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**WARRANT ISSUED**

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*Attorneys for the People of the State of California*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
CLARA SHORTRIDGE FOLTZ CRIMINAL JUSTICE CENTER

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PEOPLE OF THE STATE OF CALIFORNIA,

Case No. BA498325

*Plaintiff,*

v.

SECOND AMENDED FELONY  
COMPLAINT FOR ARREST WARRANT  
AND EXTRADITION

- 1. MIGUEL A. AGUIRRE  
(D.O.B. [REDACTED])
- 2. JUAN A. GUTIERREZ  
(D.O.B. [REDACTED])
- 3. MARTIN E. ORNELAS-SILVA  
(D.O.B. [REDACTED])
- 4. JOSE H. GONZALEZ  
(D.O.B. [REDACTED])
- 5. WALTER GONZALEZ REYES  
(D.O.B. [REDACTED])
- 6. CELSO O. GONZALEZ REYES  
(D.O.B. [REDACTED]),
- 7. JORGE E. OLMOS  
(D.O.B. [REDACTED]),

1 **8. JUAN GONZALEZ-ESPINOSA**  
2 (D.O.B. [REDACTED]),

3 *Defendants.*

4  
5 The Attorney General of the state of California accuses the above-named defendants  
6 of the following offenses, which are connected to each other in their commission:

7 **COUNT 1**

8 On and between January 1, 2021 and January 20, 2023, in the County of Los Angeles, the  
9 crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION  
10 182(a)(1), a Felony, was committed by **MIGUEL A. AGUIRRE, JUAN A. GUTIERREZ,**  
11 **MARTIN E. ORNELAS SILVA, JOSE H. GONZALEZ, WALTER GONZALEZ REYES,**  
12 **CELSO O. GONZALEZ REYES, JORGE E. OLMOS** and **JUAN GONZALEZ-ESPINOSA**  
13 who did unlawfully conspire together and with another person and persons whose identity is  
14 unknown, to commit the crime of Grand Theft in violation of Penal Code section 487(a) and  
15 Recycling Fraud in violation of Public Resources Code section 14591(b)(1)(F), felonies; that  
16 pursuant to and for the purpose of carrying out the objects and purposes of aforesaid conspiracy,  
17 the said defendants committed the following overt act and acts at and in the County of Los  
18 Angeles:

19 **OVERT ACTS**

20 **1**

21 On or about January 12, 2021, **WALTER GONZALEZ REYES** submitted a Certification  
22 Application for W's Metal Recycling Center located at 4363 Avalon Blvd., Los Angeles, CA to  
23 CalRecycle.

24 **2**

25 On or about February 20, 2021, **MIGUEL A. AGUIRRE** sent a text message to **CELSO**  
26 **O. GONZALEZ REYES.**

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On or about February 24, 2021, **MIGUEL A. AGUIRRE** sent a text message to **CELSO O. GONZALEZ REYES**.

On or about July 9, 2021, **JUAN GONZALEZ-ESPINOSA** sent a text message to **MIGUEL A. AGUIRRE**.

On or about July 9, 2021, **JOSE H. GONZALEZ** sent a text message to **CELSO O. GONZALEZ REYES**.

On or about August 8, 2021 **JOSE H. GONZALEZ** sent a text message to **WALTER GONZALEZ REYES**.

On or about August 14, 2021 **JORGE E. OLMOS** sent a WhatsApp text message to **WALTER GONZALEZ REYES**.

On or between November 2, 2021 and November 3, 2021, **MIGUEL A. AGUIRRE**, **JUAN A. GUTIERREZ**, and **MARTIN E. ORNELAS SILVA** transported out of state empty beverage containers from Arizona to California.

On or about November 3, 2021 **JORGE E. OLMOS** sent a text message to **MIGUEL A. AGUIRRE**.

On or about March 4, 2022, **MIGUEL A. AGUIRRE** sent a text message to **JORGE E. OLMOS**.

On or about March 5, 2022, **JUAN GONZALEZ-ESPINOSA** sent a text message to **MIGUEL A. AGUIRRE**.

1  
2 On or about April 5, 2022, **JORGE E. OLMOS** contacted **MARTIN E. ORNELAS**  
3 **SILVA** by telephone.

