

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA**

STATE OF FLORIDA,

CASE NO:

OSWP NO: 2006-0030-TPA

v.

WILLIAM R. MANTILLA - RODRIGUEZ,
Defendant.

INFORMATION

COUNT 1: FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION (AIDENTITY THEFT - USE²)

F.S. 817.568(2)(b)

Second Degree Felony

COUNT 2

ORGANIZED SCHEME TO DEFRAUD

F.S. 817.034(4)(a)3

Third Degree Felony

IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA

COUNT 1

IDENTITY THEFT - USE

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that beginning on or about December 21, 2005, and continuing through and including April 6, 2006, in the Sixth and Thirteenth Judicial Circuit of Florida, to wit: Pinellas and Hillsborough Counties, **William R. Mantilla - Rodriguez**, did unlawfully, willfully and without authorization, fraudulently use personal identification information concerning 10 or more individuals, to wit: **Jody L. Sodano, Nila J. Sodano, Carole M. Lorenceau, Jonathan Aljasir, Cindy Aljasir, Patricia M. Alvarez, Danielle M. Charles, George Borges, Joseph T. Flannery, Sanjay B. Sharma, Loudes N. Ungson and Kevin Kalwicz**, without first obtaining their consent, in violation of Florida Statute 817.568(2)(b).[F12]

COUNT 2

ORGANIZED SCHEME TO DEFRAUD

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that beginning on or about December 21, 2005, and continuing through and including April 6, 2006, in the Sixth and Thirteenth Judicial Circuit of Florida, to wit: Pinellas and

Hillsborough Counties, Florida, **William R. Mantilla - Rodriguez** did engage in a scheme to defraud, to wit: a systematic, ongoing course of conduct with intent to defraud one or more persons or entities, to wit: **Jody L. Sodano, Nila J. Sodano, Carole M. Lorenceau, Jonathan Aljasir, Cindy Aljasir, Patricia M. Alvarez, Danielle M. Charles, George Borges, Joseph T. Flannery, Sanjay B. Sharma, Loudes N. Ungson, Kevin Kalwicz, Hess, Sunoco, Exxon Mobil, Citgo Choice, Shell Oil, Rally, BP Oil, Visa, Mastercard/MBNA, South Florida Educational Credit Union, Wachovia Bank North America, American Express, Chase Bank, JP Morgan Chase, Jupiter Bank, Discover Financial** and/or others, known and unknown, or with intent to obtain property from one or more of these same persons or entities by false or fraudulent pretenses, representations or promises, or willful misrepresentation of a future act, and did obtain property thereby to wit: fuel and/or its equivalent value in United States currency, and such value being less than twenty thousand dollars (\$20,000.00), contrary to and in violation of Section 817.034(4)(a)3, Florida Statutes.[111]

And said offenses occurred in two or more judicial circuits as part of a related transaction or was committed in connection with an organized **criminal conspiracy affecting two or more judicial circuits in the State of Florida.**

PETER H. WILLIAMS
STATEWIDE PROSECUTOR

KATHERINE DIAMANDIS
Assistant Statewide Prosecutor
Concourse Center 4
3507 Frontage Road, Suite 350
Tampa, Florida 33607
(813) 287-7960
Florida Bar No. 69116

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared KATHERINE DIAMANDIS, designated Assistant Statewide Prosecutor for the State of Florida, who, first being duly sworn, says that the allegations as set forth in the foregoing Information are based upon facts that have been sworn to as true, and which, if true, would constitute the offenses therein charged, that the prosecution is instituted in good faith, and certifies that she has received testimony under oath from the material witness or witnesses for the offenses.

Sworn to and subscribed before
me this _____ day of _____, 2006.

Notary Public - Signature

Notary Public - Print Name

Personally known to Notary.