

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO
SPECIAL STATEWIDE GRAND JURY

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

TONI COFFMAN,
dob [REDACTED],

BRENDA JONES,
dob [REDACTED],

LINDA COFFMAN,
dob [REDACTED],

KEVIN PARDUE,
dob [REDACTED],

NATALIE HAMMON,
dob [REDACTED],

BEATRICE MUNOZ,
dob [REDACTED],

NANCY MORENO,
dob [REDACTED],

BRANDY BINGHAM,
dob [REDACTED],

BRADLEY OWEN,
dob [REDACTED],

CHARLIE BLAND,
dob [REDACTED],

ERIK CARRILLO,
dob [REDACTED],

MICHAEL MOORE,
dob [REDACTED],

**OFFICE COPY
ATTORNEY GENERAL**

FILED / ENDORSED

AUG 22 2018

By [REDACTED], Deputy Clerk

INDICTMENT

1 KATHRYN COLE,
2 dob [REDACTED],
3 BRIAN GRIGGS,
4 dob [REDACTED],
5 DELFA GUERRERO AKA BELL,
6 dob [REDACTED],
7 CHRISTOPHER "LEE" OSBORNE,
8 dob [REDACTED],
9 ANA MARIE GONZALEZ,
10 dob [REDACTED],
11 ANGELINA MORENO,
12 dob [REDACTED],
13 BRETT KROH,
14 dob [REDACTED],
15 RODNEY MAYERS,
16 dob [REDACTED],
17 GERALD ORETGER,
18 dob [REDACTED],
19 JOSEPHINE ORTEGA,
20 dob [REDACTED],
21 JONATHAN VOLKER,
22 dob [REDACTED],
23 TONY GAWAD,
24 dob [REDACTED],
25 ERIKA HUNT,
26 dob [REDACTED],
27 AMY STANFILL,
28 dob [REDACTED],
TONI TINAY,
dob [REDACTED],
EARL WYATT,
dob [REDACTED],
MEGHAN MALLEY,
dob [REDACTED],
SPENCER DUNNING,
dob [REDACTED],

1 ZACKARY RAINER,
2 dob [REDACTED],
3 JAMAUL MULLINS,
4 dob [REDACTED],
5
6 Defendants.

7 A Special Grand Jury of the County of Sacramento, State of California, accuses the
8 following defendants of committing, in the Counties of Sacramento, Contra Costa, Los Angeles,
9 Marin, Napa, Placer, San Joaquin, San Jose, Santa Clara, Stanislaus, Solano, Ventura, and Yolo,
10 before the finding of this indictment, of the following crimes:

11 **COUNT 1**

12 BREND A JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN

13 **CONSPIRACY (Re: Superior Floors)**

14 On and between July 20, 2015, and February 17, 2016, in the COUNTY of CONTRA
15 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
16 committed by BREND A JONES, NANCY MORENO, CHARLIE BLAND, and TONI
17 COFFMAN, who did willfully and unlawfully conspire together with another person or persons
18 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California
19 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
20 the aforesaid conspiracy, Defendants committed the following overt act(s):

21 **OVERT ACT 1**

22 On July 20, 2015, in the County of Contra Costa, Toni Coffman and unknown
23 coconspirators removed a window pane and entered Superior Floors.

24 **OVERT ACT 2**

25 On and between July 24, 2015, and August 6, 2015, in the County of Contra Costa, Toni
26 Coffman and other unknown coconspirators access a Superior Floors credit card terminal.

27 ///

28 ///

///

1 OVERT ACT 3

2 On and between July 24, 2015 and August 6, 2015, in the County of Contra Costa, Toni
3 Coffman and unknown coconspirators forced refunds from a Superior Floors credit card terminal
4 onto prepaid cards in the names of Brenda Jones, Charlie Bland, and Nancy Moreno.

5 OVERT ACT 4

6 Between July 20, 2015, and February 17, 2016, in the County of Contra Costa, Toni
7 Coffman printed a batch receipt for Superior Floors.

8 **COUNT 2**

9 BREANDA JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN

10 **GRAND THEFT (Re: Superior Floors)**

11 On and between July 20, 2015, and February 17, 2016, in the COUNTY of CONTRA
12 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
13 by BREANDA JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN, who did
14 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
15 Fifty Dollars (\$950) to wit: Superior Floors.

16 **COUNT 3**

17 BREANDA JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN

18 **BURGLARY (Re: Superior Floors)**

19 On July 20, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND DEGREE
20 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
21 by BREANDA JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN, who did
22 enter a commercial building occupied by Superior Floors with the intent to commit larceny and
23 any felony.

24 **COUNT 4**

25 BREANDA JONES, NANCY MORENO, CHARLIE BLAND, and TONI COFFMAN

26 **COMPUTER ACCESS AND FRAUD (Re: Superior Floors)**

27 On and between July 20, 2015, and February 17, 2016, in the COUNTY of CONTRA
28 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section

1 502(c)(1), a felony, was committed by BRENDA JONES, NANCY MORENO, CHARLIE
2 BLAND, and TONI COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of
3 this section in that they knowingly accessed and without permission accessed data on a device
4 (point of sale terminal) in order to wrongfully obtain money.

5 **COUNT 5**

6 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
7 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
8 MICHAEL MOORE

9 **CONSPIRACY (Re: Cost Rite Furniture)**

10 On and between August 7, 2015, and February 17, 2016, in the COUNTY of CONTRA
11 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
12 committed by, TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA
13 COFFMAN, BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY
14 BINGHAM, and MICHAEL MOORE, who did willfully and unlawfully conspire together with
15 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
16 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
17 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
18 act(s):

19 **OVERT ACT 1**

20 On August 7, 2015, in the County of Contra Costa, Toni Coffman and unknown
21 coconspirators removed a credit card terminal from the counter at Cost Rite Furniture.

22 **OVERT ACT 2**

23 On August 7, 2015, and August 8, 2015, in the County of Contra Costa, Toni Coffman and
24 other unknown coconspirators accessed Cost Rite Furniture's credit card terminal.

25 **OVERT ACT 3**

26 On August 7, 2015, and August 8, 2015, in the County of Contra Costa, Toni Coffman and
27 other unknown coconspirators forced refunds from a Cost Rite Furniture credit card terminal onto
28

1 prepaid cards in the names of Erika Hunt, Brenda Jones, Beatrice Munoz, Delfa Guerrero,
2 Michael Moore, Jonathan Volker, Brandy Bingham, and Linda Coffman.

3 OVERT ACT 4

4 Between August 7, 2015, and February 17, 2016, in the County of Contra Costa, Toni
5 Coffman printed a batch receipt for Cost Rite Furniture.

6 COUNT 6

7 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
8 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
9 MICHAEL MOORE

10 **GRAND THEFT (Re: Cost Rite Furniture)**

11 On and between August 7, 2015, and February 17, 2016, in the COUNTY of CONTRA
12 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
13 by TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
14 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
15 MICHAEL MOORE, who did unlawfully take money and personal property of another of a value
16 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Cost Rite Furniture.

17 COUNT 7

18 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
19 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
20 MICHAEL MOORE

21 **BURGLARY (Re: Cost Rite Furniture)**

22 On August 7, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
23 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
24 committed by TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA
25 COFFMAN, BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY
26 BINGHAM, and MICHAEL MOORE, who did enter a commercial building occupied by Cost
27 Rite Furniture with the intent to commit larceny and any felony.

28 ///

1 **COUNT 8**

2 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
3 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
4 MICHAEL MOORE

5 **COMPUTER ACCESS AND FRAUD (Re: Cost Rite Furniture)**

6 On August 7, 2015, in the COUNTY of CONTRA COSTA, the crime of COMPUTER
7 ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by
8 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
9 BRENDA JONES, ERIKA HUNT, JONATHAN VOLKER, BRANDY BINGHAM, and
10 MICHAEL MOORE, who did knowingly and unlawfully violate subsection (c)(1) of this section
11 in that they knowingly accessed and without permission accessed data on a device (point of sale
12 terminal) in order to wrongfully obtain money.

13 **COUNT 9**

14 TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, BEATRICE MUNOZ,
15 LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and NANCY MORENO

16 **CONSPIRACY (Re: Dr. William Chen)**

17 On and between August 12, 2015, and August 14, 2015, in the COUNTIES of SOLANO
18 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
19 182(a)(1) a felony, was committed by, TONI COFFMAN, DELFA GUERRERO, JONATHAN
20 VOLKER, BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, MICHAEL
21 MOORE, and NANCY MORENO, who did willfully and unlawfully conspire together with
22 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
23 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
24 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
25 act(s):

26 **OVERT ACT 1**

27 On August 14, 2015, in the County of Contra Costa, Toni Coffman and other unknown
28 coconspirators accessed Dr. William Chen's credit card terminal.

1 OVERT ACT 2

2 On August 14, 2015, in the County of Contra Costa, Toni Coffman and unknown
3 coconspirators forced refunds from a Dr. William Chen's credit card terminal onto prepaid cards
4 in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz, Jonathan Volker, Delfa
5 Guerrero, Brenda Jones, and Michael Moore.

6 COUNT 10

7 TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, BEATRICE MUNOZ,
8 LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and NANCY MORENO

9 **GRAND THEFT (Re: Dr. William Chen)**

10 On and between August 12, 2015, and August 14, 2015, in the COUNTIES of SOLANO
11 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
12 was committed by TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER,
13 BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and
14 NANCY MORENO, who did unlawfully take money and personal property of another of a value
15 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Dr. William Chen.

16 COUNT 11

17 TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, BEATRICE MUNOZ,
18 LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and NANCY MORENO

19 **BURGLARY (Re: Dr. William Chen)**

20 On August 12, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime of
21 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
22 felony, was committed by TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER,
23 BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and
24 NANCY MORENO, who did enter a commercial building occupied by Dr. William Chen with
25 the intent to commit larceny and any felony.

26 COUNT 12

27 TONI COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, BEATRICE MUNOZ,
28 LINDA COFFMAN, BRENDA JONES, MICHAEL MOORE, and NANCY MORENO

1 **COMPUTER ACCESS AND FRAUD (Re: Dr. William Chen)**

2 On and between August 12, 2015, and August 14, 2015, in the COUNTIES of SOLANO
3 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
4 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, DELFA GUERRERO,
5 JONATHAN VOLKER, BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES,
6 MICHAEL MOORE, and NANCY MORENO, who did knowingly and unlawfully violate
7 subsection (c)(1) of this section in that they knowingly accessed and without permission accessed
8 data on a device (point of sale terminal) in order to wrongfully obtain money.

9 **COUNT 13**

10 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN, NANCY
11 MORENO, NATALIE HAMMON, and MICHAEL MOORE

12 **CONSPIRACY (Re: Sofas 4 Less)**

13 On and between August 18, 2015, and August 29, 2015, in the COUNTY of CONTRA
14 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
15 committed by, TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA
16 COFFMAN, NANCY MORENO, NATALIE HAMMON, and MICHAEL MOORE, who did
17 willfully and unlawfully conspire together with another person or persons whose identity is
18 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
19 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
20 conspiracy, Defendants committed the following overt act(s):

21 OVERT ACT 1

22 On August 19, 2015, Toni Coffman and Nancy Moreno entered Sofas 4 Less in the County
23 of Contra Costa.

24 OVERT ACT 2

25 On August 19, 2015, in the County of Contra Costa, Toni Coffman distracted an employee
26 of Sofas 4 Less while Nancy Moreno took a credit card terminal.

27 ///

28 ///

1 OVERT ACT 3

2 On and between August 19, 2015, and August 21, 2015, in the County of Contra Costa,
3 Toni Coffman and other unknown coconspirators accessed Sofas 4 Less's credit card terminal.

4 OVERT ACT 4

5 On and between August 19, 2015, and August 21, 2015, in the County of Contra Costa,
6 Toni Coffman and unknown coconspirators forced refunds from a Sofas 4 Less credit card
7 terminal onto prepaid cards in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz,
8 Delfa Guerrero, and Michael Moore.

9 OVERT ACT 5

10 On August 29, 2015, in the County of Contra Costa, Toni Coffman withdrew money from a
11 Bank of the West ATM using a prepaid card with forced refunds from Sofas 4 Less.

12 OVERT ACT 6

13 On and between August 19, 2015, and August 21, 2015, a prepaid card sent to Natalie
14 Hammon's address received forced refunds from a Sofas 4 Less credit card terminal.

15 **COUNT 14**

16 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN, NANCY
17 MORENO, NATALIE HAMMON, and MICHAEL MOORE

18 **GRAND THEFT (Re: Sofas 4 Less)**

19 On and between August 18, 2015, and August 29, 2015, in the COUNTY of CONTRA
20 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
21 by TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN,
22 NANCY MORENO, NATALIE HAMMON, and MICHAEL MOORE, who did unlawfully take
23 money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars
24 (\$950) to wit: Sofas 4 Less.

25 **COUNT 15**

26 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN, NANCY
27 MORENO, NATALIE HAMMON, and MICHAEL MOORE

28 ///

1 **BURGLARY (Re: Sofas 4 Less)**

2 On August 18, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
3 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
4 committed by TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA
5 COFFMAN, NANCY MORENO, NATALIE HAMMON, and MICHAEL MOORE, who did
6 enter a commercial building occupied by Sofas 4 Less with the intent to commit larceny and any
7 felony.

8 **COUNT 16**

9 TONI COFFMAN, DELFA GUERRERO, BEATRICE MUNOZ, LINDA COFFMAN, NANCY
10 MORENO, NATALIE HAMMON, and MICHAEL MOORE

11 **COMPUTER ACCESS AND FRAUD (Re: Sofas 4 Less)**

12 On and between August 18, 2015, and August 29, 2015, in the COUNTY of CONTRA
13 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
14 502(c)(1), a felony, was committed by TONI COFFMAN, DELFA GUERRERO, BEATRICE
15 MUNOZ, LINDA COFFMAN, NANCY MORENO, NATALIE HAMMON, and MICHAEL
16 MOORE, who did knowingly and unlawfully violate subsection (c)(1) of this section in that they
17 knowingly accessed and without permission accessed data on a device (point of sale terminal) in
18 order to wrongfully obtain money.

19 **COUNT 17**

20 TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA COFFMAN, EARL
21 WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA JONES, KEVIN PARDUE,
22 and MICHAEL MOORE

23 **CONSPIRACY (Re: Sky Dental)**

24 On and between August 26, 2015, and August 28, 2015, in the COUNTY of CONTRA
25 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
26 committed by TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA
27 COFFMAN, EARL WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA
28 JONES, KEVIN PARDUE, and MICHAEL MOORE, who did willfully and unlawfully conspire

1 together with another person or persons whose identity is unknown to commit the crime of
2 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
3 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
4 following overt act(s):

5 OVERT ACT 1

6 On and between August 26, 2015, and August 28, 2015, in the County of Contra Costa,
7 Toni Coffman and other unknown coconspirators accessed Sky Dental's credit card terminal.

8 OVERT ACT 2

9 On and between August 26, 2015, and August 28, 2015 in the County of Contra Costa, Toni
10 Coffman and unknown coconspirators forced refunds from a Sky Dental credit card terminal onto
11 prepaid cards in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz, Jonathan Volker,
12 Delfa Guerrero, Earl Wyatt, and Michael Moore.

13 OVERT ACT 3

14 Between August 26, 2015, and August 28, 2015, in the County of Contra Costa, Kevin
15 Pardue and Brenda Jones accessed the merchant account of Sky Dental from their home
16 telephone line.

17 **COUNT 18**

18 TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA COFFMAN, EARL
19 WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA JONES, KEVIN PARDUE,
20 and MICHAEL MOORE

21 **GRAND THEFT (Re: Sky Dental)**

22 On and between August 26, 2015, and August 28, 2015, in the COUNTY of CONTRA
23 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
24 by TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA COFFMAN, EARL
25 WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA JONES, KEVIN PARDUE,
26 and MICHAEL MOORE, who did unlawfully take money and personal property of another of a
27 value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Sky Dental.

28 ///

1 **COUNT 19**

2 TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA COFFMAN, EARL
3 WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA JONES, KEVIN PARDUE,
4 and MICHAEL MOORE

5 **BURGLARY (Re: Sky Dental)**

6 On August 26, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
7 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
8 committed by TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA
9 COFFMAN, EARL WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA
10 JONES, KEVIN PARDUE, and MICHAEL MOORE, who did enter a commercial building
11 occupied by Sky Dental with the intent to commit larceny and any felony.

12 **COUNT 20**

13 TONI COFFMAN, BEATRICE MUNOZ, NANCY MORENO, LINDA COFFMAN, EARL
14 WYATT, JONATHAN VOLKER, DELFA GUERRERO, BRENDA JONES, KEVIN PARDUE,
15 and MICHAEL MOORE

16 **COMPUTER ACCESS AND FRAUD (Re: Sky Dental)**

17 On and between August 26, 2015, and August 28, 2015, in the COUNTY of CONTRA
18 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
19 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, NANCY
20 MORENO, LINDA COFFMAN, EARL WYATT, JONATHAN VOLKER, DELFA
21 GUERRERO, BRENDA JONES, KEVIN PARDUE, and MICHAEL MOORE, who did
22 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
23 accessed and without permission accessed data on a device (point of sale terminal) in order to
24 wrongfully obtain money.

25 **COUNT 21**

26 TONI COFFMAN, NANCY MORENO, BEATRICE MUNOZ, LINDA COFFMAN, DELFA
27 GUERRERO, JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK
28 CARRILLO, and NATALIE HAMMON

CONSPIRACY (Re: Nguyen Dental a.k.a. Hao Van Nguyen)

On and between September 4, 2015, and February 17, 2016, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TONI COFFMAN, NANCY MORENO, BEATRICE MUNOZ, LINDA COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK CARRILLO, and NATALIE HAMMON, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On or about September 4, 2015, in the County of San Joaquin, Nancy Moreno entered Nguyen Dental.

OVERT ACT 2

On and between September 7, 2015, and September 8, 2015, in the County of Contra Costa, Toni Coffman and other unknown coconspirators accessed Nguyen Dental's credit card terminal.

OVERT ACT 3

On and between September 7, 2015, and September 8, 2015, in the County of Contra Costa, Toni Coffman and unknown coconspirators forced refunds from Nguyen Dental's credit card terminal onto prepaid cards in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz, Brenda Jones, Michael Moore, Delfa Guerrero, Erik Carrillo, Natalie Hammon, and Jonathan Volker.

OVERT ACT 4

On or about February 17, 2016, in the County of Contra Costa, Toni Coffman possessed the Nguyen Dental credit card terminal in her storage unit at 1651 Drive-In Way, Antioch, California.

OVERT ACT 5

On and between September 7, 2015, and February 17, 2016, in the County of Contra Costa, Toni Coffman printed a batch receipt for Nguyen Dental.

1 **COUNT 22**

2 NANCY MORENO, TONI COFFMAN, BEATRICE MUNOZ, LINDA COFFMAN, DELFA
3 GUERRERO, JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK
4 CARRILLO, and NATALIE HAMMON

5 **GRAND THEFT (Re: Nguyen Dental a.k.a. Hao Van Nguyen)**

6 On and between September 4, 2015, and February 17, 2016, in the COUNTIES of SAN
7 JOAQUIN and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
8 487(a), a felony, was committed by TONI COFFMAN, NANCY MORENO, BEATRICE
9 MUNOZ, LINDA COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, MICHAEL
10 MOORE, BRENDA JONES, ERIK CARRILLO, and NATALIE HAMMON, who did
11 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
12 Fifty Dollars (\$950) to wit: Nguyen Dental.

13 **COUNT 23**

14 TONI COFFMAN, NANCY MORENO, BEATRICE MUNOZ, LINDA COFFMAN, DELFA
15 GUERRERO, JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK
16 CARRILLO, and NATALIE HAMMON

17 **BURGLARY (Re: Nguyen Dental a.k.a. Hao Van Nguenyn)**

18 On September 4, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
19 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
20 459, a felony, was committed by TONI COFFMAN, NANCY MORENO, BEATRICE MUNOZ,
21 LINDA COFFMAN, DELFA GUERRERO, JONATHAN VOLKER, MICHAEL MOORE,
22 BRENDA JONES, ERIK CARRILLO, and NATALIE HAMMON, who did enter a commercial
23 building occupied by Nguyen Dental with the intent to commit larceny and any felony.

24 **COUNT 24**

25 TONI COFFMAN, NANCY MORENO, BEATRICE MUNOZ, LINDA COFFMAN, DELFA
26 GUERRERO, JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK
27 CARRILLO, and NATALIE HAMMON

28 ///

1 **COMPUTER ACCESS AND FRAUD (Re: Nguyen Dental a.k.a. Hao Van Nguen)**

2 On and between September 4, 2015, and February 17, 2016, in the COUNTIES of SAN
3 JOAQUIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
4 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,
5 NANCY MORENO, BEATRICE MUNOZ, LINDA COFFMAN, DELFA GUERRERO,
6 JONATHAN VOLKER, MICHAEL MOORE, BRENDA JONES, ERIK CARRILLO, and
7 NATALIE HAMMON, who did knowingly and unlawfully violate subsection (c)(1) of this
8 section in that they knowingly accessed and without permission accessed data on a device (point
9 of sale terminal) in order to wrongfully obtain money.

10 **COUNT 25**

11 TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE MUNOZ, MICHAEL MOORE,
12 and LINDA COFFMAN

13 **CONSPIRACY (Re: Todd Knipper DDS)**

14 On and between September 10, 2015, and September 13, 2015, in the COUNTIES of
15 SOLANO and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
16 section 182(a)(1) a felony, was committed by TONI COFFMAN, CHRISTOPHER OSBORNE,
17 BEATRICE MUNOZ, MICHAEL MOORE, and LINDA COFFMAN, who did willfully and
18 unlawfully conspire together with another person or persons whose identity is unknown to
19 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
20 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
21 Defendants committed the following overt act(s):

22 **OVERT ACT 1**

23 On and between September 10, 2015, and September 13, 2015, in the County of Contra
24 Costa, Toni Coffman and other unknown coconspirators accessed Todd Knipper DDS's credit
25 card terminal.

26 **OVERT ACT 2**

27 On September 13, 2015, in the County of Contra Costa, Toni Coffman and unknown
28 coconspirators forced refunds from Todd Knipper DDS's credit card terminal onto prepaid cards

1 in the names of Christopher Osborne, Beatrice Munoz, Cassandra Peckham, Michael Moore, and
2 Linda Coffman.

3 **COUNT 26**

4 TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE MUNOZ, MICHAEL MOORE,
5 and LINDA COFFMAN

6 **GRAND THEFT (Re: Todd Knipper DDS)**

7 On and between September 10, 2015, and September 13, 2015, in the COUNTIES of
8 SOLANO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a),
9 a felony, was committed by TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE
10 MUNOZ, MICHAEL MOORE, and LINDA COFFMAN, who did unlawfully take money and
11 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
12 Todd Knipper DDS.

13 **COUNT 27**

14 TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE MUNOZ, MICHAEL MOORE,
15 and LINDA COFFMAN

16 **BURGLARY (Re: Todd Knipper DDS)**

17 On September 10, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
18 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
19 felony, was committed by TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE
20 MUNOZ, MICHAEL MOORE, and LINDA COFFMAN, who did enter a commercial building
21 occupied by Todd Knipper DDS with the intent to commit larceny and any felony.

22 **COUNT 28**

23 TONI COFFMAN, CHRISTOPHER OSBORNE, BEATRICE MUNOZ, MICHAEL MOORE,
24 and LINDA COFFMAN

25 **COMPUTER ACCESS AND FRAUD (Re: Todd Knipper DDS)**

26 On and between September 10, 2015, and September 13, 2015, in the COUNTIES of
27 SOLANO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
28 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,

1 CHRISTOPHER OSBORNE, BEATRICE MUNOZ, MICHAEL MOORE, and LINDA
2 COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of this section in that
3 they knowingly accessed and without permission accessed data on a device (point of sale
4 terminal) in order to wrongfully obtain money.

