

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA**

STATE OF FLORIDA,

CASE NO.:

Plaintiff,

DIVISION:

vs.

OSWP NO.: 2004-0060-TPA

NATALIE BRINK,

Defendant.

INFORMATION FOR:

**COUNT 1: ORGANIZED SCHEME
TO DEFRAUD**

3rd Degree Felony, Level 3
F.S. 817.034(4)(a)(3)

**COUNT 2: FRAUDULENT
POSSESSION OR USE OF PERSONAL
IDENTIFICATION INFORMATION**

3rd Degree Felony, Level 4
F.S. 817.568(2)(a)

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

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 July 23, 2002 and continuing through on or about November 21, 2002, in the Thirteenth and Nineteenth Judicial Circuits of Florida, to wit: Hillsborough and St. Lucie Counties, Florida, **NATALIE BRINK**, did engage in a scheme to defraud, to-wit: a systematic, ongoing course of conduct, with the intent to defraud one or more persons, to-wit: Medicaid, or with the intent to obtain property from one or more of this same victim by false or fraudulent pretenses, representations, or promises, or wilful misrepresentations of a future act, to wit: submit fraudulent claims of IVIG on behalf of Robert Tate and/or Gladys Troutman and/or Arthur Reaves and/or James Bass and/or Veronica Gitten and/or Peggy Nicholson which were used to obtain property, to-wit: U.S. currency, with an aggregate value of less than \$20,000, in violation of Florida Statute 817.034(4)(a)(3).

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 July 23, 2002 and continuing through on or about November 21, 2002, in the Thirteenth, Eleventh, and Nineteenth Judicial Circuits of Florida, to wit: Hillsborough, Dade, and St. Lucie Counties, Florida, **NATALIE BRINK** did willfully, and without authorization, fraudulently use or possess with intent to fraudulently use personal identification information, to-wit: name and/or medicaid account number of individuals, to-wit: Robert Tate and/or Gladys Troutman and/or Arthur Reaves and/or James Bass and/or Veronica Gitten and/or Peggy Nicholson without first obtaining their consent, in violation of Florida Statutes 817.568(2)(a).

AND said offenses occurred in two or more judicial circuits as part of a related transaction or were committed in connection with an organized criminal conspiracy affecting two or more judicial circuits of the State of Florida, and further said Counts constitute a crime involving, or resulting in, fraud or deceit upon a person or persons for the purposes of Section 16.56, Florida Statutes.

PETER H. WILLIAMS
STATEWIDE PROSECUTOR

SHANNON KENNEDY
Assistant Statewide Prosecutor
Concourse Center 4
3507 Frontage Road, Suite 200
Tampa, Florida 33607
(813) 287-7960
Florida Bar No. 0079030

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared SHANNON KENNEDY, Assistant Statewide Prosecutor, who, first being duly sworn, says 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 he has received testimony under oath from the material witness or witnesses for the offenses.

Sworn to and subscribed before me
this _____ day of January, 2005.

NOTARY PUBLIC - signature
Personally known to Notary.

Notary Public - printed name