

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF FRANKLIN

STATE OF WASHINGTON,)	
)	
Plaintiff,)	NO.
)	
vs. Pruett, Monica Lou)	AFFIDAVIT IN SUPPORT OF
)	PROBABLE CAUSE
)	
D.O.B.: 3-8-1953)	
Defendant.)	
_____)	

I, Detective Jacinto Nunez, being first duly sworn upon oath, depose and say: That I am a commissioned officer and have been employed by the Franklin County Sheriff's Office since March, 1998. I am currently assigned to the Detectives division. I believe probable cause exists for the arrest and detention of the above-named defendant in that: Records made and kept in the ordinary course of business and as business records of the Franklin County Sheriff's Office reflect as follows:

On 4-25-2012 I met with Bill Swensen who wanted to report money being stolen from his company, D&S Farms. He told me he is the owner of D&S Farms which he inherited from his father. The farm is located at 1222 Klamath Road, in Franklin County Washington.

Swensen said that in January of this year he found out his farm was in arrears about \$100,000.00 to a company in Yakima. Swensen contacted D&S Farm manager Leroy Tonn about the situation and began to investigate the expenses for D&S Farms.

Tonn was employed to manage D&S Farms on or about the year 2000. Tonn had employed the services of Monica Pruett; owner and operator of Lierman Business Services to do the farm's bookkeeping to include writing checks and providing periodic financial reports. He reported that he and Monica Pruett had agreed on a set monthly amount to be paid for bookkeeping services by Lierman Business Services which has been \$200.00 per month for the last several years.

Earlier in 2012, Swensen terminated Tonn's employment with D&S Farms.

Swensen reviewed monthly statements which were prepared by Monica Pruett. The statements showed Lierman Services were being paid \$200.00 per month for bookkeeping. He then found several

Detective Jacinto Nunez
FRANKLIN CO. SHERIFF'S OFFICE
1016 NORTH 4TH AVENUE
PASCO, WA 99301-1160
Phone (509) 545-3501

1 other checks were made to Lierman services which were not accounted for in the monthly reports in
2 varying amounts. Several of the checks were in excess of \$1,000.00. Those monthly reports were
typically prepared by Monica Pruett.

3 Swensen told me he confronted Monica Pruett and showed her copies of records for the single
4 year of 2011. He asked her to account for the overages in excess of the \$200.00 per month to which she
5 reportedly told him, "That's what I cost". He reported that in the year in question, expenses to Lierman
6 Services totaled about \$11,000.00. The monthly statement could only account for \$2,400.00 of that
amount. Swensen terminated the services of Monica Pruett and Lierman Business Services at the end of
April 2012. Over \$56,000, in excess payments to Lierman Business Services, have been reportedly made
by Pruett between the years 2005 and 2011.

7 Swensen continued to investigate several suspicious payments being made to several unknown
8 and unaccounted for expenses. He observed that several payments had been made to the Franklin
9 County Treasurer's Office. He contacted an employee at the Treasurer's office who showed him records
10 of payments being made from D&S Farms to the property taxes of Monica Pruett by check. At least three
D&S Farm checks had been shown to have paid for property taxes on properties owned by Monica Pruett
and her husband Kent Pruett. One of the properties was Lierman Business Services and the other a
private residence in Connell.

11 I contacted an employee at the Franklin County Treasurer's office and verified records of
12 payments being made by D&S Farms which were posted to two of Monica Pruett's personal properties in
three separate payments made in 2007, 2008 and 2009 and totaled over \$11,000. One of the checks was
written in the amount of \$6354.46.

13 Swensen also told me he had noticed an unusual amount of payments being made to the
14 Franklin County PUD with D&S Farm checks. He contacted an employee at Franklin County PUD who
showed him records indicating that some of his payments were being made toward electric accounts for
D&S Farms and also to electrical accounts owned by Monica Pruett and/or Kent Pruett.

15 I obtained a search warrant for Franklin County PUD records. PUD records confirmed several
16 payments to Monica Pruett's business account, Lierman Business Services, were made with D&S Farm
17 checks. They estimated the total sum was several thousands of dollars. Records obtained for the period
18 between September of 2009 and January of 2012 showed over \$13,000 of payments were made to
19 electrical bills described as Lierman Business Services and a residence at 141 North 5th Avenue in
Connell which is owned by Monica and Kent Pruett according to Franklin County Records and is the
primary residence of Monica and Kent Pruett. PUD staff indicated more payments could be located in
their archive system if needed for the investigation.

20 Swensen also showed me several checks written to "Kenica" and said he didn't know what
21 Kenica was until he found checks for an account owned by Monica Pruett, Kent Pruett and Kenica listing
Kenica on the account. He suggested Kenica may be an entity named after Kent and Monica Pruett. He
reported knowing of no vendor called Kenica in which D&S Farms did business with.

22 Swensen has presented me with copies of cleared D&S Farm checks, spreadsheets dating
23 between the years 2005 and 2007 which he has prepared and estimates he has documented over
\$160,000 in unauthorized checks to Lierman Business Services, Kenica, Kent Pruett and to Franklin
County PUD accounts owned by Monica Lou Pruett.