5 **COUNT 29**

6 TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY GAWAD, ERIK
7 CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN VOLKER, and DELFA
8 GUERRERO

9 **CONSPIRACY (Re: Woodruff DDS)**

10 On or around September 18, 2015, in the COUNTIES of STANISLAUS and CONTRA
11 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
12 committed by, TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY
13 GAWAD, ERIK CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN
14 VOLKER, and DELFA GUERRERO, who did willfully and unlawfully conspire together with
15 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
16 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
17 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
18 act(s):

19 **OVERT ACT 1**

20 On September 18, 2015, in the County of Stanislaus, Nancy Moreno entered Woodruff
21 DDS.

22 **OVERT ACT 2**

23 On September 18, 2015, in the County of Contra Costa, Toni Coffman and other unknown
24 coconspirators accessed Woodruff DDS's credit card terminal.

25 **OVERT ACT 3**

26 On September 18, 2015, in the County of Contra Costa, Toni Coffman and unknown
27 coconspirators forced refunds from Woodruff DDS's credit card terminal onto prepaid cards in
28

1 the names of Toni Coffman, Linda Coffman, Beatrice Munoz, Jonathan Volker, Delfa Guerrero,
2 Christopher Osborne, Tony Gawad, Cassandra Peckham, Erik Carrillo, and Michael Moore.

3 **COUNT 30**

4 TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY GAWAD, ERIK
5 CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN VOLKER, and DELFA
6 GUERRERO

7 **GRAND THEFT (Re: Woodruff DDS)**

8 On or around September 18, 2015, in the COUNTIES of STANISLAUS and CONTRA
9 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
10 by TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY GAWAD,
11 ERIK CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN VOLKER, and
12 DELFA GUERRERO, who did unlawfully take money and personal property of another of a
13 value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Woodruff DDS.

14 **COUNT 31**

15 TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY GAWAD,
16 ERIK CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN VOLKER, and
17 DELFA GUERRERO

18 **BURGLARY (Re: Woodruff DDS)**

19 On or around September 18, 2015, in the COUNTIES of STANISLAUS and CONTRA
20 COSTA, the crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal
21 Code section 459, a felony, was committed by TONI COFFMAN, LINDA COFFMAN,
22 CHRISTOPHER OSBORNE, TONY GAWAD, ERIK CARRILLO, BEATRICE MUNOZ,
23 MICHAEL MOORE, JONATHAN VOLKER, and DELFA GUERRERO, who did enter a
24 commercial building occupied by Woodruff DDS with the intent to commit larceny and any
25 felony.

26 ///

27 ///

28 ///

1 **COUNT 32**

2 TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER OSBORNE, TONY GAWAD,
3 ERIK CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE, JONATHAN VOLKER, and
4 DELFA GUERRERO

5 **COMPUTER ACCESS AND FRAUD (Re: Woodruff DDS)**

6 On or around September 18, 2015, in the COUNTIES of STANISLAUS and CONTRA
7 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
8 502(c)(1), a felony, was committed by TONI COFFMAN, LINDA COFFMAN, CHRISTOPHER
9 OSBORNE, TONY GAWAD, ERIK CARRILLO, BEATRICE MUNOZ, MICHAEL MOORE,
10 JONATHAN VOLKER, and DELFA GUERRERO, who did knowingly and unlawfully violate
11 subsection (c)(1) of this section in that they knowingly accessed and without permission accessed
12 data on a device (point of sale terminal) in order to wrongfully obtain money.

13 **COUNT 33**

14 TONI COFFMAN, NANCY MORENO, BRANDY BINGHAM, CHRISTOPHER OSBORNE,
15 TONY GAWAD, and ANA MARIA GONZALEZ

16 **CONSPIRACY (Re: BevMo)**

17 On and between September 24, 2015, and February 17, 2016, in the COUNTIES of
18 ALAMEDA and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
19 section 182(a)(1) a felony, was committed by TONI COFFMAN, NANCY MORENO, BRANDY
20 BINGHAM, CHRISTOPHER OSBORNE, TONY GAWAD, and ANA MARIA GONZALEZ,
21 who did willfully and unlawfully conspire together with another person or persons whose identity
22 is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
23 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
24 conspiracy, Defendants committed the following overt act(s):

25 **OVERT ACT 1**

26 On or around September 24, 2015, in the County of Contra Costa, Toni Coffman and other
27 unknown coconspirators accessed BevMo's credit card terminal.

28 ///

1 OVERT ACT 2

2 On or around September 24, 2015, in the County of Contra Costa, Toni Coffman and
3 unknown coconspirators forced refunds from BevMo's credit card terminal onto prepaid cards in
4 the names of Brandy Bingham, Cassandra Peckham, Christopher Osborne, Tony Gawad, Ana
5 Maria Gonzalez.

6 OVERT ACT 3

7 On or around September 25, 2015, in the County of Contra Costa, Toni Coffman and Nancy
8 Moreno used a prepaid card with funds from BevMo at a BevMo store.

9 OVERT ACT 4

10 On or around February 17, 2016, in the County of Contra Costa, Toni Coffman went to her
11 storage unit that contained the BevMo credit card terminal.

12 **COUNT 34**

13 TONI COFFMAN, NANCY MORENO, BRANDY BINGHAM, CHRISTOPHER OSBORNE,
14 TONY GAWAD, and ANA MARIA GONZALEZ

15 **GRAND THEFT (Re: BevMo)**

16 On and between September 24, 2015, and February 17, 2016, in the COUNTIES of
17 ALAMEDA and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
18 487(a), a felony, was committed by TONI COFFMAN, NANCY MORENO, BRANDY
19 BINGHAM, CHRISTOPHER OSBORNE, TONY GAWAD, and ANA MARIA GONZALEZ,
20 who did unlawfully take money and personal property of another of a value exceeding Nine
21 Hundred and Fifty Dollars (\$950) to wit: BevMo.

22 **COUNT 35**

23 TONI COFFMAN, NANCY MORENO, BRANDY BINGHAM, CHRISTOPHER OSBORNE,
24 TONY GAWAD, and ANA MARIA GONZALEZ

25 **COMPUTER ACCESS AND FRAUD (Re: BevMo)**

26 On and between September 24, 2015, and February 17, 2016, in the COUNTIES of
27 ALAMEDA and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
28 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,

1 NANCY MORENO, BRANDY BINGHAM, CHRISTOPHER OSBORNE, TONY GAWAD,
2 and ANA MARIA GONZALEZ, who did knowingly and unlawfully violate subsection (c)(1) of
3 this section in that they knowingly accessed and without permission accessed data on a device
4 (point of sale terminal) in order to wrongfully obtain money.

5 **COUNT 36**

6 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
7 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
8 JONES, KEVIN PARDUE, and LINDA COFFMAN

9 **CONSPIRACY (Re: Shelby Smith DDS)**

10 On and between September 27, 2015, and in the COUNTY of CONTRA COSTA, the crime
11 of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by,
12 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
13 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
14 JONES, KEVIN PARDUE, and LINDA COFFMAN, who did
15 willfully and unlawfully conspire together with another person or persons whose identity is
16 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
17 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
18 conspiracy, Defendants committed the following overt act(s):

19 **OVERT ACT 1**

20 On September 27, 2015, in the County of Contra Costa, Nancy Moreno and an unknown
21 coconspirator drove a white Chevrolet Impala associated with Toni Coffman to Shelby Smith
22 DDS.

23 **OVERT ACT 2**

24 On September 27, 2015, in the County of Contra Costa, Nancy Moreno entered Shelby
25 Smith DDS.

26 **OVERT ACT 3**

27 On September 27, 2015, in the County of Contra Costa, Nancy Moreno left a glove with her
28 DNA at Shelby Smith DDS.

1 OVERT ACT 4

2 On September 27, 2015, in the County of Contra Costa, Toni Coffman and other unknown
3 coconspirators accessed Shelby Smith DDS's credit card terminal.

4 OVERT ACT 5

5 On September 27, 2015, in the County of Contra Costa, Toni Coffman and unknown
6 coconspirators forced refunds from Shelby Smith DDS's credit card terminal onto prepaid cards
7 in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz, Erika Hunt, Erik Carrillo,
8 Cassandra Peckham, Christopher Osborne, Brandy Bingham, and Tony Gawad.

9 OVERT ACT 6

10 On September 27, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
11 accessed the merchant account of Shelby Smith DDS from their home telephone line.

12 **COUNT 37**

13 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
14 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
15 JONES, KEVIN PARDUE, and LINDA COFFMAN

16 **GRAND THEFT (Re: Shelby Smith DDS)**

17 On September 27, 2015, in the COUNTY of CONTRA COSTA, the crime of THEFT in
18 violation of Penal Code section 487(a), a felony, was committed by TONI COFFMAN, NANCY
19 MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY BINGHAM, ERIK CARRILLO, ,
20 CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA JONES, KEVIN PARDUE, and
21 LINDA COFFMAN, who did unlawfully take money and personal property of another of a value
22 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Shelby Smith DDS.

23 **COUNT 38**

24 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
25 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
26 JONES, KEVIN PARDUE, and LINDA COFFMAN

27 ///

28 ///

1 **BURGLARY (Re: Shelby Smith DDS)**

2 On September 27, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
3 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
4 committed by TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ,
5 BRANDY BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD,
6 BRENDA JONES, KEVIN PARDUE, and LINDA COFFMAN, who did enter a commercial
7 building occupied by Shelby Smith DDS with the intent to commit larceny and any felony.

8 **COUNT 39**

9 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
10 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
11 JONES, KEVIN PARDUE, and LINDA COFFMAN

12 **COMPUTER ACCESS AND FRAUD (Re: Shelby Smith DDS)**

13 On September 27, 2015, in the COUNTY of CONTRA COSTA, the crime of COMPUTER
14 ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by
15 TONI COFFMAN, NANCY MORENO, ERIKA HUNT, BEATRICE MUNOZ, BRANDY
16 BINGHAM, ERIK CARRILLO, CHRISTOPHER OSBORNE, TONY GAWAD, BRENDA
17 JONES, KEVIN PARDUE, and LINDA COFFMAN, who did knowingly and unlawfully violate
18 subsection (c)(1) of this section in that they knowingly accessed and without permission accessed
19 data on a device (point of sale terminal) in order to wrongfully obtain money.

20 **COUNT 40**

21 TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER OSBORNE,
22 NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES, and KEVIN
23 PARDUE

24 **CONSPIRACY (Re: Mark Sylvester DDS)**

25 On or around September 30, 2015, in the COUNTIES of ALAMEDA and CONTRA
26 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
27 committed by TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER
28 OSBORNE, NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES,

1 and KEVIN PARDUE, who did willfully and unlawfully conspire together with another person or
2 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
3 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
4 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

5 OVERT ACT 1

6 On September 30, 2015, in the County of Contra Costa, Toni Coffman and other unknown
7 coconspirators accessed Mark Sylvester DDS's credit card terminal.

8 OVERT ACT 2

9 On September 30, 2015, in the County of Contra Costa, Toni Coffman and unknown
10 coconspirators forced refunds from Mark Sylvester DDS's credit card terminal onto prepaid cards
11 in the names of Linda Coffman, Nancy Moreno, Brenda Jones, Toni Coffman, Natalie Hammon,
12 Erik Carrillo, Toni Tinay, Casandra Peckham, and Christopher Osborne.

13 OVERT ACT 3

14 On September 30, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
15 accessed the merchant account of Mark Sylvester DDS from their home telephone line.

16 **COUNT 41**

17 TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER OSBORNE,
18 NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES, and KEVIN
19 PARDUE

20 **GRAND THEFT (Re: Mark Sylvester DDS)**

21 On or around September 30, 2015, in the COUNTIES of ALAMEDA and CONTRA
22 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
23 by TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER OSBORNE,
24 NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES, and KEVIN
25 PARDUE, who did unlawfully take money and personal property of another of a value exceeding
26 Nine Hundred and Fifty Dollars (\$950) to wit: Mark Sylvester DDS.

27 ///

28 ///

1 **COUNT 42**

2 TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER OSBORNE,
3 NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES, and KEVIN
4 PARDUE

5 **BURGLARY (Re: Mark Sylvester DDS)**

6 On or around September 30, 2015, in the COUNTIES of ALAMEDA and CONTRA
7 COSTA, the crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal
8 Code section 459, a felony, was committed by TONI COFFMAN, LINDA COFFMAN, TONI
9 TINAY, CHRISTOPHER OSBORNE, NATALIE HAMMON, NANCY MORENO, ERIK
10 CARRILLO, BRENDA JONES, and KEVIN PARDUE, who did
11 enter a commercial building occupied by Mark Sylvester DDS with the intent to commit larceny
12 and any felony.

13 **COUNT 43**

14 TONI COFFMAN, LINDA COFFMAN, TONI TINAY, CHRISTOPHER OSBORNE,
15 NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO, BRENDA JONES, and KEVIN
16 PARDUE

17 **COMPUTER ACCESS AND FRAUD (Re: Mark Sylvester DDS)**

18 On or around September 30, 2015, in the COUNTIES of ALAMEDA and CONTRA
19 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
20 502(c)(1), a felony, was committed by TONI COFFMAN, LINDA COFFMAN, TONI TINAY,
21 CHRISTOPHER OSBORNE, NATALIE HAMMON, NANCY MORENO, ERIK CARRILLO,
22 BRENDA JONES, and KEVIN PARDUE, who did knowingly and unlawfully violate subsection
23 (c)(1) of this section in that they knowingly accessed and without permission accessed data on a
24 device (point of sale terminal) in order to wrongfully obtain money.

25 **COUNT 44**

26 NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA
27 COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ

28 ///

CONSPIRACY (Re: All Smiles a.k.a Orthoworks)

On and between October 9, 2015, and February 17, 2016, in the COUNTY of CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On October 9, 2015, in the County of Contra Costa, Nancy Moreno entered All Smiles.

OVERT ACT 2

On and between October 9, 2015, and October 14, 2015, in the County of Contra Costa, Toni Coffman and other unknown coconspirators accessed All Smiles credit card terminal.

OVERT ACT 3

On and between October 9, 2015, and October 14, 2015, in the County of Contra Costa, Toni Coffman and unknown coconspirators forced refunds from All Smiles' credit card terminal onto prepaid cards in the names of Linda Coffman, Beatrice Munoz, Rodney Mayers, Charlie Bland, Brenda Jones, and Cassandra Peckham.

OVERT ACT 4

On or about October 9, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones accessed the merchant account of All Smiles from their home telephone line.

OVERT ACT 5

On and between October 9, 2015, and February 17, 2016, in the County of Contra Costa, Toni Coffman printed a batch receipt for All Smiles.

OVERT ACT 6

On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage unit that contained the All Smiles credit card terminal.

1 **COUNT 45**

2 NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA
3 COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ

4 **GRAND THEFT (Re: All Smiles a.k.a. Orthoworks)**

5 On and between October 9, 2015, and February 17, 2016, in the COUNTY of CONTRA
6 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
7 by NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA
8 COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ, who did
9 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
10 Fifty Dollars (\$950) to wit: All Smiles.

11 **COUNT 46**

12 NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA
13 COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ

14 **BURGLARY (Re: All Smiles a.k.a. Orthoworks)**

15 On October 9, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
16 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
17 committed by NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE,
18 LINDA COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ, who
19 did enter a commercial building occupied by All Smiles with the intent to commit larceny and
20 any felony.

21 **COUNT 47**

22 NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA
23 COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and BEATRICE MUNOZ

24 **COMPUTER ACCESS AND FRAUD (Re: All Smiles a.k.a. Orthoworks)**

25 On and between October 9, 2015, and February 17, 2016, in the COUNTY of CONTRA
26 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
27 502(c)(1), a felony, was committed by NANCY MORENO, TONI COFFMAN, BRENDA
28 JONES, KEVIN PARDUE, LINDA COFFMAN, CHARLIE BLAND, RODNEY MAYERS, and

1 BEATRICE MUNOZ, who did knowingly and unlawfully violate subsection (c)(1) of this section
2 in that they knowingly accessed and without permission accessed data on a device (point of sale
3 terminal) in order to wrongfully obtain money.

4 **COUNT 48**

5 TONI COFFMAN, BRANDY BINGHAM, CHARLIE BLAND, BRENDA JONES, NATALIE
6 HAMMON, KEVIN PARDUE, and LINDA COFFMAN

7 **CONSPIRACY (Re: Cliffs Auto Pro Shop)**

8 On and between October 15, 2015, and December 15, 2015, in the COUNTY of CONTRA
9 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
10 committed by TONI COFFMAN, BRANDY BINGHAM, CHARLIE BLAND, BRENDA
11 JONES, NATALIE HAMMON, KEVIN PARDUE, and LINDA COFFMAN, who did willfully
12 and unlawfully conspire together with another person or persons whose identity is unknown to
13 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
14 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
15 Defendants committed the following overt act(s):

16 **OVERT ACT 1**

17 On and between November 4, 2015, and November 20, 2015, in the County of Contra
18 Costa, Toni Coffman and other unknown coconspirators accessed Cliffs Auto Pro Shop's credit
19 card terminal.

20 **OVERT ACT 2**

21 On and between November 4, 2015, and November 20, 2015, in the County of Contra
22 Costa, Toni Coffman and unknown coconspirators forced refunds from a Cliffs Auto Pro Shop
23 credit card terminal onto prepaid cards in the names of Linda Coffman, Natalie Hammon, Charlie
24 Bland, Brenda Jones, and Brandy Bingham.

25 **OVERT ACT 3**

26 On or about December 15, 2015, in the County of Contra Costa, Kevin Pardue and Brenda
27 Jones possessed the stolen personal identifying information of victims who had prepaid cards,
28 opened in their names, that had forced refunds from Cliffs Auto Pro Shop.

1 **COUNT 49**

2 TONI COFFMAN, BRANDY BINGHAM, CHARLIE BLAND, BRENDA JONES, NATALIE
3 HAMMON, KEVIN PARDUE, and LINDA COFFMAN

4 **GRAND THEFT (Re: Cliffs Auto Pro Shop)**

5 On and between October 15, 2015, and December 15, 2015, in the COUNTY of CONTRA
6 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
7 by TONI COFFMAN, BRANDY BINGHAM, CHARLIE BLAND, BRENDA JONES,
8 NATALIE HAMMON, KEVIN PARDUE, and LINDA COFFMAN, who did unlawfully take
9 money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars
10 (\$950) to wit: Cliffs Auto Pro Shop.

11 **COUNT 50**

12 TONI COFFMAN, BRANDY BINGHAM, CHARLIE BLAND, BRENDA JONES, NATALIE
13 HAMMON, KEVIN PARDUE, and LINDA COFFMAN

14 **COMPUTER ACCESS AND FRAUD (Re: Cliffs Auto Pro Shop)**

15 On and between October 15, 2015, and December 15, 2015, in the COUNTY of CONTRA
16 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
17 502(c)(1), a felony, was committed by TONI COFFMAN, BRANDY BINGHAM, CHARLIE
18 BLAND, BRENDA JONES, NATALIE HAMMON, KEVIN PARDUE, and LINDA
19 COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of this section in that
20 they knowingly accessed and without permission accessed data on a device (point of sale
21 terminal) in order to wrongfully obtain money.

22 **COUNT 51**

23 TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN

24 **CONSPIRACY (Re: First Choice Medical and Surgical/Park West Pain Clinic)**

25 On and between October 21, 2015, and February 17, 2016, in the COUNTIES of SOLANO
26 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
27 182(a)(1) a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, and LINDA
28 COFFMAN, who did willfully and unlawfully conspire together with another person or persons

1 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California
2 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
3 the aforesaid conspiracy, Defendants committed the following overt act(s):

4 OVERT ACT 1

5 On October 21, 2015, in the County of Contra Costa, Toni Coffman and other unknown
6 coconspirators accessed First Choice Medical's credit card terminal.

7 OVERT ACT 2

8 On October 21, 2015, in the County of Contra Costa, Toni Coffman and unknown
9 coconspirators forced refunds from First Choice Medical's credit card terminal onto prepaid cards
10 in the names of Beatrice Munoz, Cassandra Peckham, and Linda Coffman.

11 OVERT ACT 3

12 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
13 unit that contained the First Choice Medical's credit card terminal.

14 **COUNT 52**

15 TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN

16 **GRAND THEFT (Re: First Choice Medical and Surgical/Park West Pain Clinic)**

17 On and between October 21, 2015, and February 17, 2016, in the COUNTIES of SOLANO
18 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
19 was committed by TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN, who did
20 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
21 Fifty Dollars (\$950) to wit: First Choice Medical.

22 **COUNT 53**

23 TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN

24 **BURGLARY (Re: First Choice Medical and Surgical/Park West Pain Clinic)**

25 On October 21, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime of
26 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
27 felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN,
28

1 who did enter a commercial building occupied by First Choice Medical with the intent to commit
2 larceny and any felony.

3 **COUNT 54**

4 TONI COFFMAN, BEATRICE MUNOZ, and LINDA COFFMAN

5 **COMPUTER ACCESS AND FRAUD (Re: First Choice Medical and Surgical/Park West**
6 **Pain Clinic)**

7 On and between October 21, 2015, and February 17, 2016, in the COUNTIES of SOLANO
8 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
9 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ,
10 and LINDA COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of this
11 section in that they knowingly accessed and without permission accessed data on a device (point
12 of sale terminal) in order to wrongfully obtain money.

13 **COUNT 55**

14 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE MUNOZ, BRIAN
15 GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY MAYERS, and LINDA
16 COFFMAN

17 **CONSPIRACY (Re: Mark Sutter, DDS)**

18 On and between October 22, 2015, and February 17, 2016, in the COUNTIES of SOLANO
19 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
20 182(a)(1) a felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN,
21 BEATRICE MUNOZ, BRIAN GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND,
22 RODNEY MAYERS, and LINDA COFFMAN, who did willfully and unlawfully conspire
23 together with another person or persons whose identity is unknown to commit the crime of
24 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
25 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
26 following overt act(s):

27 ///

28 ///

1 OVERT ACT 1

2 On October 22, 2015, in the County of Solano, Toni Coffman and unknown coconspirators
3 entered Mark Sutter, DDS.

4 OVERT ACT 2

5 On October 22, 2015, in the County of Contra Costa, Toni Coffman and other unknown
6 coconspirators accessed Mark Sutter, DDS's credit card terminal.

7 OVERT ACT 3

8 On October 22, 2015, in the County of Contra Costa, Toni Coffman and unknown
9 coconspirators forced refunds from Mark Sutter, DDS's credit card terminal onto prepaid cards in
10 the names of Linda Coffman, Beatrice Munoz, Christopher Osborne, Brian Griggs, Rodney
11 Mayers, and Charlie Bland.

12 OVERT ACT 4

13 Around February 17, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
14 accessed the merchant account of Mark Sutter, DDS from their home telephone line.

15 OVERT ACT 5

16 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
17 unit that contained the Mark Sutter, DDS credit card terminal.

18 **COUNT 56**

19 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE MUNOZ, BRIAN
20 GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY MAYERS, and LINDA
21 COFFMAN

22 **GRAND THEFT (Re: Mark Sutter, DDS)**

23 On and between October 22, 2015, and February 17, 2016, in the COUNTIES of SOLANO
24 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
25 was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE
26 MUNOZ, BRIAN GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY
27 MAYERS, and LINDA COFFMAN, who did unlawfully take money and personal property of
28 another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Mark Sutter DDS.

1 **COUNT 57**

2 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE MUNOZ, BRIAN
3 GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY MAYERS, and LINDA
4 COFFMAN

5 **BURGLARY (Re: Mark Sutter, DDS)**

6 On October 22, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime of
7 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
8 felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE
9 MUNOZ, BRIAN GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY
10 MAYERS, and LINDA COFFMAN, who did enter a commercial building occupied by Mark
11 Sutter, DDS with the intent to commit larceny and any felony.

