

IN THE CIRCUIT COURT OF CAMDEN COUNTY, MISSOURI

STATE OF MISSOURI	]		
	]	Plaintiff	Court Case No.
vs.	]		
	]		Offense Cycle No.
DARCEE JO HEATH	]		
	]	Defendant	PA Case No. 029161885
	]		

COMPLAINT**COUNT I**

Charge Code Number: 570.090-001Y202025.0 89

The Prosecuting Attorney of the County of Camden, State of Missouri, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 9, 2025, in the County of Camden, State of Missouri, the defendant, with the purpose to defraud, used as genuine writings, namely altered college transcripts, knowing that it had been altered so that they purported to have a genuineness that they did not possess and would be used as genuine.

COUNT II

Charge Code Number: 570.090-001Y202025.0 89

The Prosecuting Attorney of the County of Camden, State of Missouri, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 9, 2025, in the County of Camden, State of Missouri, the defendant, with the purpose to defraud, presented as genuine a false certificate of completion, knowing that it had been altered so that it purported to have a authorship that it did not possess and that it would be used as genuine.

COUNT III

Charge Code Number: 570.090-001Y202025.0 89

The Prosecuting Attorney of the County of Camden, State of Missouri, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 9, 2025, in the County of Camden, State of Missouri, the defendant, with the purpose to defraud, presented as genuine a false completion for an Associate Degree in Health Science A.S.N. L.P.N. program, knowing that it had been altered so that it purported to have a genuineness that it did not possess and would be used as genuine.

COUNT IV

Charge Code Number: 335.086-001Y202055.0 99

The Prosecuting Attorney of the County of Camden, State of Missouri, charges that the defendant, in violation of Section 335.086(4), RSMo, committed the class E felony of Use of Fraudulent Nursing Credentials, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about July 9, 2025, in the County of Camden, State of Missouri, defendant used a false Licensed Practical Nurse degree in defendant's own name to imply she was a licensed practical nurse duly licensed to practice nursing. The facts that form the basis for this information and belief are contained in the attached statement of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant or a summons be issued as provided by law.

Richelle L. Grosvenor,
Prosecuting Attorney for the
County of Camden, State of Missouri, by



Steven M. Kretzer, Bar No. 56950

Case Assigned to:

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RANGE OF PUNISHMENT

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000), or if money or property has been gained through the commission of the crime, a fine of not more than double the amount of the offender's gain from the commission of the crime; or by both imprisonment and a fine.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine.