MARK BRNOVICH 1 Attorney General 2 Firm State Bar No. 14000 3 TODD C. LAWSON 4 State Bar No. 020216 Assistant Attorney General 5 2005 North Central Avenue 6 Phoenix, Arizona 85004-1592 Telephone 602-542-3881 7 Fax 602-542-5997 8 crmfraud@azag.gov 9 Attorneys for Plaintiff 10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA 11 IN AND FOR THE COUNTY OF COCONINO 12 13 THE STATE OF ARIZONA, 14 Plaintiff, 15 16 vs. 17 CARLI MICHELLE MONCHER.

Defendant.

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No. CR2018-00378

DIRECT FILE INFORMATION

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. §13-2310;

COUNT 2: THEFT, a Class 3 Felony, in violation of A.R.S. §13-1802 (A)(1);

COUNTS 3-22: FORGERY, Class 4 Felonies, in violation of A.R.S. §13-2002;

COUNTS 23-24: PERJURY, Class 4 Felonies, in violation of A.R.S. §13-2702(A)(1)

The State of Arizona accuses CARLI MICHELLE MONCHER, charging that in Coconino County Arizona:

COUNT 1 FRAUDULENT SCHEMES AND ARTIFICES

During a period of time beginning on or about March 3, 2014, and ending on or about April 21, 2017, CARLI MICHELLE MONCHER, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representations, promises or material omissions, in violation of A.R.S. §§13-2310, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER falsely completed timesheet records to obtain compensation from Northern Arizona Healthcare when she was being paid separately for private work being performed at the same time.

COUNT 2 THEFT

During a period of time beginning on or about March 3, 2014, and ending on or about April 21, 2017, CARLI MICHELLE MONCHER, without lawful authority, knowingly obtained services or property of another by means of any material misrepresentation with intent to deprive the other person of such property or services, said property having a value of more than \$4,000.00 but less than \$25,000.00, in violation of A.R.S. §§13-1802(A)(3), 13-1801, 13-1802(G), 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER obtained

\$8,148.15 in compensation from Northern Arizona Healthcare by misrepresenting that she was performing work for them, when she was actually performing private work.

COUNT 3 FORGERY

During a period of time beginning on or about March 3, 2014, and ending on or about March 12, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** falsified a claim for reimbursement of travel expenses for the case of *Yavapai-Apache Nation v. Fallsdown*.

COUNT 4 FORGERY

During a period of time beginning on or about March 3, 2014, and ending on or about March 12, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER created a subpoena purported to require her appearance to testify in the case of Yavapai-Apache Nation v. Fallsdown.

COUNT 5 FORGERY

On or about March 12, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of Yavapai-Apache Nation v. Fallsdown.

COUNT 6 FORGERY

During a period of time beginning on or about April 7, 2014, and ending on or about April 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** falsified a claim for reimbursement of travel expenses for the case of *U.S. v. Diedra Smith*.

COUNT 7 FORGERY

During a period of time beginning on or about April 7, 2014, and ending on or about April 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written

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instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER created a subpoena purported to require her appearance to testify in the case of U.S. v. Diedra Smith.

COUNT 8 FORGERY

On or about April 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of U.S. v. Diedra Smith.

COUNT 9

During a period of time beginning on or about April 16, 2014, and ending on or about May 22, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER falsified a claim for reimbursement of travel expenses for the case of U.S. v. Darren Quesada.

COUNT 10 FORGERY

On or about May 22, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of *U.S. v. Darren Quesada*.

COUNT 11 FORGERY

During a period of time beginning on or about May 5, 2014, and ending on or about May 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER falsified a claim for reimbursement of travel expenses for the case of *State v. Arnold Reese*.

COUNT 12 FORGERY

During a period of time beginning on or about May 5, 2014, and ending on or about May 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written

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instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER created a subpoena purported to require her appearance to testify in the case of State v. Arnold Reese.

COUNT 13 FORGERY

On or about May 23, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of State v. Arnold Reese.