12 **COUNT 58**

13 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BEATRICE MUNOZ, BRIAN
14 GRIGGS, CHRISTOPHER OSBORNE, CHARLIE BLAND, RODNEY MAYERS, and LINDA
15 COFFMAN

16 **COMPUTER ACCESS AND FRAUD (Re: Mark Sutter, DDS)**

17 On and between October 22, 2015, and February 17, 2016, in the COUNTIES of SOLANO
18 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
19 Code section 502(c)(1), a felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI
20 COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, CHRISTOPHER OSBORNE, CHARLIE
21 BLAND, RODNEY MAYERS, and LINDA COFFMAN, who did knowingly and unlawfully
22 violate subsection (c)(1) of this section in that they knowingly accessed and without permission
23 accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

24 **COUNT 59**

25 CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE HAMMON, BRIAN
26 GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and ERIK CARRILLO

27 ///

28 ///

1 **CONSPIRACY (Re: Francis Joven, DDS)**

2 On or about October 29, 2015, in the COUNTIES of SACRAMENTO and CONTRA
3 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
4 committed by CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE
5 HAMMON, BRIAN GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and
6 ERIK CARRILLO, who did willfully and unlawfully conspire together with another person or
7 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
8 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
9 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

10 OVERT ACT 1

11 On October 29, 2015, in the County of Contra Costa, Nancy Moreno and other unknown
12 coconspirators accessed Francis Joven DDS's credit card terminal.

13 OVERT ACT 2

14 On October 29, 2015, in the County of Contra Costa, Nancy Moreno and unknown
15 coconspirators forced refunds from Francis Joven, DDS's credit card terminal onto prepaid cards
16 in the names of Linda Coffman, Nancy Moreno, Brenda Jones, Natalie Hammon, Brian Griggs,
17 Erik Carrillo, Toni Tinay, Charlie Bland, and Rodney Mayers.

18 **COUNT 60**

19 CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE HAMMON, BRIAN
20 GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and ERIK CARRILLO

21 **GRAND THEFT (Re: Francis Joven, DDS)**

22 On or about October 29, 2015, in the COUNTIES of SACRAMENTO and CONTRA
23 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
24 by CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE HAMMON,
25 BRIAN GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and ERIK
26 CARRILLO, who did unlawfully take money and personal property of another of a value
27 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Francis Joven DDS.

28 ///

1 **COUNT 61**

2 CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE HAMMON, BRIAN
3 GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and ERIK CARRILLO

4 **BURGLARY (Re: Francis Joven, DDS)**

5 On October 29, 2015, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
6 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
7 459, a felony, was committed by CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES,
8 NATALIE HAMMON, BRIAN GRIGGS, NANCY MORENO, TONI TINAY, LINDA
9 COFFMAN, and ERIK CARRILLO, who did enter a commercial building occupied by Francis
10 Joven DDS with the intent to commit larceny and any felony.

11 **COUNT 62**

12 CHARLIE BLAND, RODNEY MAYERS, BRENDA JONES, NATALIE HAMMON, BRIAN
13 GRIGGS, NANCY MORENO, TONI TINAY, LINDA COFFMAN, and ERIK CARRILLO

14 **COMPUTER ACCESS AND FRAUD (Re: Francis Joven, DDS)**

15 On or about October 29, 2015, in the COUNTIES of SACRAMENTO and CONTRA
16 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
17 502(c)(1), a felony, was committed by CHARLIE BLAND, RODNEY MAYERS, BRENDA
18 JONES, NATALIE HAMMON, BRIAN GRIGGS, NANCY MORENO, TONI TINAY, LINDA
19 COFFMAN, and ERIK CARRILLO, who did knowingly and unlawfully violate subsection (c)(1)
20 of this section in that they knowingly accessed and without permission accessed data on a device
21 (point of sale terminal) in order to wrongfully obtain money.

22 **COUNT 63**

23 TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS, NATALIE
24 HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK CARRILLO,
25 and RODNEY MAYERS

26 **CONSPIRACY (Re: Shadelands Endodontics)**

27 On and between November 1, 2015, and February 17, 2016, in the COUNTY of CONTRA
28 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was

1 committed by, TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS,
2 NATALIE HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK
3 CARRILLO, and RODNEY MAYERS, who did willfully and unlawfully conspire together with
4 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
5 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
6 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
7 act(s):

8 OVERT ACT 1

9 Around November 1, 2015, in the County of Contra Costa, Toni Coffman and other
10 unknown coconspirators accessed Shadelands Endodontics' credit card terminal.

11 OVERT ACT 2

12 Around November 1, 2015, in the County of Contra Costa, Toni Coffman and unknown
13 coconspirators forced refunds from Shadelands Endodontics's credit card terminal onto prepaid
14 cards in the names of Linda Coffman, Nancy Moreno, Beatrice Munoz, Brian Griggs, Brenda
15 Jones, Erik Carrillo, Charlie Bland, Rodney Mayers, Natalie Hammon, and Toni Coffman.

16 OVERT ACT 3

17 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
18 unit that contained the Shadelands Endodontics credit card terminal.

19 **COUNT 64**

20 TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS, NATALIE
21 HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK CARRILLO,
22 and RODNEY MAYERS

23 **GRAND THEFT (Re: Shadelands Endodontics)**

24 On and between November 1, 2015, and February 17, 2016, in the COUNTY of CONTRA
25 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
26 by TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS, NATALIE
27 HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK CARRILLO,
28

1 and RODNEY MAYERS, who did unlawfully take money and personal property of another of a
2 value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Shadelands Endodontics.

3 **COUNT 65**

4 TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS, NATALIE
5 HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK CARRILLO,
6 and RODNEY MAYERS

7 **BURGLARY (Re: Shadelands Endodontics)**

8 On November 1, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
9 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
10 committed by TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS,
11 NATALIE HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK
12 CARRILLO, and RODNEY MAYERS, who did enter a commercial building occupied by
13 Shadelands Endodontics with the intent to commit larceny and any felony.

14 **COUNT 66**

15 TONI COFFMAN, BEATRICE MUNOZ, CHARLIE BLAND, BRIAN GRIGGS, NATALIE
16 HAMMON, BRENDA JONES, NANCY MORENO, LINDA COFFMAN, ERIK CARRILLO,
17 and RODNEY MAYERS

18 **COMPUTER ACCESS AND FRAUD (Re: Shadelands Endodontics)**

19 On and between November 1, 2015, and February 17, 2016, in the COUNTY of CONTRA
20 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
21 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, CHARLIE
22 BLAND, BRIAN GRIGGS, NATALIE HAMMON, BRENDA JONES, NANCY MORENO,
23 LINDA COFFMAN, ERIK CARRILLO, and RODNEY MAYERS, who did knowingly and
24 unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without
25 permission accessed data on a device (point of sale terminal) in order to wrongfully obtain
26 money.

27 ///

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5

5
6
7
8
9
20
21
22
23
24
25
26
27
28

6
7
8
9
20
21
22
23
24
25
26
27
28

28
27
26
25
24
23
22
21
20
19
18

29
20
21
22
23
24
25
26
27
28

23
24
25
26
27
28

24
25
26
27
28

26
27
28

27
28

28

1 OVERT ACT 4

2 On and between November 5, 2015, and March 31, 2016, in the County of Contra Costa,
3 Toni Coffman and Bradley Owen accessed balance information of prepaid cards with forced
4 refunds from Michael Schermer MD.

5 OVERT ACT 5

6 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
7 unit that contained the Michael Schermer MD credit card terminal.

8 **COUNT 68**

9 CHARLIE BLAND, BRANDY BINGHAM, NATALIE HAMMON, LINDA COFFMAN,
10 BEATRICE MUNOZ, ERIK CARRILLO, TONI COFFMAN, BRADLEY OWEN, KEVIN
11 PARDUE, and BRENDA JONES

12 **GRAND THEFT (Re: Michael Schermer, MD)**

13 On and between November 5, 2015, and February 17, 2016, in the COUNTIES of
14 SACRAMENTO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
15 487(a), a felony, was committed by CHARLIE BLAND, BRANDY BINGHAM, NATALIE
16 HAMMON, LINDA COFFMAN, BEATRICE MUNOZ, ERIK CARRILLO, TONI COFFMAN,
17 BRADLEY OWEN, KEVIN PARDUE, and BRENDA JONES, who did unlawfully take money
18 and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to
19 wit: Michael Schermer, MD.

20 **COUNT 69**

21 CHARLIE BLAND, BRANDY BINGHAM, NATALIE HAMMON, LINDA COFFMAN,
22 BEATRICE MUNOZ, ERIK CARRILLO, TONI COFFMAN, BRADLEY OWEN, KEVIN
23 PARDUE, and BRENDA JONES

24 **BURGLARY (Re: Michael Schermer, MD)**

25 On November 5, 2015, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
26 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
27 459, a felony, was committed by CHARLIE BLAND, BRANDY BINGHAM, NATALIE
28 HAMMON, LINDA COFFMAN, BEATRICE MUNOZ, ERIK CARRILLO, TONI COFFMAN,

1 BRADLEY OWEN, KEVIN PARDUE, and BRENDA JONES, who did enter a commercial
2 building occupied by Michael Schermer, MD with the intent to commit larceny and any felony.

3 **COUNT 70**

4 CHARLIE BLAND, BRANDY BINGHAM, NATALIE HAMMON, LINDA COFFMAN,
5 BEATRICE MUNOZ, ERIK CARRILLO, TONI COFFMAN, BRADLEY OWEN, KEVIN
6 PARDUE, and BRENDA JONES

7 **COMPUTER ACCESS AND FRAUD (Re: Michael Schermer, MD)**

8 On and between November 5, 2015, and February 17, 2016, in the COUNTIES of
9 SACRAMENTO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
10 violation of Penal Code section 502(c)(1), a felony, was committed by CHARLIE BLAND,
11 BRANDY BINGHAM, NATALIE HAMMON, LINDA COFFMAN, BEATRICE MUNOZ,
12 ERIK CARRILLO, TONI COFFMAN, BRADLEY OWEN, KEVIN PARDUE, and BRENDA
13 JONES, who did knowingly and unlawfully violate subsection (c)(1) of this section in that they
14 knowingly accessed and without permission accessed data on a device (point of sale terminal) in
15 order to wrongfully obtain money.

16 **COUNT 71**

17 NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA JONES

18 **CONSPIRACY (Re: Robert Meaglia DDS)**

19 On or about November 12, 2015, in the COUNTIES of PLACER and CONTRA COSTA,
20 the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
21 committed by NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA
22 JONES, who did willfully and unlawfully conspire together with another person or persons whose
23 identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal
24 Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the
25 aforesaid conspiracy, Defendants committed the following overt act(s):

26 **OVERT ACT 1**

27 On November 13, 2015, in the County of Contra Costa, Nancy Moreno and other unknown
28 coconspirators accessed Robert Meaglia DDS's credit card terminal.

1 OVERT ACT 2

2 On November 13, 2015, in the County of Contra Costa, Nancy Moreno and unknown
3 coconspirators forced refunds from Robert Meaglia DDS's credit card terminal onto prepaid cards
4 in the names of Nancy Moreno, Natalie Hammon, Linda Coffman and Brenda Jones.

5 **COUNT 72**

6 NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA JONES

7 **GRAND THEFT (Re: Robert Meaglia DDS)**

8 On or about November 12, 2015, in the COUNTIES of PLACER and CONTRA COSTA,
9 the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed by
10 NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA JONES, who
11 did unlawfully take money and personal property of another of a value exceeding Nine Hundred
12 and Fifty Dollars (\$950) to wit: Robert Meaglia DDS.

13 **COUNT 73**

14 NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA JONES

15 **BURGLARY (Re: Robert Meaglia DDS)**

16 On November 12, 2015, in the COUNTIES of PLACER and CONTRA COSTA, the crime
17 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
18 felony, was committed by NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and
19 BRENDA JONES, who did enter a commercial building occupied by Robert Meaglia DDS with
20 the intent to commit larceny and any felony.

21 **COUNT 74**

22 NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN, and BRENDA JONES

23 **COMPUTER ACCESS AND FRAUD (Re: Robert Meaglia DDS)**

24 On or about November 12, 2015, in the COUNTIES of PLACER and CONTRA COSTA,
25 the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1),
26 a felony, was committed by NANCY MORENO, NATALIE HAMMON, LINDA COFFMAN,
27 and BRENDA JONES, who did knowingly and unlawfully violate subsection (c)(1) of this
28

1 section in that they knowingly accessed and without permission accessed data on a device (point
2 of sale terminal) in order to wrongfully obtain money.

3 **COUNT 75**

4 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, NANCY MORENO, and LINDA
5 COFFMAN

6 **CONSPIRACY (Re: Sunset Family Dental and Tabije Dental)**

7 On and between November 16, 2015, and February 17, 2016, in the COUNTIES of
8 SOLANO and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
9 section 182(a)(1) a felony, was committed by TONI COFFMAN, NATALIE HAMMON,
10 BRENDA JONES, NANCY MORENO, and LINDA COFFMAN, who did willfully and
11 unlawfully conspire together with another person or persons whose identity is unknown to
12 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
13 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
14 Defendants committed the following overt act(s):

15 **OVERT ACT 1**

16 On or about November 16, 2015, in the County of Contra Costa, Toni Coffman and
17 unknown coconspirators forced refunds from Tabije Dental Corporation's credit card terminal
18 onto prepaid cards in the names of Linda Coffman, Nancy Moreno, Toni Coffman, Brenda Jones,
19 and Natalie Hammon.

20 **OVERT ACT 2**

21 On or about November 16, 2015, in the County of Contra Costa, Toni Coffman and other
22 unknown coconspirators accessed Tabije Dental Corporation's credit card terminal.

23 **OVERT ACT 3**

24 On and between November 16, 2015, and February 17, 2016, in the County of Contra
25 Costa, Toni Coffman printed a batch receipt for Tabije Dental Corporation.

26 **COUNT 76**

27 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, NANCY MORENO, and LINDA
28 COFFMAN

1 **GRAND THEFT (Re: Sunset Family Dental and Tabije Dental)**

2 On and between November 16, 2015, and February 17, 2016, in the COUNTIES of
3 SOLANO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a),
4 a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES,
5 NANCY MORENO, and LINDA COFFMAN, who did unlawfully take money and personal
6 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Sunset
7 Family Dental and Tabije Dental.

8 **COUNT 77**

9 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, NANCY MORENO, and LINDA
10 COFFMAN

11 **BURGLARY (Re: Sunset Family Dental and Tabije Dental)**

12 On November 16, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
13 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
14 felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES,
15 NANCY MORENO, and LINDA COFFMAN, who did enter a commercial building occupied by
16 Sunset Family Dental and Tabije Dental with the intent to commit larceny and any felony.

17 **COUNT 78**

18 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, NANCY MORENO, and LINDA
19 COFFMAN

20 **COMPUTER ACCESS AND FRAUD (Re: Sunset Family Dental and Tabije Dental)**

21 On November 16, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
22 of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony,
23 was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, NANCY
24 MORENO, and LINDA COFFMAN, who did knowingly and unlawfully violate subsection (c)(1)
25 of this section in that they knowingly accessed and without permission accessed data on a device
26 (point of sale terminal) in order to wrongfully obtain money.

27 ///

28 ///

1 **COUNT 79**

2 CHARLIE BLAND and TONI COFFMAN

3 **CONSPIRACY (Re: Oak Grove Dental)**

4 On and between November 20, 2015, and February 17, 2016, in the COUNTY of CONTRA
5 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
6 committed by CHARLIE BLAND and TONI COFFMAN, who did willfully and unlawfully
7 conspire together with another person or persons whose identity is unknown to commit the crime
8 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
9 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
10 committed the following overt act(s):

11 **OVERT ACT 1**

12 On November 21, 2015, in the County of Contra Costa, Toni Coffman and other unknown
13 coconspirators accessed Oak Grove Dental's credit card terminal.

14 **OVERT ACT 2**

15 On November 21, 2015, in the County of Contra Costa, Toni Coffman and unknown
16 coconspirators forced refunds from Oak Grove Dental's credit card terminal onto a prepaid card
17 in the name of Charlie Bland.

18 **OVERT ACT 3**

19 Between November 21, 2015, and February 17, 2016, in the County of Contra Costa, Toni
20 Coffman printed a batch receipt for Oak Grove Dental.

21 **OVERT ACT 4**

22 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
23 unit that contained the Oak Grove Dental credit card terminal.

24 **COUNT 80**

25 CHARLIE BLAND and TONI COFFMAN

26 **GRAND THEFT (Re: Oak Grove Dental)**

27 On and between November 20, 2015, and February 17, 2016 in the COUNTY of CONTRA
28 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed

1 by CHARLIE BLAND and TONI COFFMAN, who did unlawfully take money and personal
2 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Oak
3 Grove Dental.

4 **COUNT 81**

5 CHARLIE BLAND and TONI COFFMAN

6 **BURGLARY (Re: Oak Grove Dental)**

7 On November 20, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
8 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
9 committed by CHARLIE BLAND and TONI COFFMAN, who did enter a commercial building
10 occupied by Oak Grove Dental with the intent to commit larceny and any felony.

11 **COUNT 82**

12 CHARLIE BLAND and TONI COFFMAN

13 **COMPUTER ACCESS AND FRAUD (Re: Oak Grove Dental)**

14 On and between November 20, 2015, and February 17, 2016, in the COUNTY of CONTRA
15 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
16 502(c)(1), a felony, was committed by CHARLIE BLAND and TONI COFFMAN, who did
17 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
18 accessed and without permission accessed data on a device (point of sale terminal) in order to
19 wrongfully obtain money.

20 **COUNT 83**

21 TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK
22 CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and
23 JOSEPHINE ORTEGA

24 **CONSPIRACY (Re: Plastic Surgery Specialists)**

25 On and between November 23, 2015, and February 17, 2016, in the COUNTIES of MARIN
26 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
27 182(a)(1) a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, BRIAN
28 GRIGGS, LINDA COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM,

1 RODNEY MAYERS, and JOSEPHINE ORTEGA, who did willfully and unlawfully conspire
2 together with another person or persons whose identity is unknown to commit the crime of
3 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
4 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
5 following overt act(s):

6 OVERT ACT 1

7 On and between November 22, 2015, and November 23, 2015, in the County of Contra
8 Costa, Toni Coffman and other unknown coconspirators accessed Plastic Surgery Specialists'
9 credit card terminal.

10 OVERT ACT 2

11 On November 22, 2015, and November 23, 2015, in the County of Contra Costa, Toni
12 Coffman and unknown coconspirators forced refunds from Plastic Surgery Specialists' credit card
13 terminal onto prepaid cards in the names of Linda Coffman, Beatrice Munoz, Josephine Ortega,
14 Brandy Bingham, Brian Griggs, Rodney Mayers, Charles Bland and Erik Carrillo.

15 OVERT ACT 3

16 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
17 unit that contained the Plastic Surgery Specialists' credit card terminal.

18 **COUNT 84**

19 TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK
20 CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and
21 JOSEPHINE ORTEGA

22 **GRAND THEFT (Re: Plastic Surgery Specialists)**

23 On and between November 23, 2015, and February 17, 2016, in the COUNTIES of MARIN
24 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
25 was committed by TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA
26 COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY
27 MAYERS, and JOSEPHINE ORTEGA, who did unlawfully take money and personal property of
28

another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Plastic Surgery Specialists.

COUNT 85

TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and JOSEPHINE ORTEGA

BURGLARY (Re: Plastic Surgery Specialists)

On November 23, 2015, in the COUNTIES of MARIN and CONTRA COSTA, the crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and JOSEPHINE ORTEGA, who did enter a commercial building occupied by Plastic Surgery Specialists with the intent to commit larceny and any felony.

COUNT 86

TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and JOSEPHINE ORTEGA

COMPUTER ACCESS AND FRAUD (Re: Plastic Surgery Specialists)

On and between November 23, 2015, and February 17, 2016, in the COUNTIES of MARIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, BRIAN GRIGGS, LINDA COFFMAN, ERIK CARRILLO, CHARLIE BLAND, BRANDY BINGHAM, RODNEY MAYERS, and JOSEPHINE ORTEGA, who did knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without permission accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

///

///

1 **COUNT 87**

2 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK CARRILLO, LINDA
3 COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY OWEN

4 **CONSPIRACY (Re: Michael Handy OD)**

5 On and between November 25, 2015, and February 17, 2016, in the COUNTIES of
6 PLACER and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
7 section 182(a)(1) a felony, was committed by TONI COFFMAN, NATALIE HAMMON,
8 BRENDA JONES, ERIK CARRILLO, LINDA COFFMAN, KEVIN PARDUE, BRANDY
9 BINGHAM, and BRADLEY OWEN, who did willfully and unlawfully conspire together with
10 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
11 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
12 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
13 act(s):

14 **OVERT ACT 1**

15 On November 25, 2015, in the County of Contra Costa, Toni Coffman and other unknown
16 coconspirators accessed Michael Handy OD's credit card terminal.

17 **OVERT ACT 2**

18 On November 25, 2015, in the County of Contra Costa, Toni Coffman and unknown
19 coconspirators forced refunds from Michael Handy OD's credit card terminal onto prepaid cards
20 in the names of Brandy Bingham, Erik Carrillo, Linda Coffman, Toni Coffman, and Natalie
21 Hammon.

22 **OVERT ACT 3**

23 On and between November 25, 2015, and March 31, 2016, in the County of Contra Costa,
24 Toni Coffman and Bradley Owen accessed balance information of prepaid cards with forced
25 refunds from Michael Handy OD.

26 ///

27 ///

28 ///

1 OVERT ACT 4

2 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
3 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
4 their names, that had forced refunds from Michael Handy OD.

5 OVERT ACT 5

6 On and between November 25, 2015, and February 17, 2016, in the County of Contra
7 Costa, Toni Coffman printed a batch receipt for Michael Handy OD.

8 OVERT ACT 6

9 On February 17, 2016, in the County of Contra Costa, Toni Coffman went to her storage
10 unit that contained the Michael Handy OD credit card terminal.

11 **COUNT 88**

12 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK CARRILLO, LINDA
13 COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY OWEN

14 **GRAND THEFT (Re: Michael Handy OD)**

15 On and between November 25, 2015, and February 17, 2016, in the COUNTIES of
16 PLACER and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a),
17 a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK
18 CARRILLO, LINDA COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY
19 OWEN, who did unlawfully take money and personal property of another of a value exceeding
20 Nine Hundred and Fifty Dollars (\$950) to wit: Michael Handy OD.

21 **COUNT 89**

22 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK CARRILLO, LINDA
23 COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY OWEN

24 **BURGLARY (Re: Michael Handy OD)**

25 On November 25, 2015, in the COUNTIES of PLACER and CONTRA COSTA, the crime
26 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
27 felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK
28 CARRILLO, LINDA COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY

OWEN, who did enter a commercial building occupied by Michael Handy OD with the intent to commit larceny and any felony.

COUNT 90

TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK CARRILLO, LINDA COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY OWEN

COMPUTER ACCESS AND FRAUD (Re: Michael Handy OD)

On and between November 25, 2015, and February 17, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, ERIK CARRILLO, LINDA COFFMAN, KEVIN PARDUE, BRANDY BINGHAM, and BRADLEY OWEN, who did knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without permission accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

COUNT 91

TONI COFFMAN, BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, KEVIN PARDUE, and ERIK CARRILLO

CONSPIRACY (Re: Advanced Hearing Aid Center)

On and between December 1, 2015, February 17, 2016, in the COUNTY of CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, KEVIN PARDUE, and ERIK CARRILLO, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On and between December 1, 2015, in the County of Contra Costa, Toni Coffman and other unknown coconspirators accessed Advanced Hearing Aid's credit card terminal.

1 OVERT ACT 2

2 On December 1, 2015, in the County of Contra Costa, Toni Coffman forced refunds from
3 an Advanced Hearing Aid Center credit card terminal onto prepaid cards in the names of Beatrice
4 Munoz, Linda Coffman, Erik Carrillo, Natalie Hammon, and Toni Coffman.

5 OVERT ACT 3

6 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
7 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
8 their names, that had forced refunds from Advanced Hearing Aid Center.

