

APR 15 2022

SECOND JUDICIAL DISTRICT COURT  
COUNTY OF BERNALILLO  
STATE OF NEW MEXICO

CLERK DISTRICT COURT

STATE OF NEW MEXICO,

Plaintiff,

v.

No. D 0202 CR 2022 00750  
NMAGO#: 201905-00622

CRYSTAL LUCERO  
DOB: X/XX/1983  
SSN: XXX-XX-4042  
6156 Cutler Ave NW  
Albuquerque, NM 87102

BRITT BACA-MILLER

Defendant.

**GRAND JURY INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1 - Forgery (over \$20,000)(4564) T**

That on or between the 5<sup>th</sup> day of August 2016 through the 17<sup>th</sup> day of June 2019, in Bernalillo County, State of New Mexico, the above-named defendant, with intent to injure, deceive or cheat Congregation Albert or another, made false endorsements or signatures on Congregation Albert's checks and the damage was over \$20,000, a second degree felony, contrary to NMSA 1978, Section 30-16-10(A)(1) (2006).

**COUNT 2 - Larceny (over \$20,000)(~~9029~~) T**

That on or between the 5<sup>th</sup> day of August, 2016 through the 17<sup>th</sup> day of June, 2019, in Bernalillo County, State of New Mexico, the above-named defendant did take and carry away ~~\$647,961.40~~ \$643,861.81 in the form of money or checks totaling \$643,861.81, belonging solely to Congregation Albert which had a market value of \$643,861.81, and at the time the property was taken, the defendant intended to permanently deprive the owner of it, a second degree felony, contrary to Section 30-16-1, NMSA 1978. *4643,861.81 JE*

**COUNT 3 - Embezzlement (over \$20,000) (0605) T**

That on or between the 21<sup>st</sup> day of June 2017 through the 28<sup>th</sup> day of June 2019, in Bernalillo County, State of New Mexico, the above-named defendant acting as Administrator for Congregation Albert, was entrusted with Congregation Albert's finances and assets, and knowingly and willfully converted funds from her employer's bank account with the intent to deprive the owner of money through unauthorized card purchases with the primary purpose of directly enhancing her interest or financial position by approximately \$59,901.69, a second degree felony, contrary to Section 30-16-8(A)(F), NMSA 1978.

**COUNT 4 - Fraudulent Use of a Credit Card (over \$2,500)(4654) ↖**

On or between the 16<sup>th</sup> day of January, 2018, and the 20<sup>th</sup> day of June, 2018, in Bernalillo County, State of New Mexico, the above-named defendant used a credit card to obtain goods or services, with the intent to deceive or cheat either by misrepresenting that she was the cardholder or without the cardholder's consent; these goods or services had a value of \$3,196.55, a third degree felony, contrary to Section 30-16-33, NMSA 1978.

**COUNT 5 - Fraudulent Use of a Credit Card (over \$2,500)(4654) ↙**

On or between the 6<sup>th</sup> day of July, 2018, and the 31<sup>st</sup> day of December, 2018, in Bernalillo County, State of New Mexico, the above-named defendant used a credit card to obtain goods or services, with the intent to deceive or cheat either by misrepresenting that she was the cardholder or without the cardholder's consent; these goods or services had a value of \$16,397.49, a third degree felony, contrary to Section 30-16-33, NMSA 1978.

**COUNT 6 - Fraudulent Use of a Credit Card (over \$2,500)(4654) ↙**

On or between the 1<sup>st</sup> day of January, 2019, and the 20<sup>th</sup> day of June, 2019, in Bernalillo County, State of New Mexico, the above-named defendant used a credit card to obtain goods or services, with the intent to deceive or cheat either by misrepresenting that she was the cardholder or without the cardholder's consent; these goods or services had a value of \$15,599.48 a third degree felony, contrary to Section 30-16-33, NMSA 1978.

