

STATE OF SOUTH DAKOTA )  
: SS  
COUNTY OF HUGHES )

IN CIRCUIT COURT

SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA, )

32CRI24-000543

Plaintiff, )

INDICTMENT FOR:

v. )

COUNT 1:

RENEE LYNN STRONG, )

OFFERING FALSE OR FORGED

DOB: 06/14/1969, )

INSTRUMENT FOR FILING

Defendant. )

(SDCL 22-11-28.1)

(CLASS 6 FELONY)

*A true bill*

COUNT 2:

FORGERY

(SDCL 22-39-36)

(CLASS 5 FELONY)

*A true bill*

COUNT 3:

OFFERING FALSE OR FORGED

INSTRUMENT FOR FILING

(SDCL 22-11-28.1)

(CLASS 6 FELONY)

*A true bill*

COUNT 4:

FORGERY

(SDCL 22-39-36)

(CLASS 5 FELONY)

*A true bill*

COUNT 5:

OFFERING FALSE OR FORGED

INSTRUMENT FOR FILING

(SDCL 22-11-28.1)

(CLASS 6 FELONY)

*A true bill*

COUNT 6:

FORGERY

(SDCL 22-39-36)

(CLASS 5 FELONY)

*A true bill*

COUNT 7:

OFFERING FALSE OR FORGED

INSTRUMENT FOR FILING

(SDCL 22-11-28.1)

*A true bill*

) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 8:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 9:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 10:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 11:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 12:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 13:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 14:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 15:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*

) COUNT 16:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 17:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 18:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 19:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 20:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 21:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 22:  
) FORGERY  
) (SDCL 22-39-36)  
) (CLASS 5 FELONY)  
) *A true bill*  
)  
) COUNT 23:  
) OFFERING FALSE OR FORGED  
) INSTRUMENT FOR FILING  
) (SDCL 22-11-28.1)  
) (CLASS 6 FELONY)  
) *A true bill*  
)  
) COUNT 24:  
) FORGERY

) (SDCL 22-39-36)  
 ) (CLASS 5 FELONY) *A true bill*  
 )  
 ) COUNT 25:  
 ) OFFERING FALSE OR FORGED  
 ) INSTRUMENT FOR FILING  
 ) (SDCL 22-11-28.1)  
 ) (CLASS 6 FELONY) *A true bill*  
 )  
 ) COUNT 26:  
 ) FORGERY  
 ) (SDCL 22-39-36)  
 ) (CLASS 5 FELONY) *A true bill*  
 )

THE HUGHES COUNTY GRAND JURY CHARGES:

COUNT 1

That on or about the 12th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are S.G., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 2

That on or about the 12th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a

food service inspection report listing an owner, the initials of which are S.G.; and as to

### COUNT 3

That on or about the 13th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are C.J.J., for filing, registering, or recording with the South Dakota Department of Health; and as to

### COUNT 4

That on or about the 13th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are C.J.J.; and as to

### COUNT 5

That on or about the 13th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the

instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are P.D., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 6

That on or about the 13th day of February 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are P.D.; and as to

#### COUNT 7

That on or about the 11th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are D.D., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 8

That on or about the 11th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of

**Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are D.D.; and as to

COUNT 9

That on or about the 13th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are M.K., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 10

That on or about the 13th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are M.K.; and as to

COUNT 11

That on or about the 19th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false

or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are W.B.D., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 12

That on or about the 19th day of March 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are W.B.D.; and as to

#### COUNT 13

That on or about the 2nd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are R.D., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 14

That on or about the 2nd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of



any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are R.D.; and as to

COUNT 15

That on or about the 2nd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are J.A., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 16

That on or about the 2nd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are J.A.; and as to

COUNT 17

That on or about the 3rd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of

this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are S.B., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 18

That on or about the 3rd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are S.B.; and as to

COUNT 19

That on or about the 3rd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are J.S., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 20

That on or about the 3rd day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are J.S.

COUNT 21

That on or about the 5th day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are L.C.C., for filing, registering, or recording with the South Dakota Department of Health; and as to

COUNT 22

That on or about the 5th day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are L.C.C.; and as to

COUNT 23

That on or about the 10th day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are B.H.G.C.M., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 24

That on or about the 10th day of April 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are B.H.G.C.M.; and as to

#### COUNT 25

That on or about the 1st day of June 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Offering False or Forged Instrument for Filing, Registering, or Recording in a Public Office**, in violation of SDCL 22-11-28.1, a Class 6 Felony, in that she offered a false or forged instrument, knowing that the instrument was false or forged, for filing, registering, or recording in a public office, which instrument, if genuine, could be filed, registered, or recorded under any law of this state or of the United States, to wit: a food service inspection report listing an owner, the initials of which are J.S., for filing, registering, or recording with the South Dakota Department of Health; and as to

#### COUNT 26

That on or about the 1st day of June 2024, in the County of Hughes, State of South Dakota, Renee Lynn Strong did commit the public offense of **Forgery**, in violation of SDCL 22-39-36, a Class 5 Felony, in that she, with the intent to defraud, falsely made, completed, or altered a written instrument of any kind, or passed a forged instrument of any kind, to wit: a food service inspection report listing an owner, the initials of which are J.S.

Contrary to statute in such case made and provided against the peace and dignity of the State of South Dakota.

Dated this 17 day of December 2024, at Pierre, South Dakota.

A true bill  
"A TRUE BILL"

THIS INDICTMENT IS MADE WITH THE CONCURRENCE OF AT LEAST SIX GRAND JURORS.

Robert Hunter  
Grand Jury Foreperson

WITNESS WHO TESTIFIED BEFORE THE GRAND JURY IN REGARD TO THIS INDICTMENT:

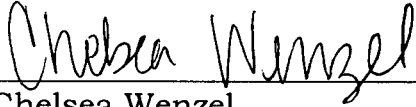
South Dakota DCI Special Agent Matthew Glenn

STATE OF SOUTH DAKOTA )  
                                  : SS  
COUNTY OF HUGHES      )

REQUEST FOR WARRANT

I, Chelsea Wenzel, prosecuting attorney in the above matter, do hereby request a Warrant be issued against the above-named Defendant.

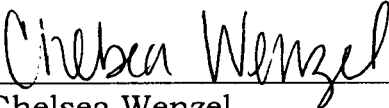
Dated this 17<sup>th</sup> day of December, 2024.

  
\_\_\_\_\_  
Chelsea Wenzel  
Assistant Attorney General

STATE OF SOUTH DAKOTA )  
  : SS  
COUNTY OF HUGHES        )

NOTICE OF DEMAND  
  
FOR ALIBI DEFENSE

I, Chelsea Wenzel, prosecuting attorney in the above matter, hereby state that the alleged offenses were committed on or about the 12th day of February, 13th day of February, 11th day of March, 13th day of March, 19th day of March, 2nd day of April, 3rd day of April, 5th day of April, 10th day of April, 22nd day of April, and 1st day of June 2024, at Pierre, South Dakota. I hereby request that Defendant or her attorney serve upon me a written notice of her intention to offer a defense of alibi within ten days as provided in SDCL 23A-9-1. Failure to provide such notice of an alibi defense may result in exclusion of any testimony pertaining to an alibi defense.

  
\_\_\_\_\_  
Chelsea Wenzel  
Prosecuting Attorney