

District Court, Denver County, Colorado LINDSEY-FLANIGAN COURTHOUSE, COLORADO 520 West Colfax Denver, CO 80202 (720) 865-8301	Filed in the County Court City & County of Denver, Colorado  <b>MAR 13 2013</b>  MATTHEW M. McCONVILLE CLERK OF COURT  <input type="checkbox"/> COURT USE ONLY <input type="checkbox"/>
<b>THE PEOPLE OF THE STATE OF          COLORADO</b> vs. <b>TATYANA ISAAKOVNA DATKHAEVA ,</b> Defendant	
MITCHELL R. MORRISSEY, District Attorney, 2nd Judicial District TIMOTHY X. SOKAS, #25359* First Assistant Attorney General RICHARD H. FERRO, #36440* Assistant Attorney General Special Deputy District Attorneys Criminal Justice Section Medicaid Fraud Control Unit Colorado Attorney General's Office 1300 Broadway, 9th Floor Denver, CO 80203 (720) 508-6685* Counsel of Record	Case No: <i>13CR01294</i>  Div: <i>2100</i> Courtroom: <i>14H</i>
<b>COMPLAINT AND INFORMATION</b>	

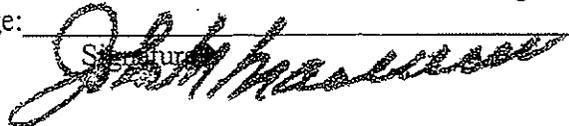
**CHARGES: 2**

**COUNT 1: THEFT, C.R.S. 18-4-401(1),(2)(d) (F3){0801V}**

**COUNT 2: THEFT, C.R.S. 18-4-401(1),(2)(b.5) (M1){0801T}**

Summons Requested - Court date: April 15 2013 10<sup>30</sup>Am

Permission to file information in district court granted:

Judge:  Date: MAR 13 2013

MITCHELL R. MORRISSEY, District Attorney, 2nd Judicial District 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 Attorney General:

**COUNT 1-THEFT (F3)**

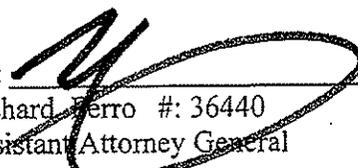
Between and including November 2, 2007 and August 4, 2011, Tatyana Isaakovna Datkhaeva unlawfully, feloniously, and knowingly obtained or exercised control over a thing of value, namely: Money, of the STATE OF COLORADO and the COLORADO STATE DEPARTMENT OF HEALTH CARE POLICY AND FINANCING, with the value of twenty thousand dollars or more, without authorization, or by threat or deception, and intended to deprive STATE OF COLORADO and the COLORADO STATE DEPARTMENT OF HEALTH CARE POLICY AND FINANCING permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S.]

**COUNT 2-THEFT (M1)**

Between and including November 2, 2007 and August 4, 2011, Tatyana Isaakovna Datkhaeva unlawfully and knowingly obtained or exercised control over a thing of value, namely: MONEY, of THE STATE OF COLORADO and the COLORADO STATE DEPARTMENT OF HEALTH CARE POLICY AND FINANCING, with the value of five hundred dollars or more but less than one thousand dollars, without authorization, or by threat or deception, and intended to deprive THE STATE OF COLORADO and the COLORADO STATE DEPARTMENT OF HEALTH CARE POLICY AND FINANCING, permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(b.5), C.R.S.

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

MITCHELL R. MORRISSEY,  
District Attorney, 2nd Judicial District

By:   
Richard Ferro #: 36440  
Assistant Attorney General

Date: **3-12-2013**