



West Virginia E-Filing Notice

CC-02-2023-F-258

Judge: Steven Redding

To: Catie Delligatti
cdelligatti@berkeleywv.org

NOTICE OF FILING

IN THE CIRCUIT COURT OF BERKELEY COUNTY, WEST VIRGINIA
State of West Virginia v. Melissa Joanna Beavers
CC-02-2023-F-258

The following complaint was FILED on 10/18/2023 7:24:12 PM

Notice Date: 10/18/2023 7:24:12 PM

Michelle R. Schoppert
CLERK OF THE CIRCUIT COURT
Berkeley County
380 W South Street
MARTINSBURG, WV 25401

(304) 264-1918
Michelle.Schoppert@courtswv.gov

STATE OF WEST VIRGINIA,

COUNTY OF BERKELEY, TO-WIT:

In the Circuit Court of said County,

In the OCTOBER Term 2023

The Grand Jurors of the State of West Virginia, in and for the body of the County of Berkeley, and now attending said Court, upon their oaths present:

COUNT ONE
Embezzlement

That MELISSA JOANNA BEAVERS on or between the 17th day of October, 2019, and the 21st day of December, 2022, in Berkeley County, West Virginia, did unlawfully and feloniously embezzle, fraudulently convert to her own use and steal money in the amount of approximately one hundred forty-five thousand dollars, to wit: approximately \$145,000.00 belonging to Berkeley County Clerk's Office located at 100 West King Street, Martinsburg, West Virginia, the same money having come into the possession or had been placed under the care or management of MELISSA JOANNA BEAVERS by virtue of a certain office, place and employment, to wit: while she was acting as the Deputy County Clerk for the Berkeley County Clerk's Office, in violation of Chapter 61, Article 3, Section 20 of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWO
Falsifying Accounts

That MELISSA JOANNA BEAVERS on or between the 17th day of October, 2019, and the 21st day of December, 2022, in Berkeley County, West Virginia, did unlawfully, intentionally, and feloniously as an officer, clerk, or agent of any county, to-wit: Deputy County Clerk for the Berkeley County Clerk's Office, make, alter, or omit to make any entry in any book

of accounts, or mutilate, destroy, or conceal any such account or book of accounts with intent in so doing to conceal the true state of any account or to defraud the county or with intent to enable or assist any person to obtain money to which she was not entitled, in violation of Chapter 61, Article 3, Section 22 of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THREE
Forgery

That MELISSA JOANNA BEAVERS on or about the 18th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 184 payable to Beavers Roof Repair in the amount of \$3,500.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FOUR
Uttering

That MELISSA JOANNA BEAVERS on or about the 18th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 184 payable to Beavers Roof Repair in the amount of \$3,500.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another's rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FIVE
Forgery

That MELISSA JOANNA BEAVERS on or about the 20th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 151 payable to Beavers Roof Repair in the amount of \$4,250.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT SIX
Uttering

That MELISSA JOANNA BEAVERS on or about the 20th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 151 payable to Beavers Roof Repair in the amount of \$4,250.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another's rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT SEVEN
Forgery

That MELISSA JOANNA BEAVERS on or about the 20th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 152 payable to Beavers Roof Repair in the amount of \$4,950.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W.

Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT EIGHT
Uttering

That MELISSA JOANNA BEAVERS on or about the 20th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 152 payable to Beavers Roof Repair in the amount of \$4,950.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another's rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT NINE
Forgery

That MELISSA JOANNA BEAVERS on or about the 28th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 717 payable to Beavers Roof Repair in the amount of \$9,978.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TEN
Uttering

That MELISSA JOANNA BEAVERS on or about the 28th day of December, 2020, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 717 payable to Beavers Roof Repair in the amount of \$9,978.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another’s rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT ELEVEN
Forgery

That MELISSA JOANNA BEAVERS on or about the 8th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 731 payable to Beavers Roof Repair in the amount of \$10,939.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWELVE
Uttering

That MELISSA JOANNA BEAVERS on or about the 8th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 731 payable to Beavers Roof Repair in the amount of \$10,939.00 written against a Jefferson Security Bank account number ending in

4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another’s rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTEEN
Forgery

That MELISSA JOANNA BEAVERS on or about the 8th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 730 payable to Beavers Roof Repair in the amount of \$10,561.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FOURTEEN
Uttering

That MELISSA JOANNA BEAVERS on or about the 8th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 730 payable to Beavers Roof Repair in the amount of \$10,561.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another’s rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FIFTEEN

Forgery

That MELISSA JOANNA BEAVERS on or about the 11th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 732 payable to Beavers Roof Repair in the amount of \$19,982.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT SIXTEEN

Uttering

That MELISSA JOANNA BEAVERS on or about the 11th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 732 payable to Beavers Roof Repair in the amount of \$19,982.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another's rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT SEVENTEEN

Forgery

That MELISSA JOANNA BEAVERS on or about the 13th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 733 payable to Beavers Roof Repair in the amount of \$22,978.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W.

Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT EIGHTEEN

Uttering

That MELISSA JOANNA BEAVERS on or about the 13th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 733 payable to Beavers Roof Repair in the amount of \$22,978.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another's rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT NINETEEN

Forgery

That MELISSA JOANNA BEAVERS on or about the 16th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously, and falsely forge a writing on paper, to wit: check number 734 payable to Beavers Roof Repair in the amount of \$39,942.00 written against Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr – County Clerk or the Berkeley County Clerk, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY
Uttering

That MELISSA JOANNA BEAVERS on or about the 16th day of January, 2021, in Berkeley County, West Virginia, did unlawfully, feloniously and intentionally utter and attempt to employ as true writing on paper, to-wit: check number 734 payable to Beavers Roof Repair in the amount of \$39,942.00 written against a Jefferson Security Bank account number ending in 4068 belonging to John W. Small Jr. – County Clerk or the Berkeley County Clerk, knowing the same to be forged, with the intent to defraud and to the prejudice of another’s rights, in violation of Chapter 61, Article 4, Section 5, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-ONE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on page 4 of an “Answer to Divorce Petition” in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-TWO
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of

a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Verification of an “Answer to Divorce Petition” in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-THREE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Certificate of Service on an “Answer to Divorce Petition” in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-FOUR
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on the Verification of an “Answer to Divorce Petition” in a

divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-FIVE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Verification of a Motion for Temporary Relief in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-SIX
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Certificate of Service in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-SEVEN
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: did forge the signature of a Notary Public, Erin C. Dunn-Carey, on the Verification of a "Motion for Temporary Relief" in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-EIGHT
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Property Agreement in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT TWENTY-NINE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or

a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on a “Property Agreement” in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on a “Property Agreement” in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-ONE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Bureau for Child Support Enforcement Application and Income Withholding Form in a divorce packet, to the prejudice of another's right and with intent to

defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-TWO
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Verification of a Financial Statement in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-THREE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Certificate of Service on the Financial Statement in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-FOUR
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on an "Financial Statement" in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-FIVE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the "Parenting Plan" in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-SIX
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, forge a public record, or a certificate, return or attestation of a clerk of

a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Verification of the “Parenting Plan” in a divorce packet, to the prejudice of another's right and with intent to defraud, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-SEVEN
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on an “Parenting Plan” in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-EIGHT
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another’s right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: by signing the name of Daniel Beavers Jr. on the Verification of the “Worksheet of Individual Proposed Parenting Plan” in a divorce packet, in violation of Chapter

61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT THIRTY-NINE
Forgery of a Public Record

That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge the signature of a Notary Public, Erin C. Dunn-Carey, on an "Worksheet of Individual Proposed Parenting Plan" in a divorce packet, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FORTY
Keeping or Concealing an Instrument for Forging

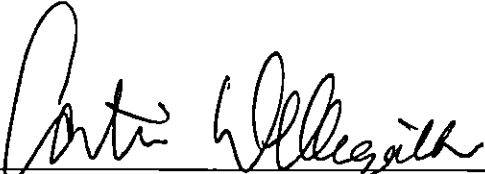
That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully and feloniously, forge, or keep or conceal any instrument for the purpose of forging, the seal of a court, or any public office or body politic or corporate in this state, to-wit: concealed and used an ex-Berkeley County Deputy Clerk's notary stamp issued to Erin C. Dunn-Carey for her own personal use, in violation of Chapter 61, Article 4, Section 2, of the Code of West Virginia, as amended, against the peace and dignity of the State.

COUNT FORTY-ONE
Forgery of a Public Record

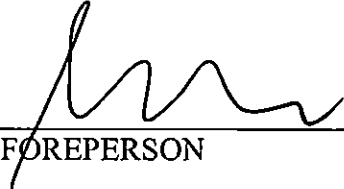
That MELISSA JOANNA BEAVERS on or about the 8th day of December, 2022, in Berkeley County, West Virginia, did unlawfully, feloniously, to the prejudice of another's right, and with intent to defraud, the said MELISSA JOANNA BEAVERS did forge a public record, or a certificate, return or attestation of a clerk of a court, notary public, judge, justice, or any public officer, in relation to any matter wherein such certificate, return, or attestation may be received as legal proof, to wit: forge retired Family Court Judge Sally Jackson's digital signature on a Berkeley County Court order titled "Order from December 8th, 2022" as well as the contents thereof, and presenting it as a true Court Order in Case Number FC-02-2022-D-702, in violation of Chapter 61, Article 4, Section 1, of the Code of West Virginia, as amended, against the peace and dignity of the State.

Found upon the testimony of Kevin Miller, duly sworn in open Court to testify to the truth and sent before the Grand Jury this 18th day of October 2023.

A TRUE BILL



PROSECUTING ATTORNEY
BERKELEY COUNTY, WEST VIRGINIA



FOREPERSON



MICHELLE R. SCHOPPERT
CLERK



Circuit Court of Berkeley County

Berkeley County Judicial Center
380 W. South Street, Suite 2200
Martinsburg, WV 25401



PHONE: 304-264-1918

FILED | 10/18/2023 7:24 PM
CC-02-2023-F-258
Berkeley County Circuit Clerk
Michelle R. Schoppert

ARRAIGNMENT DATE
JUDGE REDDING

380 W. SOUTH STREET
MARTINSBURG, WV 25401
3RD FLOOR ROOM C

TUESDAY, NOVEMBER 7, 2023
10:00 A.M.