

**THE STATE OF NEW HAMPSHIRE**

HILLSBOROUGH, SS  
Northern District

SUPERIOR COURT

**INDICTMENT**

At the Superior Court, holden at Manchester, within and for the County of Hillsborough aforesaid, on the 21st day of March in the year of our Lord two thousand and twenty-two,

THE GRAND JURORS FOR THE STATE OF NEW HAMPSHIRE, upon oath, present that

**KAYLA MONTGOMERY**  
DOB: 08/31/1990

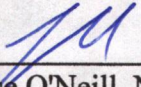
HNSC #216	<u>2022</u> CR <u>39</u>
CHG ID#	<u>1939569C</u>

of or formerly of 445 Willow Street, Manchester, in the State of New Hampshire, between approximately November 30, 2019, and June 2, 2021, at Manchester in the County of Hillsborough aforesaid, did commit the crime of

**THEFT BY DECEPTION**  
RSA 637:4

in that Kayla Montgomery, pursuant to one scheme or course of conduct, obtained or exercised control over property of another by deception and with a purpose to deprive him thereof, said property having a value in excess of \$1,500; to wit, on various occasions between approximately 11/30/2019 and 06/02/2021 the defendant represented to NH DHHS that H.M. (DOB 06/07/2014) was a member of the defendant's household despite H.M. not being a member of the defendant's household during that time period, resulting in the defendant receiving benefits for H.M. in excess of \$1,500 for that time period.

Said acts being contrary to the form of the Statute, in such case made and provided, and against the peace and dignity of the State.

  
\_\_\_\_\_  
Jesse O'Neill, NH Bar #20723  
Senior Assistant Attorney General

This is a true bill.

Theresa M. Field 3/21/2022  
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Foreperson

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Name: Kayla Montgomery  
DOB: 08/31/1990  
Address: Hillsborough County House of Corrections  
Mailing: c/o Paul J. Garrity, Esq., 14 Londonderry Rd., Londonderry, NH 03053  
RSA: 637:4  
Offense Level: Maximum of 7½-15 years State Prison, a \$4,000 fine, or both  
Case Number: 216-2022-CR-00039