Lot Size	Sqft	APN 122-92-121	Sold
1805 E ALTA VISTA RD Phoenix, AZ 85042 Maricopa	1983	6,865	2,071	MLS 5594349	\$190,000 08/31/2017

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BURE

Maricopa Assessor Parcel # 105-90-811

Parcel Dimensions Download Map

Map data ©2022

- Sold
- Pending
- Off Market
- Active
- Cancelled
- Foreclosure
- UCB
- Expired
- Coming Soon

Property Information

Property Owner ROBIN M & KENNETH J DEAN
MARYAM A SHAMSID DEEN

Property Address 6102 S 37Th Ln
Phoenix, AZ 85041-5021
Maricopa County

Tax Mailing Address Robin M & Kenneth J Dean
9842 S 47Th Pl
Phoenix, AZ 85044-5528

Property Type (0131) SFR GRADE 010-3
URBAN SUBDIV

Legal Class (03-01) OWNER
OCCUPIED RESID

Lot/Block/Tract 20/-/-

MCR Number 065047

Area Information

Subdivision VISTA RIO

Section/Town/Range 34/1N/2E

Census Tract 116606

Census Block 3000

Latitude 33.391112192491

Longitude -112.139905116922

Tax Area 591300

Tax Municipality Phoenix

School Districts Laveen Elementary District#59
Phoenix Union High School District#210

Legal Description

Abbr. Legal Description LOT 20 VISTA RIO MCR 065047

Full Legal Description VISTA RIO MCR 650-47

Land Areas

Lot	County Zone	City Zone
Size: 0.142 acres / 6,170 sqft • Corner	[R-8] RESIDENTIAL WITH 8,000 SF MINIMUM: 100%	[R1-8] Single Family Residence (Density Range Of 4 100% To 4.5 Or 5.5 W/Bonus):

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV Class: CLASS R3, AVERAGE

Structure Information

Bathroom Fixtures: 11
Living Area: 2,656 sqft
Year Built: 2005
Stories: M
Builder Name: US HOME CORP

Construction

Roof Material: CONCRETE TILE
Heat: YES
Construction: FRAME WOOD
Added Attached: None

Additional Features

A/C: REFRIGERATION
Patio: COVERED
Covered Parking: GARAGE - 2
Added Detached: None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
05/25/2021	ROBIN M & KENNETH J DEAN MARYAM A SHAMSID DEEN	JEROME DAVIS	\$350,000	\$17,500	\$332,500	Warranty	Fannie/Freddie	NON MLS	20210580778
06/27/2018	JEROME DAVIS	OFFERPAD (SPV BORROWER 1) LLC	\$240,000	\$12,000	\$228,000	Warranty	Fannie/Freddie	Flip	20180490671
04/30/2018	OFFERPAD (SPV BORROWER 1) LLC	JESUS & ERICA DIAZ	\$215,000	\$215,000	\$0	Warranty		NON MLS	20180325944
11/24/2008	JESUS & ERICA DIAZ	HSBC BANK USA NA	\$177,780	\$6,400	\$176,326	Special Warranty	Fha		20081004231
06/27/2008	HSBC BANK USA NA	FREMONT INVESTMENT & LOAN	\$0	\$0	\$0	Correction			20080569689
11/21/2007	FREMONT INVESTMENT & LOAN	KEVIN E CRAWFORD	\$192,000	\$0	\$0	Trustees			20071241771
03/17/2006	KEVIN E CRAWFORD	U S HOME INC	\$241,958	\$12	\$193,566	Warranty	Fannie/Freddie		20060363672
05/13/2005	U S HOME INC	CURTIS LAND HOLDINGS INC	\$3,649,074	\$3,649,074	\$0	Warranty			20050635388
11/13/2003	CURTIS LAND HOLDINGS INC	PAUL BRECKNER	\$1,517,000	\$50,000	\$2,800,000	Special Warranty	Construction		20031564145

Loan Origination History: \$

Subdivision - VISTA RIO

Subdivision Details

Improved Lots: 82
 Year Built Range: 2005 - 2006
 With Pool: 6 (7%)

Stories

Single Story: 36
 Multiple Story: 46

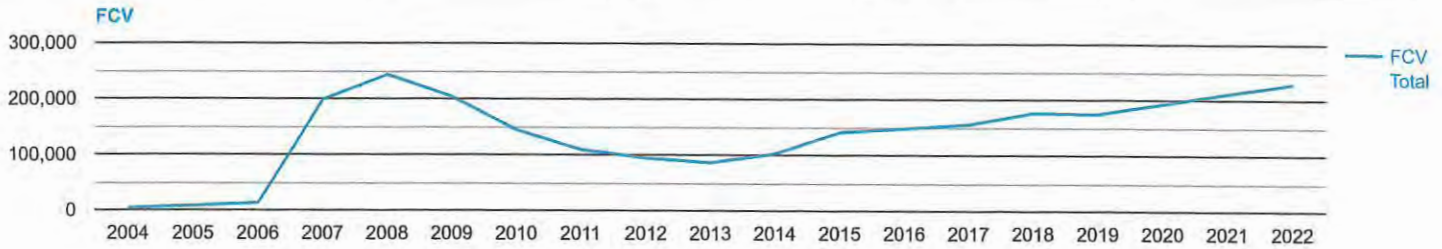
Average House

Sqft: 2,055
 Lot Sqft: 6,624
 Fixtures: 7

Tax Assessment History

Full Cash Value (FCV) Limited Property Value based on Proposition 117 (2012) (LPV) Year over Year (YoY)

	2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement	\$140,900	\$139,800	\$154,300	\$169,100	\$182,900
FCV Land	\$35,200	\$34,900	\$38,500	\$42,200	\$45,700
FCV Total	\$176,100	\$174,700	\$192,800	\$211,300	\$228,600
FCV YoY Change	13%	-1%	10%	10%	8%
Assessed FCV	\$17,610	\$17,470	\$19,280	\$21,130	\$22,860
LPV Total	\$115,789	\$121,578	\$127,657	\$134,040	\$140,742
State Aid	\$215	\$217	\$221	\$224	\$0
Tax Amount	\$2,017	\$2,121	\$2,115	\$2,173	\$0



Flood Information

Map Number: 04013C2195L
 Map Date: 2013-10-16
 Panel: 2195L
 FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

RECORDING REQUESTED BY
DRIGGS TITLE AGENCY, INC.
WHEN RECORDED MAIL TO:
ROBERT MCNEAL AND MARYAM A. SHAMSID-DEEN
1805 EAST ALTA VISTA ROAD
PHOENIX, AZ 85042

19
Ho:

ESCROW NO. 19-11-158250KV

112

Warranty Deed

For the consideration of Ten Dollars, and other valuable considerations, I or we,

Maryam A. Shamsid-Deen, a married woman as her sole and separate property and Robin M. Dean and Kenneth Dean, wife and husband
as GRANTOR(s)

do/does hereby convey to

Robert McNeal and Maryam A. Shamsid-Deen, husband and wife
as GRANTEE(s)

the following real property situated in Maricopa County, Arizona:

Lot 115, of AMBERFIELD UNIT ONE, according to Book 219 of Maps, Page 8, Records of Maricopa County, Arizona.

APN: 122-92-121

Exempt per 11-1134 B3

SUBJECT TO: Current taxes and other assessments, reservations in patents and all easements, rights of way, encumbrances, liens, covenants, conditions, restrictions, obligations, and liabilities as may appear of record.

And the Grantor does warrant the title against all persons whomsoever, subject to the matters set forth above.

Acceptance is attached hereto and made a part herewith.

Dated: December 06, 2019

Warranty Deed

Escrow No. 19-11-158250KV
APN #: 122-92-121

Grantor(s)

[Signature]
Robin M. Dean

[Signature]
Maryam. A. Shamsid-Deen

[Signature]
Kenneth Dean

State of ARIZONA

County of MARICOPA

}
} SS:
}

*Maryam A. Shamsid-Deen

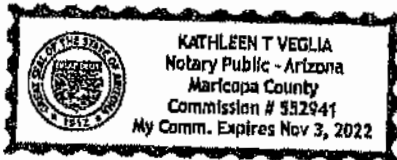
On Dec 7, 2019, before me the undersigned Notary Public, personally appeared *Robin M. Dean and Kenneth Dean, known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

Unofficial Document

WITNESS my hand and official seal.

Signature [Signature]

My Commission Expires 11-03-22



Acceptance of Community Property with Right of Survivorship

Each being first duly sworn upon oath each for himself or herself and jointly but not one for the other deposes and says,


THAT I am one of the Grantee(s) named in that certain Deed attached hereto and which is dated December 06, 2019, and executed by*, as Grantor(s), to Robert McNeal and Maryam A. Shamsid-Deen, as Grantee(s), and which conveys certain premises described as:

Lot 115, of AMBERFIELD UNIT ONE, according to Book 219 of Maps, Page 8, Records of Maricopa County, Arizona.
*Maryam A. Shamsid-Deen and Robin M. Dean and Kenneth Dean
APN: 122-92-121

To the Grantee(s) named therein, not as Tenants in Common, not as Community Property Estate, not as Joint Tenants with Full Right of Survivorship, but as Community Property with Full Right of Survivorship.

THAT each of us individually and jointly as Grantee(s) hereby asserts and affirms that it is our intention to accept said conveyance as such Community Property with Full Right of Survivorship and to acquire any interest we may have in said premises under the terms of said Deed as Community Property with Right of Survivorship.

Dated December 06, 2019


Robert McNeal


Maryam A. Shamsid-Deen

Unofficial Document

State of ARIZONA

}
} SS:
}

County of MARICOPA



On Dec 7, 2019, before me the undersigned Notary Public, personally appeared Robert McNeal and Maryam A. Shamsid-Deen, known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature  My Commission Expires: 11-03-22

Tax MLS Foreclosures Quick Search

Export Labels

Options List Of Results Print

New Recent Saved

Cards Rows Map Sort by Price: High to Low

Showing 1 - 4 of 4 properties (0 selected)

Quick Search **Jerome L. Davis**

Search Clear Save

Jerome L Davis
 Sold to R. McNeal wife
 in May 2021 6012 N 37th Lane
 However deceased
 record on April 4, 2021
 Signature of Jerome
 in 2015 doesn't
 match signature
 on deed when sold
 in May 2021, after
 death? Attached.

? Who lives
 here if
 deceased.

Property #	Owner	Year Built	Lot Size	Sqft	APN	Sold	Price	Date
1.	JEROME L DAVIS 3209 W APOLLO RD Phoenix, AZ 85041 Maricopa	2005	6,050	3,181	APN 105-91-431 MLS 6051879	<input checked="" type="checkbox"/>	\$312,000	08/20/2020
2.	DIANE L DAVIS 8030 E JEROME AVE Mesa, AZ 85209 Maricopa	1974	8,032	816	APN 218-63-085	<input type="checkbox"/>	\$73,500	12/26/2003
3.	JEROME & JANICE L DAVIS AZ Cochise	0	7,997	0	APN 208-83-167	<input type="checkbox"/>	\$0	06/27/1986
4.	JEROME & JANICE L DAVIS JEROME & JANICE L DAVIS TRUST 3478 E SHARON DR Phoenix, AZ 85032 Maricopa	1969	8,103	1,280	APN 166-52-023	<input type="checkbox"/>	-	-

Select Page 1

Maricopa Assessor Parcel # 105-91-431



Property Information		Area Information	
Property Owner	JEROME L DAVIS	Subdivision	LAVEEN VILLAGE AMD
Property Address	3209 W Apollo Rd Phoenix, AZ 85041-6338 Maricopa County	Section/Town/Range	35/1N/2E
Tax Mailing Address	Jerome L Davis 3209 W Apollo Rd Phoenix, AZ 85041-6338	Census Tract	116612
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV	Census Block	1020
Legal Class	(03-01) OWNER OCCUPIED RESID	Latitude	33.3860695428317
Lot/Block/Tract	431/-/-	Longitude	-112.127546859361
MCR Number	060619	Tax Area	661300
		Tax Municipality	Phoenix
		School Districts	Roosevelt Elementary District#66 Phoenix Union High School District#210

Legal Description	
Abbr. Legal Description	LOT 431 LAVEEN VILLAGE AMD MCR 060619
Full Legal Description	LAVEEN VILLAGE AMD MCR 606-19

Land Areas

Lot	County Zone	City Zone
Size: 0.139 acres / 6,050 sqft	[R-8] RESIDENTIAL WITH 8,000 SF MINIMUM: 100%	[R1-8] Single Family Residence (Density Range Of 4 100% To 4.5 Or 5.5 W/Bonus):

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV Class.: CLASS R3, AVERAGE

Structure Information	Construction	Additional Features
Rooms: 9 Bathroom Fixtures: 9 Living Area: 3,181 sqft Year Built: 2005 Stories: M Builder Name: COURTLAND HOMES	Roof Material: CONCRETE TILE Heat: YES Construction: FRAME WOOD Added Attached: None	A/C: REFRIGERATION Patio: COVERED Covered Parking: GARAGE - 2 Added Detached: None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
08/20/2020	JEROME L DAVIS	SAM MOUSSA FAMILY LIMITED PARTNERSHIP LLP	\$312,000	\$0	\$306,318	Warranty	Fha	Normal Sale	20200767200
12/28/2011	SAM MOUSSA FAMILY LIMITED PARTNERSHIP LLP	SAM & HALLA MOUSSA	\$0	\$0	\$0	Special Warranty			20111065979
07/06/2009	SAM & HALLA MOUSSA	U S BANK NATIONAL ASSOCIATION	\$96,000	\$96,000	\$0	Special Warranty			20090614563
01/13/2009	U S BANK NATIONAL ASSOCIATION	ANGIE CAMPOS	\$139,035	\$0	\$0	Trustees			20090029182
07/15/2005	ANGIE CAMPOS	COURTLAND HOMES INC	\$225,480	\$0	\$180,384	Warranty	Fannie/Freddie		20050986031

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
07/30/2021	DAVIS, JEROME	US BANK NA	\$10,551	Fha	20210829572
08/20/2020	DAVIS, JEROME L	STARBOARD FINANCIAL MANAGEMENT LLC	\$306,318	Fha	20200767202
08/20/2020	DAVIS, JEROME	ARIZONA IND'L DEV AUTH	\$9,190	Conventional	20200767203

Subdivision - LAVEEN VILLAGE AMD

Subdivision Details	Stories	Average House
Improved Lots: 533	Single Story: 290	Sqft: 2,390



JEROME DAVIS

1957—2021

Help us celebrate Jerome! Please share your stories and photos, and invite others who remember Jerome.