9 OVERT ACT 4

10 Between January 20, 2016, and February 17, 2016 in the County of Contra Costa, Toni
11 Coffman stored the credit card terminal from Advanced Hearing Aid Center in her storage unit.

12 **COUNT 92**

13 BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, ERIK
14 CARRILLO, KEVIN PARDUE, and TONI COFFMAN

15 **GRAND THEFT (Re: Advanced Hearing Aid Center)**

16 On and between December 1, 2015, and February 17, 2016, in the COUNTY of CONTRA
17 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
18 by BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, ERIK
19 CARRILLO, KEVIN PARDUE, and TONI COFFMAN, who did unlawfully take money and
20 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
21 Advanced Hearing Aid Center.

22 **COUNT 93**

23 BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, ERIK
24 CARRILLO, KEVIN PARDUE, and TONI COFFMAN

25 **BURGLARY (Re: Advanced Hearing Aid Center)**

26 On December 1, 2015, in the County of Contra Costa, the crime of SECOND DEGREE
27 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
28 by BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, ERIK

1 CARRILLO, KEVIN PARDUE, and TONI COFFMAN, who did enter a commercial building
2 occupied by Advanced Hearing Aid Center with the intent to commit larceny and any felony.

3 **COUNT 94**

4 BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES, NATALIE HAMMON, ERIK
5 CARRILLO, KEVIN PARDUE, and TONI COFFMAN

6 **COMPUTER ACCESS AND FRAUD (Re: Advanced Hearing Aid Center)**

7 On and between December 1, 2015, and February 17, 2016, in the County of Contra Costa,
8 the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1),
9 a felony, was committed by BEATRICE MUNOZ, LINDA COFFMAN, BRENDA JONES,
10 NATALIE HAMMON, ERIK CARRILLO, KEVIN PARDUE, and TONI COFFMAN, who did
11 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
12 accessed and without permission accessed data on a device (point of sale terminal) in order to
13 wrongfully obtain money.

14 **COUNT 95**

15 BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON, BRANDY
16 BINGHAM, LINDA COFFMAN, AND BRIAN GRIGGS

17 **CONSPIRACY (Re: David Hungerford DDS)**

18 On or about December 4, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA
19 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
20 committed by BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON,
21 BRANDY BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS, who did willfully and
22 unlawfully conspire together with another person or persons whose identity is unknown to
23 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
24 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
25 Defendants committed the following overt act(s):

26 **OVERT ACT 1**

27 On December 4, 2015, in the County of Contra Costa, Toni Coffman and other unknown
28 coconspirators accessed David Hungerford DDS's credit card terminal.

1 OVERT ACT 2

2 On December 4, 2015, in the County of Contra Costa, Toni Coffman and unknown
3 coconspirators forced refunds from David Hungerford DDS's credit card terminal onto prepaid
4 cards in the names of Natalie Hammon, Brandy Bingham, Linda Coffman, Toni Coffman, and
5 Brian Griggs.

6 OVERT ACT 3

7 On December 4, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
8 accessed the merchant account of David Hungerford DDS from their home telephone line.

9 COUNT 96

10 BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON, BRANDY
11 BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS

12 **GRAND THEFT (Re: David Hungerford DDS)**

13 On or about December 4, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA
14 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
15 by BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON, BRANDY
16 BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS, who did unlawfully take money and
17 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
18 David Hungerford DDS.

19 COUNT 97

20 BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON, BRANDY
21 BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS

22 **BURGLARY (Re: David Hungerford DDS)**

23 On December 4, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
24 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
25 459, a felony, was committed by BRENDA JONES, KEVIN PARDUE, TONI COFFMAN,
26 NATALIE HAMMON, BRANDY BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS, who
27 did enter a commercial building occupied by David Hungerford DDS with the intent to commit
28 larceny and any felony.

1 **COUNT 98**

2 BRENDA JONES, KEVIN PARDUE, TONI COFFMAN, NATALIE HAMMON, BRANDY
3 BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS

4 **COMPUTER ACCESS AND FRAUD (Re: David Hungerford DDS)**

5 On or about December 4, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA
6 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
7 502(c)(1), a felony, was committed by BRENDA JONES, KEVIN PARDUE, TONI COFFMAN,
8 NATALIE HAMMON, BRANDY BINGHAM, LINDA COFFMAN, and BRIAN GRIGGS, who
9 did knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
10 accessed and without permission accessed data on a device (point of sale terminal) in order to
11 wrongfully obtain money.

12 **COUNT 99**

13 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
14 BINGHAM, and LINDA COFFMAN

15 **CONSPIRACY (Re: Raymond Angeli DDS)**

16 On and between December 7, 2015, and March 29, 2016, in the COUNTIES of SAN
17 JOAQUIN and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
18 section 182(a)(1) a felony, was committed by TONI COFFMAN, BRENDA JONES, KEVIN
19 PARDUE, NATALIE HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did
20 willfully and unlawfully conspire together with another person or persons whose identity is
21 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
22 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
23 conspiracy, Defendants committed the following overt act(s):

24 **OVERT ACT 1**

25 On December 7, 2015, in the County of San Joaquin, Toni Coffman and unknown
26 coconspirators took Raymond Angeli DDS's patient files.

27 ///

28 ///

1 OVERT ACT 2

2 On and between December 7, 2015, and December 8, 2015, in the County of Contra Costa,
3 Toni Coffman and unknown coconspirators accessed Raymond Angeli DDS's credit card
4 terminal.

5 OVERT ACT 3

6 On and between December 7, 2015, and December 8, 2015, in the County of Contra Costa,
7 Toni Coffman and unknown coconspirators forced refunds from Raymond Angeli DDS's credit
8 card terminal onto prepaid cards in the names of Natalie Hammon, Brandy Bingham, and Linda
9 Coffman.

10 OVERT ACT 4

11 On and between December 7, 2015, and March 29, 2016, Toni Coffman and unknown
12 coconspirators opened fraudulent prepaid card accounts in the names of Raymond Angeli DDS's
13 patients.

14 OVERT ACT 5

15 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
16 possessed the stolen personal identifying information of Dr. Angeli's patients.

17 **COUNT 100**

18 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
19 BINGHAM, and LINDA COFFMAN

20 **GRAND THEFT (Re: Raymond Angeli DDS)**

21 On and between December 7, 2015, and March 29, 2016, in the COUNTIES of SAN
22 JOAQUIN and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
23 487(a), a felony, was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE,
24 NATALIE HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did unlawfully
25 take money and personal property of another of a value exceeding Nine Hundred and Fifty
26 Dollars (\$950) to wit: Raymond Angeli DDS.

27 ///

28 ///

1 **COUNT 101**

2 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
3 BINGHAM, and LINDA COFFMAN

4 **BURGLARY (Re: Raymond Angeli DDS)**

5 On December 7, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
6 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
7 459, a felony, was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE,
8 NATALIE HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did enter a
9 commercial building occupied by Raymond Angeli DDS with the intent to commit larceny and
10 any felony.

11 **COUNT 102**

12 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
13 BINGHAM, and LINDA COFFMAN

14 **COMPUTER ACCESS AND FRAUD (Re: Raymond Angeli DDS)**

15 On and between December 7, 2015, and March 29, 2016, in the COUNTIES of SAN
16 JOAQUIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
17 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,
18 BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY BINGHAM, and
19 LINDA COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of this section
20 in that they knowingly accessed and without permission accessed data on a device (point of sale
21 terminal) in order to wrongfully obtain money.

22 **COUNT 103**

23 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, BRANDY BINGHAM, LINDA
24 COFFMAN, BRIAN GRIGGS, and TONI COFFMAN

25 **CONSPIRACY (Re: Vu Plastic and Cosmetic Surgery)**

26 On and between December 8, 2015, and December 26, 2015, in the COUNTIES of SAN
27 JOAQUIN and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
28 section 182(a)(1) a felony, was committed by KEVIN PARDUE, BRENDA JONES, NATALIE

1 HAMMON, BRANDY BINGHAM, LINDA COFFMAN, BRIAN GRIGGS, and TONI
2 COFFMAN, who did willfully and unlawfully conspire together with another person or persons
3 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California
4 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
5 the aforesaid conspiracy, Defendants committed the following overt act(s):

6 OVERT ACT 1

7 On December 8, 2015, in the County of Contra Costa, Toni Coffman and unknown
8 coconspirators accessed Vu Plastic and Cosmetic Surgery's credit card terminal.

9 OVERT ACT 2

10 On December 8, 2015, in the County of Contra Costa, Toni Coffman and unknown
11 coconspirators forced refunds from Vu Plastic and Cosmetic Surgery's credit card terminal onto
12 prepaid cards in the names of Brian Griggs, Natalie Hammon, Brandy Bingham, Linda Coffman,
13 Toni Coffman, and Brenda Jones.

14 OVERT ACT 3

15 On December 26, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
16 accessed the merchant account of Vu Plastic and Cosmetic Surgery from their home telephone
17 line.

18 **COUNT 104**

19 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, BRANDY BINGHAM, LINDA
20 COFFMAN, BRIAN GRIGGS, and TONI COFFMAN

21 **GRAND THEFT (Re: Vu Plastic and Cosmetic Surgery)**

22 On and between December 8, 2015, and December 26, 2015, in the COUNTIES of SAN
23 JOAQUIN and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
24 487(a), a felony, was committed by KEVIN PARDUE, BRENDA JONES, NATALIE
25 HAMMON, BRANDY BINGHAM, LINDA COFFMAN, BRIAN GRIGGS, and TONI
26 COFFMAN, who did unlawfully take money and personal property of another of a value
27 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Vu Plastic and Cosmetic Surgery.

28 ///

1 **COUNT 105**

2 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, BRANDY BINGHAM, LINDA
3 COFFMAN, BRIAN GRIGGS, and TONI COFFMAN

4 **BURGLARY (Re: Vu Plastic and Cosmetic Surgery)**

5 On December 8, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
6 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
7 459, a felony, was committed by KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON,
8 BRANDY BINGHAM, LINDA COFFMAN, BRIAN GRIGGS, and TONI COFFMAN, who did
9 enter a commercial building occupied by Vu Plastic and Cosmetic Surgery with the intent to
10 commit larceny and any felony.

11 **COUNT 106**

12 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, BRANDY BINGHAM, LINDA
13 COFFMAN, BRIAN GRIGGS, and TONI COFFMAN

14 **COMPUTER ACCESS AND FRAUD (Re: Vu Plastic and Cosmetic Surgery)**

15 On and between December 8, 2015, and December 26, 2015, in the COUNTIES of SAN
16 JOAQUIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
17 violation of Penal Code section 502(c)(1), a felony, was committed by KEVIN PARDUE,
18 BRENDA JONES, NATALIE HAMMON, BRANDY BINGHAM, LINDA COFFMAN, BRIAN
19 GRIGGS, and TONI COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of
20 this section in that they knowingly accessed and without permission accessed data on a device
21 (point of sale terminal) in order to wrongfully obtain money.

22 **COUNT 107**

23 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA,
24 BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and
25 BEATRICE MUNOZ

26 **CONSPIRACY (Re: East Sac Dental)**

27 On and between December 10, 2015, and March 31, 2016, in the COUNTIES of
28 SACRAMENTO and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal

Code section 182(a)(1) a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA, BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and BEATRICE MUNOZ, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,

Defendants committed the following overt act(s):

OVERT ACT 1

On December 10, 2015, in the County of Sacramento, Toni Coffman and unknown coconspirators drove a Silver Chrysler 300 to East Sac Dental.

OVERT ACT 2

On December 10, 2015, in the County of Sacramento, Brenda Jones and unknown coconspirators entered East Sac Dental.

OVERT ACT 3

On December 10, 2015, in the County of Contra Costa, Toni Coffman and other unknown coconspirators accessed East Sac Dental's credit card terminal.

OVERT ACT 4

On December 10, 2015, in the County of Contra Costa, Toni Coffman and unknown coconspirators forced refunds from East Sac Dental's credit card terminal onto prepaid cards in the names of Linda Coffman, Natalie Hammon, Brenda Jones, Toni Coffman, Josephine Ortega, Beatrice Munoz, and Brandy Bingham.

OVERT ACT 5

On December 10, 2015, in the County of Contra Costa, Beatrice Munoz used a credit card with fraudulent funds from East Sac Dental at a Walmart store.

OVERT ACT 6

On and between December 10, 2015, and March 31, 2016, in the County of Contra Costa, Toni Coffman, Bradley Owen, Brenda Jones, and Kevin Pardue accessed balance information of prepaid cards with forced refunds from East Sac Dental.

1 OVERT ACT 7

2 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
3 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
4 their names, that had forced refunds from East Sac Dental.

5 **COUNT 108**

6 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA,
7 BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and
8 BEATRICE MUNOZ

9 **GRAND THEFT (Re: East Sac Dental)**

10 On and between December 10, 2015, and March 31, 2016, in the COUNTIES of
11 SACRAMENTO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
12 487(a), a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA
13 JONES, JOSEPHINE ORTEGA, BRANDY BINGHAM, LINDA COFFMAN, KEVIN
14 PARDUE, BRADLEY OWEN, and BEATRICE MUNOZ, who did unlawfully take money and
15 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
16 East Sac Dental.

17 **COUNT 109**

18 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA,
19 BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and
20 BEATRICE MUNOZ

21 **BURGLARY (Re: East Sac Dental)**

22 On December 10, 2015, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
23 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
24 459, a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES,
25 JOSEPHINE ORTEGA, BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE,
26 BRADLEY OWEN, and BEATRICE MUNOZ, who did enter a commercial building occupied
27 by East Sac Dental with the intent to commit larceny and any felony.

28 ///

1 **COUNT 110**

2 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA,
3 BRANDY BINGHAM, LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and
4 BEATRICE MUNOZ

5 **COMPUTER ACCESS AND FRAUD (Re: East Sac Dental)**

6 On and between December 10, 2015, and March 31, 2016, in the COUNTIES of
7 SACRAMENTO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
8 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,
9 NATALIE HAMMON, BRENDA JONES, JOSEPHINE ORTEGA, BRANDY BINGHAM,
10 LINDA COFFMAN, KEVIN PARDUE, BRADLEY OWEN, and BEATRICE MUNOZ, who did
11 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
12 accessed and without permission accessed data on a device (point of sale terminal) in order to
13 wrongfully obtain money.

14 **COUNT 111**

15 NATALIE HAMMON, BRENDA JONES, LINDA COFFMAN, KEVIN PARDUE, TONI
16 COFFMAN, BEATRICE MUNOZ, BRANDY BINGHAM, and NANCY MORENO

17 **CONSPIRACY (Re: Dr. Pham DDS)**

18 On and between December 15, 2015, and March 31, 2016, in the COUNTIES of SAN
19 JOAQUIN and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
20 section 182(a)(1) a felony, was committed by NATALIE HAMMON, BRENDA JONES, LINDA
21 COFFMAN, KEVIN PARDUE, TONI COFFMAN, BEATRICE MUNOZ, BRANDY
22 BINGHAM, and NANCY MORENO, who did willfully and unlawfully conspire together with
23 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
24 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
25 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
26 act(s):

27 ///

28 ///

1 OVERT ACT 1

2 On December 15, 2015, in the County of Contra Costa, Toni Coffman and unknown
3 coconspirators accessed Dr. Pham DDS's credit card terminal.

4 OVERT ACT 2

5 On December 15, 2015, in the County of Contra Costa, Toni Coffman and unknown
6 coconspirators forced refunds from Dr. Pham DDS's credit card terminal onto prepaid cards in
7 the names of Linda Coffman, Brenda Jones, Beatrice Munoz, Brandy Bingham and Natalie
8 Hammon.

9 OVERT ACT 3

10 On December 15, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
11 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
12 their names, that had forced refunds from Dr. Pham DDS.

13 OVERT ACT 4

14 On and between December 15, 2015, and March 31, 2016, in the County of Contra Costa,
15 Nancy Moreno and Toni Coffman accessed balance information of prepaid cards with forced
16 refunds from Dr. Pham DDS.

17 **COUNT 112**

18 NATALIE HAMMON, BRENDA JONES, LINDA COFFMAN, KEVIN PARDUE, TONI
19 COFFMAN, BEATRICE MUNOZ, BRANDY BINGHAM, and NANCY MORENO

20 **GRAND THEFT (Re: Dr. Pham DDS)**

21 On and between December 15, 2015, and March 31, 2016, in the COUNTIES of SAN
22 JOAQUIN and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
23 487(a), a felony, was committed by NATALIE HAMMON, BRENDA JONES, LINDA
24 COFFMAN, KEVIN PARDUE, TONI COFFMAN, BEATRICE MUNOZ, BRANDY
25 BINGHAM, and NANCY MORENO, who did unlawfully take money and personal property of
26 another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Dr. Pham DDS.

27 ///

28 ///

1 **COUNT 113**

2 NATALIE HAMMON, BRENDA JONES, LINDA COFFMAN, KEVIN PARDUE, TONI
3 COFFMAN, BEATRICE MUNOZ, BRANDY BINGHAM, and NANCY MORENO

4 **BURGLARY (Re: Dr. Pham DDS)**

5 On December 15, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
6 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
7 459, a felony, was committed by NATALIE HAMMON, BRENDA JONES, LINDA
8 COFFMAN, KEVIN PARDUE, TONI COFFMAN, BEATRICE MUNOZ, BRANDY
9 BINGHAM, and NANCY MORENO, who did enter a commercial building occupied by Dr.
10 Pham DDS with the intent to commit larceny and any felony.

11 **COUNT 114**

12 NATALIE HAMMON, BRENDA JONES, LINDA COFFMAN, KEVIN PARDUE, TONI
13 COFFMAN, BEATRICE MUNOZ, BRANDY BINGHAM, and NANCY MORENO

14 **COMPUTER ACCESS AND FRAUD (Re: Dr. Pham DDS)**

15 On and between December 15, 2015, and March 31, 2016, in the COUNTIES of SAN
16 JOAQUIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
17 violation of Penal Code section 502(c)(1), a felony, was committed by NATALIE HAMMON,
18 BRENDA JONES, LINDA COFFMAN, KEVIN PARDUE, TONI COFFMAN, BEATRICE
19 MUNOZ, BRANDY BINGHAM, and NANCY MORENO, who did knowingly and unlawfully
20 violate subsection (c)(1) of this section in that they knowingly accessed and without permission
21 accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

22 **COUNT 115**

23 BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN
24 PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE ORTEGA, and BRANDY
25 BINGHAM

26 **CONSPIRACY (Re: Nestor Karas DDS)**

27 On and between December 18, 2015, and February 16, 2016, in the COUNTY of CONTRA
28 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was

1 committed by BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA
2 JONES, KEVIN PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE
3 ORTEGA, and BRANDY BINGHAM, who did willfully and unlawfully conspire together with
4 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
5 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
6 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
7 act(s):

8 OVERT ACT 1

9 On December 18, 2015, in the County of Contra Costa, Nancy Moreno and unknown
10 coconspirators accessed Nestor Karas DDS's credit card terminal.

11 OVERT ACT 2

12 On December 18, 2015, in the County of Contra Costa, Toni Coffman and unknown
13 coconspirators forced refunds from Nestor Karas DDS's credit card terminal onto prepaid cards in
14 the names of Linda Coffman, Natalie Hammon, Toni Coffman, Beatrice Munoz, Josephine
15 Ortega, Brandy Bingham, and Brenda Jones.

16 OVERT ACT 3

17 On February 16, 2016, in the County of Contra Costa, Brenda Jones and Kevin Pardue
18 possessed Nestor Karas DDS's stolen laptop.

19 OVERT ACT 4

20 On or around December 18, 2015, Toni Coffman searched for Nestor Karas DDS on her
21 cell phone.

22 **COUNT 116**

23 BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN
24 PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE ORTEGA, and BRANDY
25 BINGHAM

26 **GRAND THEFT (Re: Nester Karas DDS)**

27 On and between December 18, 2015, and February 16, 2016, in the COUNTY of CONTRA
28 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed

1 by BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN
2 PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE ORTEGA, and BRANDY
3 BINGHAM, who did unlawfully take money and personal property of another of a value
4 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Nestor Karas DDS.

5 **COUNT 117**

6 BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN
7 PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE ORTEGA, and BRANDY
8 BINGHAM

9 **BURGLARY (Re: Nestor Karas DDS)**

10 On December 18, 2015, in the COUNTY of CONTRA COSTA, the crime of SECOND
11 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
12 committed by BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA
13 JONES, KEVIN PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE
14 ORTEGA, and BRANDY BINGHAM, who did enter a commercial building occupied by Nestor
15 Karas DDS with the intent to commit larceny and any felony.

16 **COUNT 118**

17 BEATRICE MUNOZ, NANCY MORENO, TONI COFFMAN, BRENDA JONES, KEVIN
18 PARDUE, LINDA COFFMAN, NATALIE HAMMON, JOSEPHINE ORTEGA, and BRANDY
19 BINGHAM

20 **COMPUTER ACCESS AND FRAUD (Re: Nestor Karas DDS)**

21 On and between December 18, 2015, and February 16, 2016, in the COUNTY of CONTRA
22 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
23 502(c)(1), a felony, was committed by BEATRICE MUNOZ, NANCY MORENO, TONI
24 COFFMAN, BRENDA JONES, KEVIN PARDUE, LINDA COFFMAN, NATALIE HAMMON,
25 JOSEPHINE ORTEGA, and BRANDY BINGHAM, who did knowingly and unlawfully violate
26 subsection (c)(1) of this section in that they knowingly accessed and without permission accessed
27 data on a device (point of sale terminal) in order to wrongfully obtain money.

28 ///

1 **COUNT 119**

2 NATALIE HAMMON, BEATRICE MUNOZ, TONI COFFMAN, JOSEPHINE ORTEGA,
3 BRANDY BINGHAM, BRENDA JONES, and KEVIN PARDUE

4 **CONSPIRACY (Re: Crawford Chiropractic)**

5 On and between December 19, 2015, and February 17, 2016, in the COUNTIES of SAN
6 JOAQUIN and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
7 section 182(a)(1) a felony, was committed by NATALIE HAMMON, BEATRICE MUNOZ,
8 TONI COFFMAN, JOSEPHINE ORTEGA, BRANDY BINGHAM, BRENDA JONES, and
9 KEVIN PARDUE, who did willfully and unlawfully conspire together with another person or
10 persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
11 California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
12 purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

13 **OVERT ACT 1**

14 On or about December 19, 2015, in the County of Contra Costa, Toni Coffman and other
15 unknown coconspirators accessed Crawford Chiropractic's credit card terminal.

16 **OVERT ACT 2**

17 On or about December 19, 2015, in the County of Contra Costa, Toni Coffman and
18 unknown coconspirators forced refunds from Crawford Chiropractic credit card terminal onto
19 prepaid cards in the names of Natalie Hammon, Toni Coffman, Beatrice Munoz, Josephine
20 Ortega, Brenda Jones, and Brandy Bingham.

21 **OVERT ACT 3**

22 On and between December 19, 2015, and February 17, 2016, in the County of Contra
23 Costa, Toni Coffman printed a batch receipt for Crawford Chiropractic.

24 **OVERT ACT 4**

25 Between December 19, 2015, and February 17, 2016, in the County of Contra Costa, Kevin
26 Pardue accessed the merchant account of Crawford Chiropractic from his home telephone line.

27 ///

28 ///

1 **COUNT 120**

2 NATALIE HAMMON, BEATRICE MUNOZ, TONI COFFMAN, JOSEPHINE ORTEGA,
3 BRANDY BINGHAM, BRENDA JONES, and KEVIN PARDUE

4 **GRAND THEFT (Re: Crawford Chiropractic)**

5 On and between December 19, 2015, and February 17, 2016, in the COUNTIES of SAN
6 JOAQUIN and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
7 487(a), a felony, was committed by NATALIE HAMMON, BEATRICE MUNOZ, TONI
8 COFFMAN, JOSEPHINE ORTEGA, BRANDY BINGHAM, BRENDA JONES, and KEVIN
9 PARDUE, who did unlawfully take money and personal property of another of a value exceeding
10 Nine Hundred and Fifty Dollars (\$950) to wit: Crawford Chiropractic.

