

**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA**

STATE OF FLORIDA,

Case No.:

Plaintiff,

OSWP Case No.: 2005-0273-WFB

vs.

PAUL ALBERT SHELL,

Defendant.

_____ /

INFORMATION FOR:

**COUNT 1: CRIMINAL USE OF PERSONAL
IDENTIFICATION INFORMATION
2nd Degree Felony - Level 5
F.S. 817.568(2)(b)**

**COUNT 2: ORGANIZED SCHEME TO DEFRAUD
3rd Degree Felony - Level 4
F.S. 817.034(4)(a)(3) / 777.011**

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

COUNT 1

**CRIMINAL USE OF PERSONAL
IDENTIFICATION INFORMATION**

PETER H. WILLIAMS, Statewide Prosecutor for the State of Florida, by and through his undersigned designated Assistant Statewide Prosecutor, under oath, charges that beginning on or about October 6, 2004 and continuing through on or about May 10, 2005, in the Tenth, Sixth, Ninth, and Thirteenth Judicial Circuits of Florida, to-wit: Polk, Pasco, Osceola, and Hillsborough counties, **PAUL ALBERT SHELL**, did unlawfully, willfully, and without authorization, fraudulently use personal identification information, to-wit: name and/or bank account numbers belonging to individuals, to-wit: Kay Fair and/or Katherine Smith and/or Christopher Andrew without obtaining their consent, which did result in pecuniary benefit, value of services received, payment sought to be avoided, or an amount of injury or fraud of \$5,000 or more in violation of Florida Statutes 817.568(2)(b) / 777.011.

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 October 6, 2004 and continuing through on or about May 10, 2005, in the Tenth, Sixth, Ninth, and Thirteenth Judicial Circuits of Florida, to-wit: Polk, Pasco, Osceola, and Hillsborough counties, **PAUL ALBERT SHELL**, did then and there engage in a systematic, ongoing course of conduct, to wit: did engage in a scheme to fraudulently obtain merchandise and/or U.S. currency through the use of counterfeit checks and/or Florida Driver's Licenses, with intent to defraud one or more persons, or with intent to obtain property or U.S. currency from one or more persons by false representations, to-wit: Publix and/or Staples and/or Target and/or Big Lots and/or CVS Pharmacy and/or Advance Auto Parts and/or K-Mart and/or Walgreens and/or Wal-Mart and/or Tractor Supply Plant City and/or Dollar General and/or Pac Sun and/or American Eagle Outfitters and/or Beall's and/or Books-A-Million and/or Dillard's and/or International Intimates and/or Sampurna Inc. and/or Family Dollar Stores and/or Best Buy and/or Nextel Communications and/or Auto Zone and/or Cash Systems and/or others known and unknown, and did

obtain merchandise and/or U.S. currency with an aggregate value of less than \$20,000.00, in violation of Florida Statute 817.034(4)(a)(3)/ 777.011.

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

CATHY A. McKYTON
Assistant Statewide Prosecutor
Concourse Center 4
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Tampa, Florida 33607
(813)287-7960
FL Bar # 0118214

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared CATHY McKYTON, Assistant Statewide Prosecutor, who, first being duly sworn, say that the allegations as set forth in the foregoing Information is 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 July, 2005, by
Cathy A. McKyton, who is personally known to me.

Virginia Caswell
Notary Public