 ABOUT THIS MEMORIAL

"Son, Brother, Father and Friend. "

Jerome L. Davis died on 4 April 2021. He was born on 10 July 1957 to Oscar and Georgie B. Davis. Jerome grew up in Oxnard, CA and later moved to Phoenix, AZ where he passed away. He was the proud parent of two daughters: Dorothy Davis (Sanchez) and Kateri Davis.

Jerome is also remembered for his joy and devotion of a wide variety of music genre. Jerome was preceded in death by his parents; He is survived by his sisters: Eleanor Davis, Sharon Davis, Lisa Robinson; Brothers: Andy Davis, Marc Davis; and a host of nieces, nephews, other family and loved friends.

Memorial services will be held on Saturday, May 1, 2021 at 11:00 a.m. in the Bible

RECORDING REQUESTED BY
DRIGGS TITLE AGENCY, INC.
WHEN RECORDED MAIL TO:
ROBIN MARIE DEAN, KENNETH JOHN DEAN AND
MARYAM A. SHAMSID-DEEN
9842 S. 47TH PLACE
PHOENIX, AZ 85044

21:
mo:

ESCROW NO. 21-04-193417KV

1/3

Warranty Deed

For the consideration of Ten Dollars, and other valuable considerations, I or we,

Jerome Davis, a married man,
as GRANTOR(s)

do/does hereby convey to

Robin Marie Dean and Kenneth John Dean, wife and husband and Maryam A. Shamsid-Deen, a married woman as her sole
and separate property
as GRANTEE(s)

the following real property situated in Maricopa County, Arizona:

Lot 20, of VISTA RIO, according to the Plat of Record in the Office of the County Recorder of Maricopa County, Arizona, recorded in
Book 650 of Maps, Page 47 and Certificate of Correction recorded as Recording No. 2005-1099440, of Official Records.

APN: 105-90-811

SUBJECT TO: Current taxes and other assessments, reservations in patents and all easements, rights of way, encumbrances,
liens, covenants, conditions, restrictions, obligations, and liabilities as may appear of record.

And the Grantor does warrant the title against all persons whomsoever, subject to the matters set forth above.

Acceptance is attached hereto and made a part herewith.

Dated: May 17, 2021

Acceptance of Joint Tenancy With Right of Survivorship

Robin Marie Dean and Kenneth John Dean, wife and husband and Maryam A. Shamsid-Deen, a married woman as her sole and separate property each being duly sworn, upon oath for himself or herself and jointly, but not one for the other deposes and says; That I am one of the Grantee(s) named in that certain Deed attached hereto and which is dated May 17, 2021 and executed by Jerome Davis, as Grantor(s), to Robin Marie Dean, Kenneth John Dean and Maryam A. Shamsid-Deen, as Grantee(s) and which conveys certain premises described as:

SEE EXHIBIT "A" ATTACHED

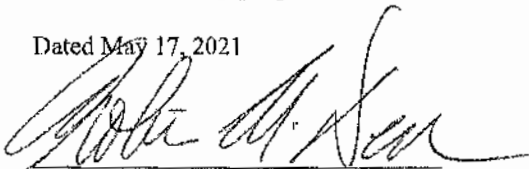
The Grantee(s) named therein are not as Tenants in Common not as Community Property Estate and Not as Community Property with Right of Survivorship but as Joint Tenants with Right of Survivorship.

That each of us individually and jointly as Grantee(s) hereby asserts and affirms that it is our intention to accept said conveyance as such Joint Tenants with Full Right of Survivorship and to acquire any interest we may have in said premises under the terms of said Deed as Joint Tenants with Right of Survivorship.

THAT the interests of the undersigned are being taken by them as Joint Tenants with the Right of Survivorship.

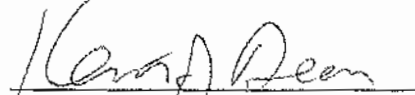
THAT each of us individually and jointly hereby assert and affirm that it is our intention to accept said instrument as such Joint Tenants and to acquire any Interest In, or any proceeds arising out of said property, not as tenants in common and not as community property but as Joint Tenants with the right of survivorship.

Dated May 17, 2021



Robin Marie Dean

Unofficial Document



Kenneth John Dean



Maryam A. Shamsid-Deen

State of ARIZONA

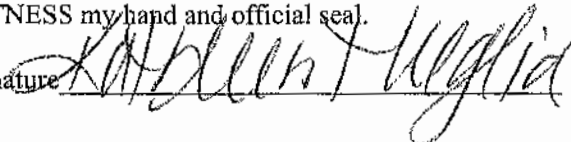
}
} SS:
}

County of MARICOPA



On May 24, 2021, before me the undersigned Notary Public, personally appeared Robin Marie Dean, Kenneth John Dean and Maryam A. Shamsid-Deen, known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature 

My Commission Expires: 11-03-22

6. DURATION - if the duration or life period of the LLC is perpetual (forever), then skip this section and continue to number 7 or number 8. Otherwise, check only one box below *and* fill in the corresponding blank:

The LLC's life period will end on this **date**: _____ (enter a date)

The LLC's life period will end upon the occurrence of this event: (describe an event)

COMPLETE NUMBER 7 OR NUMBER 8 - NOT BOTH.

7. MANAGER-MANAGED LLC - see *Instructions L010i* - check this box If management of the LLC will be vested in a manager or managers (meaning one or more managers will run the company) and complete and attach **ONLY** the Manager Structure Attachment form L040. (Both members and managers will be listed on the Manager Structure Attachment.) *The filing will be rejected if it is submitted without the attachment.*

8. MEMBER-MANAGED LLC - see *Instructions L010i* - check this box If management of the LLC will be reserved to the members (meaning all members will run the company together if there is no operating agreement stating otherwise), and complete and attach **ONLY** the Member Structure Attachment form L041. (All members will be listed on the Member Structure Attachment.) *The filing will be rejected if it is submitted without the attachment.*

9. ORGANIZERS and SIGNATURE - the individual or pre-existing entity submitting this document is the Organizer - list the name of the Organizer below. If the Organizer is an individual, that individual must sign below. If the Organizer is a pre-existing entity, provide the signature of the individual acting for that entity, then print the individual's name.

The person signing below declares and certifies under penalty of perjury that the information contained within this document together with any attachments is true and correct, and is submitted in compliance with Arizona law.

Organizer: Jerome Davis

Jerome Davis 6/18/15
Signature Date

Printed Name (if different from Organizer) _____

Filing Fee: \$50.00 (regular processing) Expedited processing - add \$35.00 to filing fee. All fees are nonrefundable - see Instructions.	Mail: Arizona Corporation Commission Corporate Filings Section 1300 W. Washington St., Phoenix, Arizona 85007 Fax: 602-542-4100
---	--

Please be advised that A.C.C. forms reflect only the minimum provisions required by statute. You should seek private legal counsel for those matters that may pertain to the individual needs of your business.
All documents filed with the Arizona Corporation Commission are public record and are open for public inspection.
If you have questions after reading the Instructions, please call 602-542-3026 or (within Arizona only) 800-345-5819.

STATUTORY AGENT ACCEPTANCE

Please read Instructions *M002i*

- 1. **ENTITY NAME** – give the **exact** name in Arizona of the corporation or LLC that has appointed the Statutory Agent (this must match exactly the name as listed on the document appointing the statutory agent, e.g., Articles of Organization or Article of Incorporation):

A Path of Resilience LLC

- 2. **STATUTORY AGENT NAME** – give the exact name of the Statutory Agent appointed by the entity listed in number 1 above (this will be *either* an individual or an entity). **NOTE** - the name must match **exactly** the statutory agent name as listed in the document that appoints the statutory agent (e.g. Articles of Incorporation or Articles of Organization), including any middle initial or suffix:

Jerome Davis

3. STATUTORY AGENT SIGNATURE:

By the signature appearing below, the individual or entity named in number 2 above accepts the appointment as statutory agent for the entity named in number 1 above, and acknowledges that the appointment is effective until the appointing entity replaces the statutory agent or the statutory agent resigns, whichever occurs first.

The person signing below declares and certifies *under penalty of perjury* that the information contained within this document together with any attachments is true and correct, and is submitted in compliance with Arizona law.

Signature Jerome Davis Printed Name Jerome Davis Date 6/12/15

REQUIRED – check only one:

<input checked="" type="checkbox"/> Individual as statutory agent: I am signing on behalf of myself as the individual (natural person) named as statutory agent.	<input type="checkbox"/> Entity as statutory agent: I am signing on behalf of the entity named as statutory agent, and I am authorized to act for that entity.
---	---

Filing Fee: none (regular processing) Expedited processing – not applicable. All fees are nonrefundable – see Instructions.	Mall: Arizona Corporation Commission - Corporate Filings Section 1300 W. Washington St., Phoenix, Arizona 85007 Fax: 602-542-4100
---	---

Please be advised that A.C.C. forms reflect only the **minimum** provisions required by statute. You should seek private legal counsel for those matters that may pertain to the individual needs of your business.
All documents filed with the Arizona Corporation Commission are **public record** and are open for public inspection.
If you have questions after reading the Instructions, please call 602-542-3026 or (within Arizona only) 800-345-5819.

DO NOT WRITE ABOVE THIS LINE; RESERVED FOR ACC USE ONLY.

MANAGER STRUCTURE ATTACHMENT

1. **ENTITY NAME** - give the exact name of the LLC (foreign LLCs - give name in domicile state or country):

A Path of Resilience LLC

2. **A.C.C. FILE NUMBER** (if known):

Find the A.C.C. file number on the upper corner of filed documents OR on our website at: <http://www.azcc.gov/Divisions/Corporations>

3. **MANAGERS / MEMBERS** - give the name and address of each and every **manager** and list all **members who own 20% or more** of the profits or capital of the LLC. **Use one block per person.** Members who own less than 20% may also be listed, but it is not required. Check the appropriate box or boxes below each person listed - *do not check both member boxes.* If more space is needed, use another Manager Structure Attachment form.

1. Name: <u>Jenome Davis</u>		2. Name: <u>Milton Earl Howard</u>	
Address 1: <u>3212 W. Melody Dr</u>		Address 1: <u>2508 N. 44th Dr.</u>	
Address 2 (optional):		Address 2 (optional):	
City: <u>Laveen</u>	State or Province: <u>AZ</u>	City: <u>Phoenix</u>	State or Province: <u>AZ</u>
Zip: <u>85339</u>		Zip: <u>85035</u>	
Country:	<input checked="" type="checkbox"/> 20% or more member	Country:	<input checked="" type="checkbox"/> 20% or more member
<input checked="" type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	<input checked="" type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member
3. Name: <u>Larone Davis</u>		4. Name:	
Address 1: <u>2258 W. Wayland Rd</u>		Address 1:	
Address 2 (optional):		Address 2 (optional):	
City: <u>Phoenix</u>	State or Province: <u>AZ</u>	City:	State or Province:
Zip: <u>85041</u>		Zip:	
Country:	<input checked="" type="checkbox"/> 20% or more member	Country:	<input type="checkbox"/> 20% or more member
<input checked="" type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member
5. Name: <u>Robert McNeal</u>		6. Name:	
Address 1: <u>4707 W. Maldonado Rd</u>		Address 1:	
Address 2 (optional):		Address 2 (optional):	
City: <u>Laveen</u>	State or Province: <u>AZ</u>	City:	State or Province:
Zip: <u>85339</u>		Zip:	
Country:	<input checked="" type="checkbox"/> 20% or more member	Country:	<input type="checkbox"/> 20% or more member
<input checked="" type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member	<input type="checkbox"/> Manager	<input type="checkbox"/> Less than 20% member

JUN 18 2015



05046202

FILE NO. L-20121518

DO NOT WRITE ABOVE THIS LINE; RESERVED FOR AOC USE ONLY.

