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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

Plaintiff,

v.

DANNI DENISE OWENS (001),
(Counts 1-7, 11)
BREE KAYLYN LOBLEY (002),
(Counts 1, 2, 4, 5, 9)
AHLIA NEOLANI WONG (003),
(Counts 1, 2, 8, 9, 10)
HEATHER JANE SMITH (004),
(Counts 1, 2, 6-10)
TANYA BOEHM, aka TANYA
KANTUN (005),
(Counts 1, 2, 6-10)
NATALIE DIANE REBELLOZO
(006), (Counts 1, 2, 8, 9)
[REDACTED] (007),
(Counts 1, 2, 9)
SLIMMING GRACE, LLC (008)
(Counts 1, 11)

Defendants.

Cause No:

98 SGJ 161

INDICTMENT

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

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

COUNT 3: PARTICIPATION IN A
CRIMINAL SYNDICATE, MANAGE
OR FINANCE, a Class 2 Felony, in
violation of A.R.S. § 13-2308(A)(1)

COUNT 4: AGGRAVATED TAKING
IDENTITY FOR UNLAWFUL
PURPOSE OR TO CAUSE LOSS,
THREE OR MORE PERSONS, a Class 3
Felony, in violation of A.R.S. § 13-2009A1

COUNT 5: FORGERY, MAKE, COMPLETE OR ALTER WRITTEN INSTRUMENT, a Class 4 Felony, in violation of A.R.S. § 13-2002A1

COUNT 6: PRESCRIPTION-ONLY DRUG MANUFACTURE, SELL OR DISTRIBUTE MISBRANDED DRUGS, a Class 4 Felony, in violation of A.R.S. § 13-3406A9

COUNT 7: PRESCRIPTION-ONLY DRUG TRANSPORT OR IMPORT FOR SALE, a Class 6 Felony, in violation of A.R.S. § 13-3406A7

COUNT 8: ADMINISTRATION OF PRESCRIPTION-ONLY DRUGS, a Class 1 Misdemeanor, in violation of A.R.S. § 13-3406A5

COUNT 9: ASSISTING A CRIMINAL SYNDICATE, a Class 4 Felony, in violation of A.R.S. § 13-2308(C)

COUNT 10: UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, a Class 5 Felony, in violation of A.R.S. § 32-3227F

COUNT 11: ILLEGAL CONTROL OF A CRIMINAL ENTERPRISE, ACQUIRE OR MAINTAIN BY RACKETEERING, a Class 3 Felony, in violation of A.R.S. § 13-2312A

The State Grand Jury accuses **DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN (005), NATALIE DIANE REBELLOZO**

(006), [REDACTED] (007), and SLIMMING GRACE, LLC (008) charging on this 15th day of June, 2026 that in or from MOHAVE County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES, A CLASS 2 FELONY

On or between January 26, 2024 and February 25, 2025, pursuant to scheme or artifice to defraud, DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), [REDACTED] (007), and SLIMMING GRACE, LLC (008) knowingly did obtain a benefit from Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock Charlie Smith, Toria Thomlinson, and Adriana Vides, by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, and 13-801.

COUNT 2

CONSPIRACY, A CLASS 2 FELONY

DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), and [REDACTED] (007), on or between January 26, 2024 and February 25, 2025, defendants herein, with the intent to promote or aid the commission of an offense, did agree with one or more persons, both known and unknown to the State Grand Jury, that at least

one of them or another person would engage in conduct constituting the offenses, in particular:

- 1) **Aggravated Identity Theft** in violation of A.R.S. § 13-2009(A)(1);
- 2) **Forgery** in violation of A.R.S. § 13-2002(A)(1); and
- 3) **Sale of Misbranded Drugs** in violation of A.R.S. § 13-3406.
- 4) **Fraud Schemes** in violation of A.R.S. § 13-2310

In furtherance of this conspiracy and to effect the foregoing objects thereof, these defendants and their co-conspirators did commit numerous overt acts, including but not limited to the overt acts described in Counts 1, 6, and 8 of this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-1003, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 3

PARTICIPATION IN A CRIMINAL SYNDICATE, MANAGE OR FINANCE, A CLASS 2 FELONY

DANNI DENISE OWENS (001), on or between January 26, 2024 and February 25, 2025, participated in a criminal syndicate by intentionally did organize, manage, direct, supervise, or finance Slimming Grace, LLC, a criminal syndicate, with the intent to promote or further the criminal syndicate, in violation of A.R.S. §§ 13-2301, 13-2308(A)(1), 13-701, 13-702, and 13-801.