COUNT 14 FORGERY

During a period of time beginning on or about August 1, 2014, and ending on or about August 8, 2014, **CARLI MICHELLE MONCHER**, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** falsified a claim for reimbursement of travel expenses for the case of *State v. Michael Wade Nelson*.

COUNT 15 FORGERY

On or about August 8, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of State v. Michael Wade Nelson.

COUNT 16 FORGERY

During a period of time beginning on or about August 28, 2014, and ending on or about September 1, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER falsified a claim for reimbursement of travel expenses for the case of *State v. Michael Joseph Gonzalez*.

COUNT 17 FORGERY

On or about September 1, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation

of A.R.S. §§13·2002(A)(3), 13·2001, 13·701, 13·702 and 13·801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of *State v. Michael Joseph Gonzalez*.

COUNT 18 FORGERY

During a period of time beginning on or about September 16, 2014, and ending on or about September 22, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13·2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** falsified a claim for reimbursement of travel expenses for the case of *State v. Teodoro Gomez-Torres*.

COUNT 19 FORGERY

On or about September 22, 2014, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of State v. Teodoro Gomez-Torres.

COUNT 20 FORGERY

During a period of time beginning on or about November 17, 2015, and ending on or about December 17, 2015, **CARLI MICHELLE MONCHER**, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** falsified a claim for reimbursement of travel expenses for the case of *State v. Glenda Gyce*.

COUNT 21 FORGERY

During a period of time beginning on or about November 17, 2015, and ending on or about December 17, 2015, CARLI MICHELLE MONCHER, acting with the intent to defraud, knowingly made, completed, or altered a written instrument, in violation of A.R.S. §§13-2002(A)(1), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER created a subpoena purported to require her appearance to testify in the case of *State* v. Glenda Gyce.

COUNT 22 FORGERY

On or about December 17, 2015, CARLI MICHELLE MONCHER, acting with the intent to defraud, offered or presented, whether accepted or not, a forged instrument or one that contains false information, in violation

of A.R.S. §§13-2002(A)(3), 13-2001, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER submitted falsified claim for reimbursement for travel to Northern Arizona Healthcare related to her purported travel to testify in the case of *State v. Glenda Gyce*.

COUNT 23 PERJURY

On or about September 16, 2014, CARLI MICHELLE MONCHER, knowingly made a false sworn statement in regard to a material issue, believing it to be false, in violation of A.R.S. §§ 13-2702(A)(1), 13-2701, 13-701, 13-702 and 13-801.

Said conduct occurred when CARLI MICHELLE MONCHER testified in the matter of *State v. Teodoro Gomez-Torres* that she was only receiving her "typical daily salary" when in fact she was also being paid an hourly fee by the Mohave County Attorney's Office.

COUNT 24 PERJURY

On or about June 29, 2015, CARLI MICHELLE MONCHER, knowingly made a false sworn statement in regard to a material issue, believing it to be false, in violation of A.R.S. §§ 13-2702(A)(1), 13-2701, 13-701, 13-702 and 13-801.

Said conduct occurred when **CARLI MICHELLE MONCHER** testified in the matter of *State v. David Salcido* that she was only receiving her "normal wage" when in fact she was also being paid an hourly fee by the Mohave County Attorney's Office.

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MARK BRNOVICH ATTOXNEY GUNERAL

TODD C. LAWSON

Assistant Attorney General Criminal Division

ORIGINAL of the foregoing sent via FedEx this 23rd day of April, 2018, to:

Clerk of the Superior Court Coconino County Superior Court 200 N. San Francisco Street Flagstaff, Arizona 86001

COPY of the foregoing mailed this 23rd day of April, 2018, to:

The Honorable Dan Slayton Coconino County Superior Court Division 2 200 N. San Francisco Street Flagstaff, Arizona 86001

COPY of the foregoing mailed this 23rd day of April, 2018, to:

Matthew S. Long, Esq. Rowley Long & Simmons, PLLC 7135 E. Camelback Road, Ste. 230 Scottsdale, Arizona 85251

By: Stacky Coned #6972105v1

COCONINO COUNTY SUPERIOR COURT

Date: 4/25/2018 Time: 2:00 PM

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4/24/2018



Event Code

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