24 I later spoke with former D&S Farm Manager Leroy Tonn. Tonn reported he was the lead
25 manager at D&S Farms between the years 2000 until he was terminated earlier this year. He told me he
26 had employed the services of Lierman Services, owned by Monica Pruett, around the same year he
became lead manager. He said the last amount agreed upon by him and Monica Pruett for bookkeeping

1 services was \$200.00 per month.

2 I showed Tonn several payments made with D&S Farm checks. He told me Monica Pruettt wrote
3 farm checks and said he sometimes pre-endorsed some checks which had employee names or business
4 account numbers already written on them.

5 I showed Tonn three checks written to the Franklin County Treasurer's Office for payments
6 toward Monica Pruettt's properties. He said he did not know anything about the checks and did not
7 authorize Pruettt to pay her personal taxes with the farm account. He said Pruettt had never discussed it
8 with him.

9 I showed Tonn several D&S Farm checks made to the Franklin County PUD and told him Monica
10 Pruettt may have paid her personal utility bills with checks from D&S Farms. He said he knew nothing
11 about that and had never authorized Pruettt to pay her personal bills with farm checks.

12 I showed Tonn a D&S Farm check made out to the payee Kenica and he told me he had never
13 heard of Kenica and had not authorized any payment made to Kenica. He told me he knows all of the
14 vendors used by D&S Farms and was sure none were called Kenica. Several payments were found to
15 have been made to Kenica between the years 2007 and 2011 totaling over \$13,000.

16 I showed Tonn a D&S Farm check made out to the payee Kent Pruettt. He told me Kent Pruettt
17 had not been an employee or vendor of D&S Farms while he was managing. Several payments were
18 found to have been made to Kent Pruettt between the years 2007 and 2011 totaling over \$5,000.

19 On June 22nd 2012, I served a search warrant at Lierman Business Services in Connell. Several
20 hundreds of documents pertaining to D&S Farms were seized along with a single desktop computer.
21 Monica Pruettt was also present and interviewed about this investigation.

22 Monica Pruettt admitted to altering D&S Farm checks which were already endorsed for the
23 amount of \$200.00 and changing the amount to varying amounts above that. She described in detail her
24 method of carefully using an erasing feature on her typewriter to alter the checks. She also admitted to
25 occasionally forging Manager Leroy Tonn's name on checks to write herself payments, in cases when
26 Tonn was out of town. Pruettt also stated she documented large overpayment checks to Lierman
27 Business Services into the payroll portion of the monthly statements she prepared in order to hide them
28 and make the payments more difficult to identify.

29 Pruettt also admitted writing checks to her private account known as Kenica. She told me Kenica
30 was an account used for the finances of her rental homes. When a tenant did not make their rent
31 payment and the fund was low, Pruettt said she deposited D&S Farm checks into the account.

32 Pruettt also admitted to writing checks to the name of her husband Kent Pruettt. She told me she
33 then forged Kent's name and deposited the amount into their personal account. She said Kent had no
34 part in those transactions and said she did all of the personal accounting in her household.

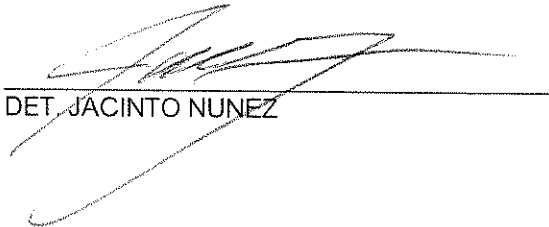
35 Kent Pruettt was also interviewed and reported he had never received any payments from D&S
36 Farms and added that Monica did all of the family's finances.

37 Bank records of four personal accounts belonging to Monica Pruettt and/or Kent Pruettt to include
38 the business account for Lierman Business Services have been obtained with search warrants to include
39 an account listing Kenica, Monica Pruettt and Kent Pruettt as the account title. Those records are currently
40 being examined. Several of the deposit amounts made into the Kenica account match amounts written
41 from D&S Farm accounts and are consistent with payments made by D&S Farms.

1 It is apparent that numerous counts of theft have been committed by Monica Lou Pruett by using her
2 position of trust as the owner and operator of Lierman Business Services which provides bookkeeping
3 services to D&S Farms and maintains control of a checkbook to write unauthorized checks and depositing
4 them into her personal and business accounts for financial gain and with intent to deprive the owner of D&S
5 Farms of those funds. These offenses involved a high degree of planning on her part by her actions of
6 falsifying financial reports and methods of altering checks. This occurred over a period of about 12 years and
7 caused considerable damages to the financial welfare of D&S Farms whose owner is still organizing a
8 recovery of his company and constitutes aggravating circumstances for the crime of first degree theft.

9 I certify under penalty of perjury under the laws of the State of Washington that the foregoing
10 is true and correct.

11 8-5-2012 PASCO
12 Date and Place

13 
14 DET. JACINTO NUNEZ