4  
5 **COUNT 2**

6 On and between January 1, 2021 and January 20, 2023, in the County of Los Angeles, the  
7 crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section  
8 487(a), a felony, was committed by **MIGUEL A. AGUIRRE, JUAN A. GUTIERREZ,**  
9 **MARTIN E. ORNELAS SILVA, JOSE H. GONZALEZ, WALTER GONZALEZ REYES,**  
10 **CELSO O. GONZALEZ REYES, JORGE E. OLMOS** and **JUAN GONZALEZ-ESPINOSA**  
11 who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty  
12 Dollars (\$950), to wit: the property of the State of California.

13  
14 **COUNT 3**

15 On and between January 1, 2021 and January 20, 2023, in the County of Los Angeles, the  
16 crime of UNLAWFUL RECYCLING, in violation of PUBLIC RESOURCES CODE SECTION  
17 14591(b)(1)(F), a felony, was committed by **MIGUEL A. AGUIRRE, JUAN A. GUTIERREZ,**  
18 and **MARTIN E. ORNELAS SILVA, JORGE E. OLMOS** and **JUAN GONZALEZ-**  
19 **ESPINOSA** who, with the intent to defraud the State of California, did bring out-of-state  
20 containers, rejected containers, or line breakage to the California marketplace for redemption.

21  
22 **COUNT 4**

23 On and between January 1, 2021 and January 20, 2023, in the County of Los Angeles, the  
24 crime of UNLAWFUL RECYCLING, in violation of PUBLIC RESOURCES CODE SECTION  
25 14591(b)(1)(D), a felony, was committed by **JOSE H. GONZALEZ** and **WALTER**  
26 **GONZALEZ REYES** and **CELSO O. GONZALEZ REYES** who, with the intent to defraud  
27 the State of California, did redeem out-of-state containers, rejected containers, line breakage, or  
28 containers that have already been redeemed.

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First Special Allegation

Multiple Felonies Involving Fraud/Embezzlement

It is further alleged that in the commission of the offenses alleged in Counts 1 through 5, defendants MIGUEL A. AGUIRRE, JUAN A. GUTIERREZ, MARTIN E. ORNELAS SILVA, JOSE H. GONZALEZ, WALTER GONZALEZ REYES, CELSO O. GONZALEZ REYES, JORGE E. OLMOS and JUAN GONZALEZ-ESPINOSA committed two or more related felonies, a material element of which is fraud or embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000), within the meaning of Penal Code section 186.11(a)(2).

Second Special Allegation

Theft of Amount Over \$100,000

It is further alleged that MIGUEL A. AGUIRRE, JUAN A. GUTIERREZ, MARTIN E. ORNELAS SILVA, JOSE H. GONZALEZ, WALTER GONZALEZ REYES, CELSO O. GONZALEZ REYES, JORGE E. OLMOS and JUAN GONZALEZ-ESPINOSA, in the commission of the Grand Theft count alleged against them in this Amended Felony Complaint, with the intent to do so, took funds of value exceeding one hundred thousand dollars (\$100,000) within the meaning of Penal Code §1203.045.


NOTICE: If found true, convictions imposed in this matter shall be served in State Prison pursuant to Penal Code section 1170(h)(3)(D).

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**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this complaint consists of 4 counts.

Executed at Los Angeles, County of Los Angeles, on March 1, 2023.



MICHAEL MORÁ  
DECLARANT AND COMPLAINANT

Dated: March 1, 2023

Respectfully Submitted,

ROB BONTA  
Attorney General of California



RYAN TOOMEY  
Deputy Attorney General  
*Attorneys for the People of the State of California*



Order Holding To Answer - Felony Complaint (P.C. § 872)

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

*(Strike out or add as applicable)*

**MIGUEL A. AGUIRRE**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
3	PRC 14591(b)(1)(F)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP

**JUAN A. GUTIERREZ**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
3	PRC 14591(b)(1)(F)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP

**MARTIN E. ORNELAS SILVA**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
3	PRC 14591(b)(1)(F)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP

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<b>JOSE H. GONZALEZ</b>				
<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
4	PRC 14591(b)(1)(D)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP
<b>WALTER GONZALEZ REYES</b>				
<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
4	PRC 14591(b)(1)(D)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP
<b>CELSO O. GONZALEZ REYES</b>				
<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
4	PRC 14591(b)(1)(D)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP
<b>JORGE E. OLMOS</b>				
<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
3	PRC 14591(b)(1)(F)	16-2-3		
			PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP

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JUAN GONZALEZ-ESPINOSA

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect.</u>
1	PC 182 (a)(1)	16-2-3		
2	PC 487	16-2-3		
3	PRC 14591(b)(1)(F)	16-2-3	PC 186.11(a)(2)	2-3-5
			PC 1203.045	MSP