ARTICLES OF ORGANIZATION

Read the Instructions L010!

1. ENTITY TYPE - check only one to indicate the type of entity being formed:

LIMITED LIABILITY COMPANY
(entity name must contain the words "Limited Liability Company" or "LLC")

PROFESSIONAL LIMITED LIABILITY COMPANY
(entity name must contain the words "Professional Limited Liability Company" or "PLLC")

2. ENTITY NAME - see Instructions L010! for full naming requirements - give the exact name of the LLC:

A Path of Resilience LLC

3. PROFESSIONAL LIMITED LIABILITY COMPANY SERVICES - If and only if professional LLC is checked in number 1 above, describe the professional services that the professional LLC will provide (examples: law firm, accounting, medical):

4. STATUTORY AGENT for service of process - see Instructions L010!

4.1 REQUIRED - give the name (can be an Arizona resident or an Arizona-registered entity) and physical or street address (not a P.O. Box) in Arizona of the statutory agent:		4.2 OPTIONAL - mailing address in Arizona of Statutory Agent (can be a P.O. Box):	
Statutory Agent Name <u>Jerome Davis</u>			
Attention (optional) <u>3212 W. Melody Dr.</u>		Attention (optional)	
Address 1		Address 1	
Address 2 (optional) City <u>Phoenix/Lavien</u> State <u>AZ</u> Zip <u>85339</u>	Address 2 (optional) City	State <u>AZ</u>	Zip
4.3 REQUIRED - the Statutory Agent Acceptance form M002 must be submitted along with these Articles of Organization.			

5. ARIZONA KNOWN PLACE OF BUSINESS ADDRESS:

- 5.1** Is the Arizona known place of business address the same as the street address of the statutory agent? Yes - go to number 6 and continue
 No - go to number 5.2 and continue

- 5.2** If you answered "No" to number 5.1, give the physical or street address (not a P.O. Box) of the known place of business of the LLC in Arizona:

Attention (optional) <u>1752 E Carter Rd</u>			
Address 1			
Address 2 (optional)	State <u>AZ</u>	Zip	
City <u>Maricopa</u> Country <u>U.S.A.</u>	State or Province	Zip <u>85042</u>	

New Recent Saved

Cards Rows Map Sort by Price: High to Low

Showing 1 - 3 of 3 properties (0 selected)

Quick Search patrick legenzoff

Search Clear Save

Select Page 1

1,050,000

1. PATRICK & KENDRA LEGENZOFF 6726 W BLOOMFIELD RD Peoria, AZ 85381 Maricopa	Year Built 1991	Lot Size 10,020	Sqft 3,712	APN 200-04-135 MLS 5046323	Sold \$645,000 10/20/2021	<input type="checkbox"/>
2. PATRICK & KENDRA LEGENZOFF 10528 W ODEUM LN Tolleson, AZ 85353 Maricopa	Year Built 2016	Lot Size 9,674	Sqft 3,240	APN 101-25-790	Sold \$405,000 06/23/2021	<input type="checkbox"/>
3. KENDR A & PATRICK LEGENZOFF 3529 W PASEO WAY Laveen, AZ 85339 Maricopa	Year Built 2005	Lot Size 4,543	Sqft 2,103	APN 300-11-098 MLS 5459575	Sold \$199,000 09/29/2016	<input type="checkbox"/>

Shut down by Azrha but still operating

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Maricopa Assessor Parcel # 200-04-135



Property Information

Property Owner	PATRICK & KENDRA LEGENZOFF
Property Address	6726 W Bloomfield Rd Peoria, AZ 85381-9590 Maricopa County
Tax Mailing Address	Patrick & Kendra Legenzoff 10528 W Odeum Ln Tolleson, AZ 85353
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV
Legal Class	(04-01) NON-PRIMARY
Lot/Block/Tract	34/-/-
MCR Number	034227

Area Information

Subdivision	PROMENADE LOT 1-54
Section/Town/Range	13/3N/1E
Census Tract	071510
Census Block	3010
Latitude	33.5987468372508
Longitude	-112.203939619826
Tax Area	111200
Tax Municipality	Peoria
School Districts	Peoria Unified School District#11

Legal Description

Abbr. Legal Description	LOT 34 PROMENADE LOT 1-54 MCR 034227
Full Legal Description	PROMENADE MCR 342-27

Land Areas

Lot	County Zone	City Zone
Size: 0.23 acres / 10,020 sqft	[R-8] RESIDENTIAL WITH 8,000 SF MINIMUM: 100%	[R1-8] Single Family Residence (Density Range Of 4 100% To 4.5 Or 5.5 W/Bonus):

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV	Class:: CLASS R3, AVERAGE
-------------------------------------	---------------------------

Structure Information

Bathroom Fixtures:	12
Living Area:	3,712 sqft
Year Built:	1991
Stories:	M
Builder Name:	SHEA HOMES

Construction

Roof Material:	CONCRETE TILE
Heat:	YES
Construction:	8" STUCCO
Pool:	375 sqft
Added Attached:	None

Additional Features

A/C:	REFRIGERATION
Patio:	COVERED
Covered Parking:	GARAGE - 2
Added Detached:	None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
10/20/2021	PATRICK & KENDRA LEGENZOFF	ZAK VENTURES LLC	\$645,000	\$162,500	\$480,000	Warranty	Fannie/Freddie	NON MLS	20211129705
06/16/2020	ZAK VENTURES LLC	TRAVIS FRANKS	\$345,000	\$345,000	\$0	Warranty		NON MLS	20200523015
11/03/2017	TRAVIS FRANKS	CAPITAL MONEY MANAGEMENT LLC	\$0	\$0	\$0	Warranty			20170820068
01/13/2014	TRAVIS FRANKS	CAPITAL MONEY MANAGEMENT LLC	\$350,000	\$0	\$330,000	Correction	Seller Carryback		20140022054
12/27/2013	TRAVIS FRANKS	CAPITAL MONEY MANAGEMENT LLC	\$350,000	\$20,000	\$350,000	Sale Agreement	Other	Normal Sale	20131090038
12/27/2013	CAPITAL MONEY MANAGEMENT LLC	ERICA L LANG	\$0	\$0	\$0	Special Warranty			20131090037
12/27/2013	ERICA L RODRIGUEZ	ROBERT & JEANNE M RODRIGUEZ	\$0	\$0	\$0	Special Warranty			20131090036
06/12/2013	CAPITAL MONEY MANAGEMENT LLC	ERICA L RODRIGUEZ	\$0	\$0	\$0	Quit Claim			20130537217
02/03/2009	ERICA L RODRIGUEZ	ROBERT & JEANNE M RODRIGUEZ	\$0	\$0	\$0	Quit Claim			20090090135
04/16/2008	ROBERT & JEANNE M RODRIGUEZ	ROBERT RODRIGUEZ	\$0	\$0	\$0	Special Warranty			20080333791
08/22/2005	ROBERT RODRIGUEZ	ROBERT & JEANNIE M RODRIGUEZ	\$0	\$0	\$239,000	Quit Claim	Fannie/Freddie		20051209649
05/16/2003	ROBERT & JEANNIE M RODRIGUEZ	ROBERT RODRIGUEZ	\$0	\$0	\$0	Joint Tenancy			20030630513

Sale Date	Buyer	Seller	Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
05/16/2003	ROBERT RODRIGUEZ	JEANNE M RODRIGUEZ	\$0	\$0	\$225,250	Warranty	Fannie/Freddie		20030630511
11/19/2002	ROBERT & JEANNE M RODRIGUEZ	ROBERT RODRIGUEZ	\$0	\$0	\$0	Warranty			20021222180
11/01/2002	ROBERT RODRIGUEZ	ROBERT & JEANNE M RODRIGUEZ	\$0	\$0	\$36,000	Warranty	Conventional		20021155783
06/17/2002	ROBERT & JEANNE M RODRIGUEZ	ROBERT R & CHRISTINE M BUTTES	\$242,000	\$112,000	\$157,300	Warranty	Conventional		20020615669
03/27/1992	ROBERT & CHRISTINE BUTTES	SHEA HOMES LTD	\$180,000	\$41,000	\$144,000	Miscellaneous	Conventional		1992 0160056

Loan Origination History: \$

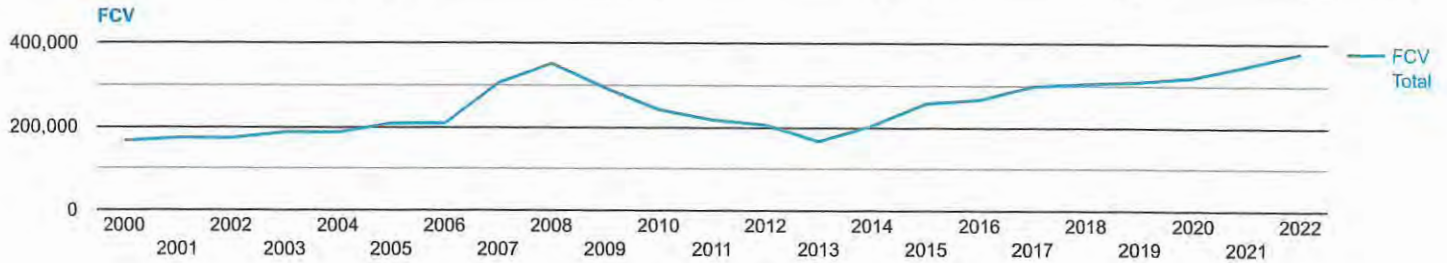
Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
10/20/2021	LEGENZOFF, PATRICK	UNITED WHOLESALE MORTGAGE	\$480,000	Conventional	20211129706

Subdivision - PROMENADE LOT 1-54

Subdivision Details	Stories	Average House
Improved Lots: 54	Single Story: 24	Sqft: 2,718
Year Built Range: 1991 - 1992	Multiple Story: 30	Lot Sqft: 12,133
With Pool: 48 (89%)		Fixtures: 10

Tax Assessment History

	Full Cash Value (FCV) Limited Property Value based on Proposition 117 (2012) (LPV) Year over Year (YoY)				
	2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement	\$243,500	\$247,500	\$255,700	\$277,800	\$302,400
FCV Land	\$60,800	\$61,800	\$63,900	\$69,400	\$75,600
FCV Total	\$304,300	\$309,300	\$319,600	\$347,200	\$378,000
FCV YoY Change	2%	2%	3%	9%	9%
Assessed FCV	\$30,430	\$30,930	\$31,960	\$34,720	\$37,800
LPV Total	\$222,086	\$233,190	\$244,850	\$257,093	\$269,948
State Aid	\$0	\$0	\$0	\$0	\$0
Tax Amount	\$2,785	\$2,870	\$2,960	\$2,941	\$0



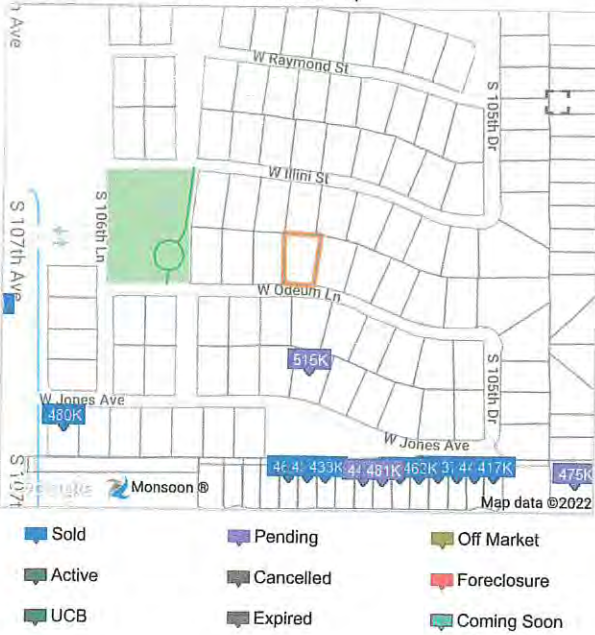
Flood Information

Map Number: 04013C1705L
 Map Date: 2013-10-16
 Panel: 1705L
 FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

Maricopa Assessor Parcel # 101-25-790

Parcel Dimensions Download Map



Property Information

Property Owner	PATRICK & KENDRA LEGENZOFF
Property Address	10528 W Odeum Ln Tolleson, AZ 85353-7668 Maricopa County
Tax Mailing Address	Patrick & Kendra Legenzoff 10528 W Odeum Ln Tolleson, AZ 85353-7668
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV
Legal Class	(03-01) OWNER OCCUPIED RESID
Lot/Block/Tract	53/-/-
MCR Number	082315

Area Information

Subdivision	LIONS GATE
Section/Town/Range	20/1N/1E
Census Tract	082203
Census Block	3008
Latitude	33.4113595101776
Longitude	-112.287126263777
Tax Area	651300
Tax Municipality	Phoenix
School Districts	Littleton Elementary District#55 Tolleson Union High School District#214

Legal Description

Abbr. Legal Description	LOT 53 LIONS GATE MCR 082315
Full Legal Description	LIONS GATE MCR 823-15

Land Areas

Lot Size: 0.222 acres / 9,674 sqft	County Zone: [R-10] RESIDENTIAL WITH 10,000 SF MINIMUM: 100%	City Zone: [R1-10] Single Family Residence (Density Range Of 3 100% To 3.5 Or 4.5 W/Bonus):
• Gated Community		

