

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA**

STATE OF FLORIDA

CASE NO.:

OSWP NO.: 2005-0504-WFB

v.

KAREN A. KIEHL,

Defendant.

INFORMATION

COUNT 1

ORGANIZED SCHEME TO DEFRAUD

F.S. 817.034(4)(a)1

First Degree Felony

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

COUNT 1

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 8, 2004 and continuing through on or about December 22, 2005, in the Thirteenth, Tenth, Twelfth, Eighth and Sixth Judicial Circuits of Florida, to wit: Hillsborough, Polk, Hardee, Manatee, Alachua, Pinellas and Pasco Counties, Florida, **KAREN A. KIEHL** 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: Kathy A. Seward, Kathy S. Steiner, Linda A. Anderson, Gary Foster, Terrell Alderman, Allen R. Baynard, Jewel Baynard, Kim Denton, David Denton, Rebekah L. Torres, Linda L. Lamb, Linda D. Underwood, Cynthia Washington, Patricia L. Stutts, Tammy L. Friend, Richard A. Briggs, Heather L. Whittaker, Sara Chase, Joyce Albritton, Gary Albritton, Jr., Nancy Witherspoon, Brenda Roberts, Melissa Franko, Juana Escobedo, Patrick Cochran, Caroline Durrance, Daisy V. Lopez, Robert Taylor, Deborah Taylor, Cherie Simmons, Diane V. Justice, Cynthia Fulwood, Charlotte Donovan, David Harrell, Richard Seward, Vernon Simms, Ronald Kent, Sheri A. Testa, Sandra Katuala, Deborah Kennedy, Deborah Reynolds, Lisa Cope, Patricia F. Naranjo, Mike Hayes, Monica Torres, Luciano Naranjo, Jr., Amy Ward, Jesus Naranjo, Alice Ramirez, Azael Ramirez, Linda A. Moran, Beatrice Naranjo, Adam Naranjo, Olivia Torres, Maria

P. Sanchez, Pedro Ramirez, Ruben Naranjo, Rigoberto Sanchez, Nora Borges, Melissa Mcfarland, Melissa Bedford, Laura Ross, Steven Shockley, Kristen Harris, 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: United States currency with an aggregate value of fifty thousand dollars (\$50,000.00) or more, contrary to and in violation of Section 817.034(4)(a)1, Florida Statutes.

And said offense 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, 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 offense 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 April, 2006.

NOTARY PUBLIC - Signature
Personally known to Notary.

Notary Public - Printed Name