

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA**

**State of Florida**

**Case No:** \_\_\_\_\_

**vs.**

**Division:** \_\_\_\_\_

**Michael Glass (A)**  
**Christopher Miller (B)**  
**Samuel Harris (C)**  
**Amber Suters (D)**  
**William Wofford (E)**  
**Tara Megna (F)**

**OSWP No: 2005-0174-ORL**

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F.S. 895.03(3)  
(F-1)  
(A,B,C,D,E & F)

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**INFORMATION**  
F.S. 817.568(2)(a)  
(F-3)  
A

**COUNT 2: CONSPIRACY TO COMMIT**  
**RACKETEERING**  
F.S. 895.03(4)  
(F-1)  
(A,B,C,D,E & F)

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**INFORMATION**  
F.S. 817.568(2)(a)  
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**COUNT 3: CRIMINAL USE OF**  
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A

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PERSONAL IDENTIFICATION  
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(F-3)  
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DEGREE, \$300 OR MORE  
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A**

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DEGREE, \$300 OR MORE  
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(F-3)  
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DEGREE, \$300 OR MORE  
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(F-3)  
A**

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DEGREE, \$300 OR MORE  
F.S. 812.014  
(F-3)  
B**

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

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**COUNT 1 - RACKETEERING**

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 November 1, 2003, and continuing through on or about February 28, 2005, in the Fifth, Ninth, Tenth, Seventeenth and Eighteenth Judicial Circuits of Florida, to wit: Lake, Orange, Osceola, Polk, Broward and Seminole Counties, **MICHAEL GLASS, CHRISTOPHER MILLER, SAMUEL HARRIS, AMBER SUTERS, WILLIAM WOFFORD and TARA MEGNA**, while employed by or associated with an enterprise, as defined in Section 895.02(3), Florida Statutes, to wit: a group of individuals associated in fact although not a legal entity, consisting of the above-named individuals, together with others, to wit: Erica Webb did unlawfully conduct or participate, directly or indirectly, in such enterprise through a continuous pattern of racketeering activities as defined by Section 895.02(4), Florida Statutes, by engaging in at least two incidents of racketeering activity which had similar intents, results, accomplices, victims, or methods of commission, or were otherwise related by distinguishing characteristics and were not isolated incidents, including at least two of the following predicate incidents, in violation of and contrary to Florida Statutes 895.03(3):

### **Predicate Incident One**

On or about February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Joseph Delrosso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Two**

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, Florida, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Deanna Cardoso and George Cardoso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Circuit City, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Three**

On or about July 31, 2004, in the Eighteenth Judicial Circuit of Florida, to-wit: Seminole County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Darrell Johnson, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about July 31, 2004, in the Eighteenth Judicial Circuit of Florida, to-wit: Seminole County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Four**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Bass Pro Shop, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Five**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Target, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Six**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Home Depot, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Seven**

On or about November 26, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jason Palmer, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Eight**

On or about December 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Nancy and Dion Fickert, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Nine**

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Recep Aksu, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Ten**

On or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

or

On or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Discount Tire, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Eleven**

On or about August 8, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twelve**

On or about August 7, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about August 7, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000 the property of another, to wit: American Express or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Thirteen**

On or about October 10, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Orlando Colon, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Fourteen**

On or about October 10, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Orlando Colon, at Wal-Mart, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Fifteen**

On or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: John Huddleston, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Sixteen**

On or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Marsha and James Salisbury, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: First USA or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Seventeen**

On or about March 19, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Sem Joseph Cuevas, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Eighteen**

On or about March 18, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Sem Joseph Cuevas, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or March 18, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Nineteen**

On or about August 26, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Ashley Voit, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty**

On or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: David Scott Link, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-one**

On or about October 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Geoffrey Koach, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-two**

On or about November 22, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-three**

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Lowes, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Lowes or MBNA, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-four**

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Wal-Mart, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Wal-Mart or MBNA, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-five**

On or about January 18, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-six**

On or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Sound Advise, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-seven**

On or about November 11, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Orange, Osceola and Polk Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-eight**

On or about November 30, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Orange, Osceola and Polk Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

