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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

2021 JUL -8 AM 9:41  
CENTRAL CRIMINAL  
LOS ANGELES SUPERIOR COURT

FILED

PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

v.

(1) GIOVANNI BEMBI

(2) CONNIE MARIE GUZMAN

(3) WILLIAM PRECIADO

(4) EDMUND ZORRILLA

(5) LUIS MANUEL MENDOZA

(6) WILLIAM MATTHEW FOUNTAIN

Defendants.

Case No. **BA484322**

**FELONY COMPLAINT FOR  
ARREST WARRANT**

1 The Attorney General of the State of California accuses the above-named Defendants of the  
2 following offenses, which are connected to each other in their commission:

3 **COUNT 1**

4 On or about and between January 22, 2016 through January 23, 2017, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendants GIOVANNI BEMBI, who did unlawfully take money and  
7 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Seven Thousand Five  
8 Hundred Twenty-Four Dollars and Forty-Two Cents (\$7,524.42).

9 **COUNT 2**

10 On or about January 23, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 **COUNT 3**

16 On or about January 6, 2017, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 **COUNT 4**

22 On or about November 28, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
25 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
26 and writing.

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1 **COUNT 5**

2 On or about November 22, 2016, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
5 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 **COUNT 6**

8 On or about November 3, 2016, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 **COUNT 7**

14 On or about October 12, 2016, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
17 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
18 and writing.

19 **COUNT 8**

20 On or about October 11, 2016, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to  
23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
24 and writing.

25 **COUNT 9**

26 On or about October 6, 2016, in the County of Los Angeles, the crime of PRESENTATION  
27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
28 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,

1 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
2 writing.

3 **COUNT 10**

4 On or about October 5, 2016, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,  
7 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
8 writing.

9 **COUNT 11**

10 On or about October 4, 2016, in the County of Los Angeles, the crime of PRESENTATION  
11 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
12 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,  
13 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
14 writing.

15 **COUNT 12**

16 On or about October 4, 2016, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 **COUNT 13**

22 On or about October 3, 2016, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud,  
25 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
26 writing.

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**COUNT 14**

On or about September 29, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 15**

On or about September 27, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 16**

On or about September 26, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 17**

On or about August 25, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 18**

On or about August 23, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to

defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 19**

On or about August 22, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 20**

On or about August 17, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 21**

On or about August 16, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 22**

On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant GIOVANNI BEMBI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

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1 **COUNT 23**

2 On or about and between March 29, 2016 through July 29, 2017, in the County of Los  
3 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
4 Felony, was committed by Defendants CONNIE MARIE GUZMAN, who did unlawfully take  
5 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three  
6 Thousand Eight Dollars and Forty-Five Cents (\$3,008.45).

7 **COUNT 24**

8 On or about June 25, 2017, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 **COUNT 25**

14 On or about February 4, 2017, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 **COUNT 26**

20 On or about January 19, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
23 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
24 voucher and writing.

25 **COUNT 27**

26 On or about December 4, 2016, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with



1 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
2 voucher and writing.

3 **COUNT 28**

4 On or about December 3, 2016, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
7 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
8 voucher and writing.

9 **COUNT 29**

10 On or about November 19, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 **COUNT 30**

16 On or about November 7, 2016, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 **COUNT 31**

22 On or about October 27, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
25 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
26 voucher and writing.

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1 COUNT 32

2 On or about August 23, 2016, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with  
5 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
6 voucher and writing.

7 COUNT 33

8 On or about June 29, 2016, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 34

14 On or about June 28, 2016, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to  
17 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
18 and writing.

19 COUNT 35

20 On or about June 23, 2016, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to  
23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
24 and writing.

25 COUNT 36

26 On or about and between August 12, 2016 through December 20, 2017, in the County of  
27 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
28 Felony, was committed by Defendants WILLIAM PRECIADO, who did unlawfully take money

1 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Five  
2 Hundred Seventy-Three Dollars and Five Cents (\$1,573.05).

3 **COUNT 37**

4 On or about December 21, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully and with  
7 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
8 voucher and writing.

9 **COUNT 38**

10 On or about December 20, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 **COUNT 39**

16 On or about August 27, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 **COUNT 40**

22 On or about December 1, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully and with  
25 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
26 voucher and writing.

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1 **COUNT 41**

2 On or about and between January 21, 2016 through August 25, 2016, in the County of Los  
3 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
4 Felony, was committed by Defendants EDMUND ZORRILLA, who did unlawfully take money  
5 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Five  
6 Hundred Ninety-One Dollars and Ninety-Four Cents (\$4,591.94).

7 **COUNT 42**

8 On or about August 25, 2016, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with  
11 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
12 voucher and writing.

13 **COUNT 43**

14 On or about August 11, 2016, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 **COUNT 44**

20 On or about July 13, 2016, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
23 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
24 writing.

25 **COUNT 45**

26 On or about July 12, 2016, in the County of Los Angeles, the crime of PRESENTATION  
27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
28 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,

1 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
2 writing.

3 **COUNT 46**

4 On or about July 7, 2016, in the County of Los Angeles, the crime of PRESENTATION OF  
5 FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed  
6 by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud, present for  
7 allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

8 **COUNT 47**

9 On or about June 29, 2016, in the County of Los Angeles, the crime of PRESENTATION  
10 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
11 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
12 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
13 writing.

14 **COUNT 48**

15 On or about June 27, 2016, in the County of Los Angeles, the crime of PRESENTATION  
16 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
17 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
18 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
19 writing.

20 **COUNT 49**

21 On or about June 24, 2016, in the County of Los Angeles, the crime of PRESENTATION  
22 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
23 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
24 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
25 writing.