COUNT 4

AGGRAVATED TAKING IDENTITY FOR UNLAWFUL PURPOSE OR TO CAUSE LOSS, THREE OR MORE PERSONS, A CLASS 3 FELONY

On or between January 26, 2024 and February 25, 2025, **DANNI DENISE**

OWENS (001), and BREE KAYLYN LOBLEY (002), knowingly took, purchased, manufactured, recorded, possessed, or used any personal identifying information of three or more other persons or entities, to wit: Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock, Charlie Smith, Toria Thomlinson, and Adriana Vides, without consent, with the intent to obtain or use those other persons' identity for any unlawful purpose, in violation of A.R.S §§ 13-2001, 13-2009, 13-701, 13-702, and 13-801.

COUNT 5

**FORGERY, MAKE COMPLETE OR ALTER WRITTEN INSTRUMENT, A
CLASS 4 FELONY**

On or between January 26, 2024 and February 25, 2025, **DANNI DENISE OWENS (001), and BREE KAYLYN LOBLEY (002),** with the intent to defraud, falsely made and altered a written instrument and knowingly possessed a forged instrument, in violation of A.R.S. §§13-2002, 13-2001, 13-701, 13-702, and 13-801.

COUNT 6

**PRESCRIPTION-ONLY DRUG MANUFACTURE SELL OR DISTRIBUTE
MISBRANDED DRUGS, A CLASS 4 FELONY**

DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), and TANYA BOEHM, aka TANYA KANTUN (005), on or between January 26, 2024 and February 25, 2025, knowingly did manufacture, sell, or distribute various prescription-only medications that had their labels altered such that they were a misbranded drug, in violation of A.R.S. §§ 13-3401, 13-3406(A)(9), 13-3418, 32-1967, 13-701, 13-702, and 13-801.

DANNI DENISE OWENS (001), BREE KAYLYN LOBLEY (002),

HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005) ordered various weight loss drugs, skin creams, hair restoring drugs and numerous other prescription-only medications under identities stolen from Leslie Alexander, Kevin Brown, Laura Cardwell, Marina Mattingly, Destiny Morris, Cydni Irving Pitcock, Charlie Smith, Toria Thomlinson, and Adriana Vides. **DANNI DENISE OWENS (001), and BREE KAYLYN LOBLEY (002)** removed or obscured the names and other information of the prescribed persons, and **DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005)** sold the misbranded drugs to members of the public.

COUNT 7

**PRESCRIPTION-ONLY DRUG TRANSPORT OR IMPORT FOR SALE, A
CLASS 6 FELONY**

DANNI DENISE OWENS (001), HEATHER JANE SMITH (004), AND TANYA BOEHM, aka TANYA KANTUN (005), on or between January 26, 2024 and February 25, 2025, knowingly did transport for sale, import into this state, or offer to transport for sale or import into this state, sell, transfer or offer to sell or transfer “Clear Revive Blemish Cream”, a prescription-only drug, without a valid prescription, in violation of A.R.S. §§ 13-3401, 13-3406(A)(7), 13-3418, 13-701, 13-702, and 13-801.

COUNT 8

**ADMINISTRATION OF PRESCRIPTION-ONLY DRUGS, A CLASS 1
MISDEMEANOR**

HEATHER JANE SMITH (004), AHLIA NEOLANI WONG (003), TANYA BOEHM, aka TANYA KANTUN (005), and NATALIE DIANE REBELLOZO (006),

on or between January 26, 2024 and February 25, 2025, knowingly did administer Tirzepatide, a prescription-only drug, to many patients without a valid consultation or prescription, including Amy Posie, Juanita Contreras, Tory Mortensen, Chaz Morris, Maxine Hart, Alexis Hercenberg, Sandra Hernandez, Harold Meeker, Christi Meeker, Christopher Demme, Katie Lee Demme, Donna Diamant, Jenny Narro, and Shelly Griffith, whose possession or use of Tirzepatide, violated A.R.S. § 13-3406, in violation of A.R.S. §§ 13-3401, 13-3406(A)(5), 13-3418, 13-707, and 13-802.

