

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

**STATE OF FLORIDA,**

**Case No.: CF05-009190-xx**

**Plaintiff,**

**OSWP Case No.: 2005-0511-TPA**

**vs.**

**JERI CARUTHERS,**

**Defendant.**

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**AMENDED INFORMATION FOR:**

**COUNT 1: ORGANIZED SCHEME TO  
DEFRAUD**

1st Degree Felony- Level 6  
F.S. 817.034(4)(a)(1) / 777.011

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

1st Degree Felony- Level 7  
F.S. 817.568(2)(c) / 777.011

**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 May 1, 2005 and continuing through on or about **December 5, 2005**, in the Tenth, Fifth, Sixth, Ninth, Twelfth, Thirteenth, and Seventeenth Judicial Circuits of Florida, to-wit: Polk, Lake, Pasco, Pinellas, Osceola, Orange, Manatee, Sarasota, and Broward counties, **JERI CARUTHERS** did then and there engage in a systematic, ongoing course of conduct, to wit: did engage in a scheme to fraudulently obtain personal identification information, checks, and/or credit card accounts and subsequently forge and cash or present said checks and/or credit card accounts, 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: Walmart, and/or Mid Florida Federal Credit Union, and/or Kash N Karry, and/or Albertson's, and/or Publix, and/or Hess, and/or Thrifty Car Rental, and/or Beall's, and/or Marks & Morgan Jewelers, and/or JC Penney, and/or Discover, and/or AT&T Universal Mastercard, and/or GM HSCC, and/or Sears, and/or Circuit City, and/or Chase, and/or Wachovia, and/or 7-11, and/or Ace America's Cash Express, and/or Railroad & Industrial Federal Credit Union, and/or Whitehall Jewelers, and/or Marathon, and/or New York Gold Store, and/or Providian, and/or Office Depot, and/or Bank of America, and/or Third Federal Savings and Loan, and/or **Home Depot, and/or Best Buy, and/or Macy's** 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 Statutes 817.034(4)(a)(1) / 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 May 1, 2005 and continuing through on or about **December 5, 2005**, in the Tenth, Fifth, Sixth, Ninth, Twelfth, Thirteenth, and Seventeenth Judicial Circuits of Florida, to-wit: Polk, Lake, Pasco, Pinellas, Osceola, Orange, Manatee, Sarasota, and Broward counties, did unlawfully, willfully, and without authorization, fraudulently use personal identification information, to-wit: name, date of birth, social security number, postal address, Florida State issued Driver's License, Florida State issued Driver's License number, bank account number, and/or credit card numbers belonging to 20 or more individuals, to-wit: Diane Sobieski, and/or Jody Drewno, and/or Casey Solomon, and/or Selena Bodkins, and/or James Bodkins, and/or and/or Karen McCormick, and/or Tina Capriotti, and/or Derek Jones, and/or Darrell Jones, and/or Richard Wilkinson, and/or Robin Allee, and/or Jeffrey Davidson, and/or Velma Davidson, and/or Donna Squires, and/or Matthew Klinowski, and/or Christina Mangie, and/or Susan Carr, and/or Aura Tello, and/or Kelly Swalleh, and/or Scott Midwall, and/or Magaly Merea, and/or Stacy Secrest, and/or Rachel Johnson, and/or David Gates, and/or **Jay Jackson, and/or Johnnie Flannagan, and/or Linda Flannagan, and/or Walter McGhee, and/or Linda Bennett, and/or Laura Spinoso** and/or others known and unknown without obtaining their consent, and/or such activity did result in pecuniary benefit, value of services received, or an amount of injury or fraud of \$50,000 or more in violation of

Florida Statutes 817.568(2)(c) / 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

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CATHY A. McKYTON  
Assistant Statewide Prosecutor  
Concourse Center 4  
3507 Frontage Road, Suite 200  
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 August, 2006, by  
Cathy A. McKyton, who is personally known to me.

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Virginia I. Caswell  
Notary Public

**CO-DEFENDANT(S): AMANDA PRINE, CF05-008555-01XX-XX, KENDRA HUTCHINSON  
CF05-008304-01XX-XX, AMELYA SMITH, AMANDA SMITH, MICHAEL SHANE  
CAMPBELL**