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**IN THE JUSTICE COURT, PRECINCT NUMBER ONE
COUNTY OF SANTA CRUZ, ARIZONA**

STATE OF ARIZONA,

Plaintiff,

v.

SYLVIA NEREY a.k.a. Sylvia Montanez,

Defendant.

Case No: 01CR09-_____

Felony

COMPLAINT

(AGO P002-2009-002398)

The complainant herein personally appears and, being first duly sworn, complains (of his own knowledge) (on information and belief) against: **SYLVIA NEREY**, D.O.B 3/5/1966 charging that in Precinct One, Santa Cruz County, Arizona:

COUNT 1
FRAUD

On or between the 1st day of October 2006 to the 31st day of October, 2008, in the County of Santa Cruz the Defendant, **SYLVIA NEREY**, pursuant to scheme or artifice to defraud, knowingly obtained a benefit from the SOUTHEASTERN ARIZONA BEHAVIORAL HEALTH SYSTEMS, INC (SEABHS), by means of fraudulent pretenses, representation, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-302, 13-701, 13-702, and 13-801, a class 2 felony.

Said conduct occurred when she defrauded her employer, Southeastern Arizona Behavioral Health Systems, Inc. by creating eighteen (18) fraudulent checks and either depositing them or cashing them into her personal account(s).

COUNT 2

THEFT

On or between the 1st day of October 2006 to the 31st day of October, 2008, in the County of Santa Cruz the Defendant, **SYLVIA NEREY**, knowingly controlled funds and/or checks and/or property belonging to SOUTHEASTERN ARIZONA BEHAVIORAL HEALTH SYSTEMS, INC., of a value of \$25,000 or more with the intent to deprive SOUTHEASTERN ARIZONA BEHAVIORAL HEALTH SYSTEMS, INC., of such property, in violation of A.R.S. §§ 13-1802(A)(1), 13-1801, 13-302, 13-701, 13-702, and 13-801, a class 2 felony.

Said conduct occurred when she knowingly controlled funds in the amount of \$30,665.72 belonging to SOUTHEASTERN ARIZONA BEHAVIORAL HEALTH SYSTEMS, INC. with the intent to permanently deprive.

COUNT 3

FORGERY

On or about 31st day of October, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$975.99 and either deposited or cashed said check into her personal account(s).

COUNT 4

FORGERY

On or about 31st day of October, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$989.75 and either deposited or cashed said check into her personal account(s).

COUNT 5
FORGERY

On or about 1st day of January, 2007, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,982.00 and either deposited or cashed said check into her personal account(s).

COUNT 6
FORGERY

On or about 31st day of January, 2007, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,159.96 and either deposited or cashed said check into her personal account(s).

COUNT 7
FORGERY

On or about 6th day of March, 2007, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$768.22 and either deposited or cashed said check into her personal account(s).

COUNT 8
FORGERY

On or about 6th day of March, 2007, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$605.95 and either deposited or cashed said check into her personal account(s).

COUNT 9
FORGERY

On or about 3rd day of April, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$2,973.89 and either deposited or cashed said check into her personal account(s).

COUNT 10
FORGERY

On or about 14th day of September, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,632.92 and either deposited or cashed said check into her personal account(s).

COUNT 11
FORGERY

On or about 21st day of September, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,499.96 and either deposited or cashed said check into her personal account(s).

COUNT 12
FORGERY

On or about 28th day of September, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written

instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,899.97 and either deposited or cashed said check into her personal account(s).

COUNT 13
FORGERY

On or about 31st day of October, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$2,021.58 and either deposited or cashed said check into her personal account(s).

COUNT 14
FORGERY

On or about 27th day of November, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,804.24 and either deposited or cashed said check into her personal account(s).

COUNT 15
FORGERY

On or about 28th day of December, 2007, in the County of Santa Cruz, Arizona, SYLVIA NEREY, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,895.98 and either deposited or cashed said check into her personal account(s).

COUNT 16
FORGERY

On or about 28th day of December, 2007, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$2,799.85 and either deposited or cashed said check into her personal account(s).

COUNT 17
FORGERY

On or about 10th day of March, 2008, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$2,795.99 and either deposited or cashed said check into her personal account(s).

COUNT 18
FORGERY

On or about 30th day of May, 2008, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$2,103.73 and either deposited or cashed said check into her personal account(s).

COUNT 19
FORGERY

On or about 31st day of October, 2008, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,475.80 and either deposited or cashed said check into her personal account(s).

COUNT 20
FORGERY

On or about 31st day of October, 2008, in the County of Santa Cruz, Arizona, **SYLVIA NEREY**, with intent to defraud, falsely made, completed or altered a written instrument or offer or presented, whether accepted or not, a forged instrument or one which contains false information in violation of A.R.S. §§ 13-2001, 13-2002, 13-302, 13-701, 13-702, and 13-801, a class 4 felony.

Said conduct occurred when SYLVIA NEREY presented a forged check in the amount of \$1,315.94 and either deposited or cashed said check into her personal account(s).

Complainant
Nogales Police Department

Subscribed and Sworn to me this _____ day of November, 2009.

Justice of the Peace