## **COUNT 2: CONSPIRACY TO COMMIT RACKETEERING**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida by and through the undersigned Assistant Statewide Prosecutor, under oath, CHARGES that beginning on or about November 1, 2003, and continuing through on or about February 28, 2005, in the Fifth, Ninth, Tenth, Seventeenth and Eighteenth Judicial Circuits of Florida, to-wit: Lake, Orange, Osceola, Polk, Broward and Seminole Counties, Florida, **MICHAEL GLASS, CHRISTOPHER MILLER, SAMUEL HARRIS, AMBER SUTERS, WILLIAM WOFFORD and TARA MEGNA**, did, unlawfully and knowingly combine, conspire, confederate or agree, with each other or with others, known or unknown, to violate the laws of the State of Florida, to-wit: the laws which prohibit any persons employed by or associated with any enterprise as defined in Florida Statutes 895.02(3), which enterprise consisted of the above named individuals acting together with a group of individuals associated in fact although not a legal entity, including Erica Webb, and others known and unknown, from conducting or participating, either directly or indirectly, in the affairs of said enterprise through a continuous pattern of racketeering activity, in violation of Florida Statutes 895.03(3), with the intent that such offense would be committed, either by intending to engage in at least two incidents of racketeering activity or intending otherwise to participate in the affairs of said enterprise with the knowledge and intent that other members of the enterprise would engage in at least two incidents of racketeering activity as defined by Section 895.02(4), Florida Statutes which had similar intents, results, accomplices, victims, or methods of commission or which were otherwise interrelated by distinguishing characteristics and were not isolated incidents, and in furtherance of said conspiracy the defendants and other known and unknown did the following:

### **Predicate Incident One**

On or about February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Joseph Delrosso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Two**

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, Florida, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Deanna Cardoso and George Cardoso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Circuit City, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Three**

On or about July 31, 2004, in the Eighteenth Judicial Circuit of Florida, to-wit: Seminole County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Darrell Johnson, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about July 31, 2004, in the Eighteenth Judicial Circuit of Florida, to-wit: Seminole County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

#### **Predicate Incident Four**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Bass Pro Shop, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

#### **Predicate Incident Five**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Target, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Six**

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, at Home Depot, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Seven**

On or about November 26, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jason Palmer, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Eight**

On or about December 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Nancy and Dion Fickert, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Nine**

On or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Recep Aksu, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Ten**

On or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

or

On or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Discount Tire, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Eleven**

On or about August 8, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twelve**

On or about August 7, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about August 7, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000 the property of another, to wit: American Express or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Thirteen**

On or about October 10, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Orlando Colon, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Fourteen**

On or about October 10, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Orlando Colon, at Wal-Mart, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Fifteen**

On or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: John Huddleston, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Sixteen**

On or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Marsha and James Salisbury, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: First USA or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Seventeen**

On or about March 19, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Sem Joseph Cuevas, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Eighteen**

On or about March 18, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, Florida, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Sem Joseph Cuevas, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or March 18, 2004, in the Seventeenth Judicial Circuit of Florida, to-wit: Broward County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Nineteen**

On or about August 26, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Ashley Voit, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty**

On or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: David Scott Link, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-one**

On or about October 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Geoffrey Koach, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-two**

On or about November 22, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Target, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-three**

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Lowes, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Lowes or MBNA, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-four**

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, at Wal-Mart, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Wal-Mart or MBNA, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-five**

On or about January 18, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-six**

On or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a),

or

On or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Sound Advise, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

### **Predicate Incident Twenty-seven**

On or about November 30, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Orange, Osceola and Polk Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, check # 7305, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

### **Predicate Incident Twenty-eight**

On or about November 30, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Orange, Osceola and Polk Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, check # 7306, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT THREE**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Joseph Delrosso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT FOUR**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, Florida, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Deanna Cardoso and George Cardoso, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT FIVE**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about September 18, 2004, in the Fifth and Ninth Judicial Circuits of Florida, to-wit: Lake, Osceola and Orange Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jeffrey Borgen, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT SIX**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about November 26, 2004, in the Ninth Judicial Circuits of Florida, to-wit: Orange and Osceola Counties, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Jason Palmer, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT SEVEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about December 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Nancy and Dion Fickert, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT EIGHT**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Recep Aksu, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT NINE**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Orange and Osceola County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Christophe Pollzzie, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT TEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about October 10, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Orlando Colon, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT ELEVEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: John Huddleston, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT TWELVE**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Marsha and James Salisbury, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT THIRTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about August 26, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Ashley Voit, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT FOURTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: David Scott Link, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT FIFTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about October 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **SAMUEL HARRIS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Geoffrey Koach, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT SIXTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about November 22, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Angela Thompson, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT SEVENTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT EIGHTEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about January 18, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Brian Platta, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT NINETEEN**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about November 11, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Polk, Osceola and Orange Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT TWENTY**  
**CRIMINAL USE OF PERSONAL IDENTIFYING INFORMATION**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that on or about November 30, 2004, in the Ninth and Tenth Judicial Circuits of Florida, to-wit: Polk, Osceola and Orange Counties, **TARA MEGNA**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, to-wit: Manuel Brack and Sandra Brack, without first obtaining that individual's consent, in violation of Florida Statutes 817.568(2)(a).