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV	Class.: CLASS R3, AVERAGE
-------------------------------------	---------------------------

Structure Information

Bathroom Fixtures:	10
Living Area:	3,240 sqft
Year Built:	2016
Stories:	S
Builder Name:	MERITAGE HOMES

Construction

Roof Material:	CONCRETE TILE
Heat:	YES
Construction:	OTHER
Pool:	395 sqft
Added Attached:	None

Additional Features

A/C:	REFRIGERATION
Patio:	COVERED
Covered Parking:	GARAGE - 2
Added Detached:	None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
06/23/2021	PATRICK & KENDRA LEGENZOFF	ZAK VENTURES LLC	\$405,000	\$20,250	\$384,750	Warranty	Fannie/Freddie	NON MLS	20210690094
06/19/2020	ZAK VENTURES LLC	CARRINGTON L MELTON	\$305,000	\$44,855	\$310,000	Sale Agreement	Other	NON MLS	20200541549
10/28/2016	CARRINGTON L MELTON TANEISA BLUE MELTON	MERITAGE HOMES OF ARIZONA INC	\$284,857	\$500	\$284,857	Special Warranty	Va	New Construction	20160794113
06/13/2008	MERITAGE HOMES OF ARIZONA INC	RICHMOND AMERICAN HOMES OF ARIZONA INC	\$4,241,250	\$0	\$0	Special Warranty			20080526007

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
06/23/2021	LEGENZOFF, PATRICK	NOVA FINANCIAL & INVESTME	\$384,750	Conventional	20210690095

Subdivision - LIONS GATE

Subdivision Details

Improved Lots:	96
Year Built Range:	2008 - 2017
With Pool:	21 (22%)

Stories

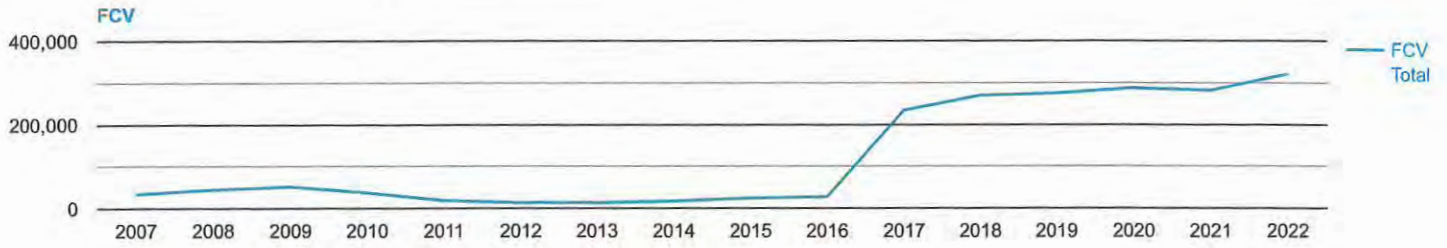
Single Story:	72
Multiple Story:	24

Average House

Sqft:	3,182
Lot Sqft:	9,716
Fixtures:	10

Tax Assessment History

Full Cash Value (FCV)	Limited Property Value based on Proposition 117 (2012) (LPV)	Year over Year (YoY)		2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement				\$215,500	\$219,600	\$229,400	\$225,100	\$256,200
FCV Land				\$53,800	\$54,900	\$57,300	\$56,200	\$64,000
FCV Total				\$269,300	\$274,500	\$286,700	\$281,300	\$320,200
FCV YoY Change				15%	2%	4%	-2%	14%
Assessed FCV				\$26,930	\$27,450	\$28,670	\$28,130	\$32,020
LPV Total				\$183,960	\$193,158	\$202,816	\$212,957	\$223,605
State Aid				\$341	\$346	\$0	\$0	\$0
Tax Amount				\$2,647	\$2,913	\$3,320	\$3,440	\$0

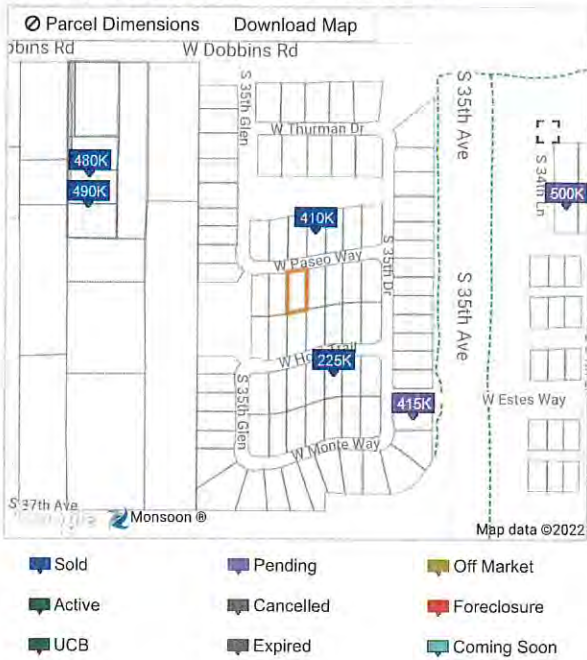


Flood Information

Map Number: 04013C2170M
Map Date: 2015-11-04
Panel: 2170M
FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

Maricopa Assessor Parcel # 300-11-098



Property Information

Property Owner	KENDR A & PATRICK LEGENZOFF
Property Address	3529 W Paseo Way Laveen, AZ 85339-1412 Maricopa County
Tax Mailing Address	Kendr A & Patrick Legenzoff 3529 W Paseo Way Laveen, AZ 85339-1412
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV
Legal Class	(04-02) RENTAL RESIDENTIAL
Lot/Block/Tract	44/-/-
MCR Number	068311

Area Information

Subdivision	DOBBINS CORNER PROPERTY
Section/Town/Range	10/1S/2E
Census Tract	116611
Census Block	2001
Latitude	33.3614013454647
Longitude	-112.136142095107
Tax Area	591300
Tax Municipality	Phoenix
School Districts	Laveen Elementary District#59 Phoenix Union High School District#210

Legal Description

Abbr. Legal Description	LOT 44 DOBBINS CORNER PROPERTY MCR 068311
Full Legal Description	DOBBINS CORNER PROPERTY MCR 683-11

Land Areas

Lot	County Zone	City Zone
Size: 0.104 acres / 4,543 sqft	[M-M] MULTI-FAMILY, MEDIUM DENSITY (2,500 - 3,999 SF): 100%	[R-3] Multiple Family Residence (Detached SF 5 To 6.5 Or 12 W/Bonus) (Attached 14.5 To 15.23 Or 17.4 W/Bonus): 100%

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV	Class:: CLASS R3, AVERAGE
-------------------------------------	---------------------------

Structure Information

Bathroom Fixtures:	8
Living Area:	2,103 sqft
Year Built:	2005
Stories:	M
Builder Name:	GREYSTONE HOMES

Construction

Roof Material:	CONCRETE TILE
Heat:	YES
Construction:	OTHER
Added Attached:	None

Additional Features

A/C:	REFRIGERATION
Patio:	COVERED
Covered Parking:	GARAGE - 2
Added Detached:	None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
09/29/2016	KENDR A & PATRICK LEGENZOFF	MARIA T DE LA TORRE	\$199,000	\$19,900	\$181,090	Warranty	Fannie/Freddie	Normal Sale	20160710731
02/28/2006	MARIA T DE LA TORRE GLORIA E DE LA TORRE	GREYSTONE HOMES INC	\$225,104	\$22,510	\$180,083	Warranty	Fannie/Freddie		20060274103
05/13/2005	GREYSTONE HOMES INC	CURTIS LAND HOLDINGS INC	\$4,486,149	\$4,486,149	\$0	Special Warranty			20050635385
05/13/2005	CURTIS LAND HOLDINGS INC	LANCELOT DOBBINS LLC	\$2,238,600	\$0	\$0	Warranty			20050635382

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
09/29/2016	LEGENZOFF,PATRICK & KENDRA	LEND SMART MORTGAGE LLC	\$181,090	Conventional	20160710732

Subdivision - DOBBINS CORNER PROPERTY

Subdivision Details

Improved Lots:	84
Year Built Range:	2005 - 2006
With Pool:	6 (7%)

Stories

Single Story:	23
Multiple Story:	61

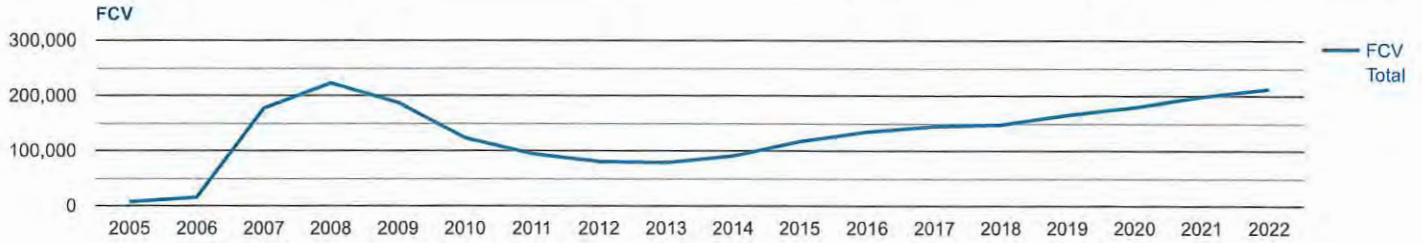
Average House

Sqft:	1,927
Lot Sqft:	5,104
Fixtures:	7

Tax Assessment History

Full Cash Value (FCV)	Limited Property Value based on Proposition 117 (2012) (LPV)	Year over Year (YoY)
2018 Final	2019 Final	2020 Final
		2021 Final
		2022 Prelim

FCV Improvement	\$117,300	\$131,300	\$142,600	\$158,400	\$169,600
FCV Land	\$29,300	\$32,800	\$35,600	\$39,600	\$42,400
FCV Total	\$146,600	\$164,100	\$178,200	\$198,000	\$212,000
FCV YoY Change	2%	12%	9%	11%	7%
Assessed FCV	\$14,660	\$16,410	\$17,820	\$19,800	\$21,200
LPV Total	\$103,755	\$108,943	\$114,390	\$120,110	\$126,116
State Aid	\$193	\$195	\$198	\$0	\$0
Tax Amount	\$1,808	\$1,900	\$1,895	\$2,147	\$0



Flood Information

Map Number: 04013C2660L
Map Date: 2013-10-16
Panel: 2660L
FEMA Zone: X

(Zone SubType: 0.2 PCT ANNUAL CHANCE FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

"Mommy and me" house

Maricopa Assessor Parcel # 147-03-156



Property Information		Area Information	
Property Owner	BNJ RENTALS LLC	Subdivision	WEST PLAZA 25
Property Address	4813 W Belmont Ave Glendale, AZ 85301-1523 Maricopa County	Section/Town/Range	4/2N/2E
Tax Mailing Address	Bnj Rentals LLC 3800 N Central Ave Ste 460 Phoenix, AZ 85012-1995	Census Tract	092401
Property Type	(0131) SFR GRADE 010-3 URBAN SUBDIV	Census Block	3013
Legal Class	(04-01) NON-PRIMARY	Latitude	33.5477218091893
Lot/Block/Tract	723/-/-	Longitude	-112.162666123595
MCR Number	012330	Tax Area	400700
		Tax Municipality	Glendale
		School Districts	Glendale Elementary* District#40 Glendale Union High School District#205

Legal Description	
Abbr. Legal Description	LOT 723 WEST PLAZA 25 MCR 012330
Full Legal Description	WEST PLAZA 25

Land Areas

Lot	County Zone	City Zone
Size: 0.181 acres / 7,897 sqft	[R-6] RESIDENTIAL WITH 6,000 SF MINIMUM: 100%	[R1-6] Single Residence: 100%

Structure:

(0131) SFR GRADE 010-3 URBAN SUBDIV Class: CLASS R3, AVERAGE

Structure Information	Construction	Additional Features
Rooms: 8 Bathroom Fixtures: 6 Living Area: 2,778 sqft Year Built: 1970 Stories: M Builder Name: HALLCRAFT HOMES	Roof Material: ASPHALT SHINGLE Heat: YES Construction: 8" PAINTED BLOCK Added Attached: 522 sqft	A/C: REFRIGERATION Patio: NONE Covered Parking: GARAGE - 2 Added Detached: None

Deed History

Sale Date	Buyer	Seller	Sale Price	Down	Mortgage	Deed	Financing	Transaction	Doc #
08/04/2020	BNJ RENTALS LLC	BNJ LEASING INC	\$0	\$0	\$0	Warranty			20200706258
06/28/2019	BNJ LEASING INC	CARLOS A VALDEZ FLORES	\$266,998	\$0	\$0	Trustees		Reverted	20190495042
08/31/2018	CARLOS A VALDEZ FLORES ROSA A GALAVIZ PINA	BNJ LEASING INC	\$274,900	\$27,500	\$247,400	Warranty	Seller Carryback	Bank Sale	20180663633
11/17/2017	BNJ LEASING INC	PATRICK & RACHELLE MCGRATH LLC	\$233,041	\$0	\$0	Trustees		Reverted	20170857208
09/23/2016	PATRICK & RACHELLE MCGRATH LLC	BNJ LEASING INC	\$245,000	\$30,000	\$215,000	Warranty	Seller Carryback	Normal Sale	20160696191
09/23/2016	BNJ LEASING INC	ARIZONA ACQUISITION FUND INC	\$0	\$0	\$0	Warranty			20160696190
03/08/2016	ARIZONA ACQUISITION FUND INC	ZAK VENTURES LLC	\$0	\$0	\$0	Warranty			20160147773
03/07/2016	ZAK VENTURES LLC	CHIU TRUST	\$125,750	\$125,750	\$0	Warranty		NON MLS	20160144541
07/31/2007	CHIU TRUST	JOHN Y & AGNES CHIU	\$0	\$0	\$0	Quit Claim			20070863463
06/29/1993	JOHN Y & AGNES CHIU	VA	\$0	\$0	\$78,001	Special Warranty	Va		1993 0418200
10/07/1992	VA	CHARLES F CURRY CO	\$0	\$0	\$0	Special Warranty			1992 0565369
10/07/1992	CHARLES F CURRY CO	GILLEPIE	\$70,876	\$0	\$0	Trustees			1992 0565368

New Recent Saved

Cards Rows Map Sort by Price: High to Low

Showing 1 - 2 of 2 properties (0 selected).

