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FOR IMMEDIATE RELEASE: Jan. 31, 2014

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Salt Lake County District Attorney Files Theft, Forgery Charges in Landfill Employee Case

Salt Lake City, UT -- The Salt Lake County District Attorney's Office Friday filed one Second-Degree Felony Theft charge, one Second-Degree Felony Pattern of Unlawful Activity Charge, and nine Third-Degree Felony forgery charges against Christina Patton, a former temporary staff services employee at the Salt Lake County Landfill.

In the accompanying statement of probable cause, the District Attorney's Office alleges that between about April 20, 2012 and Oct. 27, 2012, Defendant Patton participated in a scheme at the Salt Lake County Solid Waste Facility that involved theft and forgery. As outlined more fully in the statement of probable cause, it is alleged that, among other things, Defendant Patton often printed "duplicate tickets" for landfill customers. It is alleged that Defendant Patton stole more than \$5,000.00 from Salt Lake County through a "duplicate ticket" scheme. The Salt Lake County Auditor's review has confirmed that the losses exceed \$5,000.

A Second-Degree Felony is punishable by a maximum sentence of up to 15 years at the Utah State Prison, and each Third-Degree Felony is punishable by a maximum sentence of up to five years.

Salt Lake County District Attorney Sim Gill acknowledges the great assistance and professionalism of the Salt Lake County Auditor Greg Hawkins and his staff in this investigation.

All persons accused of a crime are presumed innocent unless and until proven guilty in a court of law.

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MATTHEW LLOYD, Bar No. 9105
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FILED DISTRICT COURT
Third Judicial District
JAN 31 2014
SALT LAKE COUNTY
Deputy Clerk

ORIGINAL

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH
Plaintiff,

vs.

CHRISTINA JOY PATTON
DOB: 07/11/1987,
AKA:
5505 West 4260 South
West Valley City, UT 84120
D.L.# 170657021
OTN
SO# 369139
Defendant.

Screened by: MATTHEW LLOYD
Assigned to: MATTHEW LLOYD

INFORMATION

DAO # 13019183
ECR Status: **NON-ECR**
Bail: \$50,000
Warrant/Release: NON-JAIL

Case No. *141902012*

The undersigned Michael S. Leary – SALT LAKE DISTRICT ATTORNEY’S OFFICE, Agency Case No. 2013-1360, upon a written declaration states on information and belief that the defendant, CHRISTINA JOY PATTON, committed the crime(s) of:

COUNT 1

THEFT, 76-6-404 UCA, Second Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did obtain or exercise unauthorized control over the property of another person with a purpose to deprive the person thereof, and
(i) the value of the property or services was or exceeded \$5,000;
(ii) the property stolen is a firearm or an operable motor vehicle;
(iii) the defendant was armed with a dangerous weapon, as defined in Section 76-1-601, at the time of the theft; or
(iv) the property was stolen from the person of another.

COUNT 2

PATTERN OF UNLAWFUL ACTIVITY, 76-10-1603 UCA, Second Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, (a) having received any proceeds derived, whether directly or indirectly, from a pattern of unlawful activity in which the defendant had participated as a principal, use or invest, directly or indirectly, any part of that income, or the proceeds of the income, or the proceeds derived from the investment or use of those proceeds, in the acquisition of any interest in, or the establishment or operation of, any enterprise;

(b) through a pattern of unlawful activity, acquire or maintain, directly or indirectly, any interest in or control of any enterprise;

(c) having been employed by or associated with any enterprise, conduct or participate, whether directly or indirectly, in the conduct of that enterprise's affairs through a pattern of unlawful activity; or

(d) conspire to violate any of the above provisions.

COUNT 3

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

(a) alter any writing of another without his authority or uttered the altered writing; or

(b) make, complete, execute, authenticate, issue, transfer, publish, or utter any writing so that the writing or the making, completion, execution, authentication, issuance, transference, publication or utterance:

(i) purported to be the act of another, whether the person was existent or nonexistent;

(ii) purported to be an act on behalf of another party without the authority of that other party; or

(iii) purported to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed.

COUNT 4

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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- (i) purported to be the act of another, whether the person was existent or nonexistent;
- (ii) purported to be an act on behalf of another party without the authority of that other party; or
- (iii) purported to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed.

COUNT 5

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COUNT 6

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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COUNT 7

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COUNT 8

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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COUNT 9

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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- (ii) purported to be an act on behalf of another party without the authority of that other party; or
- (iii) purported to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed.

COUNT 10

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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 - (iii) purported to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed.