**COUNT TWENTY-ONE**  
**GRAND THEFT OF THE THIRD DEGREE**

**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 February 12, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-TWO**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about February 14, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States money current or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Circuit City, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statutes 812.0142(c)1.

**COUNT TWENTY-THREE**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Target, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-FOUR**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-FIVE**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about September 18, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **MICHAEL GLASS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Bass Pro Shop, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-SIX**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about August 9, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Discount Tire, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-SEVEN**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about August 7, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-EIGHT**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about October 31, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: American Express or Home Depot, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT TWENTY-NINE**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about February 23, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **CHRISTOPHER MILLER** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: First USA and Best Buy, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT THIRTY**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Lowes or MBNA, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT THIRTY-ONE**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about November 24, 2004, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **AMBER SUTERS** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: MBNA or Wal-Mart, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT THIRTY-TWO**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about January 10, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$300 or more but less than \$5,000, the property of another, to wit: Discover or Sound Advise, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

**COUNT THIRTY-THREE**  
**GRAND THEFT OF THE THIRD DEGREE**

**PETER H. WILLIAMS**, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between on or about January 18, 2005, in the Ninth Judicial Circuit of Florida, to-wit: Osceola and Orange County, **WILLIAM FRED WOFFORD** did knowingly obtain or use, or endeavor to obtain or use United States currency or general merchandise, of a value of \$5,000 or more but less than \$10,000, the property of another, to wit: Cycle Sports Center, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to the defendant's own use or the use of a person not entitled thereto, in violation of Florida Statutes 812.014(2)(c)1.

AND SAID OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AS PART OF A RELATED TRANSACTION OR SAID OFFENSES WERE CONNECTED WITH AN ORGANIZED CRIMINAL CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA.

PETER H. WILLIAMS  
STATEWIDE PROSECUTOR  
STATE OF FLORIDA

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Dan R. Mosley  
Assistant Statewide Prosecutor  
Florida Bar No.856843  
135 W. Central Blvd., Suite 1000  
Orlando, Florida 32801  
(407) 245-0893

STATE OF FLORIDA  
COUNTY OF ORANGE

Personally appeared before me Dan R. Mosley, designated Assistant Statewide Prosecutor, who, being first duly sworn, says that she has received testimony under oath from the material witnesses which, if true, would constitute the offenses herein charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed before me this \_\_\_\_\_ day of October 2005, Dan R. Mosley, being personally known to me.

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Shirley Moton  
Notary Public  
State of Florida at Large

Defendants' Biographical Data

MICHAEL HARRIS GLASS  
1750 Cunningham Drive  
St. Cloud, FL 34771  
White Male  
DOB: 12/05/78  
ID # G420-548-78-445-0

AMBER SUTERS  
P.O. Box 251  
Davenport, FL 33836  
White Female  
DOB 11/14/83  
ID# S362-016-83-914-0

CHRISTOPHER BRYAN MILLER  
3151 Granada Blvd.  
Kissimmee, Fl 34746  
White Male  
DOB: 07/19/79  
ID # M460-102-79-259-0

WILLIAM FRED WOFFORD  
5283 Johnson Avenue  
Haines City, FL 33844  
White Male  
DOB 10/12/73  
ID# W163-926-73-372-0

SAMUEL HARRIS  
204 Marion Avenue  
Kissimmee, Florida 34741  
DOB: 02/23/73  
White Male  
DL # H620-785-73-064-0

TARA MEGNA  
Woodford County Sheriff's Department  
111 E. Court Street  
Eureka, Illinois 61530