Quick Search tamara l. allen

Search Clear \$407,500 Save

Select Page 1

1. JOHN L & TAMARA J ALLEN 7001 E SUMMIT TRAIL CIR Mesa, AZ 85207 Maricopa	Year Built 2003	Lot Size 44,224	Sqft 4,804	APN 219-17-917 MLS 5902333	Sold \$1,100,000 04/19/2019
2. TAMARA L ALLEN 7625 E CAMELBACK RD UNIT 247A Scottsdale, AZ 85251 Maricopa	Year Built 1971	Lot Size 122	Sqft 1,140	APN 173-53-442 MLS 6300829	Sold \$407,500 12/40/2021

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Zero results match your search criteria. Please check your entry.

Personal Property

Maricopa Assessor Parcel # 173-53-442



Property Information

Property Owner	TAMARA L ALLEN
Property Address	7625 E Camelback Rd Unit 247A Scottsdale, AZ 85251-2120 Maricopa County
Tax Mailing Address	Tamara L Allen 4420 W Hopi Trl Laveen, AZ 85339
Property Type	(0735) CONDO/TH GRADE 070-3, COMM AREA NOT PRCLD
Legal Class	(04-02) RENTAL RESIDENTIAL
Lot/Block/Tract	247A/10/-
MCR Number	021505

Area Information

Subdivision	MAYA CONDOMINIUMS
Section/Town/Range	23/2N/4E
Census Tract	217204
Census Block	3001
Latitude	33.4997890685649
Longitude	-111.916788093903
Tax Area	481400
Tax Municipality	Scottsdale
School Districts	Scottsdale Unified District#48

Legal Description

Abbr. Legal Description	LOT 247A BLOCK 10 MAYA CONDOMINIUMS MCR 021505
Full Legal Description	MAYA CONDOMINIUMS MCR 215-5 UNIT 247A BLDG 10 TOG W AN UNDIV .3436% INT IN THE COMMON ELEMENTS

Land Areas

Lot	County Zone	City Zone
Size: 0.003 acres / 122 sqft	[M-H] MULTI-FAMILY, HIGH DENSITY (UP TO 2,499 100% SF)	[R-5] Multiple-Family Residential: 100%

Structure:

(0735) CONDO/TH GRADE 070-3, COMM AREA NOT PRCLD Class:: CLASS R3, AVERAGE

Structure Information

Rooms:	5
Bathroom Fixtures:	6
Living Area:	1,140 sqft
Year Built:	1971
Stories:	S

Construction

Roof Material:	BUILT-UP
Heat:	YES
Construction:	8" STUCCO
Added Value:	None
Added Attached:	None

Additional Features

A/C:	REFRIGERATION
Patio:	COVERED
Covered Parking:	CARPORT - 1
Land Premium:	None
Added Detached:	None

Deed History

Sale Date	Buyer	Seller	Sale			Deed	Financing	Transaction	Doc #
			Price	Down	Mortgage				
12/10/2021	TAMARA L ALLEN	7625 CAMELBACK UNIT 247A LLC	\$407,500	\$114,405	\$293,095	Warranty	Fannie/Freddie	Normal Sale	20211312376
05/24/2018	7625 CAMELBACK UNIT 247A LLC	WHIP IT IN LLC	\$223,500	\$0	\$0	Warranty		Normal Sale	20180398011
02/06/2017	WHIP IT IN LLC	RICHARD P NORRIS	\$170,000	\$170,000	\$0	Warranty	All Cash	Normal Sale	20170089812
05/18/2016	RICHARD P NORRIS	ALAN R KANE	\$125,000	\$6,250	\$118,750	Warranty	Fannie/Freddie	Normal Sale	20160341881
05/04/2011	ALAN R KANE	HEIDI WITTWER	\$59,900	\$59,900	\$0	Warranty		Short Sale	20110379033
05/08/2006	HEIDI & FLORIAN WITTWER	JAMES C & STEPHANIE S JAFFEE SR	\$0	\$0	\$169,600	Warranty	Fannie/Freddie		20060621995
02/24/2005	HEIDI & FLORIAN WITTWER	JAMES C & STEPHANIE S JAFFEE	\$155,000	\$0	\$124,000	Warranty	Fannie/Freddie		20050226870
08/10/1998	JAMES C & STEPHANIE S JAFFEE SR	DONNA H WILSON TRUST	\$75,000	\$3,750	\$67,500	Warranty	Conventional		1998 0698303
08/06/1997	DONNA H WILSON TRUST	DONNA H WILSON	\$0	\$0	\$0	Quit Claim			1997 0535863
01/31/1997	DONNA H WILSON	M MORAN WESTON	\$66,000	\$66,000	\$0	Warranty			1997 0063749

Loan Origination History: \$

Date	Name	Mortgage Company	Mortgage Amount	Finance Type	Document #
------	------	------------------	-----------------	--------------	------------

Subdivision - MAYA CONDOMINIUMS

Subdivision Details

Improved Lots: 332
 Year Built Range: 1971 - 1971
 With Pool: 0 (0%)

Stories

Single Story: 332
 Multiple Story: 0

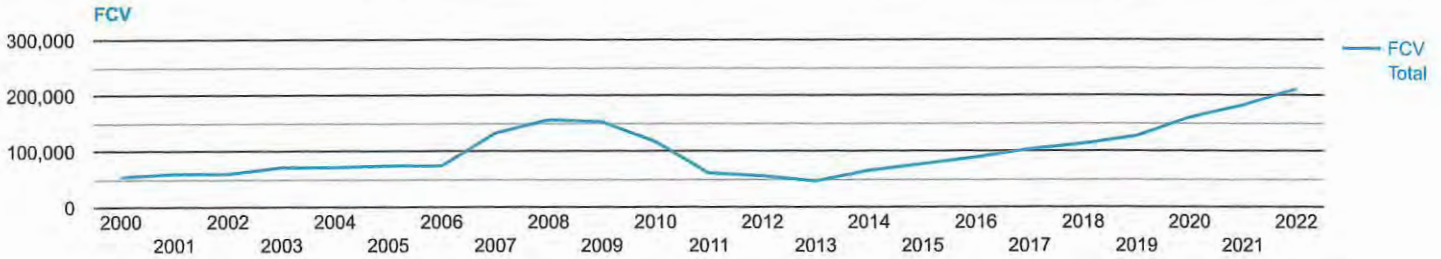
Average House

Sqft: 937
 Lot Sqft: 833
 Fixtures: 4

Tax Assessment History

Full Cash Value (FCV) Limited Property Value based on Proposition 117 (2012) (LPV) Year over Year (YoY)

	2018 Final	2019 Final	2020 Final	2021 Final	2022 Prelim
FCV Improvement	\$90,300	\$101,600	\$128,000	\$145,900	\$168,600
FCV Land	\$22,500	\$25,400	\$32,000	\$36,400	\$42,100
FCV Total	\$112,800	\$127,000	\$160,000	\$182,300	\$210,700
FCV YoY Change	10%	13%	26%	14%	16%
Assessed FCV	\$11,280	\$12,700	\$16,000	\$18,230	\$21,070
LPV Total	\$61,718	\$64,804	\$68,044	\$71,446	\$75,018
State Aid	\$0	\$0	\$0	\$0	\$0
Tax Amount	\$542	\$560	\$580	\$586	\$0



Flood Information

Map Number: 04013C2235L
 Map Date: 2013-10-16
 Panel: 2235L
 FEMA Zone: X

(Zone SubType: AREA OF MINIMAL FLOOD HAZARD); Zone Description: Areas outside the one-percent annual chance floodplain, areas of 1% annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1% annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1% annual chance flood by levees. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.

AzRHA Complaint and example missing natives posted on facebook.

From: Cassie <wordpress@myazrna.org>

Date: Friday, May 7, 2021 at 1:56 PM

To: info@myazrha.org <info@myazrha.org>

Subject: MyAzRHA Form

From: Cassie <crshay84@gmail.com>

Subject: Unsafe conditions at a rehabilitation facility

3529 W Paseo Way
a "sober living"
revoked by azrha

Message Body:

I'm trying to get some information on how to make a formal complaint about a rehabilitation facility that my loved one is currently in. I'm not sure who licenses or governs these facilities in Arizona, but I would greatly appreciate someone to speak with regarding the issue. Not only is my loved one being treated unfairly by staff and coordinators but so are others in the program. Meds are being denied or "tapered" down staff that has absolutely no medical training, house managers are using drugs in the houses they are supposed to be caring for the rehabilitants. Vehicles that are in poor maintenance and no seat belts are being used to transport patients. Managers and staff sharing medical diagnoses and medication to others in the program other than patient.

These are just a few of the things witnessed that I feel the program should really be reviewed as far as their license. My loved one does not have private insurance so it is being paid through the state and the American Indian medical insurance, it seems they're taking advantage of these people that are trying to receive help. I'm not sure what the next step is but I would love to hear from someone to get this resolved or find some sort of assistance.

Thank you,

Cassie

--

This e-mail was sent from a contact form on My AZRHA (<http://myazrha.org>)

Help.

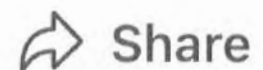
21h · 🌐

Hey peeps, my dad Rex Pinal Sr, is dwn here in Phx, apparently he came down 3 days ago with 1 of the treatment centers that are goin bk getn random ppl 2 go with & we dk which 1, if u Kno or seen my dad can u plz lmk, if the treatment center hes in contact me, plz, here's my # +1(623)703-3441, I'm worried bout my dad 🙏❤️



20 MILES AWAY · PHOENIX

Requesting help



👍🙏😱 25

Evidence of public records request where AzDHS repeatedly said the license for path of resilience did not exist. It wasn't until a screenshot was provided that AzDHS "found" the license.

from disclosure by applicable law. It is intended only for the person(s) to whom it is addressed. If you have received this communication in error, please do not retain or distribute it. Please notify the sender immediately by e-mail at the address shown above and delete the original message. Thank you.



me Jun 10, 2021
to Office ▾



Hello,

I may have done this wrong. The OTC was licensed under the Name: APRBHS-Rose House # OTC10206 licensed in 5/01/21



Office of Administrative... Jun 10, 2021
to me ▾



Thank you for the clarification. We will look into this and get back to you.



Thank you!

Great, thank you

Thank you for



Office of Administrative...

Jun 10, 2021



to me ▾

The Department was unable to locate any records responsive to your June 3, 2021 public records request. Note that any licensing records regarding A Path of Resilience outside of the time period you requested (2020/2021), should they exist, would not have been considered responsive to your request. The Department considers this request completed.

