

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

STATE OF FLORIDA,

Case No.: CRC 05

Plaintiff,

OSWP Case No.: 2004-0099-TPA

vs.

TRACIE LYNN SOBERON

SPN:

Defendant.

_____ /

AMENDED INFORMATION

COUNT 1: ORGANIZED FRAUD

1st Degree Felony

F.S. 817.034(4)(a)(1) / 777.011

**COUNT 2: CRIMINAL USE OF PERSONAL
IDENTIFICATION INFORMATION**

1st Degree Felony

F.S. 817.568(2)(c)(1)

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

COUNT 1

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

August 23, 2003 and continuing through on or about August 18, 2004, in the Sixth, Fourth, Fifth, Seventh, Ninth, Twelfth, Thirteenth, and Eighteenth Judicial Circuits of Florida, to-wit: Pinellas, Pasco, Duval, Clay, Lake, Volusia, Orange, Seminole, Hillsborough, Manatee, and St. John's counties, **TRACIE LYNN SOBERON**, did then and there engage in a systematic, ongoing course of conduct, to wit: did engage in a scheme to fraudulently obtain checks belonging to an individual and subsequently forge and cash said checks, 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: South Trust Bank, and/or Fairwinds Federal Credit Union, and/or Bank of America, and/or Regions Bank, and/or Century Bank, and/or Sarasota Municipal Employee's Credit Union, and/or Farmer's & Mercantile Bank, and/or Florida Telco Credit Union, and/or Compass Bank, and/or, CNB Bank, and/or Oceanside Bank, and/or SunTrust Bank, and/or Wachovia, and/or Educational Community Credit Union, and/or others known and unknown, and did obtain merchandise and/or U.S. currency with an aggregate value of more than \$50,000.00, in violation of Florida Statute 817.034(4)(a)(1), or did aid, abet, counsel, hire, or otherwise procure such offense to be committed, in violation of Florida Statute 777.011.

COUNT 2

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 between, on or about August 23, 2003 and continuing through or about August 18, 2004, in the Sixth, Fourth, Fifth, Seventh, Ninth, Twelfth, Thirteenth, and Eighteenth Judicial Circuits of Florida, to-wit: Pinellas, Pasco, Duval, Clay, Lake, Volusia, Orange, Seminole, Hillsborough, Manatee, and St. John's counties, **TRACIE LYNN SOBERON**, unlawfully, willfully, and without authorization, fraudulently use personal identification information, to-wit: Florida State issued Driver's License and/or checks drawn on a bank account and/or credit card numbers belonging to 30 or more individuals, to-wit: Patricia Grinner, Drusilla Atkinson, Carol Jones, Dorothy Hancock, Cynthia Willis, Patricia Snyder, Karen Hangartner, Cheryl Ross, Anita Kosloski, Nancy Dages, Amanda Stevens, Debra Yeloushan, Alex Swan, William Blake, Peter Wallace, Bonita Clemons, Rita Catlin Reid, Lesa Mueller, Jacqueline Viljoen, Carol Wanstall, Lynn Palafox-Gill, Cathleen Casto, Virginia Caruso, Deborah Bragg, Miriam Kersun, Shannon McLeod, Connie Zeepvat, Mary Spence, Betty Graham, Rachel Putala, Ruth Harjung, Jennifer Black, Rebecca Lauble, and Wanda Ray without obtaining their consent, and/or did result in pecuniary benefit, value of services received, or an amount of injury or fraud of \$100,000 or more in violation of Florida Statutes 817.568(2)(c)(1) and 777.011.

AND SAID OFFENSE OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS IN THE STATE OF FLORIDA AS PART OF A RELATED TRANSACTION OR SAID OFFENSE WAS 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
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Tampa, Florida 33607
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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 June, 2005, by
Cathy A. McKyton, who is personally known to me.

Virginia Caswell
Notary Public