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IN THE FIFTH JUDICIAL DISTRICT COURT IN AND FOR BEAVER COUNTY

STATE OF UTAH

STATE OF UTAH, Plaintiff, vs. MEGAN CHRISTINE RAMIREZ, DOB 11/06/1987 AG Case Number 2019-261 Defendant.	INFORMATION Criminal No. Judge
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THE STATE OF UTAH TO THE ABOVE-NAMED DEFENDANT:

The undersigned Coy Acocks, Utah Attorney General's Office, Utah Medicaid Fraud Control Unit, upon a written declaration states on information and belief that the defendant, MEGAN CHRISTINE RAMIREZ, committed the crimes of:

COUNT I

ABUSE, NEGLECT OR EXPLOITATION OF A VULNERABLE ADULT, a Second Degree Felony, in violation of Utah Code Ann. §76-5-111(9)(a)(iii) and/or (iv) (2019, as amended), in Beaver County, State of Utah, between the time period October 2016 through July

2018, in that the defendant, MEGAN CHRISTINE RAMIREZ, a party to the offense,

(iii) unjustly or improperly used or managed the resources of a vulnerable adult for the profit or advantage of someone other than the vulnerable adult; or

(iv) unjustly or improperly used a vulnerable adult's power of attorney or guardianship for the profit or advantage of someone other than the vulnerable adult.

To-Wit: T.J. (initials used to preserve patient confidentiality) is a vulnerable adult as defined in Utah Code Ann. § 76-5-111 because he is 78 years old. On or about October 6, 2016, defendant used her power of attorney over her grandfather, T.J., to sell his home in Lakewood, California, for approximately \$513,000.00. Defendant used the proceeds from that sale to buy a home in Beaver, Utah, for approximately \$325,000.00. Defendant's name is the only name on the title of the Beaver, Utah, home. Defendant moved T.J. into the basement of that home where he stayed until defendant moved T.J. out of the home and into Spanish Fork Rehabilitation on May 18, 2018.

The conduct was done intentionally or knowingly and the aggregate value of the resources used or the profit made exceeds \$5,000.00, a Second Degree Felony.

COUNT II

ABUSE, NEGLECT OR EXPLOITATION OF A VULNERABLE ADULT, a Second Degree Felony, in violation of Utah Code Ann. §76-5-111(9)(a)(iii) and/or (iv) (2019, as amended), in Beaver County, State of Utah, between the time period February 1, 2016, through January 3, 2017, in that the defendant, MEGAN CHRISTINE RAMIREZ, a party to the offense,

(iii) unjustly or improperly used or managed the resources of a vulnerable adult for the profit or advantage of someone other than the vulnerable adult; or

(iv) unjustly or improperly used a vulnerable adult's power of attorney or guardianship for the profit or advantage of someone other than the vulnerable adult.

To-Wit: T.J. is a vulnerable adult as defined in Utah Code Ann. § 76-5-111 because he is 78 years old. Between February 1, 2016, and January 3, 2017, defendant used her power of attorney over T.J. to transfer approximately \$167,286.02 from a bank account she shared with T.J. to her own personal account. On or about October 13, 2016, defendant also transferred \$75,000.00 from the shared account to another separate personal account. The approximate balance of both accounts was not spent for the benefit of T.J., they were spent on items such as backyard work, travel expenses, ski passes, Costco, ATV go carts, Bliss, Amazon, Shopko, Victoria's Secret, Partyland, Jodi Maddison Escort Services, Rio Nail and Sephora.

The conduct was done intentionally or knowingly and the aggregate value of the resources used or the profit made exceeds \$5,000.00, a Second Degree Felony.

COUNT III

ABUSE, NEGLECT OR EXPLOITATION OF A VULNERABLE ADULT, a Second Degree Felony, in violation of Utah Code Ann. §76-5-111(9)(a)(iii) and/or (iv) (2019, as amended), in Beaver County, State of Utah, between the time period May 18, 2018, through December 22, 2018, in that the defendant, MEGAN CHRISTINE RAMIREZ, a party to the offense,

(iii) unjustly or improperly used or managed the resources of a vulnerable adult for the profit or advantage of someone other than the vulnerable adult; or

(iv) unjustly or improperly used a vulnerable adult's power of attorney or guardianship for the profit or advantage of someone other than the vulnerable adult.

To-Wit: T.J. is a vulnerable adult as defined in Utah Code Ann. § 76-5-111 because he is 78 years old. On May 18, 2018, defendant used her power of attorney over T.J. to sign T.J. into the Spanish Fork Rehabilitation care facility where he stayed until December 22, 2018. As power of attorney, defendant is responsible to pay for T.J.'s care. Defendant never paid Spanish Fork Rehabilitation any money for T.J.'s stay and care and there is an outstanding balance of approximately \$38,000.00.

The conduct was done intentionally or knowingly and the aggregate value of the resources used or the profit made exceeds \$5,000.00, a Second Degree Felony.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: SA Coy Acocks, Donna Forsyth, Laura Davis

Pursuant to Utah Code § 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 knowledge and belief.

Dated this 19th day of September, 2019.

/s/ Coy Acocks

SA COY ACOCKS
Declarant

Authorized for presentment and filing this 19th day of September, 2019.

SEAN D. REYES
Attorney General

/s/ Seth Nielsen
By _____
SETH NIELSEN
Assistant Attorney General