Thank you,

Office of Administrative Counsel and Rules

Arizona Department of Health Services

150 N. 18th Ave., Suite 200, Phoenix, AZ 85007

Phone: 602.542.1020

Fax: 602.364.1150

Health and Wellness for all Arizonans

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Arizona Corporation Commission – Related Business Entity Searches

Business Related Entities Research:



ACC

Search for an Entity Name



eCorp

Search

File

FAQ

Principal Name	Principal Type	Entity ID	Entity Name	Entity Type	Entity County	Entity Status
LaRoie Davis	Member and Manager	23101181	A PATH OF RESILIENCE - APRBHS - ROSE HOUSE - LLC	Domestic LLC	Maricopa	Active
LaRoie Davis	Organizer	23101181	A PATH OF RESILIENCE - APRBHS - ROSE HOUSE - LLC	Domestic LLC	Maricopa	Active
LAROIE DAVIS	Manager	L20121518	A PATH OF RESILIENCE LLC	Domestic LLC	Maricopa	Active
LAROIE DAVIS	Member	L20121518	A PATH OF RESILIENCE LLC	Domestic LLC	Maricopa	Active
LaRoie Davis	Member and Manager	23100834	A Path of Resilience rose hose llc	Domestic LLC	Maricopa	Inactive
LaRoie Davis	Organizer	23100834	A Path of Resilience rose hose llc	Domestic LLC	Maricopa	Inactive
LAROIE DAVIS	Manager	L12201316	DESERT OASIS HOMES LLC	Domestic LLC	Maricopa	Active
LAROIE DAVIS	Member	L12201316	DESERT OASIS HOMES LLC	Domestic LLC	Maricopa	Active
LaRoie Davis	Manager	23182593	ls davis llc	Domestic LLC	Maricopa	Active
LaRoie Davis	Organizer	23182593	ls davis llc	Domestic LLC	Maricopa	Active
LaRoie Davis	Member	23260066	Solutions of Sobriety APRBHS LLC	Domestic LLC	Maricopa	Active
LaRoie Davis	Organizer	23260066	Solutions of Sobriety APRBHS LLC	Domestic LLC	Maricopa	Active



ACC

SEARCH CRITERIA

Entity Name: N/A
Statutory Agent Name: Is davis llc
Principal Name: N/A
Entity Number: N/A

Entity Type: All
Entity Status: All
Name Type: All
Entity County: All

SEARCH RESULTS

Follow	Entity ID	Entity Name	Entity Type	Entity County	Agent Name	Agent Type	Entity Status
	23271571	Divine Roses LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active
	23223868	DLSD Enterprise LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active
	23272446	LSII Health Services LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active
	23301440	sidneydavis LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active
	23260066	Solutions of Sobriety APRBHS LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active



ACC

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SEARCH CRITERIA

Entity Name:	solutions of sobriety	Entity Type:	All
Statutory Agent Name:	N/A	Entity Status:	All
Principal Name:	N/A	Name Type:	All
Entity Number:	N/A	Entity County:	All

SEARCH RESULTS

Follow	Entity ID	Entity Name	Entity Type	Entity County	Agent Name	Agent Type	Entity Status
	23260066	Solutions of Sobriety APRBHS LLC	Domestic LLC	Maricopa	Is davis llc	Statutory Agent	Active
	23292620	Solutions Of Sobriety BHS LLC	Domestic LLC	Maricopa	Tamara Allen	Statutory Agent	Active
	23114168	Solutions of sobriety LLC	Domestic LLC	Maricopa	Tamara L Allen	Statutory Agent	Active

Page 1 of 1, records 1 to 3 of 3



ACC

Entity Number: N/A

Entity County: All

SEARCH RESULTS

Follow	Principal Name	Principal Type	Entity ID	Entity Name	Entity Type	Entity County	Entity Status
	Patrick Legenzoff	Organizer	23256617	JCA Prosperity LLC	Domestic LLC	Maricopa	Active
	Patrick Legenzoff	Manager	23262121	Legenzoff Properties LLC	Domestic LLC	Maricopa	Active
	Patrick Legenzoff	Organizer	23262121	Legenzoff Properties LLC	Domestic LLC	Maricopa	Active
	PATRICK LEGENZOFF	Manager	23064535	PATRICK LEGENZOFF PLLC	Domestic Professional LLC	Maricopa	Active
	Patrick Legenzoff	Member	23292620	Solutions Of Sobriety BHS LLC	Domestic LLC	Maricopa	Active
	Patrick Legenzoff	Member	23114168	Solutions of sobriety LLC	Domestic LLC	Maricopa	Active
	Patrick Legenzoff	President	23099136	SOUL REVIVAL ,INC.	Domestic Nonprofit Corporation	Maricopa	Active
	PATRICK LEGENZOFF	Manager	23064534	YOU FIRST CASH OFFERS LLC	Domestic LLC	Maricopa	Active



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SEARCH CRITERIA

Entity Name:	N/A	Entity Type:	All
Statutory Agent Name:	patrick legenzoff	Entity Status:	All
Principal Name:	N/A	Name Type:	All
Entity Number:	N/A	Entity County:	All

SEARCH RESULTS

Follow	Entity ID	Entity Name	Entity Type	Entity County	Agent Name	Agent Type	Entity Status
	23262121	Legenzoff Properties LLC	Domestic LLC	Maricopa	Patrick Legenzoff	Statutory Agent	Active
	23064535	PATRICK LEGENZOFF PLLC	Domestic Professional LLC	Maricopa	PATRICK LEGENZOFF	Statutory Agent	Active
	23099136	SOUL REVIVAL, INC.	Domestic Nonprofit Corporation	Maricopa	PATRICK LEGENZOFF	Statutory Agent	Active

23262137 Helping Hands Recovery LLC

Non profits



ACC

Follow	Principal Name	Principal Type	Entity ID	Entity Name	Entity Type	Entity County	Entity Status
0	Jerome Davison	Director	1917434		Domestic Nonprofit Corporation	Maricopa	Inactive
0	JEROME DAVIS	Manager	L20121518	<u>A PATH OF RESILIENCE LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Member	L20121518	<u>A PATH OF RESILIENCE LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Manager	23307945	<u>HOWARD & DAVIS THERAPEUTIC HOMES LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Member	23307945	<u>HOWARD & DAVIS THERAPEUTIC HOMES LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Manager	23307946	<u>MAJEVYN DESIGNS LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Member	23307946	<u>MAJEVYN DESIGNS LLC</u>	Domestic LLC	Maricopa	Active
0	JEROME DAVIS	Director	17811562	<u>SAGUARO ACRES COMMUNITY C. SERVICES</u>	Domestic Nonprofit Corporation	Pima	Inactive
0	JEROME DAVIS	Secretary	F09942576	<u>THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK</u>	Foreign Nonprofit Corporation	Maricopa	Active



ACC

Search for an Entity Name

Zachary Kepes	Manager	23097260	<u>7 Figure Investor, LLC</u>	Domestic LLC	Maricopa	Active
Zachary Kepes	Organizer	23097260	<u>7 Figure Investor, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L15546030	<u>AZ CAPITAL PARTNERS, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L15546041	<u>AZ CAPITAL PARTNERS LT, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Member	R16360060	<u>OCA APARTMENTS, LLC</u>	Foreign LLC	Maricopa	Active
ZACHARY KEPES	Member	L13931019	<u>EZ LEGAL FUNDING, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L14292957	<u>HELPING HEARTS RESIDENTIAL FACILITIES III, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L14292924	<u>HELPING HEARTS RESIDENTIAL FACILITIES IV, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L14292946	<u>HELPING HEARTS RESIDENTIAL FACILITIES V, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L14292935	<u>LRS RESIDENTIAL CARE FACILITIES, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L15278485	<u>RMZK PROPERTIES, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L15349710	<u>TRES AMIGOS PROPERTIES, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L18075429	<u>ZAK VENT 1, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L18075451	<u>ZAK VENT 2, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L18075462	<u>ZAK VENT 3, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L18075440	<u>ZAK VENT 4, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L18075430	<u>ZAK VENT 5, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L10511200	<u>ZAK VENTURES 1, LLC</u>	Domestic LLC	Maricopa	Active
ZACHARY KEPES	Manager	L15266420	<u>ZR PROPERTIES, LLC</u>	Domestic LLC	Maricopa	Active

ENTITY INFORMATION

Search Date and Time: 2/3/2022 10:57:07 AM

Entity Details

Entity Name:	SOLUTIONS OF SOBRIETY BHS LLC	Entity ID:	23292620
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	11/4/2021	Reason for Status:	In Good Standing
Approval Date:	11/4/2021	Status Date:	11/4/2021
Original Incorporation Date:	11/4/2021	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			


Statutory Agent Information

Name:	Tamara Allen	Appointed Status:	Active 11/4/2021
Attention:			
Address:	1526 W Glendale Ave, suite 107, PHOENIX, AZ 85021, USA		
Agent Last Updated:	11/4/2021	E-mail:	
Attention:		Mailing Address:	1526 W Glendale Ave, suite 107, PHOENIX, AZ 85021, USA

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member	Tamara Allen		1526 W Glendale Ave, suite 107, PHOENIX, AZ, 85021, Maricopa County, USA	11/1/2021	11/4/2021
Member	Patrick Legenzoff		1526 W Glendale Ave, suite 107, PHOENIX, AZ, 85021, Maricopa County, USA	11/1/2021	11/4/2021

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Address 

Attention: Solutions of Sobriety BHS
Address: 1526 W Glendale Ave, suite 107, PHOENIX, AZ, 85021, USA
County: Maricopa
Last Updated: 11/4/2021

Entity Principal Office Address

Attention:
Address:
County:
Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/3/2022 10:57:31 AM

Entity Details

Entity Name:	SOLUTIONS OF SOBRIETY LLC	Entity ID:	23114168
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	8/2/2020	Reason for Status:	In Good Standing
Approval Date:	8/3/2020	Status Date:	8/2/2020
Original Incorporation Date:	8/2/2020	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information

Name:	Tamara L Allen	Appointed Status:	Active 8/3/2020
Attention:			
Address:	4420 West Hopi Trail, LAVEEN, AZ 85339, USA		
Agent Last Updated:	9/9/2020	E-mail:	
Attention:		Mailing Address:	4420 West Hopi Trail, LAVEEN, AZ 85339, USA
County:	Maricopa		

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member	Tamara L Allen		4420 West Hopi Trail, LAVEEN, AZ, 85339, Maricopa County, USA	8/2/2020	8/3/2020
Member	Patrick Legenzoff		3529 W Paseo Way, LAVEEN, AZ, 85339, Maricopa County, USA	8/2/2020	9/9/2020

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Address

Attention: Tamara L Allen
Address: 4420 West Hopi Trail, LAVEEN, AZ, 85339, USA
County: Maricopa
Last Updated: 9/9/2020

Entity Principal Office Address

Attention:
Address:
County:
Last Updated:

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ARTICLES OF ORGANIZATION

OF LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: SOLUTIONS OF SOBRIETY APRBHS LLC
ENTITY ID: 23260066
ENTITY TYPE: Domestic LLC
EFFECTIVE DATE: 08/16/2021
CHARACTER OF BUSINESS: Health Care and Social Assistance
MANAGEMENT STRUCTURE: Member-Managed
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES: N/A

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: Is davis llc
PHYSICAL ADDRESS: Attn: LaRoie. Davis, 2245 W Wayland , PHOENIX, AZ 85041
MAILING ADDRESS: Attn: LaRoie. Davis, 2245 W Wayland , PHOENIX, AZ 85041

PRINCIPAL ADDRESS

Att: LaRoie. Davis, 2245 W Wayland , PHOENIX, AZ 85041

PRINCIPALS

Member: LaRoie Davis - 2245 W Wayland Rd, PHOENIX, AZ, 85041, USA - Isdavis.inc@gmail.com - Date of Taking Office:

ORGANIZERS

LaRoie Davis: 2245 W Wayland Rd, PHOENIX, AZ, 85041, USA, Isdavis.inc@gmail.com

SIGNATURES

Organizer: LaRoie Davis - 08/16/2021

ARTICLES OF ORGANIZATION OF LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: SOLUTIONS OF SOBRIETY APRBHS LLC
ENTITY ID: 23260066
ENTITY TYPE: Domestic LLC
EFFECTIVE DATE: 08/16/2021
CHARACTER OF BUSINESS: Health Care and Social Assistance
MANAGEMENT STRUCTURE: Member-Managed
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES: N/A

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: Is davis llc
PHYSICAL ADDRESS: Attn: LaRole. Davis, 2245 W Wayland , PHOENIX, AZ 85041
MAILING ADDRESS: Attn: LaRole. Davis, 2245 W Wayland , PHOENIX, AZ 85041

PRINCIPAL ADDRESS

Att: LaRole. Davis, 2245 W Wayland , PHOENIX, AZ 85041

PRINCIPALS

Member: LaRole Davis - 2245 W Wayland Rd, PHOENIX, AZ, 85041, USA - Isdavis.inc@gmail.com - Date of Taking Office:

ORGANIZERS

LaRole Davis: 2245 W Wayland Rd, PHOENIX, AZ, 85041, USA, Isdavis.inc@gmail.com

SIGNATURES

Organizer: LaRole Davis - 08/16/2021

ENTITY INFORMATION

Search Date and Time: 2/2/2022 9:08:15 PM

Entity Details

Entity Name:	A PATH OF RESILIENCE - APRBHS - ROSE HOUSE - LLC	Entity ID:	23101181
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	6/29/2020	Reason for Status:	In Good Standing
Approval Date:	6/29/2020	Status Date:	6/29/2020
Original Incorporation Date:	6/29/2020	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information

Name:	LaRoie S Davis	Appointed Status:	Active 6/29/2020
Attention:			
Address:	2258 W Wayland Rd., PHOENIX, AZ 85041, USA		
Agent Last Updated:	6/29/2020	E-mail:	
Attention:		Mailing Address:	2258 W Wayland Rd., PHOENIX, AZ 85041, USA
County:	Maricopa		

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member and Manager	LaRoie Davis		2258 W WAYLAND RD, PHOENIX, AZ, 85041, Maricopa County, USA		6/29/2020

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Address 

Attention: Address: 2258 W Wayland Rd., PHOENIX, AZ, 85041, USA County: Maricopa Last Updated: 6/29/2020