COUNT 11

FORGERY, 76-6-501(2) UCA, Third Degree Felony, as follows: That on or about April 20, 2010 through October 27, 2012, at Salt Lake County Solid Waste Management 6030 West California Avenue, in Salt Lake County, State of Utah, the defendant did, with purpose to defraud anyone, or with knowledge that he was facilitating a fraud to be perpetrated by anyone,

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 - (i) purported to be the act of another, whether the person was existent or nonexistent;
 - (ii) purported to be an act on behalf of another party without the authority of that other party; or
 - (iii) purported to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

Investigator Michael S. Leary, Daniel Davies, Debbie Haggard, Lawrence "Larry" Hansen, John "Yianni" Ioannou, Brenda Nelson, Kathleen "Kitty" Ogden, and Tresia Whipple


DECLARATION OF PROBABLE CAUSE:

Affiant, Michael S. Leary, is a Investigator with the Salt Lake County District Attorney's Office. In that capacity, Affiant has received information from citizens or law enforcement personnel named herein. Based on those materials or communications, Affiant believes that the following supports this Information.

Between April 20, 2012 and October 27, 2012 the defendant participated in a scheme at the Salt Lake County Solid Waste Facility, in Salt Lake County, involving theft and forgery. The evidence will show that a customer would go to the dump to get rid of their trash. The customer would go to the payment window of one of three the scale houses and give the defendant money to pay to enter the facility. The fee amount varies depending on the type of waste, how much there is and whether the waste is commercial or residential. The defendant CHRISTINA JOY PATTON (PATTON) worked at a scale house payment window taking money from customers. The defendant would enter the payment on the computer as a "point of sale", put the money in the till, print a receipt, and give a receipt to the customer. During PATTON's shift she would print several duplicate receipts, cut off the top portion of the receipt where was written "DUPLICATE TICKET" and set them next to her keyboard. As some customers would come to the payment window, the defendant would tell them the amount of the fee, and if the customer paid in cash, the defendant would take the cash and put it in the till without creating a "point of sale" in the computer system. She would then give the customer a duplicate receipt with the "DUPLICATE TICKET" cut off and send them on their way. She would then make a note on a piece of paper of the amount of the cash that was not entered into the computer system as a point of sale, but was in the till. The defendant would do this several times on the days she worked. At the end of her shift, when it was time to balance the till with each "point of sale" she would consult her notes of how much unaccounted for cash was in the till and remove it to her own pocket.

In 2012 alone, evidence shows PATTON to have printed and altered at least two thousand two hundred (2200) duplicate receipts; government documents, and passed them on to customers. Evidence indicates at least on two occasions (June 2 and June 23, 2012), PATTON provided one hundred eighty five (185) altered duplicate receipts to customers entering the solid waste facility. The amount of the theft from Salt Lake County is at least \$25,000.


Pursuant to Utah Code Annotated § 78B-5-705 (2008) I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my belief and knowledge.

Executed on: 1/31/14


Michael S. Leary
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney


Deputy District Attorney
30th day of January, 2014
MEL /lo/ DAO #13019183

SO # 369139 OTN
DAO # 13019183

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

FILED DISTRICT COURT
Third Judicial District
JAN 31 2014

SALT LAKE COUNTY
Deputy Clerk

THE STATE OF UTAH,

Plaintiff,

vs.

CHRISTINA JOY PATTON
DOB: 07/11/1987,
5505 West 4260 South
West Valley City, UT 84120
AKA:
SS# 529878193

Defendant.

Before: _____

Magistrate

WARRANT OF ARREST

Case No.

141981812

THE STATE OF UTAH;

To any Peace Officer in the State of Utah, Greetings:

An Information, based upon a written declaration having been declared by Michael S. Leary – SALT LAKE COUNTY DISTRICT ATTORNEY’S OFFICE, Agency Case No. 2013-1360, and it appears from the Information or Declaration filed with the Information, that there is probable cause to believe that the public offense(s) of;

THEFT, Second Degree Felony, PATTERN OF UNLAWFUL ACTIVITY, Second Degree Felony, FORGERY (9 Counts), Third Degree Felony, has been committed, and that CHRISTINA JOY PATTON has committed them.

YOU ARE THEREFORE COMMANDED to arrest the above-named defendant forthwith and bring the defendant before this Court, or before the nearest or most accessible magistrate for setting bail. If the defendant has fled justice, you shall pursue the defendant into any other county of this state and there arrest the defendant. The Court finds reasonable grounds to believe defendant will not appear upon a summons.

Bail is set in the amount of \$50,000.

Dated this 31 day of January A.D. 2014

I CERTIFY THAT THIS IS A TRUE COPY OF AN ORIGINAL DOCUMENT ON FILE IN THE THIRD DISTRICT COURT, SALT LAKE COUNTY, STATE OF UTAH.

DATE: _____
DEPUTY COURT CLERK

This Warrant may be served day or night.

[Signature]
MAGISTRATE OF UTAH

SERVED DATE _____ BY _____