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LOS ANGELES  
SUPERIOR COURT

Attorneys for the People of the State of California

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, SOUTHEAST DISTRICT**

**PEOPLE OF THE STATE OF  
CALIFORNIA,**

**Plaintiff,**

**vs.**

**ROMMEL AMADO SIBAL,**

**Defendant.**

**Case No. VA 083454**

**AG Docket No. LB2004101256**

**COMPLAINT IN SUPPORT OF ARREST  
WARRANT**

**Counts 1-5 - P.C. §288(c)(2)**

**Count 6 - P.C. §261(a)(1)**

**Count 7 - P.C. §288(a)(g)**

The undersigned, based upon information and belief, complains that before the making of this Complaint defendant ROMMEL AMADO SIBAL committed the following crime in the County of Los Angeles, State of California:

**COUNT 1**

**Penal Code § 288(c)(2)- Felony  
Lewd Act on Dependent Adult**

On or about March 27, 2004, in the County of Los Angeles, defendant, ROMMEL AMADO SIBAL, while a caretaker, wilfully and lewdly committed a lewd and lascivious act upon and with the body of Eileen B., a dependent adult, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of himself and the dependent adult, in violation of Penal Code section 288(c)(2), a felony.

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**COUNT 2**  
**Penal Code § 288(c)(2)- Felony**  
**Lewd Act on Dependent Adult**

Between September 20, 2003 to September 21, 2003, in the County of Los Angeles, defendant, ROMMEL AMADO SIBAL, while a caretaker, wilfully and lewdly committed a lewd and lascivious act upon and with the body of LaVonne V., a dependent adult, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of himself and the dependent adult, in violation of Penal Code section 288(c)(2), a felony.

**COUNT 3**  
**Penal Code § 288(c)(2)- Felony**  
**Lewd Act on Dependent Adult**

Between September 20, 2003 to September 21, 2003, in the County of Los Angeles, defendant, ROMMEL AMADO SIBAL, while a caretaker, wilfully and lewdly committed a lewd and lascivious act upon and with the body of LaVonne V., a dependent adult, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of himself and the dependent adult, in violation of Penal Code section 288(c)(2), a felony.

**COUNT 4**  
**Penal Code § 288(c)(2)- Felony**  
**Lewd Act on Dependent Adult**

On or about November 29, 2003 , in the County of Los Angeles, defendant, ROMMEL AMADO SIBAL, while a caretaker, wilfully and lewdly committed a lewd and lascivious act upon and with the body of LaVonne V., a dependent adult, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of himself and the dependent adult, in violation of Penal Code section 288(c)(2), a felony.

**COUNT 5**  
**Penal Code § 288(c)(2)- Felony**  
**Lewd Act on Dependent Adult**

On or about November 29, 2003 , in the County of Los Angeles, defendant, ROMMEL AMADO SIBAL, while a caretaker, wilfully and lewdly committed a lewd and lascivious act upon and with the body of LaVonne V., a dependent adult, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of himself and the dependent adult, in violation of Penal Code section 288(c)(2), a felony.

**COUNT 6**

1                                   **Penal Code § 261(a)(1)- Felony**  
2                                   **Rape of an incompetent person**

3           Between September 20, 2003 to September 21, 2003, in the County of Los Angeles,  
4 defendant, ROMMEL AMADO SIBAL, did willfully and unlawfully have and accomplish an act  
5 of sexual intercourse with a person, to wit, LaVonne V., not his spouse, where said person was  
6 incapable of giving legal consent because of a mental disorder and said defendant knew and  
7 reasonable should have known of such condition.

8           It is further alleged that the above offense is a serious felony within the meaning of Penal  
9 Code Section 1192.7(c)(3).

10          Notice: Conviction of this offense will require the court to order you to submit to a blood  
11 test for evidence of antibodies to the probably causative agent of Acquired Immune Deficiency  
12 Syndrome (AIDS). Penal Code Section 1202.1.

13          Notice: Conviction of this offense will require you to register pursuant to Penal code Section  
14 290. Willful failure to register is a crime.

15                                   **COUNT 7**  
16                                   **Penal Code § 288(a)(g)- Felony**  
17                                   **Oral Copulation of an incompetent person**

18           On or about November 29, 2003, in the County of Los Angeles, defendant, ROMMEL  
19 AMADO SIBAL, did willfully and unlawfully have and accomplish an act of oral copulation with  
20 a person, to wit, LaVonne V., who at the time was incapable, because of a mental disorder, of giving  
21 legal consent to said act, and said defendant knew and reasonable should have known of such  
22 condition.

23          Notice: Conviction of this offense will require the court to order you to submit to a blood  
24 test for evidence of antibodies to the probably causative agent of Acquired Immune Deficiency  
25 Syndrome (AIDS). Penal Code Section 1202.1.

26          Notice: Conviction of this offense will require you to register pursuant to Penal code Section  
27 290. Willful failure to register is a crime.

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1 I declare under penalty of perjury under the laws of the State of California, based upon  
2 information and belief, that the foregoing is true and correct, and that this was executed on June  
3 \_\_\_\_, 2004, in the County of Los Angeles, State of California.

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5 Martha Supernor, Special Agent  
6 Elder Abuse Prosecution Unit  
7 Bureau of Medi-Cal Fraud and Elder Abuse  
8 Office of the Attorney General  
9 California Department of Justice

10 **REQUEST FOR DISCOVERY**

11 Pursuant to Penal Code § 1054.5(b), the People request from defense counsel all materials  
12 and information required to be disclosed to the prosecution by the defense under the authority of  
13 Penal Code § 1054.3, including the following:

14 1. The names and addresses of persons, other than the defendant, whom the defendant  
15 intends to call as witnesses at trial. [Penal Code § 1054.3(a).]

16 2. Any relevant written or recorded statements of persons whom the defendant intends to call  
17 as witnesses at trial. [Penal Code § 1054.3(a).]

18 3. Any reports of the statements of persons whom the defendant intends to call as witnesses  
19 at trial. [Penal Code § 1054.3(a).]

20 4. Any reports or statements of experts made in connection with the case. [Penal Code §  
21 1054.3(a).]

22 5. Any results of physical or mental examinations, scientific tests, experiments, or  
23 comparisons which the defendant intends to offer in evidence at the trial. [Penal Code § 1054.3(a).]

24 6. The opportunity to view "[a]ny real evidence which the defendant intends to offer in  
25 evidence at the trial." [Penal Code § 1054.3(b).]

26 This is a continuing request for the above information. If the information becomes available  
27 at a future time, the prosecution by this request asks that it be immediately disclosed to the  
28 prosecution.