11 **COUNT 121**

12 NATALIE HAMMON, BEATRICE MUNOZ, TONI COFFMAN, JOSEPHINE ORTEGA,
13 BRANDY BINGHAM, BRENDA JONES, and KEVIN PARDUE

14 **BURGLARY (Re: Crawford Chiropractic)**

15 On December 19, 2015, in the COUNTIES of SAN JOAQUIN and CONTRA COSTA, the
16 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
17 459, a felony, was committed by NATALIE HAMMON, BEATRICE MUNOZ, TONI
18 COFFMAN, JOSEPHINE ORTEGA, BRANDY BINGHAM, BRENDA JONES, and KEVIN
19 PARDUE, who did enter a commercial building occupied by Crawford Chiropractic with the
20 intent to commit larceny and any felony.

21 **COUNT 122**

22 NATALIE HAMMON, BEATRICE MUNOZ, TONI COFFMAN, JOSEPHINE ORTEGA,
23 BRANDY BINGHAM, BRENDA JONES, and KEVIN PARDUE

24 **COMPUTER ACCESS AND FRAUD (Re: Crawford Chiropractic)**

25 On and between December 19, 2015, and February 17, 2016, in the COUNTIES of SAN
26 JOAQUIN and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
27 violation of Penal Code section 502(c)(1), a felony, was committed by NATALIE HAMMON,
28 BEATRICE MUNOZ, TONI COFFMAN, JOSEPHINE ORTEGA, BRANDY BINGHAM,

1 BRENDA JONES, and KEVIN PARDUE, who did knowingly and unlawfully violate subsection
2 (c)(1) of this section in that they knowingly accessed and without permission accessed data on a
3 device (point of sale terminal) in order to wrongfully obtain money.

4 **COUNT 123**

5 TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN

6 **CONSPIRACY (Re: Melissa Doyle DDS)**

7 On and between December 21, 2015, and March 31, 2016, in the COUNTIES of SOLANO
8 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
9 182(a)(1) a felony, was committed by TONI COFFMAN, NANCY MORENO, and BRADLEY
10 OWEN, who did willfully and unlawfully conspire together with another person or persons whose
11 identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal
12 Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the
13 aforesaid conspiracy, Defendants committed the following overt act(s):

14 OVERT ACT 1

15 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
16 coconspirators removed a credit card terminal from Melissa Doyle DDS.

17 OVERT ACT 2

18 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
19 coconspirators stole patient records from Melissa Doyle DDS.

20 OVERT ACT 3

21 On and between December 21, 2015, and March 29, 2016, Toni Coffman and unknown
22 coconspirators opened fraudulent prepaid card accounts in the names of Melissa Doyle DDS's
23 patients.

24 OVERT ACT 4

25 On and between December 21, 2015, and March 31, 2016, in the County of Contra Costa,
26 Nancy Moreno, Toni Coffman and unknown coconspirators forced refunds onto prepaid cards
27 created with the stolen personal identifying information from Melissa Doyle DDS's patient files.

28 ///

1 **COUNT 124**

2 TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN

3 **BURGLARY (Re: Melissa Doyle DDS)**

4 On December 21, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
5 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
6 felony, was committed by TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN, who
7 did enter a commercial building occupied by Melissa Doyle DDS with the intent to commit
8 larceny and any felony.

9 **COUNT 125**

10 TONI COFFMAN and NANCY MORENO

11 **CONSPIRACY (Re: James Bawden Dentistry)**

12 On or about December 21, 2015, in the COUNTIES of SOLANO and CONTRA COSTA,
13 the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
14 committed by TONI COFFMAN and NANCY MORENO who did willfully and unlawfully
15 conspire together with another person or persons whose identity is unknown to commit the crime
16 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
17 purpose of carrying out the
18 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
19 act(s):

20 **OVERT ACT 1**

21 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
22 coconspirators drove to James Bawden Dentistry.

23 **OVERT ACT 2**

24 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
25 coconspirators entered James Bawden Dentistry.

26 **OVERT ACT 3**

27 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
28 coconspirators removed a credit card terminal from James Bawden Dentistry.

1 **COUNT 126**

2 TONI COFFMAN and NANCY MORENO

3 **BURGLARY (Re: James Bawden Dentistry)**

4 On December 21, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
5 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
6 felony, was committed by TONI COFFMAN and NANCY MORENO, who did enter a
7 commercial building occupied by James Bawden Dentistry with the intent to commit larceny and
8 any felony.

9 **COUNT 127**

10 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, BRANDY BINGHAM,
11 BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY MORENO,
12 JOSEPHINE ORTEGA, and BRADLEY OWEN

13 **CONSPIRACY (Re: Fairfield Oral Surgery)**

14 On and between December 21, 2015, and March 31, 2016, in the COUNTIES of SOLANO
15 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
16 182(a)(1) a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA
17 JONES, BRANDY BINGHAM, BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE,
18 NANCY MORENO, JOSEPHINE ORTEGA, and BRADLEY OWEN, who did willfully and
19 unlawfully conspire together with another person or persons whose identity is unknown to
20 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
21 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
22 Defendants committed the following overt act(s):

23 **OVERT ACT 1**

24 On December 21, 2015, in the County of Solano, Toni Coffman and unknown
25 coconspirators drove to Fairfield Oral Surgery.

26 **OVERT ACT 2**

27 On December 21, 2015, in the County of Solano, Angelina Moreno and unknown
28 coconspirators entered Fairfield Oral Surgery.

1 OVERT ACT 3

2 On December 23, 2015, in the County of Solano, Toni Coffman and unknown
3 coconspirators removed a credit card terminal from Fairfield Oral Surgery.

4 OVERT ACT 4

5 On and between December 21, 2015, and January 13, 2016, in the County of Contra Costa,
6 Toni Coffman and unknown coconspirators accessed Fairfield Oral Surgery's credit card
7 terminal.

8 OVERT ACT 5

9 On and between December 21, 2015, and January 13, 2016, in the County of Contra Costa,
10 Toni Coffman and unknown coconspirators forced refunds from Fairfield Oral Surgery's credit
11 card terminal onto prepaid cards in the names of Natalie Hammon, Brandy Bingham, Beatrice
12 Munoz, Josephine Ortega, and Linda Coffman.

13 OVERT ACT 6

14 On or around December 21 2015, in the State of California, Toni Coffman searched
15 Fairfield Oral Surgery on her cell phone.

16 OVERT ACT 7

17 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
18 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
19 their names, that had forced refunds from Fairfield Oral Surgery.

20 OVERT ACT 8

21 On and between December 21, 2015, and March 31, 2016, in the County of Contra Costa,
22 Nancy Moreno, Bradley Owen and Toni Coffman accessed balance information of prepaid cards
23 with forced refunds from Fairfield Oral Surgery.

24 **COUNT 128**

25 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, BRANDY BINGHAM,
26 BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY MORENO,
27 JOSEPHINE ORTEGA, and BRADLEY OWEN

28 ///

1 **GRAND THEFT (Re: Fairfield Oral Surgery)**

2 On and between December 21, 2015, and March 31, 2016, in the COUNTIES of SOLANO
3 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
4 was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, BRANDY
5 BINGHAM, BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY
6 MORENO, JOSEPHINE ORTEGA, and BRADLEY OWEN, who did unlawfully take money
7 and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to
8 wit: Fairfield Oral Surgery.

9 **COUNT 129**

10 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, BRANDY BINGHAM,
11 BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY MORENO,
12 JOSEPHINE ORTEGA, and BRADLEY OWEN

13 **BURGLARY (Re: Fairfield Oral Surgery)**

14 On December 21, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
15 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
16 felony, was committed by TONI COFFMAN, NATALIE HAMMON, BRENDA JONES,
17 BRANDY BINGHAM, BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY
18 MORENO, JOSEPHINE ORTEGA, and BRADLEY OWEN, who did enter a commercial
19 building occupied by Fairfield Oral Surgery with the intent to commit larceny and any felony.

20 **COUNT 130**

21 TONI COFFMAN, NATALIE HAMMON, BRENDA JONES, BRANDY BINGHAM,
22 BEATRICE MUNOZ, LINDA COFFMAN, KEVIN PARDUE, NANCY MORENO,
23 JOSEPHINE ORTEGA, and BRADLEY OWEN

24 **COMPUTER ACCESS AND FRAUD (Re: Fairfield Oral Surgery)**

25 On and between December 21, 2015, and March 31, 2016, in the COUNTIES of SOLANO
26 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
27 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, NATALIE HAMMON,
28 BRENDA JONES, BRANDY BINGHAM, BEATRICE MUNOZ, LINDA COFFMAN, KEVIN

1 PARDUE, NANCY MORENO, JOSEPHINE ORTEGA, and BRADLEY OWEN, who did
2 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
3 accessed and without permission accessed data on a device (point of sale terminal) in order to
4 wrongfully obtain money.

5 **COUNT 131**

6 TONI COFFMAN and BEATRICE MUNOZ

7 **CONSPIRACY (Re: Mark Wah DDS)**

8 On and between December 23, 2015, and February 17, 2016, in the COUNTIES of
9 SOLANO and CONTRA COSTA the crime of CONSPIRACY, in violation of Penal Code
10 section 182(a)(1) a felony, was committed by TONI COFFMAN and BEATRICE MUNOZ, who
11 did willfully and unlawfully conspire together with another person or persons whose identity is
12 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
13 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
14 conspiracy, Defendants committed the following overt act(s):

15 OVERT ACT 1

16 On December 23, 2015, in the County of Solano, Toni Coffman and unknown
17 coconspirators removed a credit card terminal from Mark Wah DDS.

18 OVERT ACT 2

19 On December 23, 2015, in the County of Contra Costa, Toni Coffman and unknown
20 coconspirators accessed Mark Wah DDS's credit card terminal.

21 OVERT ACT 3

22 On December 23, 2015, in the County of Contra Costa, Toni Coffman and unknown
23 coconspirators forced refunds from Mark Wah DDS's credit card terminal onto a prepaid card in
24 the name of Beatrice Munoz.

25 OVERT ACT 4

26 On February 17, 2016, in the County of Contra Costa, Toni Coffman possessed a receipt
27 depicting fraudulent transactions from Mark Wah DDS.

28 ///

1 **COUNT 132**

2 TONI COFFMAN and BEATRICE MUNOZ

3 **GRAND THEFT (Re: Mark Wah DDS)**

4 On and between December 23, 2015, and February 17, 2016, in the COUNTIES of
5 SOLANO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a),
6 a felony, was committed by TONI COFFMAN and BEATRICE MUNOZ, who did unlawfully
7 take money and personal property of another of a value exceeding Nine Hundred and Fifty
8 Dollars (\$950) to wit: Mark Wah DDS.

9 **COUNT 133**

10 TONI COFFMAN and BEATRICE MUNOZ

11 **BURGLARY (Re: Mark Wah DDS)**

12 On December 23, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
13 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
14 felony, was committed by TONI COFFMAN and BEATRICE MUNOZ, who did enter a
15 commercial building occupied by Mark Wah DDS with the intent to commit larceny and any
16 felony.

17 **COUNT 134**

18 TONI COFFMAN and BEATRICE MUNOZ

19 **COMPUTER ACCESS AND FRAUD (Re: Mark Wah DDS)**

20 On and between December 23, 2015, and February 17, 2016, in the COUNTIES of
21 SOLANO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
22 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN and
23 BEATRICE MUNOZ, who did knowingly and unlawfully violate subsection (c)(1) of this section
24 in that they knowingly accessed and without permission accessed data on a device (point of sale
25 terminal) in order to wrongfully obtain money.

26 ///

27 ///

28 ///

1 **COUNT 135**

2 TONI COFFMAN, NATALIE HAMMON, BEATRICE MUNOZ, ANA MARIA GONZALEZ,
3 KATHRYN COLE, LINDA COFFMAN, BRENDA JONES, BRANDY BINGHAM, KEVIN
4 PARDUE, and NANCY MORENO

5 **CONSPIRACY (Re: KIDS CARE DENTAL)**

6 On and between December 23, 2015, and March 31, 2016, in the Counties of
7 SACRAMENTO and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal
8 Code section 182(a)(1) a felony, was committed by TONI COFFMAN, NATALIE HAMMON,
9 BEATRICE MUNOZ, ANA MARIA GONZALEZ, KATHRYN COLE, LINDA COFFMAN,
10 BRENDA JONES, BRANDY BINGHAM, KEVIN PARDUE, and NANCY MORENO, who did
11 willfully and unlawfully conspire together with another person or persons whose identity is
12 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
13 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
14 conspiracy, Defendants committed the following overt act(s):

15 OVERT ACT 1

16 On December 23, 2015, in the County of Sacramento, Toni Coffman drove to Kids Care
17 Dental.

18 OVERT ACT 2

19 On December 23, 2015, in the County of Sacramento, Toni Coffman entered Kids Care
20 Dental.

21 OVERT ACT 3

22 On December 23, 2015, in the County of Contra Costa, Toni Coffman and unknown
23 coconspirators removed a credit card terminal from Kid's Care Dental.

24 OVERT ACT 4

25 On December 23, 2015, in the County of Contra Costa, Toni Coffman and unknown
26 coconspirators accessed Kid's Care Dental's credit card terminal.

27 ///

28 ///

1 OVERT ACT 5

2 On December 23, 2015, in the County of Contra Costa, Toni Coffman and unknown
3 coconspirators forced refunds from a Kids Care Dental credit card terminal onto prepaid cards in
4 the names of Natalie Hammon, Toni Coffman, Beatrice Munoz, Brandy Bingham, Linda
5 Coffman, Kathryn Cole, Ana Maria Gonzalez, and Brenda Jones.

6 OVERT ACT 6

7 On or about December 23, 2015, in the State of California Toni Coffman searched Kids
8 Care Dental on her cell phone.

9 OVERT ACT 7

10 On and between December 23, 2015, and March 31, 2016, in the County of Contra Costa,
11 Nancy Moreno accessed balance information of prepaid cards with forced refunds from Kids Care
12 Dental.

13 OVERT ACT 8

14 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
15 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
16 their names, that had forced refunds from Kids Care Dental.

17 **COUNT 136**

18 TONI COFFMAN, NATALIE HAMMON, BEATRICE MUNOZ, ANA MARIA GONZALEZ,
19 KATHRYN COLE, LINDA COFFMAN, BRENDA JONES, BRANDY BINGHAM, KEVIN
20 PARDUE, and NANCY MORENO

21 **GRAND THEFT (Re: KIDS CARE DENTAL)**

22 On and between December 23, 2015, and March 31, 2016, in the COUNTIES of
23 SACRAMENTO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
24 487(a), a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BEATRICE
25 MUNOZ, ANA MARIA GONZALEZ, KATHRYN COLE, LINDA COFFMAN, BRENDA
26 JONES, BRANDY BINGHAM, KEVIN PARDUE, and NANCY MORENO, who did unlawfully
27 take money and personal property of another of a value exceeding Nine Hundred and Fifty
28 Dollars (\$950) to wit: Kids Care Dental.

1 **COUNT 137**

2 TONI COFFMAN, NATALIE HAMMON, BEATRICE MUNOZ, ANA MARIA GONZALEZ,
3 KATHRYN COLE, LINDA COFFMAN, BRENDA JONES, BRANDY BINGHAM, KEVIN
4 PARDUE, and NANCY MORENO

5 **BURGLARY (Re: KIDS CARE DENTAL)**

6 On December 23, 2015, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
7 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
8 459, a felony, was committed by TONI COFFMAN, NATALIE HAMMON, BEATRICE
9 MUNOZ, ANA MARIA GONZALEZ, KATHRYN COLE, LINDA COFFMAN, BRENDA
10 JONES, BRANDY BINGHAM, KEVIN PARDUE, and NANCY MORENO, who did enter a
11 commercial building occupied by Kids Care Dental with the intent to commit larceny and any
12 felony.

13 **COUNT 138**

14 TONI COFFMAN, NATALIE HAMMON, BEATRICE MUNOZ, ANA MARIA GONZALEZ,
15 KATHRYN COLE, LINDA COFFMAN, BRENDA JONES, BRANDY BINGHAM, KEVIN
16 PARDUE, and NANCY MORENO

17 **COMPUTER ACCESS AND FRAUD (Re: KIDS CARE DENTAL)**

18 On and between December 23, 2015, and March 31, 2016, in the COUNTIES of
19 SACRAMENTO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
20 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN,
21 NATALIE HAMMON, BEATRICE MUNOZ, ANA MARIA GONZALEZ, KATHRYN COLE,
22 LINDA COFFMAN, BRENDA JONES, BRANDY BINGHAM, KEVIN PARDUE, and
23 NANCY MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section
24 in that they knowingly accessed and without permission accessed data on a device (point of sale
25 terminal) in order to wrongfully obtain money.

26 **COUNT 139**

27 BRENDA JONES, LINDA COFFMAN, NATALIE HAMMON, KATHRYN COLE,
28 BEATRICE MUNOZ, and TONI COFFMAN

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

10
11
12
13
14
15
16
17
18
19

20
21
22

23
24
25
26
27

28

1 HAMMON, KATHRYN COLE, BEATRICE MUNOZ, and TONI COFFMAN who did
2 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
3 Fifty Dollars (\$950) to wit: Nikki Chauhan DDS.

4 **COUNT 141**

5 BREND A JONES, LIND A COFFMAN, NATALIE HAMMON, KATHRYN COLE,
6 BEATRICE MUNOZ, and TONI COFFMAN

7 **BURGLARY (Re: Nikki Chauhan DDS)**

8 On December 24, 2015, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
9 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
10 459, a felony, was committed by BREND A JONES, LIND A COFFMAN, NATALIE
11 HAMMON, KATHRYN COLE, BEATRICE MUNOZ, and TONI COFFMAN, who did enter a
12 commercial building occupied by Nikki Chauhan DDS with the intent to commit larceny and any
13 felony.

14 **COUNT 142**

15 BREND A JONES, LIND A COFFMAN, NATALIE HAMMON, KATHRYN COLE,
16 BEATRICE MUNOZ, and TONI COFFMAN

17 **COMPUTER ACCESS AND FRAUD (Re: Nikki Chauhan DDS)**

18 On and between December 24, 2015, and February 17, 2016, in the COUNTIES of
19 SACRAMENTO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
20 violation of Penal Code section 502(c)(1), a felony, was committed by BREND A JONES,
21 LIND A COFFMAN, NATALIE HAMMON, KATHRYN COLE, BEATRICE MUNOZ, and
22 TONI COFFMAN, who did knowingly and unlawfully violate subsection (c)(1) of this section in
23 that they knowingly accessed and without permission accessed data on a device (point of sale
24 terminal) in order to wrongfully obtain money.

25 **COUNT 143**

26 KEVIN PARDUE, BREND A JONES, TONI COFFMAN, NATALIE HAMMON, LIND A
27 COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA
28 GONZALEZ, NANCY MORENO, and BRADLEY OWEN

CONSPIRACY (Re: Steven Nerad DMD)

On and between December 25, 2015, and February 17, 2016, in the COUNTIES of ALAMEDA and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, NATALIE HAMMON, LINDA COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA GONZALEZ, NANCY MORENO, and BRADLEY OWEN, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On or about December 25, 2015, in the County of Alameda, Toni Coffman and unknown coconspirators removed a credit card terminal from Steven Nerad DMD.

OVERT ACT 2

On December 26, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones accessed the merchant account of Steven Nerad DMD from their home telephone line.

OVERT ACT 3

On December 26, 2015, in the County of Contra Costa, Toni Coffman forced refunds from a Steven Nerad DMD credit card terminal onto prepaid cards in the names of Linda Coffman, Natalie Hammon, Beatrice Munoz, Kathryn Cole, Brandy Bingham, Ana Maria Gonzalez, Brenda Jones.

OVERT ACT 4

On December 26, 2015, in the County of Contra Costa, Nancy Moreno and Bradley Owen accessed the records of prepaid card accounts that had forced refunds on them from Steven Nerad DMD.

OVERT ACT 5

On February 17, 2016, in the County of Contra Costa, Toni Coffman possessed a receipt depicting fraudulent transactions from Steven Nerad DMD.

1 **COUNT 144**

2 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, NATALIE HAMMON, LINDA
3 COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA
4 GONZALEZ, NANCY MORENO, and BRADLEY OWEN

5 **GRAND THEFT (Re: Steven Nerad DMD)**

6 On and between December 25, 2015, and February 17, 2016, in the COUNTIES of
7 ALAMEDA and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
8 487(a), a felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN,
9 NATALIE HAMMON, LINDA COFFMAN, BEATRICE MUNOZ, KATHRYN COLE,
10 BRANDY BINGHAM, ANA MARIA GONZALEZ, NANCY MORENO, and BRADLEY
11 OWEN, who did unlawfully take money and personal property of another of a value exceeding
12 Nine Hundred and Fifty Dollars (\$950) to wit: Steven Nerad DMD.

13 **COUNT 145**

14 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, NATALIE HAMMON, LINDA
15 COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA
16 GONZALEZ, NANCY MORENO, and BRADLEY OWEN

17 **BURGLARY (Re: Steven Nerad DMD)**

18 On December 25, 2015, in the COUNTIES of ALAMEDA and CONTRA COSTA, the
19 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
20 459, a felony, was committed by KEVIN PARDUE, BRENDA JONES, TONI COFFMAN,
21 NATALIE HAMMON, LINDA COFFMAN, BEATRICE MUNOZ, KATHRYN COLE,
22 BRANDY BINGHAM, ANA MARIA GONZALEZ, NANCY MORENO, and BRADLEY
23 OWEN who did enter a commercial building occupied by Steven Nerad DMD with the intent to
24 commit larceny and any felony.

25 **COUNT 146**

26 KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, NATALIE HAMMON, LINDA
27 COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA
28 GONZALEZ, NANCY MORENO, and BRADLEY OWEN

1 **COMPUTER ACCESS AND FRAUD (Re: Steven Nerad DMD)**

2 On and between December 25, 2015, and February 17, 2016, in the COUNTIES of
3 ALAMEDA and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
4 violation of Penal Code section 502(c)(1), a felony, was committed by KEVIN PARDUE,
5 BRENDA JONES, TONI COFFMAN, NATALIE HAMMON, LINDA COFFMAN, BEATRICE
6 MUNOZ, KATHRYN COLE, BRANDY BINGHAM, ANA MARIA GONZALEZ, NANCY
7 MORENO, and BRADLEY OWEN who did knowingly and unlawfully violate subsection (c)(1)
8 of this section in that they knowingly accessed and without permission accessed data on a device
9 (point of sale terminal) in order to wrongfully obtain money.

10 **COUNT 147**

11 TONI COFFMAN and NANCY MORENO

12 **CONSPIRACY (Re: Murrieta Dental Care)**

13 On and between December 28, 2015, and February 17, 2016, in the COUNTIES of
14 ALAMEDA and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
15 section 182(a)(1) a felony, was committed by TONI COFFMAN and NANCY MORENO, who
16 did willfully and unlawfully conspire together with another person or persons whose identity is
17 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
18 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
19 conspiracy, Defendants committed the following overt act(s):

20 OVERT ACT 1

21 On December 28, 2015, in the County of Alameda, Nancy Moreno and unknown
22 conspirators removed a credit card terminal from Murrieta Dental Care.

23 OVERT ACT 2

24 On February 17, 2016, in the County of Contra Costa, Toni Coffman possessed a receipt
25 depicting fraudulent transactions from Murrieta Dental Care's terminal.

26 ///

27 ///

28 ///

1 **COUNT 148**

2 TONI COFFMAN and NANCY MORENO

3 **GRAND THEFT (Re: Murrieta Dental Care)**

4 On and between December 28, 2015, and February 17, 2016, in the COUNTIES of
5 ALAMEDA and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
6 487(a), a felony, was committed by TONI COFFMAN and NANCY MORENO, who did
7 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
8 Fifty Dollars (\$950) to wit: Murrieta Dental Care.

