

County Court, El Paso County, Colorado 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: May 10, 2024 3:14 PM FILING ID: 39E1F7A79FF78 CASE NUMBER: 2024CR1793
THE PEOPLE OF THE STATE OF COLORADO vs. LEAH ANGELITA VALENTINE, Defendant.	<input type="checkbox"/> COURT USE ONLY <input type="checkbox"/>
PHILIP J. WEISER, Attorney General DANIEL A. PIETRAGALLO* Senior Assistant Attorney General Ralph L. Carr Colorado Judicial Center, 1300 Broadway, 9th Floor Denver, CO 80203 (720) 508-6722 Registration Number: 41794 *Counsel of Record	Case No: 2024CR1793 Div: 18 Courtroom:
COMPLAINT AND INFORMATION	

CHARGES: 15

COUNT 1: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 2: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 3: FORGERY, C.R.S. 18-5-102(1)(c) (F5){1001C}

COUNT 4: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 5: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 6: FORGERY, C.R.S. 18-5-102(1)(c) (F5){1001C}

COUNT 7: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 8: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 9: FORGERY, C.R.S. 18-5-102(1)(c) (F5){1001C}

COUNT 10: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 11: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

Summons Requested - Court date: July 11th, 2024 at 10:00 a.m.

COUNT 12: FORGERY, C.R.S. 18-5-102(1)(c) (F5){1001C}

COUNT 13: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 14: INSURANCE FRAUD, C.R.S. 18-5-211(1),(4) (F5){11068}

COUNT 15: FORGERY, C.R.S. 18-5-102(1)(c) (F5){1001C}

Philip J. Weiser, Attorney General for the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of El Paso:

COUNT 1-INSURANCE FRAUD (F5)

Between and including March 4, 2021 and March 9, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented any insurance claim which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT 2-INSURANCE FRAUD (F5)

Between and including March 4, 2021 and March 9, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented a written, verbal, or digital material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the material or statement contained false material information or withheld material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT 3-FORGERY (F5)

On or about March 4, 2021, Leah Angelita Valentine with the intent to defraud Nationwide Insurance Company, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a fraudulent invoice for veterinary services; in violation of section 18-5-102(1)(c), C.R.S.

COUNT 4-INSURANCE FRAUD (F5)

Between and including March 4, 2021 and March 9, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented any insurance claim which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT 5-INSURANCE FRAUD (F5)

Between and including March 4, 2021 and March 9, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented a written, verbal, or digital material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the material or statement contained false material information or withheld material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT 6-FORGERY (F5)

On or about March 4, 2021, Leah Angelita Valentine with the intent to defraud Nationwide Insurance Company, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a fraudulent invoice for veterinary services; in violation of section 18-5-102(1)(c), C.R.S.

COUNT 7-INSURANCE FRAUD (F5)

Between and including March 14, 2021 and April 8, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented any insurance claim which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT 8-INSURANCE FRAUD (F5)

Between and including March 14, 2021 and April 8, 2021, with a date of discovery on or after May 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented a written, verbal, or digital material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the material or statement contained false material information or withheld material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT 9-FORGERY (F5)

On or about March 14, 2021, Leah Angelita Valentine with the intent to defraud Nationwide Insurance Company, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a fraudulent invoice for veterinary services; in violation of section 18-5-102(1)(c), C.R.S.

COUNT 10-INSURANCE FRAUD (F5)

Between and including May 16, 2021 and July 23, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented any insurance claim which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT 11-INSURANCE FRAUD (F5)

Between and including May 16, 2021 and July 23, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented a written, verbal, or digital material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the material or statement contained false material information or withheld material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT 12-FORGERY (F5)

On or about May 16, 2021, Leah Angelita Valentine with the intent to defraud Nationwide Insurance Company, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a fraudulent invoice for veterinary services; in violation of section 18-5-102(1)(c), C.R.S.

COUNT 13-INSURANCE FRAUD (F5)

Between and including May 18, 2021 and December 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented any insurance claim which contained false material information or withheld material information; in violation of section 18-5-211(1)(b),(4), C.R.S.

COUNT 14-INSURANCE FRAUD (F5)

Between and including May 18, 2021 and December 16, 2021, Leah Angelita Valentine unlawfully, feloniously, and with the intent to defraud Nationwide Insurance Company, presented or caused to be presented a written, verbal, or digital material or statement as part of, in support of or in opposition to, a claim for payment or other benefit pursuant to an insurance policy, knowing that the material or statement contained false material information or withheld material information; in violation of section 18-5-211(1)(e),(4), C.R.S.

COUNT 15-FORGERY (F5)

On or about May 18, 2021, Leah Angelita Valentine with the intent to defraud Nationwide Insurance Company, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a fraudulent invoice for veterinary services; in violation of section 18-5-102(1)(c), C.R.S.

All offenses against the peace and dignity of the people of the State of Colorado.

PHILIP J. WEISER
ATTORNEY GENERAL, #: 38314

By: /s/ Daniel A. Pietragallo Date: 5/10/2024
Daniel A. Pietragallo #: 41794
Senior Assistant Attorney General