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ARTICLES OF ORGANIZATION OF LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: A PATH OF RESILIENCE - APRBHS - ROSE HOUSE - LLC
ENTITY ID: 23101181
ENTITY TYPE: Domestic LLC
EFFECTIVE DATE: 06/29/2020
CHARACTER OF BUSINESS: Health Care and Social Assistance
MANAGEMENT STRUCTURE: Manager-Managed
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES: N/A

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: LaRoie S Davis
PHYSICAL ADDRESS: 2258 W Wayland Rd., PHOENIX, AZ 85041
MAILING ADDRESS: 2258 W Wayland Rd., PHOENIX, AZ 85041

KNOWN PLACE OF BUSINESS

2258 W Wayland Rd., PHOENIX, AZ 85041

PRINCIPALS

Member and Manager: LaRoie Davis - 2258 W WAYLAND RD, PHOENIX, AZ, 85041, USA -
mr.davs@yahoo.com - Date of Taking Office:

ORGANIZERS

LaRoie Davis: 2258 W WAYLAND RD, PHOENIX, AZ, 85041, USA, apr.rosehouse@yahoo.com

SIGNATURES

Authorized Agent: LaRoie S Davis - 06/29/2020

ENTITY INFORMATION

Search Date and Time: 2/2/2022 9:07:55 PM

Entity Details

Entity Name:	A PATH OF RESILIENCE LLC	Entity ID:	L20121518
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	6/12/2015	Reason for Status:	In Good Standing
Approval Date:	6/16/2015	Status Date:	
Original Incorporation Date:	6/12/2015	Life Period:	Perpetual
Business Type:		Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			


Statutory Agent Information

Name:	JEROME DAVIS	Appointed Status:	Active
Attention:			
Address:	3212 W MELODY DR , LAVEEN, AZ 85339, USA		
Agent Last Updated:	3/16/2017	E-mail:	
Attention:		Mailing Address:	3212 W MELODY DR , LAVEEN, AZ 85339, USA
County:			

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Manager	ROBERT MCNEAL		4707 W MALDONADO RD, LAVEEN, AZ, 85339, USA	6/12/2015	6/16/2015
Manager	LAROIE DAVIS		2258 W WAYLAND RD, PHOENIX, AZ, 85041, USA	6/12/2015	12/8/2017
Manager	JEROME DAVIS		3212 W MELODY DR, LAVEEN, AZ, 85339, USA	6/12/2015	6/16/2015
Member	ROBERT MCNEAL		4707 W MALDONADO RD, LAVEEN, AZ, 85339, USA	6/12/2015	6/16/2015
Member	LAROIE DAVIS		2258 W WAYLAND RD, PHOENIX, AZ, 85041, USA	6/12/2015	12/8/2017

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Address 

Attention: **Address:** 1752 E CARTER RD, MARICOPA, AZ, 85042, USA **County:** Maricopa **Last Updated:** 6/12/2015

Entity Principal Office Address

Attention: **Address:** **County:** **Last Updated:**

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Entity Information

Search Date and Time:
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Entity Details

Entity Name:	LS DAVIS LLC	Entity ID:	23182593
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	2/10/2021	Reason for Status:	In Good Standing
Approval Date:	2/10/2021	Status Date:	2/10/2021
Original Incorporation Date:	2/10/2021	Life Period:	Perpetual
Business Type:	Management of Companies and Enterprises	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information

Name:	Ebony Oakry	Appointed Status:	Active 2/10/2021
Attention:		Address:	3141 W Saint Anne Ave, PHOENIX, AZ 85041, USA
Agent Last Updated:	2/10/2021	E-mail:	
Attention:		Mailing Address:	3141 W Saint Anne Ave, PHOENIX, AZ 85041, USA
County:	Maricopa		

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Manager	LaRoie Davis		2245 W Wayland Rd., PHOENIX, AZ, 85041, USA	2/1/2021	2/10/2021

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Entity Known Place of Business

Attention: LaRoie Davis
Address: 2245 W Wayland Rd., PHOENIX, AZ, 85041, USA
County: Maricopa
Last Updated: 2/10/2021

Entity Principal Office Address

Attention:
Address:
County:
Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/2/2022 10:11:32 PM

Entity Details

Entity Name:	LSII HEALTH SERVICES LLC.	Entity ID:	23272446
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	9/15/2021	Reason for Status:	In Good Standing
Approval Date:	9/15/2021	Status Date:	9/15/2021
Original Incorporation Date:	9/15/2021	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			


Statutory Agent Information

Name:	Is davis llc	Appointed Status:	Active 9/15/2021
Attention:	LaRoie. Davis		
Address:	2245 W Wayland , PHOENIX, AZ 85041, USA		
Agent Last Updated:	9/15/2021	E-mail:	
Attention:	LaRoie. Davis	Mailing Address:	2245 W Wayland , PHOENIX, AZ 85041, USA
County:	Maricopa		

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member	LaRoie S. Davis II		2245 W Wayland, PHOENIX, AZ, 85041, Maricopa County, USA	9/16/2021	9/15/2021

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Address 

Attention: LaRoie. Davis Address: 2245 W Wayland, PHOENIX, AZ, 85041, USA County: Maricopa Last Updated: 9/15/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/2/2022 10:11:02 PM

Entity Details

Entity Name:	DLSD ENTERPRISE LLC	Entity ID:	23223868
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	5/16/2021	Reason for Status:	In Good Standing
Approval Date:	5/20/2021	Status Date:	5/16/2021
Original Incorporation Date:	5/16/2021	Life Period:	Perpetual
Business Type:	Other Services (except Public Administration)	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information


Name:	Is davis llc	Appointed Status:	Active 5/20/2021
Attention:	LaRoie. Davis		
Address:	2245 W Wayland , PHOENIX, AZ 85041, USA		
Agent Last Updated:	5/20/2021	E-mail:	
Attention:	LaRoie. Davis	Mailing Address:	2245 W Wayland , PHOENIX, AZ 85041, USA

County: Maricopa

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member	Dominique Owens		16160 S 50th St, 226, PHOENIX, AZ, 85048, Maricopa County, USA		5/20/2021
Member	LaRoie S Davis JR		16160 S 50th St, 226, PHOENIX, AZ, 85048, Maricopa County, USA		5/20/2021
Member	Sydney Davis		16160 S 50th St, 226, PHOENIX, AZ, 85048, Maricopa County, USA		5/20/2021

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Address 

Attention: Address: 16160 S 50th St, 226, PHOENIX, AZ, 85048, USA County: Maricopa Last Updated: 5/20/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/2/2022 10:09:51 PM

Entity Details

Entity Name:	DIVINE ROSES LLC	Entity ID:	23271571
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	9/14/2021	Reason for Status:	In Good Standing
Approval Date:	9/15/2021	Status Date:	9/14/2021
Original Incorporation Date:	9/14/2021	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			


Statutory Agent Information

Name:	Is davis llc	Appointed Status:	Active 9/15/2021
Attention:	LaRoie. Davis		
Address:	2245 W Wayland , PHOENIX, AZ 85041, USA		
Agent Last Updated:	9/15/2021	E-mail:	
Attention:	LaRoie. Davis	Mailing Address:	2245 W Wayland , PHOENIX, AZ 85041, USA
County:	Maricopa		

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member and Manager	Ariel Davis		5118 W Melody Ln, LAVEEN, AZ, 85339, Maricopa County, USA	9/13/2021	9/15/2021
Member and Manager	Jovon Davis		5118 W Melody Ln, LAVEEN, AZ, 85339, Maricopa County, USA	9/13/2021	9/15/2021

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Address 

Attention: Divine Roses LLC Address: 5118 W Melody Ln, LAVEEN, AZ, 85339, USA County: Maricopa Last Updated: 9/15/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/2/2022 10:12:01 PM

Entity Details

Entity Name:	SIDNEYRDAVIS LLC	Entity ID:	23301440
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	11/30/2021	Reason for Status:	In Good Standing
Approval Date:	11/30/2021	Status Date:	11/30/2021
Original Incorporation Date:	11/30/2021	Life Period:	Perpetual
Business Type:	Other Services (except Public Administration)	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information


Name:	Is davis llc	Appointed Status:	Active 11/30/2021
Attention:	LaRoie. Davis		
Address:	2245 W Wayland , PHOENIX, AZ 85041, USA		
Agent Last Updated:	11/30/2021	E-mail:	
Attention:	LaRoie. Davis	Mailing Address:	2245 W Wayland , PHOENIX, AZ 85041, USA

County: Maricopa

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Member and Manager	Sidney R Davis		2258 W Wayland Rd, PHOENIX, AZ, 85041, Maricopa County, USA		11/30/2021

Page 1 of 1, records 1 to 1 of 1

Address 

Attention: LaRoie. Davis Address: 2245 W Wayland, PHOENIX, AZ, 85041, USA County: Maricopa Last Updated: 11/30/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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Entity Information

Search Date and Time:

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Entity Details

Entity Name:	SOUL REVIVAL, INC.	Entity ID:	23099136
Entity Type:	Domestic Nonprofit Corporation	Entity Status:	Active
Formation Date:	6/23/2020	Reason for Status:	In Good Standing
Approval Date:	7/16/2020	Status Date:	8/20/2021
Original Incorporation Date:	6/23/2020	Life Period:	Perpetual
Business Type:	TO HELP FIND HOUSING, MEALS, CLOTHING AND OTHER NECESSITIES FOR THOSE IN NEED.	Last Annual Report Filed:	2021
Domicile State:	Arizona	Annual Report Due Date:	6/23/2022
		Years Due:	
Original Publish Date:			

Statutory Agent Information

Name:	PATRICK LEGENZOFF	Appointed Status:	Active 7/16/2020
Attention:		Address:	3529 W. PASEO WAY, LAVEEN, AZ 85339, USA
Agent Last Updated:	8/20/2021	E-mail:	
Attention:		Mailing Address:	

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
President	Patrick Legenzoff		PO Box 627, CASHION, AZ, 85329, USA	6/23/2020	8/20/2021
Treasurer	Michael Legenzoff		2323 W Mescal St, #202, PHOENIX, AZ, 85029, USA	8/9/2021	8/20/2021
Secretary	Ferrah Melton		2323 W Mescal St, #202, PHOENIX, AZ, 85029, USA	8/16/2021	8/20/2021
Director	James Owen		4020 N Parkway, # 1, SCOTTSDALE, AZ, 85251, USA	8/9/2021	8/20/2021

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Entity Known Place of Business

Attention: Address: 2323 W Mescal St, #202, PHOENIX, AZ, 85029, USA County: Maricopa Last Updated: 8/20/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 2/2/2022 10:43:06 PM

Entity Details

Entity Name:	HELPING HANDS RECOVERY LLC	Entity ID:	23262137
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	8/20/2021	Reason for Status:	In Good Standing
Approval Date:	8/20/2021	Status Date:	8/20/2021
Original Incorporation Date:	8/20/2021	Life Period:	Perpetual
Business Type:	Health Care and Social Assistance	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			


Statutory Agent Information

Name:	Helping Hands Realty	Appointed Status:	Active 8/20/2021
Attention:			
Address:	2323 W Mescal st, #201, PHOENIX, AZ 85029, USA		
Agent Last Updated:	8/20/2021	E-mail:	
Attention:	Patrick Legenzoff	Mailing Address:	PO Box 627, CASHION, AZ 85329, USA
County:	Maricopa		

Principal Information

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Manager	Helping Hands Realty	Helping Hands	PO Box 627, CASHION, AZ, 85329, Maricopa County, USA		8/20/2021

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Address 

Attention: Helping Hands Address: PO Box 627, CASHION, AZ, 85329, USA County: Maricopa Last Updated: 8/20/2021

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 1/29/2022 3:18:25 PM

Entity Details

Entity Name:	HOWARD & DAVIS THERAPEUTIC HOMES LLC	Entity ID:	23307945
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	12/31/2021	Reason for Status:	In Good Standing
Approval Date:	1/7/2022	Status Date:	12/31/2021
Original Incorporation Date:	12/31/2021	Life Period:	Perpetual
Business Type:	Any legal purpose	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information

Name:	JEROME DAVIS	Appointed Status:	Active 1/7/2022
Attention:			
Address:	3209 W APOLLO RD , PHOENIX, AZ 85041, USA		
Agent Last Updated:	1/7/2022	E-mail:	
Attention:		Mailing Address:	3209 W APOLLO RD , PHOENIX, AZ 85041, USA
County:	Maricopa		

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Manager	JEROME DAVIS		3209 W APOLLO RD, PHOENIX, AZ, 85041, Maricopa County, USA	12/13/2021	1/7/2022
Member	JEROME DAVIS		3209 W APOLLO RD, PHOENIX, AZ, 85041, Maricopa County, USA	12/13/2021	1/7/2022
Member	MILTON HOWARD		7371 W SAN MIGUEL AVE, GLENDALE, AZ, 85303, Maricopa County, USA	12/13/2021	1/7/2022

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Address 

Attention: Address: 3209 W APOLLO RD, PHOENIX, AZ, 85041, USA County: Maricopa Last Updated: 1/7/2022

Entity Principal Office Address

Attention: Address: County: Last Updated:

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ENTITY INFORMATION

Search Date and Time: 1/29/2022 3:17:03 PM

Entity Details

Entity Name:	MAJEVYN DESIGNS LLC	Entity ID:	23307946
Entity Type:	Domestic LLC	Entity Status:	Active
Formation Date:	12/31/2021	Reason for Status:	In Good Standing
Approval Date:	1/7/2022	Status Date:	12/31/2021
Original Incorporation Date:	12/31/2021	Life Period:	Perpetual
Business Type:	Any legal purpose	Last Annual Report Filed:	
Domicile State:	Arizona	Annual Report Due Date:	
		Years Due:	
Original Publish Date:			

Statutory Agent Information


Name:	JEROME DAVIS	Appointed Status:	Active 1/7/2022
Attention:			
Address:	3209 W APOLLO RD , PHOENIX, AZ 85041, USA		
Agent Last Updated:	1/7/2022	E-mail:	
Attention:		Mailing Address:	3209 W APOLLO RD , PHOENIX, AZ 85041, USA
County:	Maricopa		

Principal Information

Privacy Policy (<http://azcc.gov/privacy-policy>) | Contact Us (<http://azcc.gov/corporations/corporation-contacts>)

Title	Name	Attention	Address	Date of Taking Office	Last Updated
Manager	JEROME DAVIS		3209 W APOLLO RD, PHOENIX, AZ, 85041, Maricopa County, USA	12/31/2021	1/7/2022
Member	JEROME DAVIS		3209 W APOLLO RD, PHOENIX, AZ, 85041, Maricopa County, USA	12/31/2021	1/7/2022

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Address 

Attention: Address: 3209 W APOLLO RD, PHOENIX, AZ, 85041, USA County: Maricopa Last Updated: 1/7/2022

Entity Principal Office Address

Attention: Address: County: Last Updated:

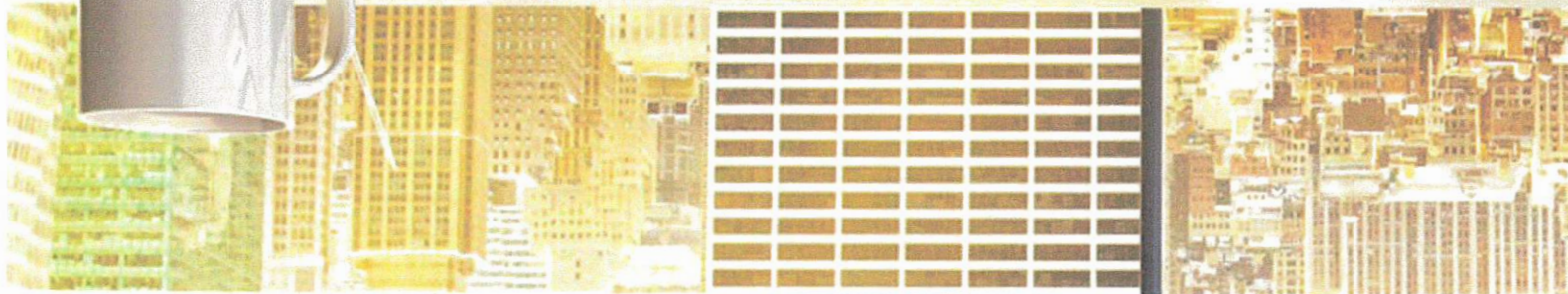
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Franchise Information on www.APRBHS.com

www.Solutionsofsobriety.com website has been taken down as of 2/4/22

A PATH OF RESILIENCE FRANCHISE OPPORTUNITY



6102 S 37TH LN, PHOENIX, AZ 85041
O/ (602) 535-4525
W/ WWW.FRRBHS.COM



A PATH of RESILIENCE LLC. Is a behavioral health business that was established in 2015. Over the course of the last five years **APRLLC.** has grown from a single group home to owning three separate properties. It has been the vision of our founder's to lead the charge when it comes to behavioral health. Our founders had the vision while working in the field for other well-known company's and leading the charge when it came to development in those company's, that It became a natural progression into ownership.

Ownership: the act, state, or right of possessing something. The ability to control one's decision making process!

APRLLC. is seeking to become the bridge between the working force that drives the vehicle of Behavioral Health Services, and the working man or woman who desires to be that Vehicle to Behavioral Health Services through Ownership by way of franchising. **A PATH of RESILIENCE LLC.** has the ability to extend it's reach from a simple small business into the platform of a mega company, All we need is your help! By helping us grow under our umbrella as a franchise you not only get to embark on a journey of success, but on one of purpose as well. **APRLLC.** is about giving back as well as making a profit.

Here at **A PATH of RESILIENCE LLC.** we understand that joining a team can be a lengthy and well thought out process. It is our job to make you feel welcome, how we do that is by allowing you to ask questions and voice your concerns. Our team of professionals have been in the business for more than a collective 50 years.

Our Goals

The goal of every business is to be successful, by successful; I means a large customer base, constantly increasing our client core, and hence rapid business growth.

- APOR paramount goal is to properly maintain or improve the clients well-being overall mental health
- APOR's goal is to properly educate the general public on how to properly maintain a healthy lifestyle for our clients through behavioral health.
- Our goal is also to run a business that will be successful in revenue and size.

Our Objectives

APOR has set the following objectives for the first three years of our business

- To generate substantially significant revenue at the end of the first year of operations after opening.
- Produce a positive return on investment (ROI) for our business by the end of the second year.
- Maintain a steady amount of clients via our referral services.



Our Long-term Objectives

- To become a pillar of our community, tagged with Excellence and Quality Services.
- Create our legacy which will provide for generations to come.
- Establish a minimum of 98% customer satisfaction to establish long-time relationships with our clients, insurance providers and state and local officials, which will help create word-of-mouth marketing.
- To achieve a consistently increasing marginal profit.
- To obtain a payback on investment within 3 – 5 years of opening.

To obtain these objectives **APRLLC.** is seeking individuals who are eager to obtain personal wealth, in the beginning APOR is forecasting to grow at a rapid pace and will expect rapid increase in our profits.

The business model is developed from the understanding that there is a growing need in behavioral health. Many states are changing laws to better regulate the treatment of clients under the behavioral health umbrella, as there could be relapses that occur during the treatment process. Some stories have come to light in the last year about client mistreatment during their stay in a facility. A Path of Resilience LLC. Offers peace of mind to client family members and also allow them to keep a watchful eye as the treatment process wages on.

What a better way to bring peace of mind to the family members of our clients. Clients that would benefit from the services **APRLLC.** provides are unlimited, and here are a few examples. Clients that have pre-existing health issues, daily anxiety attacks, clients that have been injured or traumatized by certain experiences. Others have been in behavioral health for years and have witnessed the tragedies of treatment at a few facilities and will find **APRLLC.** a breathe of fresh air. The business model is to leverage the client landscape and innovative nature of behavioral health and turn the tables into our favor and rake in significant revenue along the way. The revenue stream will be mainly from the services we provide.

At **APRLLC.** We will uphold premium and distinct values such as:

- ♣ Quality Premium Service
- ♣ Integrity
- ♣ Honesty
- ♣ Trust
- ♣ Accessibility
- ♣ Excellent Client Relationship



Tier 1

Our Tier 1 package will grant the Franchisee the ability to use the name and likeness of **APRLLC**. The Franchisee will also be able to secure clients and bill for those clients under our license and insurance providers. This package also includes (2) days, 48 hours of set-up and development training for new facilities. In addition **APRLLC** will help the Franchisee via email, skype, go meeting, phone call ect; free consultation's over the next (1 year). We will basically mentor you to success.

Franchise Tag: \$250,000 dollars (US)

Down Payment: 10%

Initial Cost: \$25,000 dollars (USD)

APR: 6.75%

Agreement: 5 year minimum term

Options: up to 3 options to renew.

Total Franchise Fee: \$334,375.00

Royalty: 9% of monthly net profit

Loan Payment Schedule: 60 payments of \$5,572.92/month

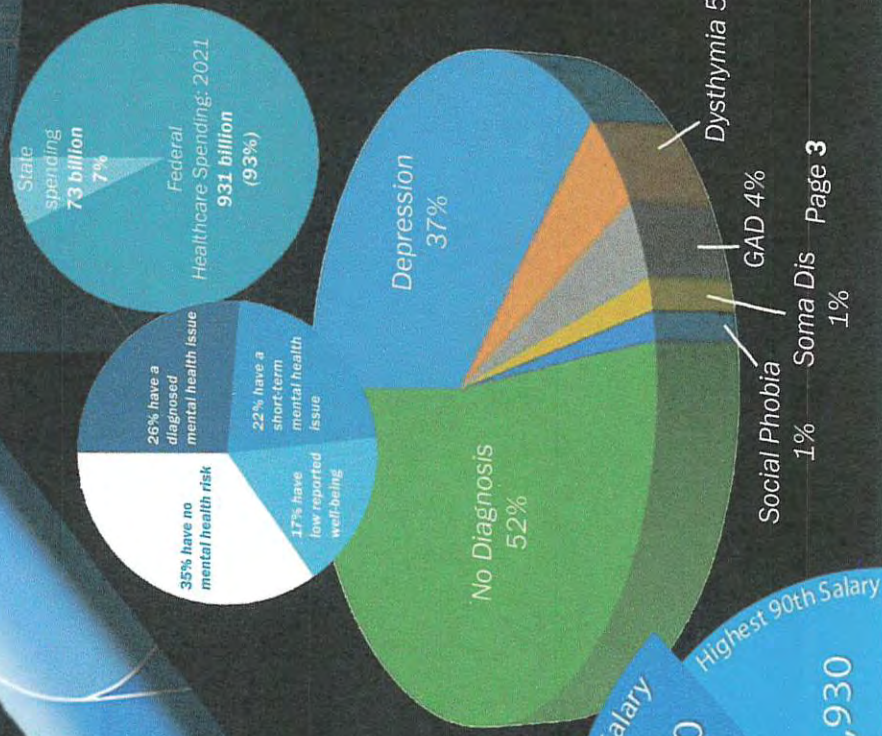
Royalty fee 9%: \$/ month

\$25K

INVESTMENT



Providing Options and Supporting Change





MENTAL HEALTH

Tier 2

Our Tier 2 package will grant the Franchisee the ability to use the name and likeness of **APRLLC**. The Franchisee will also be able to secure clients and bill for those clients under our license and insurance providers. This package also includes (2) days, 48 hours of set-up and development training for new facilities. In addition **APRLLC** will help the Franchisee via email, skype, go meeting, phone call ect; free consultation's over the next (10 month's). We will basically mentor you to success.

Franchise Tag: \$250,000 dollars (US)

Down Payment: 2%

Initial Cost: \$5,000 dollars (USD)

APR: 13.75%

Agreement: 5 year minimum term

Options: up to 3 options to renew.

Total Franchise Fee: \$421,875.00

Royalty: 18.9% of monthly net profit

Loan Payment Schedule: 60 payments of \$7,031.25/month

Royalty fee 18.9%: \$/ month

\$5K
INVESTMENT

A PATH of RESILIENCE LLC.

Marketing Objectives

Due to the nature of the business, **APRLLC.** will use its business contacts to secure the following;

- Acquire more insurance providers and seek out new clients
- Position ourselves as the market leader in client care
- Increase company awareness and brand recognition in Arizona, Texas and California
- Create immediate and long-term revenue for your business

Marketing Activities of APRLLC.

The following are the marketing strategies which **APRLLC.** have adopted:

- Extensively utilize word-of-mouth advertisement – interacting with everyone that comes in contact with us
- Utilizing friends and family to promote awareness of the business
- Leveraging social media platforms to build awareness
- Engaging in social media donations to worthy causes
- Active involvement in local events, activities and or community service
- Posters, Flyers, Brochures

Pricing Strategy

Although, we will be providing services of the highest quality and professional standards only; they will represent the industry standard in pricing per client. Our pricing system is based on services provided or all inclusive billing, we do not have the ability to negotiate or change customer pricing it is set by the healthcare providers. We will not compromise our integrity or business dealing in private services and price gouging.

The standard pricing today for a client is approximately \$150 per day for a client that is in a bed in your facility overnight. There maybe additional fees that maybe added to this total that will be disclosed upon interest in franchising via **APRLLC.** on average our business will earn between \$17k and \$24k a month. Before bills and payroll are deducted.

At the end of the day we would like to sit down with you and see if you will make a promising addition to **APRLLC.** and its bottom line.

Confidentiality Agreement

The undersigned reader acknowledges that the information provided by A Path of Resilience LLC. In this business plan is confidential; therefore reader agrees not to disclose it without the express written consent of A Path of Resilience LLC. It is acknowledges by reader that information to be furnished in this business plan is in all respects confidential in nature, other than information which is in the public domain through other means and that any disclosure or use of same by reader may cause serious harm or damage to A Path of Resilience LLC.

Upon request, this document is to be immediately returned to A Path of Resilience LLC.

Signature

A Path of Resilience LLC.



[e/customer.service@aprbhs.com](mailto:customer.service@aprbhs.com) * [w/ www.aprbhs.com](http://www.aprbhs.com)

Pleasant House

Phoenix/Laveen

6102 S 37th Ln, Phx AZ 85041

Rose House

Phoenix/South

2258 W Wayland Rd, Phx, AZ 85041

Christi's House

Mesa

1102/1104 N July Cir, Mesa, AZ 85203