9 **COUNT 149**

10 TONI COFFMAN and NANCY MORENO

11 **BURGLARY (Re: Murrieta Dental Care)**

12 On December 28, 2015, in the COUNTIES of ALAMEDA and CONTRA COSTA, the
13 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
14 459, a felony, was committed by TONI COFFMAN and NANCY MORENO, who did enter a
15 commercial building occupied by Murrieta Dental Care with the intent to commit larceny and any
16 felony.

17 **COUNT 150**

18 TONI COFFMAN and NANCY MORENO

19 **COMPUTER ACCESS AND FRAUD (Re: Murrieta Dental Care)**

20 On and between December 28, 2015, and February 17, 2016, in the COUNTIES of
21 ALAMEDA and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
22 violation of Penal Code section 502(c)(1), a felony, was committed by TONI COFFMAN and
23 NANCY MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section
24 in that they knowingly accessed and without permission accessed data on a device (point of sale
25 terminal) in order to wrongfully obtain money.

26 ///

27 ///

28 ///

1 **COUNT 151**

2 KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ, NATALIE HAMMON, BRANDY
3 BINGHAM, KATHRYN COLE, AMY STANFILL, TONI COFFMAN, NANCY MORENO,
4 ANA MARIA GONZALEZ and LINDA COFFMAN

5 **CONSPIRACY (Re: Seturam Pandurangi Allergy and Asthma Center)**

6 On and between December 30, 2015, and March 31, 2016, in the COUNTIES of SOLANO
7 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
8 182(a)(1) a felony, was committed by KEVIN PARDUE, BRENDA JONES, BEATRICE
9 MUNOZ, NATALIE HAMMON, BRANDY BINGHAM, KATHRYN COLE, AMY
10 STANFILL, TONI COFFMAN, LINDA COFFMAN, ANA MARIA GONZALEZ, and NANCY
11 MORENO, who did willfully and unlawfully conspire together with another person or persons
12 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California
13 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
14 the aforesaid conspiracy, Defendants committed the following overt act(s):

15 **OVERT ACT 1**

16 On December 30, 2015, in the County of Solano, Toni Coffman and unknown
17 coconspirators removed a credit card terminal from Seturam Pandurangi Allergy and Asthma
18 Center.

19 **OVERT ACT 2**

20 On December 30, 2015, in the County of Contra Costa, Kevin Pardue and Brenda Jones
21 accessed the merchant account of Seturam Pandurangi Allergy and Asthma Center from their
22 home telephone line.

23 **OVERT ACT 3**

24 On December 30, 2015, in the County of Contra Costa, Toni Coffman forced refunds from
25 a Seturam Pandurangi Allergy and Asthma Center credit card terminal onto prepaid cards in the
26 names of Beatrice Munoz, Brenda Jones, Natalie Hammon, Brandy Bingham, Kathryn Cole, Amy
27 Stanfill, Linda Coffman, and Ana Maria Gonzalez.

28 ///

1 OVERT ACT 4

2 Between December 30, 2015, and March 31, 2016, in the County of Contra Costa, Nancy
3 Moreno accessed balance information of prepaid cards with forced refunds from Seturam
4 Pandurangi Allergy and Asthma Center.

5 OVERT ACT 5

6 Between December 30, 2015, and February 17, 2016, in the County of Contra Costa, Toni
7 Coffman printed a batch receipt for Seturam Pandurangi Allergy and Asthma Center.

8 **COUNT 152**

9 KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ, NATALIE HAMMON, BRANDY
10 BINGHAM, KATHRYN COLE, AMY STANFILL, TONI COFFMAN, LINDA COFFMAN,
11 ANA MARIA GONZALEZ, and NANCY MORENO

12 **GRAND THEFT (Re: Seturam Pandurangi Allergy and Asthma Center)**

13 On and between December 30, 2015, and March 31, 2016, in the COUNTIES of SOLANO
14 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
15 was committed by KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ, NATALIE
16 HAMMON, BRANDY BINGHAM, KATHRYN COLE, AMY STANFILL, TONI COFFMAN,
17 LINDA COFFMAN, ANA MARIA GONZALEZ, and NANCY MORENO, who did unlawfully
18 take money and personal property of another of a value exceeding Nine Hundred and Fifty
19 Dollars (\$950) to wit: SETURAM PANDURANGI ALLERGY AND ASTHMA CENTER.

20 **COUNT 153**

21 KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ, NATALIE HAMMON, BRANDY
22 BINGHAM, KATHRYN COLE, AMY STANFILL, TONI COFFMAN, LINDA COFFMAN,
23 ANA MARIA GONZALEZ, NANCY MORENO

24 **BURGLARY (Re: Seturam Pandurangi Allergy and Asthma Center)**

25 On December 30, 2015, in the COUNTIES of SOLANO and CONTRA COSTA, the crime
26 of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
27 felony, was committed by KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ,
28 NATALIE HAMMON, BRANDY BINGHAM, KATHRYN COLE, AMY STANFILL, TONI

1 COFFMAN, LINDA COFFMAN, ANA MARIA GONZALEZ, and NANCY MORENO, who
2 did enter a commercial building occupied by Seturam Pandurangi Allergy and Asthma Center
3 with the intent to commit larceny and any felony.

4 **COUNT 154**

5 KEVIN PARDUE, BRENDA JONES, BEATRICE MUNOZ, NATALIE HAMMON, BRANDY
6 BINGHAM, KATHRYN COLE, AMY STANFILL, TONI COFFMAN, LINDA COFFMAN,
7 ANA MARIA GONZALEZ, and NANCY MORENO

8 **COMPUTER ACCESS AND FRAUD (Re: Seturam Pandurangi Allergy**
9 **and Asthma Center)**

10 On and between December 30, 2015, and March 31, 2016, in the COUNTIES of SOLANO
11 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
12 Code section 502(c)(1), a felony, was committed by KEVIN PARDUE, BRENDA JONES,
13 BEATRICE MUNOZ, NATALIE HAMMON, BRANDY BINGHAM, KATHRYN COLE,
14 AMY STANFILL, TONI COFFMAN, LINDA COFFMAN, ANA MARIA GONZALEZ, and
15 NANCY MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section
16 in that they knowingly accessed and without permission accessed data on a device (point of sale
17 terminal) in order to wrongfully obtain money.

18 **COUNT 155**

19 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, LINDA COFFMAN, AMY
20 STANFILL, KATHRYN COLE, BEATRICE MUNOZ, BRANDY BINGHAM, and TONI
21 COFFMAN

22 **CONSPIRACY (Re: Universal Chiropractic)**

23 On and between January 5, 2016, and February 17, 2016, in the COUNTIES of
24 SACRAMENTO and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal
25 Code section 182(a)(1) a felony, was committed by KEVIN PARDUE, BRENDA JONES,
26 NATALIE HAMMON, LINDA COFFMAN, AMY STANFILL, KATHRYN COLE,
27 BEATRICE MUNOZ, BRANDY BINGHAM, and TONI COFFMAN, who did willfully and
28 unlawfully conspire together with another person or persons whose identity is unknown to

1 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
2 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
3 Defendants committed the following overt act(s):

4 OVERT ACT 1

5 On January 5, 2016, in the County of Sacramento, Toni Coffman and unknown
6 coconspirators removed a credit card terminal from Universal Chiropractic.

7 OVERT ACT 2

8 On January 5, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
9 accessed the merchant account of Universal Chiropractic from their home telephone line.

10 OVERT ACT 3

11 On January 5, 2016, in the County of Contra Costa, Toni Coffman forced refunds from a
12 Universal Chiropractic credit card terminal onto prepaid cards in the names of Natalie Hammon,
13 Linda Coffman, Amy Stanfill, Kathryn Cole, Brenda Jones, Beatrice Munoz, and Brandy
14 Bingham.

15 OVERT ACT 4

16 Between January 5, 2016, and February 17, 2016, in the County of Contra Costa, Toni
17 Coffman printed a batch receipt for Universal Chiropractic.

18 **COUNT 156**

19 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, LINDA COFFMAN, AMY
20 STANFILL, KATHRYN COLE, BEATRICE MUNOZ, BRANDY BINGHAM, and TONI
21 COFFMAN

22 **GRAND THEFT (Re: Universal Chiropractic)**

23 On and between January 5, 2016, and February 17, 2016, in the COUNTIES of
24 SACRAMENTO and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
25 487(a), a felony, was committed by KEVIN PARDUE, BRENDA JONES, NATALIE
26 HAMMON, LINDA COFFMAN, AMY STANFILL, KATHRYN COLE, BEATRICE MUNOZ,
27 BRANDY BINGHAM, and TONI COFFMAN, who did unlawfully take money and personal
28

1 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Universal
2 Chiropractic.

3 **COUNT 157**

4 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, LINDA COFFMAN, AMY
5 STANFILL, KATHRYN COLE, BEATRICE MUNOZ, BRANDY BINGHAM, and TONI
6 COFFMAN

7 **BURGLARY (Re: Universal Chiropractic)**

8 On January 5, 2016, in the COUNTIES of SACRAMENTO and CONTRA COSTA, the
9 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
10 459, a felony, was committed by KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON,
11 LINDA COFFMAN, AMY STANFILL, KATHRYN COLE, BEATRICE MUNOZ, BRANDY
12 BINGHAM, and TONI COFFMAN, who did enter a commercial building occupied Universal
13 Chiropractic with the intent to commit larceny and any felony.

14 **COUNT 158**

15 KEVIN PARDUE, BRENDA JONES, NATALIE HAMMON, LINDA COFFMAN, AMY
16 STANFILL, KATHRYN COLE, BEATRICE MUNOZ, BRANDY BINGHAM, and TONI
17 COFFMAN

18 **COMPUTER ACCESS AND FRAUD (Re: Universal Chiropractic)**

19 On and between January 5, 2016, and February 17, 2016, in the COUNTIES of
20 SACRAMENTO and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
21 violation of Penal Code section 502(c)(1), a felony, was committed by KEVIN PARDUE,
22 BRENDA JONES, NATALIE HAMMON, LINDA COFFMAN, AMY STANFILL, KATHRYN
23 COLE, BEATRICE MUNOZ, BRANDY BINGHAM, and TONI COFFMAN, who did
24 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
25 accessed and without permission accessed data on a device (point of sale terminal) in order to
26 wrongfully obtain money.

27 ///

28 ///

COUNT 159

NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BRADLEY
OWEN, and ANGELINA MORENO

CONSPIRACY (Re: Auburn Eye Care)

On and between January 11, 2016, and March 31, 2016, in the COUNTIES of PLACER
and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
182(a)(1) a felony, was committed by NANCY MORENO, KEVIN PARDUE, BRENDA
JONES, TONI COFFMAN, BRADLEY OWEN, and ANGELINA MORENO, who did willfully
and unlawfully conspire together with another person or persons whose identity is unknown to
commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
Defendants committed the following overt act(s):

OVERT ACT 1

On January 11, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
removed three credit card terminals from Auburn Eye Care.

OVERT ACT 2

On January 11, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
removed several pairs of eyeglasses from Auburn Eye Care.

OVERT ACT 3

On January 13, 2016, in the County of Contra Costa, Toni Coffman forced a refund from an
Auburn Eye Care credit card terminal onto a prepaid card in the name of Angelina Moreno.

OVERT ACT 4

Between January 11, 2016, and March 31, 2016, in the County of Contra Costa, Bradley
Owen and Toni Coffman accessed balance information of prepaid cards with forced refunds from
Auburn Eye Care.

///

///

///

1 OVERT ACT 5

2 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
3 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
4 their names, that had forced refunds from Auburn Eye Care.

5 OVERT ACT 6

6 Between January 11, 2016, and March 31, 2016, in the County of Contra Costa, Nancy
7 Moreno accessed information of prepaid cards with forced refunds from Auburn Eye Care via the
8 internet.

9 OVERT ACT 7

10 Between January 11, 2016, and February 17, 2016, in the County of Contra Costa, Toni
11 Coffman printed a batch receipt for Auburn Eye Care.

12 COUNT 160

13 NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BRADLEY
14 OWEN, and ANGELINA MORENO

15 **GRAND THEFT (Re: Auburn Eye Care)**

16 On and between January 11, 2016, and March 31, 2016, in the COUNTIES of PLACER
17 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
18 was committed by NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI
19 COFFMAN, BRADLEY OWEN, and ANGELINA MORENO, who did unlawfully take money
20 and personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to
21 wit: Auburn Eye Care.

22 COUNT 161

23 NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BRADLEY
24 OWEN, and ANGELINA MORENO

25 **BURGLARY (Re: AUBURN EYE CARE)**

26 On January 11, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of
27 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
28 felony, was committed by NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI

1 COFFMAN, BRADLEY OWEN, and ANGELINA MORENO, who did enter a commercial
2 building occupied by Auburn Eye Care with the intent to commit larceny and any felony.

3 **COUNT 162**

4 NANCY MORENO, KEVIN PARDUE, BRENDA JONES, TONI COFFMAN, BRADLEY
5 OWEN, and ANGELINA MORENO

6 **COMPUTER ACCESS AND FRAUD (Re: Auburn Eye Care)**

7 On and between January 11, 2016, and March 31, 2016, in the COUNTIES of PLACER
8 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
9 Code section 502(c)(1), a felony, was committed by NANCY MORENO, KEVIN PARDUE,
10 BRENDA JONES, TONI COFFMAN, BRADLEY OWEN, and ANGELINA MORENO, who
11 did knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
12 accessed and without permission accessed data on a device (point of sale terminal) in order to
13 wrongfully obtain money.

14 **COUNT 163**

15 TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM,
16 NATALIE HAMMON, and ANGELINA MORENO

17 **CONSPIRACY (Re: Mendoza Eye Care)**

18 On and between January 12, 2016, and February 17, 2016, in the COUNTIES of SOLANO
19 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
20 182(a)(1) a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, KATHRYN
21 COLE, BRANDY BINGHAM, NATALIE HAMMON, and ANGELINA MORENO, who did
22 willfully and unlawfully conspire together with another person or persons whose identity is
23 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
24 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
25 conspiracy, Defendants committed the following overt act(s):

26 **OVERT ACT 1**

27 On January 12, 2016, in the County of Solano, Toni Coffman and unknown conspirators
28 removed a credit card terminal from Mendoza Eye Care.

1 OVERT ACT 2

2 On January 12, 2016, in the County of Contra Costa, Toni Coffman forced refunds from an
3 Mendoza Eye Care credit card terminal onto prepaid cards in the names of Beatrice Munoz,
4 Kathryn Cole, Brandy Bingham, Natalie Hammon, Angelina Moreno.

5 OVERT ACT 3

6 Between January 12, 2016, and February 17, 2016, in the County of Contra Costa, Toni
7 Coffman printed a batch receipt for Mendoza Eye Care.

8 **COUNT 164**

9 TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM,
10 NATALIE HAMMON, and ANGELINA MORENO

11 **GRAND THEFT (Re: Mendoza Eye Care)**

12 On and between January 12, 2016, and February 17, 2016, in the COUNTIES of SOLANO
13 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
14 was committed by TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY
15 BINGHAM, NATALIE HAMMON, and ANGELINA MORENO, who did unlawfully take
16 money and personal property of another of a value exceeding Nine Hundred and Fifty Dollars
17 (\$950) to wit: Mendoza Eye Care.

18 **COUNT 165**

19 TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM,
20 NATALIE HAMMON, and ANGELINA MORENO

21 **BURGLARY (Re: Mendoza Eye Care)**

22 On January 12, 2016, in the COUNTIES of SOLANO and CONTRA COSTA, the crime of
23 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
24 felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE,
25 BRANDY BINGHAM, NATALIE HAMMON, and ANGELINA MORENO, who did enter a
26 commercial building occupied by Mendoza Eye Care with the intent to commit larceny and any
27 felony.

28 ///

1 **COUNT 166**

2 TONI COFFMAN, BEATRICE MUNOZ, KATHRYN COLE, BRANDY BINGHAM,
3 NATALIE HAMMON, and ANGELINA MORENO

4 **COMPUTER ACCESS AND FRAUD (Re: Mendoza Eye Care)**

5 On and between January 12, 2016, and February 17, 2016, in the COUNTIES of SOLANO
6 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
7 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ,
8 KATHRYN COLE, BRANDY BINGHAM, NATALIE HAMMON, and ANGELINA
9 MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section in that
10 they knowingly accessed and without permission accessed data on a device (point of sale
11 terminal) in order to wrongfully obtain money.

12 **COUNT 167**

13 TONI COFFMAN

14 **CONSPIRACY (Re: Ralph Baker OD)**

15 On or about January 13, 2016, in the COUNTY of PLACER, in violation of Penal Code
16 section 182(a)(1) a felony, was committed by TONI COFFMAN, who did willfully and
17 unlawfully conspire together with another person or persons whose identity is unknown to
18 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
19 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
20 Defendants committed the following overt act(s):

21 **OVERT ACT 1**

22 On January 13, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
23 removed a credit card terminal from Ralph Baker OD.

24 **OVERT ACT 2**

25 On January 13, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
26 removed several pairs of eyeglasses from Ralph Baker OD.

27 ///

28 ///

1 OVERT ACT 3

2 On or about January 13, 2016, in the County of Contra Costa, Toni Coffman searched for
3 location information about Ralph Baker OD on her mobile device.

4 **COUNT 168**

5 TONI COFFMAN

6 **GRAND THEFT (Re: Ralph Baker OD)**

7 On or about January 13, 2016, in the COUNTY of PLACER, the crime of THEFT in
8 violation of Penal Code section 487(a), a felony, was committed by TONI COFFMAN, who did
9 unlawfully take money and personal property of another of a value exceeding Nine Hundred and
10 Fifty Dollars (\$950) to wit: Ralph Baker OD/Eyeglasses.

11 **COUNT 169**

12 TONI COFFMAN

13 **BURGLARY (Re: Ralph Baker OD)**

14 On January 13, 2016, in the COUNTY of PLACER, the crime of SECOND DEGREE
15 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
16 by TONI COFFMAN, who did enter a commercial building occupied by Ralph Baker OD with
17 the intent to commit larceny and any felony.

18 **COUNT 170**

19 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
20 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES

21 **CONSPIRACY (Re: Concord Optometry)**

22 On or about January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of
23 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by
24 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
25 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES, who did willfully and unlawfully
26 conspire together with another person or persons whose identity is unknown to commit the crime
27 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
28

1 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
2 committed the following overt act(s):

3 OVERT ACT 1

4 On January 14, 2016, in the County of Contra Costa, Brenda Jones and unknown
5 conspirators removed a credit card terminal from Concord Optometry.

6 OVERT ACT 2

7 On January 14, 2016, in the County of Contra Costa, Brenda Jones forced refunds from a
8 Concord Optometry credit card terminal onto prepaid cards in the names of Natalie Hammon,
9 Angelina Moreno, Linda Coffman, Brandy Bingham and Charlie Bland.

10 OVERT ACT 3

11 On January 14, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
12 accessed the merchant account of Concord Optometry from their home telephone line.

13 OVERT ACT 4

14 On January 14, 2016, in the County of Contra Costa, Brenda Jones and unknown
15 coconspirators removed several pairs of eyeglasses from Concord Optometry.

16 **COUNT 171**

17 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
18 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES

19 **GRAND THEFT (Re: Concord Optometry)**

20 On or about January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of THEFT
21 in violation of Penal Code section 487(a), a felony, was committed by NATALIE HAMMON,
22 ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM, KEVIN PARDUE,
23 CHARLIE BLAND, and BRENDA JONES, who did unlawfully take money and personal
24 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Concord
25 Optometry.

26 **COUNT 172**

27 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
28 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES

1 **BURGLARY (Re: Concord Optometry)**

2 On January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
3 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
4 committed by NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY
5 BINGHAM, KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES, who did enter a
6 commercial building occupied by Concord Optometry with the intent to commit larceny and any
7 felony.

8 **COUNT 173**

9 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
10 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES

11 **COMPUTER ACCESS AND FRAUD (Re: Concord Optometry)**

12 On January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of COMPUTER
13 ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by
14 NATALIE HAMMON, ANGELINA MORENO, LINDA COFFMAN, BRANDY BINGHAM,
15 KEVIN PARDUE, CHARLIE BLAND, and BRENDA JONES, who did knowingly and
16 unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without
17 permission accessed data on a device (point of sale terminal) in order to wrongfully obtain
18 money.

19 **COUNT 174**

20 TONI COFFMAN

21 **CONSPIRACY (Re: Hercules Optometric Group)**

22 On or about January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of
23 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TONI
24 COFFMAN, who did willfully and unlawfully conspire together with another person or persons
25 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California
26 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
27 the aforesaid conspiracy, Defendants committed the following overt act(s):

28 ///

1 OVERT ACT 1

2 On January 14, 2016, in the County of Contra Costa, Toni Coffman drove to Hercules
3 Optometric Group.

4 OVERT ACT 2

5 On January 14, 2016, in the County of Contra Costa, Toni Coffman and unknown
6 coconspirators removed several pairs of eyeglasses from Hercules Optometric Group.

7 **COUNT 175**

8 TONI COFFMAN

9 **GRAND THEFT (Re: Hercules Optometric Group)**

10 On or about January 14, 2016, in the COUNTY of CONTRA COSTA, the crime of THEFT
11 in violation of Penal Code section 487(a), a felony, was committed by TONI COFFMAN, who
12 did unlawfully take money and personal property of another of a value exceeding Nine Hundred
13 and Fifty Dollars (\$950) to wit: Hercules Optometric Group.

14 **COUNT 176**

15 TONI COFFMAN

16 **BURGLARY (Re: Hercules Optometric Group)**

17 On January 14, 2016, in the County of Contra Costa, the crime of SECOND DEGREE
18 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
19 by TONI COFFMAN, who did enter a commercial building occupied by Hercules Optometric
20 Group with the intent to commit larceny and any felony.

21 **COUNT 177**

22 TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN PARDUE, and LINDA
23 COFFMAN

24 **CONSPIRACY (Re: Eye Center/Vision Therapy)**

25 On and between January 15, 2016, and February 17, 2016, in the COUNTIES of PLACER
26 and CONTRA COSTA the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1)
27 a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES,
28

1 KEVIN PARDUE, and LINDA COFFMAN, who did willfully and unlawfully conspire together
2 with another person or persons whose identity is unknown to commit the crime of GRAND
3 THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of
4 carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
5 following overt act(s):

6 OVERT ACT 1

7 On January 15, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
8 removed a credit card terminal from Eye Center/Vision Therapy.

9 OVERT ACT 2

10 On January 15, 2016, in the County of Contra Costa, Toni Coffman forced refunds from an
11 Eye Center/Vision Therapy credit card terminal onto a prepaid cards in the names of Beatrice
12 Munoz, Linda Coffman.

13 OVERT ACT 3

14 On January 15, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
15 accessed the merchant account of Eye Center/Vision Therapy from their home telephone line.

16 OVERT ACT 4

17 Between January 15, 2016, and February 17, 2016, in the County of Contra Costa, Toni
18 Coffman printed a batch receipt for Eye Center/Vision Therapy.

19 **COUNT 178**

20 TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN PARDUE, and LINDA
21 COFFMAN

22 **GRAND THEFT (Re: Eye Center/Vision Therapy)**

23 On and between January 15, 2016, and February 17, 2016, in the COUNTIES of PLACER
24 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
25 was committed by TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN
26 PARDUE, and LINDA COFFMAN, who did unlawfully take money and personal property of
27 another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Eye Center/Vision
28 Therapy.

1 **COUNT 179**

2 TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN PARDUE, and LINDA
3 COFFMAN

4 **BURGLARY (Re: Eye Center/Vision Therapy)**

5 On January 15, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of
6 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
7 felony, was committed by TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN
8 PARDUE, and LINDA COFFMAN, who did enter a commercial building occupied by Eye
9 Center/Vision Therapy with the intent to commit larceny and any felony.