COUNT 9

ASSISTING A CRIMINAL SYNDICATE, A CLASS 4 FELONY

BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), AND [REDACTED] (007), on or between January 26, 2024 and February 25, 2025, did commit **Fraud Schemes and Artifices §13-2310, Conspiracy §13-1003, Aggravated Identity Theft §13-2009, Forgery §13-2002, Sales of Misbranded Drugs §13-3406, and/or Unauthorized Practice of a Health Profession §32-3227**, all felony offenses, with the intent to promote or further the criminal objectives of **DANNI DENISE OWENS (001)** and **SLIMMING GRACE LLC**, a criminal syndicate, in violation of A.R.S. §§ 13-2301, 13-2308(C), 13-701, 13-702, and 13-801.

Each of the subjects, **BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), AND [REDACTED]**

██████████ (007) committed the felonies listed below:

BREE KAYLYN LOBLEY (002) - selected names of random patients to place on prescription orders from Slimming Grace to Strive Pharmacy without their permission thereby stealing their identity for illegal purposes.

AHLIA NEOLANI WONG (003) – sold and administered prescription only medication to clients without a prescription and without a valid medical consultation, fraudulently misleading the clients to believe she was a qualified medical assistant.

HEATHER JANE SMITH (004) – Engaging in the unauthorized practice of a health profession by giving patient consultations and injections of prescription-only medications.

TANYA BOEHM, aka TANYA KANTUN(005) - Engaging in the unauthorized practice of a health profession by giving patient consultations and injections of prescription-only medications.

NATALIE DIANE REBELLOZO (006) – Filling and Distributing syringes filled with unlabeled prescription only medications and fraudulently holding herself out as a medical professional authorized to administer prescription only medication.

██ (007) – As sales representative for Strive Pharmacy, knowingly selling prescription only medications near their expiration dates for use by **DANNI DENISE OWENS (001)** and **SLIMMING GRACE LLC** thereby furthering and assisting their fraud scheme for monetary gain.

COUNT 10

**UNAUTHORIZED PRACTICE OF A HEALTH PROFESSION, A CLASS 5
FELONY**

AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005) on or between January 26, 2024 and February 25, 2025, did engage in the practice of Medical Assistant, a health profession, without having the licensure or certification required to practice in that health profession, in violation of A.R.S. §§ 32-3227, 13-701, 13-702, and 13-801.

COUNT 11

**ILLEGAL CONTROL OF A CRIMINAL ENTERPRISE, ACQUIRE OR
MAINTAIN BY RACKETEERING, A CLASS 3 FELONY**

DANNI DENISE OWENS (001) and SLIMMING GRACE, LLC (008), on or between January 26, 2024 and February 25, 2025, through racketeering or its proceeds, acquired or maintained, by investment or otherwise, control of any enterprise. The enterprise(s) included, but were not limited to BREE KAYLYN LOBLEY (002), AHLIA NEOLANI WONG (003), HEATHER JANE SMITH (004), TANYA BOEHM, aka TANYA KANTUN(005), NATALIE DIANE REBELLOZO (006), and [REDACTED] (007), and others known and/or unknown.

The racketeering included:

- 1) **Aggravated Identity Theft** in violation of A.R.S. § 13-2009(A)(1);
- 2) **Forgery** in violation of A.R.S. § 13-2002(A)(1); and
- 3) **Sale of Misbranded Drugs** in violation of A.R.S. § 13-3406.
- 4) **Fraud Schemes** in violation of A.R.S. § 13-2310

The alleged racketeering includes, but is not limited to the acts of racketeering described in this Indictment (which are incorporated herein by reference as if set forth in full), in violation of A.R.S. §§ 13-2312(A) and (D), 13-2301, 13-108, 13-109, 13-302, 13-304, 13-305, 13-701, 13-703, 13-801, 13-804, 13-803, 13-811, 13-2313, 13-2314.

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

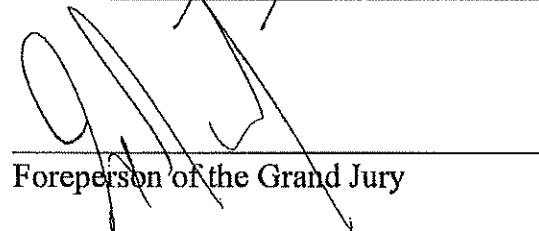
True Bill
(A "True Bill")

KRISTIN K. MAYES
ATTORNEY GENERAL
STATE OF ARIZONA



ROBERT TOKAR
Assistant Attorney General

Dated: 8/15/26



Foreperson of the Grand Jury