

FILED

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KIMBERLY A. ALLEN
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STATE OF WASHINGTON
GRANT COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

JACQUELIN MONTANO,

DOB [REDACTED],

Defendant.

NO. 26-1-00154-13

INFORMATION

Count 1: Theft in the First Degree
RCW 9A.56.030(1)(a)

Count 2: Medicaid False Statement
RCW 74.09.230(1)

Count 3: Theft in the Second Degree
RCW 9A.56.030

Count 4: Medicaid False Statement
RCW 74.09.230(1)

I, NICHOLAS W. BROWN, Attorney General for the State of Washington, with the concurrence of Grant County Prosecuting Attorney Brandon Guernsey pursuant to RCW 43.10.232, through Assistant Attorney General RACHEL STERETT, do accuse JACQUELIN MONTANO of the crime of THEFT IN THE FIRST DEGREE (CLASS B FELONY) THEFT IN THE SECOND DEGREE AND (2) counts of MEDICAID FALSE STATEMENT (UNRANKED CLASS C FELONY), committed as follows:

1 **COUNT 1 – THEFT IN THE FIRST DEGREE**

2 On, about, or between April 1st, 2022 through May 25th, 2023, in the county of Grant The
3 above named defendant, JACQUELIN MONTANO State of Washington, by deception,
4 obtaining and taking control over the property or services of another or the value thereof, with
5 intent to deprive the other person of the property or services, to wit: Medicaid funds, of an
6 aggregate value exceeding \$5,000, obtained by a series of transactions which are part of a
7 criminal episode or a common scheme or plan;

8 Contrary to RCW 9A.56.020(1)(a)(b) and RCW 9A.56.030(1)(a), and against the peace
9 and dignity of the State of Washington.

10 **COUNT 2 – MEDICAID FALSE STATEMENT**

11 That the defendant, JACQUELIN MONTANO, in the county of Grant, State of
12 Washington, on, about, or between April 1st, 2022, through May 25th, 2023, knowingly made or
13 caused to be made any false statement or representation of a material fact in any application for
14 any payment under any medical care program authorized under RCW 74.09;

15 Contrary to RCW 74.09.230, and against the peace and dignity of the State of
16 Washington.

17 **COUNT 3 – THEFT IN THE SECOND DEGREE**

18 On, about, or between October 1, 2024 through November 19th 2024, in the county of
19 Grant, State of Washington the above named defendant, JACQUELIN MONTANO by
20 deception, obtaining and taking control over the property or services of another or the value
21 thereof, with intent to deprive the other person of the property or services, to wit: Medicaid funds,
22 of an aggregate value exceeding \$750, obtained by a series of transactions which are part of a
23 criminal episode or a common scheme or plan;

24 Contrary to RCW 9A.56.020(1)(a)(b) and RCW 9A.56.030(1)(a), and against the peace
25 and dignity of the State of Washington.

COUNT 4 – MEDICAID FALSE STATEMENT

That the defendant, JACQUELIN MONTANO, in the county of Grant, State of Washington, on, about, or between October 1, 2024, through November 19th, 2024, knowingly made or caused to be made any false statement or representation of a material fact in any application for any payment under any medical care program authorized under RCW 74.09;

Contrary to RCW 74.09.230, and against the peace and dignity of the State of Washington.

DATED this 9th day of June 2026.

Nicholas W. Brown
Attorney General

BY:


RACHEL STERETT, WSBA #27141
Assistant Attorney General
509-225-3873

In Concurrence:

Brandon K. Guernsey
Grant County Prosecution Attorney


Brandon K. Guernsey
Prosecution Attorney