10 **COUNT 180**

11 TONI COFFMAN, BEATRICE MUNOZ, BRENDA JONES, KEVIN PARDUE, and LINDA
12 COFFMAN

13 **COMPUTER ACCESS AND FRAUD (Re: Eye Center/Vision Therapy)**

14 On and between January 15, 2016, and February 17, 2016, in the COUNTIES of PLACER
15 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
16 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, BEATRICE MUNOZ,
17 BRENDA JONES, KEVIN PARDUE, and LINDA COFFMAN, who did knowingly and
18 unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without
19 permission accessed data on a device (point of sale terminal) in order to wrongfully obtain
20 money.

21 **COUNT 181**

22 TONI COFFMAN, ANGELINA MORENO, BRADLEY OWEN, and JAMAUL MULLINS

23 **CONSPIRACY (Re: Valley Eyecare)**

24 On or about January 17, 2016, in the COUNTIES of ALAMEDA and CONTRA COSTA,
25 the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
26 committed by TONI COFFMAN, ANGELINA MORENO, BRADLEY OWEN, and JAMAUL
27 MULLINS, who did willfully and unlawfully conspire together with another person or persons
28 whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California

1 Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of
2 the aforesaid conspiracy, Defendants committed the following overt act(s):

3 OVERT ACT 1

4 On or about January 17, 2016, in the County of Contra Costa, Toni Coffman searched for
5 location information about Valley Eyecare on her mobile device.

6 OVERT ACT 2

7 On or about January 17, 2016, in the County of Contra Costa, Toni Coffman, Angelina
8 Moreno, Bradley Owen and Jamaul Mullins put gloves and a ski mask in a vehicle they drove.

9 OVERT ACT 3

10 On or about January 17, 2016, in the County of Alameda, Toni Coffman, Angelina Moreno,
11 Bradley Owen and Jamaul Mullins rode in a vehicle with a paper dealership plate attached to it.

12 OVERT ACT 4

13 On or about January 17, 2016, in the County of Alameda, Toni Coffman, Angelina Moreno,
14 Bradley Owen and Jamaul Mullins drove toward Valley Eyecare together.

15 **COUNT 182**

16 BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON, CHARLIE
17 BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN PARDUE, and
18 BRADLEY OWEN

19 **CONSPIRACY (Re: Advanced Hearing Aid Center)**

20 On and between January 20, 2016, and March 31, 2016, in the COUNTY of CONTRA
21 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
22 committed by BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON,
23 CHARLIE BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN
24 PARDUE, and BRADLEY OWEN, who did willfully and unlawfully conspire together with
25 another person or persons whose identity is unknown to commit the crime of GRAND THEFT,
26 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the
27 objects and purposes of the aforesaid conspiracy, Defendants committed the following overt
28 act(s):

1 OVERT ACT 1

2 On January 20, 2016, in the County of Contra Costa, Toni Coffman and unknown
3 coconspirators removed a credit card terminal from Advanced Hearing Aid Center.

4 OVERT ACT 2

5 On January 20, 2016, in the County of Contra Costa, Toni Coffman forced refunds from an
6 Advanced Hearing Aid Center credit card terminal onto prepaid cards in the names of Brandy
7 Bingham, Ana Maria Gonzalez, Natalie Hammon, and Charlie Bland.

8 OVERT ACT 3

9 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
10 possessed the stolen personal identifying information of victims who had prepaid cards, opened in
11 their names, that had forced refunds from Advanced Hearing Aid Center.

12 OVERT ACT 4

13 On and between January 20, 2016, and March 31, 2016, in the County of Contra Costa,
14 Nancy Moreno, Brenda Jones, Toni Coffman and Bradley Owen accessed the records of prepaid
15 card accounts that had forced refunds on them from Advanced Hearing Aid Center.

16 OVERT ACT 5

17 On and between January 20, 2016, and February 17, 2016, in the County of Contra Costa,
18 Toni Coffman stored the credit card terminal from Advanced Hearing Aid Center in her storage
19 unit.

20 **COUNT 183**

21 BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON, CHARLIE
22 BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN PARDUE, and
23 BRADLEY OWEN

24 **GRAND THEFT (Re: Advanced Hearing Aid Center)**

25 On and between January 20, 2016, and March 31, 2016, in the COUNTY of CONTRA
26 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
27 by BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON, CHARLIE
28 BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN PARDUE, and

1 BRADLEY OWEN, who did unlawfully take money and personal property of another of a value
2 exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Advanced Hearing Aid Center.

3 **COUNT 184**

4 BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON, CHARLIE
5 BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN PARDUE, and
6 BRADLEY OWEN

7 **BURGLARY (Re: Advanced Hearing Aid Center)**

8 On January 20, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
9 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
10 committed by BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON,
11 CHARLIE BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN
12 PARDUE, and BRADLEY OWEN, who did enter a commercial building occupied by Advanced
13 Hearing Aid Center with the intent to commit larceny and any felony.

14 **COUNT 185**

15 BRANDY BINGHAM, ANA MARIA GONZALEZ, NATALIE HAMMON, CHARLIE
16 BLAND, NANCY MORENO, BRENDA JONES, TONI COFFMAN, KEVIN PARDUE, and
17 BRADLEY OWEN

18 **COMPUTER ACCESS AND FRAUD (Re: Advanced Hearing Aid Center)**

19 On and between January 20, 2016, and March 31, 2016, in the COUNTY of CONTRA
20 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
21 502(c)(1), a felony, was committed by BRANDY BINGHAM, ANA MARIA GONZALEZ,
22 NATALIE HAMMON, CHARLIE BLAND, NANCY MORENO, BRENDA JONES, TONI
23 COFFMAN, KEVIN PARDUE, and BRADLEY OWEN, who did knowingly and unlawfully
24 violate subsection (c)(1) of this section in that they knowingly accessed and without permission
25 accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

26 **COUNT 186**

27 TONI COFFMAN, ANA MARIA GONZALEZ, BRENDA JONES, KEVIN PARDUE,
28 BRADLEY OWEN, and NANCY MORENO

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9

10

11
12
13

14

15
16
17

18

19
20
21

22

23
24
25

26

27
28

1 **COUNT 187**

2 TONI COFFMAN, ANA MARIA GONZALEZ, BRENDA JONES, KEVIN PARDUE,
3 BRADLEY OWEN, and NANCY MORENO

4 **GRAND THEFT (Re: Air Ducts Purification)**

5 On and between January 20, 2016, and March 31, 2016, in the COUNTY of CONTRA
6 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
7 by TONI COFFMAN, ANA MARIA GONZALEZ, BRENDA JONES, KEVIN PARDUE,
8 BRADLEY OWEN, and NANCY MORENO, who did unlawfully take money and personal
9 property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Air Ducts
10 Purification.

11 **COUNT 188**

12 TONI COFFMAN, ANA MARIA GONZALEZ, BRENDA JONES, KEVIN PARDUE,
13 BRADLEY OWEN, and NANCY MORENO

14 **COMPUTER ACCESS AND FRAUD (Re: Air Ducts Purification)**

15 On and between January 20, 2016, and March 31, 2016, in the COUNTY of CONTRA
16 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
17 502(c)(1), a felony, was committed by TONI COFFMAN, ANA MARIA GONZALEZ,
18 BRENDA JONES, KEVIN PARDUE, BRADLEY OWEN, and NANCY
19 MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section in that
20 they knowingly accessed and without permission accessed data on a device (point of sale
21 terminal) in order to wrongfully obtain money.

22 **COUNT 189**

23 GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN, BRENDA JONES, KEVIN
24 PARDUE, BEATRICE MUNOZ, and NANCY MORENO

25 **CONSPIRACY (Re: Red Sun Automotive Repair)**

26 On and between January 25, 2016, and March 31, 2016, in the COUNTIES of PLACER
27 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
28 182(a)(1) a felony, was committed by GERALD ORETGER, MICHAEL MOORE, BRADLEY

1 OWEN, BRENDA JONES, KEVIN PARDUE, BEATRICE MUNOZ, and NANCY MORENO,
2 who did willfully and unlawfully conspire together with another person or persons whose identity
3 is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
4 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
5 conspiracy, Defendants committed the following overt act(s):

6 OVERT ACT 1

7 On January 25, 2016, in the County of Placer, Nancy Moreno smashed the front door of
8 Red Sun Automotive Repair.

9 OVERT ACT 2

10 On January 25, 2016, in the County of Placer, Nancy Moreno took a credit card terminal
11 from Red Sun Automotive Repair.

12 OVERT ACT 3

13 On January 25, 2016, in the County of Contra Costa, Nancy Moreno forced refunds from a
14 Red Sun Automotive Repair credit card terminal onto prepaid cards in the names of Michael
15 Moore, Bradley Owen, Brenda Jones, and Beatrice Munoz.

16 OVERT ACT 4

17 On and between January 25, 2016, and March 31, 2016, in the County of Contra Costa,
18 Gerald Oretger, Bradley Owen, Nancy Moreno, Brenda Jones, and Kevin Pardue accessed
19 balance information of prepaid cards with forced refunds from Red Sun Automotive Repair.

20 **COUNT 190**

21 GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN, BRENDA JONES, KEVIN
22 PARDUE, BEATRICE MUNOZ, and NANCY MORENO

23 **GRAND THEFT (Re: Red Sun Automotive Repair)**

24 On and between January 25, 2016, and March 31, 2016, in the COUNTIES of PLACER
25 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
26 was committed by GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN, BRENDA

27 ///

28 ///

1 JONES, KEVIN PARDUE, BEATRICE MUNOZ, and NANCY MORENO, who did unlawfully
2 take money and personal property of another of a value exceeding Nine Hundred and Fifty
3 Dollars (\$950) to wit: Red Sun Automotive Repair.

4 **COUNT 191**

5 GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN, BRENDA JONES, KEVIN
6 PARDUE, BEATRICE MUNOZ, and NANCY MORENO

7 **BURGLARY (Re: Red Sun Automotive Repair)**

8 On January 25, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of
9 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
10 felony, was committed by GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN,
11 BRENDA JONES, KEVIN PARDUE, BEATRICE MUNOZ, and NANCY MORENO, who did
12 enter a commercial building occupied by Red Sun Automotive Repair with the intent to commit
13 larceny and any felony.

14 **COUNT 192**

15 GERALD ORETGER, MICHAEL MOORE, BRADLEY OWEN, BRENDA JONES, KEVIN
16 PARDUE, BEATRICE MUNOZ, and NANCY MORENO

17 **COMPUTER ACCESS AND FRAUD (Re: Red Sun Automotive Repair)**

18 On and between January 25, 2016, and March 31, 2016, in the COUNTIES of PLACER
19 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
20 Code section 502(c)(1), a felony, was committed by GERALD ORETGER, MICHAEL MOORE,
21 BRADLEY OWEN, BRENDA JONES, KEVIN PARDUE, BEATRICE MUNOZ, and NANCY
22 MORENO, who did knowingly and unlawfully violate subsection (c)(1) of this section in that
23 they knowingly accessed and without permission accessed data on a device (point of sale
24 terminal) in order to wrongfully obtain money.

25 **COUNT 193**

26 TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA JONES, MICHAEL
27 MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN, and NANCY
28 MORENO

CONSPIRACY (Re: Dick Huang DMD)

On and between January 26, 2016, and March 31, 2016, in the COUNTIES of YOLO and CONTRA COSTA the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA JONES, MICHAEL MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN, and NANCY MORENO, who did willfully and unlawfully conspire together with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On January 26, 2016, in the County of Yolo, Toni Coffman and unknown coconspirators removed a credit card terminal from Dick Huang DMD.

OVERT ACT 2

On January 26, 2016, in the County of Contra Costa, Toni Coffman forced refunds from a Dick Huang DMD credit card terminal onto prepaid cards in the names of Charlie Bland, Brenda Jones, Michael Moore, and Beatrice Munoz.

OVERT ACT 3

On and between January 26, 2016, and March 31, 2016, in the County of Contra Costa, Toni Coffman, Gerald Oretger, Bradley Owen, Nancy Moreno, Brenda Jones and Kevin Pardue accessed balance information of prepaid cards with forced refunds from Dick Huang.

OVERT ACT 4

On and between January 26, 2016, and February 17, 2016, in the County of Contra Costa, Toni Coffman printed a batch receipt for Dick Huang DMD.

COUNT 194

TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA JONES, MICHAEL MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN, and NANCY MORENO

1 **GRAND THEFT (Re: Dick Huang DMD)**

2 On and between January 26, 2016, and March 31, 2016, in the COUNTIES of YOLO and
3 CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was
4 committed by TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA
5 JONES, MICHAEL MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN,
6 and NANCY MORENO, who did unlawfully take money and personal property of another of a
7 value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Dick Huang DMD.

8 **COUNT 195**

9 TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA JONES, MICHAEL
10 MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN, and NANCY
11 MORENO

12 **BURGLARY (Re: Dick Huang DMD)**

13 On January 26, 2016, in the COUNTIES of YOLO and CONTRA COSTA, the crime of
14 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
15 felony, was committed by TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND,
16 BRENDA JONES, MICHAEL MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY
17 OWEN, and NANCY MORENO, who did enter a commercial building occupied by Dick Huang
18 DMD with the intent to commit larceny and any felony.

19 **COUNT 196**

20 TONI COFFMAN, GERALD ORETGER, CHARLIE BLAND, BRENDA JONES, MICHAEL
21 MOORE, BEATRICE MUNOZ, KEVIN PARDUE, BRADLEY OWEN, and NANCY
22 MORENO

23 **COMPUTER ACCESS AND FRAUD (Re: Dick Huang DMD)**

24 On and between January 26, 2016, and March 31, 2016, in the COUNTIES of YOLO and
25 CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
26 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, GERALD ORETGER,
27 CHARLIE BLAND, BRENDA JONES, MICHAEL MOORE, BEATRICE MUNOZ, KEVIN
28 PARDUE, BRADLEY OWEN, and NANCY MORENO, who did knowingly and unlawfully

1 violate subsection (c)(1) of this section in that they knowingly accessed and without permission
2 accessed data on a device (point of sale terminal) in order to wrongfully obtain money.

3 **COUNT 197**

4 TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY, BRADLEY OWEN, and
5 ANGELINA MORENO

6 **CONSPIRACY (Re: SMILE QUEST DENTAL)**

7 On and between January 28, 2016, and March 31, 2016, in the COUNTIES of PLACER
8 and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section
9 182(a)(1) a felony, was committed by TONI COFFMAN, GERALD ORETGER, MEGAN
10 MALLEY, BRADLEY OWEN, and ANGELINA MORENO, who did willfully and unlawfully
11 conspire together with another person or persons whose identity is unknown to commit the crime
12 of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
13 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
14 committed the following overt act(s):

15 OVERT ACT 1

16 On January 28, 2016, in the County of Placer, Toni Coffman and unknown coconspirators
17 removed three credit card terminals from Smile Quest Dental.

18 OVERT ACT 2

19 On January 28, 2016, in the County of Placer, a white Toyota Tundra associated with Toni
20 Coffman drove to Smile Quest Dental.

21 OVERT ACT 3

22 On January 29, 2016, in the County of Contra Costa, Angelina Moreno and Bradley Owen
23 used a credit card with fraudulent funds from Smile Quest Dental at a Footlocker store.

24 OVERT ACT 4

25 On January 29, 2016, in the County of Contra Costa, Angelina Moreno used a credit card
26 with fraudulent funds from Smile Quest Dental at a Sprint store.

27 ///

28 ///

1 OVERT ACT 5

2 On January 28, 2016, in the County of Contra Costa, Toni Coffman forced a refund from a
3 Smile Quest Dental credit card terminal onto a prepaid card in the name of Meghan Malley.

4 OVERT ACT 6

5 On and between January 28, 2016, and March 31, 2016, in the County of Contra Costa,
6 Gerald Oretger, Bradley Owen, and Toni Coffman accessed balance information of prepaid cards
7 with forced refunds from Smile Quest Dental.

8 **COUNT 198**

9 TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY, BRADLEY OWEN, and
10 ANGELINA MORENO

11 **GRAND THEFT (Re: SMILE QUEST DENTAL)**

12 On and between January 28, 2016, and March 31, 2016, in the COUNTIES of PLACER
13 and CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony,
14 was committed by TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY, BRADLEY
15 OWEN, and ANGELINA MORENO, who did unlawfully take money and personal property of
16 another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Smile Quest Dental.

17 **COUNT 199**

18 TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY, BRADLEY OWEN, and
19 ANGELINA MORENO

20 **BURGLARY (Re: SMILE QUEST DENTAL)**

21 On January 28, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of
22 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
23 felony, was committed by TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY,
24 BRADLEY OWEN, and ANGELINA MORENO, who did enter a commercial building occupied
25 by Smile Quest Dental with the intent to commit larceny and any felony.

26 **COUNT 200**

27 TONI COFFMAN, GERALD ORETGER, MEGAN MALLEY, BRADLEY OWEN, and
28 ANGELINA MORENO

1 **COMPUTER ACCESS AND FRAUD (Re: SMILE QUEST DENTAL)**

2 On and between January 28, 2016, and March 31, 2016, in the COUNTIES of PLACER
3 and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
4 Code section 502(c)(1), a felony, was committed by TONI COFFMAN, GERALD ORETGER,
5 MEGAN MALLEY, BRADLEY OWEN, and ANGELINA MORENO, who did knowingly and
6 unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without
7 permission accessed data on a device (point of sale terminal) in order to wrongfully obtain
8 money.

9 **COUNT 201**

10 TONI COFFMAN and NANCY MORENO

11 **CONSPIRACY (Re: SMILE ISLAND PEDIATRIC)**

12 On or about January 31, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the
13 crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed
14 by TONI COFFMAN and NANCY MORENO, who did willfully and unlawfully conspire
15 together with another person or persons whose identity is unknown to commit the crime of
16 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
17 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
18 following overt act(s):

19 OVERT ACT 1

20 On January 31, 2016, in the County of Placer, a white Toyota Tundra associated with Toni
21 Coffman drove to Smile Island Pediatric.

22 OVERT ACT 2

23 On January 31, 2016, in the County of Placer, Nancy Moreno and unknown coconspirators
24 removed a credit card terminal from Smile Island Pediatric.

25 ///

26 ///

27 ///

28 ///

1 **COUNT 202**

2 TONI COFFMAN and NANCY MORENO

3 **BURGLARY (Re: SMILE ISLAND PEDIATRIC)**

4 On January 31, 2016, in the COUNTIES of PLACER and CONTRA COSTA, the crime of
5 SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a
6 felony, was committed by TONI COFFMAN and NANCY MORENO, who did enter a
7 commercial building occupied by Smile Island Pediatric with the intent to commit larceny and
8 any felony.

9 **COUNT 203**

10 GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES,

11 **CONSPIRACY (Re: ROCKLIN DENTAL)**

12 On or about February 1, 2016 in the COUNTY of PLACER, the crime of CONSPIRACY,
13 in violation of Penal Code section 182(a)(1) a felony, was committed by GERALD ORETGER,
14 KEVIN PARDUE, and BRENDA JONES, who did willfully and unlawfully conspire together
15 with another person or persons whose identity is unknown to commit the crime of GRAND
16 THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the
17 purpose of carrying out the objects and purposes of the aforesaid conspiracy, Defendants
18 committed the following overt act(s):

19 **OVERT ACT 1**

20 On February 1, 2016, in the County of Placer, Gerald Orteger and unknown coconspirators
21 entered Rocklin Dental.

22 **OVERT ACT 2**

23 On February 1, 2016, in County of Placer, Gerald Orteger and unknown coconspirators
24 removed the credit card terminal from Rocklin Dental.

25 **OVERT ACT 3**

26 On February 1, 2016, in the County of Placer, a refund from a Rocklin Dental credit card
27 terminal was forced onto a prepaid card in the name of Brett Kroh.

28 ///

1 OVERT ACT 4

2 On February 1, 2016, in the County of Placer, Kevin Pardue and Brenda Jones used their
3 home phone line to access Rocklin Dental's credit card terminal.

4 OVERT ACT 5

5 On February 1, 2016, in the County of Contra Costa, Brenda Jones, Kevin Pardue and
6 unknown coconspirators accessed Rocklin Dental's credit card terminal.

7 **COUNT 204**

8 GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES

9 **GRAND THEFT (Re: ROCKLIN DENTAL)**

10 On February 1, 2016, in the COUNTY of PLACER, the crime of THEFT in violation of
11 Penal Code section 487(a), a felony, was committed by GERALD ORETGER, KEVIN
12 PARDUE, and BRENDA JONES, who did unlawfully take money and personal property of
13 another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Rocklin Dental.

14 **COUNT 205**

15 GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES

16 **BURGLARY (Re: ROCKLIN DENTAL)**

17 On February 1, 2016, in the COUNTY of PLACER, the crime of SECOND DEGREE
18 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
19 by GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES, who did enter a commercial
20 building occupied by Rocklin Dental with the intent to commit larceny and any felony.

21 **COUNT 206**

22 GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES

23 **COMPUTER ACCESS AND FRAUD (Re: ROCKLIN DENTAL)**

24 On February 1, 2016, in the COUNTY of PLACER, the crime of COMPUTER ACCESS
25 AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by
26 GERALD ORETGER, KEVIN PARDUE, and BRENDA JONES, who did knowingly and
27 unlawfully violate subsection (c)(1) of this section in that they knowingly accessed and without
28

1 permission accessed data on a device (point of sale terminal) in order to wrongfully obtain
2 money.

3 **COUNT 207**

4 TONI COFFMAN, ZACKARY RAINER, and GERALD ORETGER

5 **CONSPIRACY (Re: VINTAGE DENTAL)**

6 On or about February 2, 2016, in the COUNTY of NAPA, the crime of CONSPIRACY, in
7 violation of Penal Code section 182(a)(1) a felony, was committed by TONI COFFMAN,
8 ZACKARY RAINER, and GERALD ORETGER, who did willfully and unlawfully conspire
9 together with another person or persons whose identity is unknown to commit the crime of
10 GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to and for the purpose
11 of carrying out the objects and purposes of the aforesaid conspiracy, Defendants committed the
12 following overt act(s):

13 **OVERT ACT 1**

14 On February 2, 2016, in the County of Napa, Toni Coffman, Zachary Rainer, and Gerald
15 Oretger drove a white Toyota Tundra to Vintage Dental.

16 **OVERT ACT 2**

17 On February 2, 2016, in the County of Napa, Toni Coffman, Zachary Rainer, and Gerald
18 Oretger entered Vintage Dental.

19 **OVERT ACT 3**

20 On February 2, 2016, in County of Napa, Toni Coffman, Zachary Rainer, and Gerald
21 Oretger removed the credit card terminal from Vintage Dental.

22 **COUNT 208**

23 TONI COFFMAN, ZACKARY RAINER, and GERALD ORETGER

24 **BURGLARY (Re: VINTAGE DENTAL)**

25 On February 2, 2016, in the COUNTY of NAPA, the crime of SECOND DEGREE
26 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
27 by TONI COFFMAN, ZACKARY RAINER, and GERALD ORETGER, who did enter a
28

1 commercial building occupied by Vintage Dental with the intent to commit larceny and any
2 felony.

3 **COUNT 209**

4 KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON

5 **CONSPIRACY (Re: MAACO)**

6 On or about February 7, 2016, in the COUNTY of CONTRA COSTA, the crime of
7 CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by KEVIN
8 PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON, who did willfully and
9 unlawfully conspire together with another person or persons whose identity is unknown to
10 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
11 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
12 Defendants committed the following overt act(s):

13 **OVERT ACT 1**

14 On February 8, 2016, in the County of Contra Costa, Brenda Jones, Kevin Pardue, and
15 unknown coconspirators accessed MAACO's credit card terminal.

16 **OVERT ACT 2**

17 On February 8, 2016, in the County of Contra Costa, a refund from a MAACO credit card
18 terminal was forced onto prepaid cards in the names of Brett Kroh and Natalie Hammon.

19 **OVERT ACT 3**

20 On February 8, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones used
21 their home phone line to access MAACO's credit card terminal.

