

MATTHEW E. LLOYD (9105)  
Assistant Attorney General  
SEAN D. REYES (7969)  
Utah Attorney General  
5272 South College Drive, Suite 200  
Murray, Utah 84123  
Tel: 801-281-1200  
Fax: 801-281-1224  
Email: mlloyd@utah.gov

*Attorneys for Plaintiff*

<b>IN THE SIXTH DISTRICT COURT, KANAB DEPARTMENT</b> <b>IN AND FOR KANE COUNTY, STATE OF UTAH</b>	
STATE OF UTAH,  Plaintiff,  -vs-  GEORGIA BACA, DOB: 10/23/1963 570 N 200 E Washington, Utah 84708  Defendant.	<b>INFORMATION</b> (Service: Summons)  Case No. 161600145  Judge: Bagley

The undersigned, Special Agent Christopher Walden, Office of the Attorney General, upon a written declaration states on information and belief that the defendant committed the following crimes:

COUNT 1  
MISUSING PUBLIC MONEY, 76-8-402 UCA, Third Degree Felony, as follows: on or about March 10, 2014 to April 2, 2014 in Kane County, State of Utah, the defendant, as a party to the

offense, 76-2-101 UCA, did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to her own use or benefit or to the use or benefit of another without authority of law.

#### COUNT 2

MISUSING PUBLIC MONEY, 76-8-402 UCA, Third Degree Felony, as follows: on or about June 2, 2014 to January 11, 2016 in Kane County, State of Utah, the defendant, as a party to the offense, 76-2-101 UCA, did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to her own use or benefit or to the use or benefit of another without authority of law.

#### COUNT 3

MISUSING PUBLIC MONEY, 76-8-402 UCA, Third Degree Felony, as follows: on or about September 8, 2014 to September 9, 2015 in Kane County, State of Utah, the defendant, as a party to the offense, 76-2-101 UCA, did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to her own use or benefit or to the use or benefit of another without authority of law.

#### COUNT 4

MISUSING PUBLIC MONEY, 76-8-402 UCA, Third Degree Felony, as follows: on or about November 12, 2014 to September 24, 2015 in Kane County, State of Utah, the defendant, as a party to the offense, 76-2-101 UCA, did, as a public officer or other person charged with receipt, safekeeping, transfer, disbursement, or use of public money:

- (a) appropriate the money or any portion of it to her own use or benefit or to the use or benefit of another without authority of law.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: Christopher Walden, Karla Johnson, Cindy Forrester, Trish Spendlove, Keiren Chatterley, Emalene Seegmiller

#### DECLARATION OF PROBABLE CAUSE:

I am a Special Agent for the Office of the Utah Attorney General, Financial Crimes and Public Corruption Investigations Unit. I have probable cause to believe that the Defendant has committed the following criminal acts, Misuse of Public Money in violation of Utah Code Ann. § 76-8-402.

The facts set forth in this Affidavit are based upon the results of an investigation during which I collected and reviewed business and personal records from the defendant, interviews of witnesses listed above, and other sources.

Between February 1, 2013 and January 31, 2016 in Kane County, Utah, the defendant, Georgia Baca (hereafter BACA), was the Kane County Treasurer. Baca was responsible for managing Kane County's tax revenues and managing its money. As the treasurer, she had access to county money and checking accounts, and had signatory control of Kane County accounts xxx8122 and xxx4046 at the State Bank of Southern Utah.

During the dates alleged in the information, BACA, without authority of law, made approximately 45 transfers of Kane County money totaling approximately \$33,600 from Kane County accounts xxx8122 (property tax) and xxx4046 (Kane County Justice Court) at the State Bank of Southern Utah into accounts numbered -6307, -5705, -2132, and -2378 at the State Bank of Southern Utah. Accounts xxx6307, xxx5705, xxx2132, and xxx2378, belong to BACA individually or, BACA and her children. BACA's accounts, xxx6307, xxx5705, xxx2132, and xxx2378 show money spent on miscellaneous personal purchases not authorized by Kane County.

For Count 1, on 3/10/14 BACA transferred \$700 from xxx8122 (property tax) into xxx6307 (BACA's personal checking account). On 4/2/14 BACA transferred \$500 from xxx8122 (property tax) into xxx6307 (BACA's personal checking account).

For Count 2, between 6/2/14 and 1/11/16, BACA transferred money from xxx8122 (property tax) into xxx5705 (BACA's joint checking account with her son) twenty three times for a total of \$19,600.

For Count 3, between 9/8/14 and 9/9/15, BACA transferred money from xxx8122 (property tax) into xxx2132 (BACA's joint checking account with her daughter), five times for a total of \$2,450 dollars. And between 12/3/14 and 12/22/14, BACA transferred money from xxx4046 (Kane County Justice Court) into xxx2132 (BACA's joint checking account with her daughter) two times for a total of \$1,350.

For Count 4, between 11/12/14 and 9/24/15, BACA transferred money from xxx8122 (property tax) into xxx2378 (BACA's savings account with her son), eight times for a total of \$9,000.

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: October 6, 2016

/s/ Christopher Walden

Christopher Walden

Declarant

Authorized for presentment and filing:  
SEAN D. REYES, Utah Attorney General

/s/ Matthew E. Lloyd  
MATTHEW E. LLOYD  
Assistant Utah Attorney General  
This 6<sup>th</sup> day of October, 2016  
AG Case No. 2016-127