**COUNT 7: Attempts to Evade or Defeat Tax (1941) ↙**

On or between January 01, 2017 and December 31, 2017, in Bernalillo County, New Mexico, the above-named defendant, with intent to evade or defeat the payment or collection of \$2,408 in taxes, willfully did not provide a tax return, a special penalty felony, contrary to Section 7-1-72, NMSA 1978.

**COUNT 8: Attempts to Evade or Defeat Tax (1941) ↙**

On or between January 01, 2018 and December 31, 2018, in Bernalillo County, New Mexico, the above-named defendant, with intent to evade or defeat the payment or collection of \$18,789 in taxes, willfully did not provide a tax return, a special penalty felony, contrary to Section 7-1-72, NMSA 1978.

**COUNT 9: Attempts to Evade or Defeat Tax (1941) ↙**

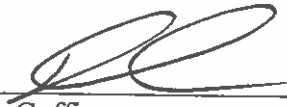
On or between January 01, 2019 and December 31, 2019, in Bernalillo County, New Mexico, the above-named defendant, with intent to evade or defeat the payment or collection of \$9,476 in taxes, willfully did not provide a tax return, a special penalty felony, contrary to Section 7-1-72, NMSA 1978.

The name of the witness upon whose testimony this Indictment is based is as follows:

SPECIAL AGENT DOLORES PEREA  
NEW MEXICO OFFICE OF THE ATTORNEY GENERAL

I hereby certify that the foregoing Indictment is a True Bill.

APPROVED:

  
\_\_\_\_\_  
Andrew Coffing  
Assistant Attorney General

4/15/22  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Foreman

4/15/22  
\_\_\_\_\_  
Date

**CASE INFORMATION**

NMAGO FILE#: 201905-02

MET.CT. #:N/A

LEA/RPT#:

AAG: Andrew Coffing

Def. DOB: [REDACTED] 1983

Def. SS#: [REDACTED] 4042

Def. 615 Cutler Ave NW, Albuquerque, NM 87102

BOOKING/ARREST DATE:

BOOKING/ARREST#:

STN:

DEF. ATTY: LOPD

## PENALTIES

- Count 1 Forgery (over \$20,000): 2nd Degree Felony: Basic sentence of 9 years and not more than \$10,000 fine. (4564)
- Count 2 Larceny (over \$20,000): 2nd Degree Felony: Basic sentence of 9 years and not more than \$10,000 fine. (1029)
- Count 3 Embezzlement (over \$20,000): 2nd Degree Felony: Basic sentence of 9 years and not more than \$10,000 fine. (0605)
- Counts 4, 5, 6 Fraudulent Use of a Credit Card: 3rd Degree Felony: Basic sentence of 3 years and not more than \$5,000 fine. (4654)
- Counts 7, 8, 9 Attempt to Evade or Defeat a Tax: <sup>Fourth degree</sup> Special Penalty Felony: Basic sentence of imprisonment not less than one year nor more than five years, fine of not less than one thousand dollars (\$1,000) nor more than ten thousand dollars (\$10,000), or both such fine and imprisonment, together with the costs of prosecution. (1941)
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- 4th Degree Felony: Basic sentence of 18 months and not more than \$5,000 fine.
- 4th Degree Felony for Sexual Exploitation of Children (2016 Amendment): Basic sentence of 10 years imprisonment and not more than \$5,000 fine.
- 3rd Degree Felony: Basic sentence of 3 years and not more than \$5,000 fine.
- 3rd Degree Felony for Sexual Exploitation of Children (2016 Amendment): Basic sentence of 11 years imprisonment and not more than \$5,000 fine.
- 2nd Degree Felony: Basic sentence of 9 years and not more than \$10,000 fine.
- 2nd Degree Felony for Sexual Exploitation of Children (2016 Amendment): Basic sentence of 12 years imprisonment and not more than \$5,000 fine.
- 1st Degree Felony: Basic sentence of 18 years and not more than \$15,000 fine.
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