22 **COUNT 210**

23 KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON

24 **GRAND THEFT (Re: MAACO)**

25 On or about February 7, 2016, in the County of CONTRA COSTA, the crime of THEFT in
26 violation of Penal Code section 487(a), a felony, was committed by KEVIN PARDUE, BRENDA
27 JONES, BRETT KROH, and NATALIE HAMMON, who did unlawfully take money and
28

1 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
2 Maaco.

3 **COUNT 211**

4 KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON

5 **BURGLARY (Re: MAACO)**

6 On February 7, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
7 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
8 committed by KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE
9 HAMMON, who did enter a commercial building occupied by MAACO with the intent to
10 commit larceny and any felony.

11 **COUNT 212**

12 KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON

13 **COMPUTER ACCESS AND FRAUD (Re: MAACO)**

14 On February 7, 2016, in the COUNTY of CONTRA COSTA, the crime of COMPUTER
15 ACCESS AND FRAUD in violation of Penal Code section 502(c)(1), a felony, was committed by
16 KEVIN PARDUE, BRENDA JONES, BRETT KROH, and NATALIE HAMMON, who did
17 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
18 accessed and without permission accessed data on a device (point of sale terminal) in order to
19 wrongfully obtain money.

20 **COUNT 213**

21 MICHAEL MOORE, BRETT KROH, NATALIE HAMMON, BRENDA JONES, NANCY
22 MORENO, and KEVIN PARDUE

23 **CONSPIRACY (Re: FUNK'S AUTO WORKS)**

24 On and between February 12, 2016, and March 31, 2016, in the COUNTIES of
25 ALAMEDA and CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code
26 section 182(a)(1) a felony, was committed by MICHAEL MOORE, BRETT KROH, NATALIE
27 HAMMON, BRENDA JONES, NANCY MORENO, and KEVIN PARDUE, who did willfully
28 and unlawfully conspire together with another person or persons whose identity is unknown to

1 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
2 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
3 Defendants committed the following overt act(s):

4 OVERT ACT 1

5 On February 12, 2016, in the County of Alameda, Brenda Jones and unknown
6 coconspirators removed a credit card terminal from Funk's Auto Works.

7 OVERT ACT 2

8 On and between February 13, 2016, and March 30, 2016, in the County of Contra Costa,
9 Brenda Jones forced refunds from a Funk's Auto Works credit card terminal onto prepaid cards in
10 the names of Brenda Jones, Brett Kroh, Natalie Hammon and Michael Moore.

11 OVERT ACT 3

12 On and between February 16, 2016, and March 31, 2016, in the County of Contra Costa,
13 Nancy Moreno, Kevin Pardue and Brenda Jones accessed the records of prepaid card accounts
14 that had forced refunds on them from Funk's Auto Works.

15 OVERT ACT 4

16 On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
17 possessed Funk's Auto Works credit card terminal.

18 **COUNT 214**

19 MICHAEL MOORE, BRETT KROH, NATALIE HAMMON, BRENDA JONES, NANCY
20 MORENO, and KEVIN PARDUE

21 **GRAND THEFT (Re: FUNK'S AUTO WORKS)**

22 On and between February 12, 2016, and March 31, 2016, in the COUNTIES of
23 ALAMEDA and CONTRA COSTA, the crime of THEFT in violation of Penal Code section
24 487(a), a felony, was committed by MICHAEL MOORE, BRETT KROH, NATALIE
25 HAMMON, BRENDA JONES, NANCY MORENO, and KEVIN PARDUE, who did unlawfully
26 take money and personal property of another of a value exceeding Nine Hundred and Fifty
27 Dollars (\$950) to wit: Funk's Auto Works.

28 ///

1 **COUNT 215**

2 MICHAEL MOORE, BRETT KROH, NATALIE HAMMON, BRENDA JONES, NANCY
3 MORENO, and KEVIN PARDUE

4 **BURGLARY (Re: FUNK'S AUTO WORKS)**

5 On February 12, 2016, in the COUNTIES of ALAMEDA and CONTRA COSTA, the
6 crime of SECOND DEGREE COMMERCIAL BURGLARY in violation of Penal Code section
7 459, a felony, was committed by MICHAEL MOORE, BRETT KROH, NATALIE HAMMON,
8 BRENDA JONES, NANCY MORENO, and KEVIN PARDUE, who did enter a commercial
9 building occupied by Funk's Auto Works with the intent to commit larceny and any felony.

10 **COUNT 216**

11 MICHAEL MOORE, BRETT KROH, NATALIE HAMMON, BRENDA JONES, NANCY
12 MORENO, and KEVIN PARDUE

13 **COMPUTER ACCESS AND FRAUD (Re: FUNK'S AUTO WORKS)**

14 On and between February 12, 2016, and March 31, 2016, in the COUNTIES of
15 ALAMEDA and CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in
16 violation of Penal Code section 502(c)(1), a felony, was committed by MICHAEL MOORE,
17 BRETT KROH, NATALIE HAMMON, BRENDA JONES, NANCY MORENO, and KEVIN
18 PARDUE, who did knowingly and unlawfully violate subsection (c)(1) of this section in that they
19 knowingly accessed and without permission accessed data on a device (point of sale terminal) in
20 order to wrongfully obtain money.

21 **COUNT 217**

22 SPENCER DUNNING, EARL WYATT, KEVIN PARDUE, and BRENDA JONES

23 **CONSPIRACY (Re: 7-Eleven)**

24 On and between February 14, 2016, and February 16, 2016, in the COUNTY of CONTRA
25 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
26 committed by SPENCER DUNNING, EARL WYATT, KEVIN PARDUE, and BRENDA
27 JONES, who did willfully and unlawfully conspire together with another person or persons whose
28 identity is unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal

Code, a felony, pursuant to and for the purpose of carrying out the objects and purposes of the
aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On February 14, 2016, in the County of Contra Costa, Spencer Dunning and Earl Wyatt
removed a credit card terminal from 7-Eleven.

OVERT ACT 2

On February 16, 2016, in the County of Contra Costa, Kevin Pardue and Brenda Jones
possessed a credit card terminal from 7-Eleven.

COUNT 218

SPENCER DUNNING, EARL WYATT, KEVIN PARDUE, and BRENDA JONES

BURGLARY (Re: 7-Eleven)

On February 14, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
committed by SPENCER DUNNING, EARL WYATT, KEVIN PARDUE, and BRENDA
JONES, who did enter a commercial building occupied by 7-Eleven with the intent to commit
larceny and any felony.

COUNT 219

GERALD ORETGER

CONSPIRACY (Re: L&L HAWAIIAN BBQ)

On or about February 27, 2016, in the COUNTY of SANTA CLARA, the crime of
CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was committed by
GERALD ORETGER, who did willfully and unlawfully conspire together with another person or
persons whose identity is unknown to commit the crime of GRAND THEFT, 487(a), of the
California Penal Code, a felony, pursuant to and for the purpose of carrying out the objects and
purposes of the aforesaid conspiracy, Defendants committed the following overt act(s):

OVERT ACT 1

On February 27, 2016, in the County of Santa Clara, Gerald Oretger and unknown
coconspirators entered L&L Hawaiian BBQ.

1 OVERT ACT 2

2 On February 27, 2016, in the County of Santa Clara, Gerald Oretger removed L&L
3 Hawaiian BBQ's credit card terminal.

4 **COUNT 220**

5 GERALD ORETGER

6 **BURGLARY (Re: L&L HAWAIIAN BBQ)**

7 On February 27, 2016, in the COUNTY of SANTA CLARA, the crime of SECOND
8 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
9 committed by GERALD ORETGER, who did enter a commercial building occupied by L&L
10 Hawaiian BBQ with the intent to commit larceny and any felony.

11 **COUNT 221**

12 BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY OWEN, TONI
13 COFFMAN, and NATALIE HAMMON

14 **CONSPIRACY (Re: OIL CAN HENRY'S)**

15 On and between March 29, 2016, and May 20, 2016, in the COUNTY of CONTRA
16 COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
17 committed by BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY
18 OWEN, TONI COFFMAN, and NATALIE HAMMON, who did
19 willfully and unlawfully conspire together with another person or persons whose identity is
20 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
21 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
22 conspiracy, Defendants committed the following overt act(s):

23 OVERT ACT 1

24 On March 29, 2016, in the County of Contra Costa, Nancy Moreno entered Oil Can
25 Henry's.

26 ///

27 ///

28 ///

1 OVERT ACT 2

2 On and between March 29, 2016, and May 20, 2016, in the County of Contra Costa, Toni
3 Coffman and unknown coconspirators forced refunds from Oil Can Henry's credit card terminal
4 onto prepaid cards in the names of Alfred Noblitt, Brett Kroh, and Nancy Moreno.

5 OVERT ACT 3

6 On and between March 29, 2016, and May 20, 2016, in the County of Contra Costa, Toni
7 Coffman and unknown coconspirators accessed Oil Can Henry's credit card terminal.

8 OVERT ACT 4

9 On and between March, 29, 2016 and May 20, 2016, in the County of Contra Costa, Toni
10 Coffman, Angelina Moreno, Bradley Owen, Nancy Moreno, Natalie Hammon, and Brenda Jones
11 accessed credit card accounts with funds from Oil Can Henry's.

12 **COUNT 222**

13 BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY OWEN, TONI
14 COFFMAN, and NATALIE HAMMON

15 **GRAND THEFT (Re: OIL CAN HENRY'S)**

16 On and between March 29, 2016, and May 20, 2016, in the COUNTY of CONTRA
17 COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed
18 by BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY OWEN, TONI
19 COFFMAN, and NATALIE HAMMON, who did unlawfully take money and personal property
20 of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit: Oil Can Henry's.

21 **COUNT 223**

22 BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY OWEN, TONI
23 COFFMAN, and NATALIE HAMMON

24 **BURGLARY (Re: OIL CAN HENRY'S)**

25 On March 29, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
26 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
27 committed by BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY
28 OWEN, TONI COFFMAN, and NATALIE HAMMON, who did enter a

1 commercial building occupied by Oil Can Henry's with the intent to commit larceny and any
2 felony.

3 **COUNT 224**

4 BRETT KROH, ANGELINA MORENO, NANCY MORENO, BRADLEY OWEN, TONI
5 COFFMAN, and NATALIE HAMMON

6 **COMPUTER ACCESS AND FRAUD (Re: OIL CAN HENRY'S)**

7 On and between March 29, 2016, and May 20, 2016, in the COUNTY of CONTRA
8 COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section
9 502(c)(1), a felony, was committed by BRETT KROH, ANGELINA MORENO, NANCY
10 MORENO, BRADLEY OWEN, TONI COFFMAN, and NATALIE HAMMON, who did
11 knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
12 accessed and without permission accessed data on a device (point of sale terminal) in order to
13 wrongfully obtain money.

14 **COUNT 225**

15 TONI COFFMAN, NANCY MORENO and BRETT KROH

16 **CONSPIRACY (Re: BRENTWOOD ORAL SURGERY)**

17 On and between April 1, 2016, and April 30, 2016, in the COUNTY of CONTRA COSTA,
18 the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a felony, was
19 committed by TONI COFFMAN, NANCY MORENO and BRETT KROH, who did willfully and
20 unlawfully conspire together with another person or persons whose identity is unknown to
21 commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a felony, pursuant to
22 and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy,
23 Defendants committed the following overt act(s):

24 **OVERT ACT 1**

25 On and between April 1, 2016, and April 30, 2016, in the County of Contra Costa, Toni
26 Coffman and unknown coconspirators accessed Brentwood Oral Surgery's credit card terminal.

27 ///

28 ///

1 OVERT ACT 2

2 On and between April 1, 2016, and April 30, 2016, in the County of Contra Costa, Toni
3 Coffman and unknown coconspirators forced refunds from Brentwood Oral Surgery's credit card
4 terminal onto prepaid card in the names of Nancy Moreno and Brett Kroh.

5 **COUNT 226**

6 TONI COFFMAN, NANCY MORENO and BRETT KROH

7 **GRAND THEFT (Re: BRENTWOOD ORAL SURGERY)**

8 On and between April 1, 2016, and April 30, 2016, in the COUNTY of CONTRA COSTA,
9 the crime of THEFT in violation of Penal Code section 487(a), a felony, was committed by TONI
10 COFFMAN, NANCY MORENO and BRETT KROH, who did unlawfully take money and
11 personal property of another of a value exceeding Nine Hundred and Fifty Dollars (\$950) to wit:
12 Brentwood Oral Surgery.

13 **COUNT 227**

14 TONI COFFMAN, NANCY MORENO and BRETT KROH

15 **BURGLARY (Re: BRENTWOOD ORAL SURGERY)**

16 On or about April 1, 2016, in the COUNTY of CONTRA COSTA, the crime of SECOND
17 DEGREE COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was
18 committed by TONI COFFMAN, NANCY MORENO and BRETT KROH, who did enter a
19 commercial building occupied by Brentwood Oral Surgery with the intent to commit larceny and
20 any felony.

21 **COUNT 228**

22 TONI COFFMAN, NANCY MORENO and BRETT KROH

23 **COMPUTER ACCESS AND FRAUD (Re: BRENTWOOD ORAL SURGERY)**

24 On and between April 1, 2016, and April 30, 2016, in the COUNTY of CONTRA COSTA,
25 the crime of COMPUTER ACCESS AND FRAUD in violation of Penal Code section 502(c)(1),
26 a felony, was committed by TONI COFFMAN, NANCY MORENO and BRETT KROH, who
27 did knowingly and unlawfully violate subsection (c)(1) of this section in that they knowingly
28

1 accessed and without permission accessed data on a device (point of sale terminal) in order to
2 wrongfully obtain money.

3 **COUNT 229**

4 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
5 BINGHAM, and LINDA COFFMAN

6 **IDENTITY THEFT (Re: MIA B.)**

7 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
8 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
9 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
10 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
11 obtain personal identifying information of Mia B. and used that information for an unlawful
12 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
13 information without the consent of Mia B.

14 **COUNT 230**

15 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
16 BINGHAM, and LINDA COFFMAN

17 **IDENTITY THEFT (Re: FRANK G.)**

18 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
19 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
20 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
21 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
22 obtain personal identifying information of Frank G. and used that information for an unlawful
23 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
24 information without the consent of Frank G.

25 **COUNT 231**

26 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
27 BINGHAM, and LINDA COFFMAN

28 ///

1 **IDENTITY THEFT (Re: BETTY D.)**

2 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
3 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
4 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
5 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
6 obtain personal identifying information of Betty D. and used that information for an unlawful
7 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
8 information without the consent of Betty D.

9 **COUNT 232**

10 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
11 BINGHAM, and LINDA COFFMAN

12 **IDENTITY THEFT (Re: HOLLY A.)**

13 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
14 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
15 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
16 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
17 obtain personal identifying information of Holly A. and used that information for an unlawful
18 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
19 information without the consent of Holly A.

20 **COUNT 233**

21 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
22 BINGHAM, and LINDA COFFMAN

23 **IDENTITY THEFT (Re: MATTHEW C.)**

24 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
25 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
26 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
27 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
28 obtain personal identifying information of Matthew C. and used that information for an unlawful

1 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
2 information without the consent of Matthew C.

3 **COUNT 234**

4 TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE HAMMON, BRANDY
5 BINGHAM, and LINDA COFFMAN

6 **IDENTITY THEFT (Re: STACY L.)**

7 On and between December 7, 2015, and March 29, 2016, in the COUNTY of CONTRA
8 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
9 was committed by TONI COFFMAN, BRENDA JONES, KEVIN PARDUE, NATALIE
10 HAMMON, BRANDY BINGHAM, and LINDA COFFMAN, who did willfully and unlawfully
11 obtain personal identifying information of Stacy L. and used that information for an unlawful
12 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
13 information without the consent of Stacy L.

14 **COUNT 235**

15 TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN

16 **IDENTITY THEFT (Re: SHERRY H.)**

17 On and between December 21, 2015, and March 31, 2016, in the COUNTY of CONTRA
18 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
19 was committed by TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN, who did
20 willfully and unlawfully obtain personal identifying information of Sherry H. and used that
21 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
22 real property, and medical information without the consent of Sherry H.

23 **COUNT 236**

24 TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN

25 **IDENTITY THEFT (Re: DOYLE W.)**

26 On and between December 21, 2015, and March 31, 2016, in the COUNTY of CONTRA
27 COSTA, the crime of IDENTITY THEFT in violation of Penal Code section 530.5(a), a felony,
28

1 was committed by TONI COFFMAN, NANCY MORENO, and BRADLEY OWEN, who did
2 willfully and unlawfully obtain personal identifying information of Doyle W. and used that
3 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
4 real property, and medical information without the consent of Doyle W.

5 **COUNT 237**

6 LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE

7 **CONSPIRACY (Re: CITY CARPETS)**

8 On and between May 1, 2018, and June 30, 2018, in the COUNTIES of MARIN and
9 CONTRA COSTA, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1) a
10 felony, was committed by LINDA COFFMAN and CHRISTOPHER LEE OSBORNE, who did
11 willfully and unlawfully conspire together with another person or persons whose identity is
12 unknown to commit the crime of GRAND THEFT, 487(a), of the California Penal Code, a
13 felony, pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid
14 conspiracy, Defendants committed the following overt act(s):

15 **OVERT ACT 1**

16 On or about May 27, 2018, in the County of Marin, a vehicle registered to Linda Coffman
17 was driven to City Carpets in San Rafael, California.

18 **OVERT ACT 2**

19 On or about May 27, 2018, in the County of Marin, two unknown conspirators exited Linda
20 Coffman's vehicle and entered City Carpets.

21 **OVERT ACT 3**

22 On or about May 27, 2018, in the County of Marin, the two unknown conspirators took a
23 credit card machine from inside City Carpets.

24 ///

25 ///

26 ///

27 ///

28 ///

1 **COUNT 238**

2 LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE

3 **GRAND THEFT (Re: CITY CARPETS)**

4 On and between May 1, 2018, and June 30, 2018, in the COUNTIES of MARIN and
5 CONTRA COSTA, the crime of THEFT in violation of Penal Code section 487(a), a felony, was
6 committed by LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE, who did unlawfully
7 take money and personal property of another of a value exceeding Nine Hundred and Fifty
8 Dollars (\$950) to wit: City Carpets.

9 **COUNT 239**

10 LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE

11 **BURGLARY (Re: City Carpets)**

12 On or about May 27, 2018, in the COUNTY of MARIN, the crime of SECOND DEGREE
13 COMMERCIAL BURGLARY in violation of Penal Code section 459, a felony, was committed
14 by LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE, who did enter a commercial
15 building occupied by City Carpets with the intent to commit larceny and any felony.

16 **COUNT 240**

17 LINDA COFFMAN and CHRISTOPHER "LEE" OSBORNE

18 **COMPUTER ACCESS AND FRAUD (Re: City Carpets)**

19 On and between May 1, 2018, and June 30, 2018, in the COUNTIES of MARIN and
20 CONTRA COSTA, the crime of COMPUTER ACCESS AND FRAUD in violation of Penal
21 Code section 502(c)(1), a felony, was committed by LINDA COFFMAN and CHRISTOPHER
22 LEE OSBORNE, who did knowingly and unlawfully violate subsection (c)(1) of this section in
23 that they knowingly accessed and without permission accessed data on a device (point of sale
24 terminal) in order to wrongfully obtain money.

25 **FIRST SPECIAL ALLEGATION**

26 **[AGGRAVATED WHITE-COLLAR CRIME IN EXCESS OF \$500,000]**

27 It is further alleged that the following targets charged in the Indictment committed two or
28 more related felonies to wit: Computer Access Fraud and Grand Theft; a material element of each

of which is fraud, involving a pattern of related felony conduct and the taking of more than Five
Hundred Thousand Dollars (\$500,000) within the meaning of California Penal Code section
186.11(a)(2):

Target	Counts
Toni Coffman	1 - 58, 63 - 70, 75 - 169, 174 -188, 193 - 202, 207 - 208, 221 - 228
Brenda Jones	1-12, 17-24, 36-50, 55-78, 87-122, 127-130, 135-146, 151-162, 170-173, 177-180, 182- 196, 203-206, 209-218
Linda Coffman	5-32, 36-78, 83-88, 90-118, 127-130, 135- 146, 151-158, 170-173, 177-180
Kevin Pardue	17-20, 36-50, 55-58, 67-70, 87-122, 127-130, 135-138, 143-146, 151-162, 170-173, 177- 180, 182-196, 203-206, 209-218
Natalie Hammon	13-16, 21-24, 40-43, 48-50, 59-78, 87-122, 127-130, 135-146, 151-158, 163-166, 170- 173, 182- ¹⁸⁵ 188 , 209-216, 221-224
Beatrice Munoz	5-32, 36-39, 44-47, 51-58, 63-70, 83-86, 91- 94, 107-122, 127-146, 151-158, 163-166, 177- 180, 189-196
Nancy Moreno	1-4, 9-24, 33-47, 59-66, 71-78, 111-118, 123- 124, 127-130, 135-138, 143-154, 159-162, 182-196, 201-202, 213-216, 221-228

///

///

///

1 **SECOND SPECIAL ALLEGATION**

2 **[AGGRAVATED WHITE-COLLAR CRIME, \$100,000 - \$500,000]**

3 It is further alleged that the following targets charged in the Indictment committed two or
4 more related felonies to wit: Computer Access Fraud and Grand Theft; a material element of each
5 of which is fraud, involving a pattern of related felony conduct and the taking of more than one
6 hundred thousand dollars (\$100,000), but not more than five hundred thousand dollars
7 (\$500,000), within the meaning of California Penal Code section 186.11(a)(2):

8

Target	Counts
Brandy Bingham	5-8, 33-39, 48-50, 67-70, 83-90, 95-122, 127-130, 135-138, 143-146, 151-158, 163-166, 170-173, 182-185
Bradley Owen	67-70, 87-90, 107-110, 123-124, 127-130, 143-146, 159-162, 181-200, 221-224
Charlie Bland	1-4, 44-50, 55-86, 170-173, 182-185, 193-196
Erik Carrillo	21-24, 29-32, 36-43, 59-70, 83-94
Michael Moore	5-32, 189-196, 213-216
Kathryn Cole	135-146, 151-158, 163-166
Brian Griggs	55-66, 83-86, 95-98, 103-106
Delfa Guerrero aka Bell	5-24, 29-32
Christopher "Lee" Osborne	25-43, 55-58
Ana Marie Gonzalez	33-35, 135-138, 143-146, 151-154, 182-188
Rodney Mayers	44-47, 55-66, 83-86
Josephine Ortega	83-86, 107-110, 115-122, 127-130
Jonathan Volker	5-12, 17-24, 29-32

24

25 **THIRD SPECIAL ALLEGATION**

26 **[GANG ALLEGATION]**

27 It is further alleged that each and every target, did commit the above felony offenses for the
28 benefit of, at the direction of, or in association with a criminal street gang with the specific intent

1 to promote, further and assist in criminal conduct by gang members within the meaning of Penal
2 Code section 186.22(b).

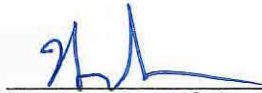
3 **TOLLING OF THE STATUTE OF LIMITATIONS**

4 It is further alleged, as described in Penal Code section 803(c), that each of the above
5 conspiracy violations were not discovered until February 2016, at the earliest, by law enforcement
6 in this case and the conspiracies had not been discovered by the Victims named in the conspiracy
7 counts either, until after that date. In February 2016, the forced refund fraud scheme described in
8 the conspiracy counts was discovered by law enforcement investigating a rash of burglaries
9 around Northern and Central California. No victim of these violations and no law enforcement
10 agency chargeable with the investigation and prosecution of said violations had actual or
11 constructive knowledge of said scheme prior to February 2016. Law enforcement believed these
12 crimes were isolated incidents until the discovery of the scheme in February 2016.

13
14 Dated: August 21, 2018

15
16
17 * * * * *

18
19 A TRUE BILL, and with a finding that the requirements of Penal Code section 923(c) have
20 been satisfied.

21 
22 Foreperson of the Grand Jury

23 Dated: 8/22/18
24
25
26
27
28