26 **COUNT 50**

27 On or about June 21, 2016, in the County of Los Angeles, the crime of PRESENTATION  
28 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was

1 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
2 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
3 writing.

4 **COUNT 51**

5 On or about June 20, 2016, in the County of Los Angeles, the crime of PRESENTATION  
6 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
7 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
8 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
9 writing.

10 **COUNT 52**

11 On or about June 14, 2016, in the County of Los Angeles, the crime of PRESENTATION  
12 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
13 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
14 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
15 writing.

16 **COUNT 53**

17 On or about June 13, 2016, in the County of Los Angeles, the crime of PRESENTATION  
18 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
19 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
20 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
21 writing.

22 **COUNT 54**

23 On or about June 7, 2016, in the County of Los Angeles, the crime of PRESENTATION  
24 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
25 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
26 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
27 writing.

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**COUNT 55**

On or about June 1, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 56**

On or about May 26, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 57**

On or about April 25, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 58**

On or about April 20, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 59**

On or about April 12, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,

1 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
2 writing.

3 **COUNT 60**

4 On or about April 4, 2016, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
7 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
8 writing.

9 **COUNT 61**

10 On or about March 29, 2016, in the County of Los Angeles, the crime of PRESENTATION  
11 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
12 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
13 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
14 writing.

15 **COUNT 62**

16 On or about March 17, 2016, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 **COUNT 63**

22 On or about March 15, 2016, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
25 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
26 writing.

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1 **COUNT 64**

2 On or about March 14, 2016, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
5 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
6 writing.

7 **COUNT 65**

8 On or about March 7, 2016, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant EDMUND ZORRILLA, who did unlawfully and with intent to defraud,  
11 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
12 writing.

13 **COUNT 66**

14 On or about February 25, 2016, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 **COUNT 67**

20 On or about January 21, 2016, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with  
23 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
24 voucher and writing.

25 **COUNT 68**

26 On or about and between March 29, 2016 through July 29, 2017, in the County of Los  
27 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
28 Felony, was committed by Defendants LUIS MANUEL MENDOZA, who did unlawfully take

1 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three  
2 Thousand Nine Hundred Ninety-Five Dollars and Thirty-Five Cents (\$3,995.35).

3 **COUNT 69**

4 On or about March 27, 2017, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 **COUNT 70**

10 On or about March 22, 2017, in the County of Los Angeles, the crime of PRESENTATION  
11 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
12 committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 **COUNT 71**

16 On or about March 22, 2017, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 **COUNT 72**

22 On or about January 17, 2017, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and  
25 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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**COUNT 73**

On or about January 12, 2017, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 74**

On or about January 4, 2017, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 75**

On or about January 3, 2017, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 76**

On or about December 6, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

**COUNT 77**

On or about November 2, 2016, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and

1 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
2 account, voucher and writing.

3 **COUNT 78**

4 On or about October 27, 2016, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and  
7 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
8 account, voucher and writing.

9 **COUNT 79**

10 On or about October 11, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and  
13 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 **COUNT 80**

16 On or about August 24, 2016, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and  
19 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
20 account, voucher and writing.

21 **COUNT 81**

22 On or about August 17, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and  
25 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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1 **COUNT 82**

2 On or about August 3, 2016, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to  
5 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 **COUNT 83**

8 On or about June 1, 2016, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 **COUNT 84**

14 On or about and between January 27, 2016 through June 19, 2017, in the County of Los  
15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
16 Felony, was committed by Defendants WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
17 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two  
18 Thousand Seven Hundred Twenty-Five Dollars and Six Cents (\$2,725.06).

19 **COUNT 85**

20 On or about June 19, 2017, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with  
23 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
24 voucher and writing.

25 **COUNT 86**

26 On or about February 1, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully

1 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
2 account, voucher and writing.

3 **COUNT 87**

4 On or about January 17, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
7 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
8 account, voucher and writing.

9 **COUNT 88**

10 On or about January 12, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
13 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 **COUNT 89**

16 On or about August 23, 2016, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
19 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
20 account, voucher and writing.

21 **COUNT 90**

22 On or about August 17, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
25 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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1 COUNT 91

2 On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with  
5 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
6 voucher and writing.

7 COUNT 92

8 On or about March 24, 2016, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with  
11 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
12 voucher and writing.

13 COUNT 93

14 On or about March 17, 2016, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 COUNT 94

20 On or about February 18, 2016, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
23 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
24 account, voucher and writing.

25 COUNT 95

26 On or about February 11, 2016, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully



1 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
2 account, voucher and writing.

3 **COUNT 96**

4 On or about February 2, 2016, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
7 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
8 account, voucher and writing.

9 **COUNT 97**

10 On or about January 27, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully  
13 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 **SPECIAL ALLEGATION**

16 **STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)**

17 It is further alleged for Counts 1 – 98, offenses described in Penal Code section 803(c), that  
18 the above violations were not discovered until May 4, 2018, by Investigators from the California  
19 Highway Patrol who were made aware of irregularities in the overtime being reported by officers  
20 out of the CHP East Los Angeles Station and began an investigation into the alleged fraud, which  
21 included investigations into Defendants GIOVANNI BEMBI, CONNIE MARIE GUZMAN,  
22 WILLIAM PRECIADO, EDMUND ZORRILLA, LUIS MANUEL MENDOZA, and WILLIAM  
23 MATTHEW FOUNTAIN, within the meaning of Penal Code section 803(c).

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1 CONCLUSION

2 All of the foregoing is contrary to the form, force, and effect of the above-named statutes,  
3 and is against the peace and dignity of the People of the State of California.

4 Attached hereto and incorporated by reference is a declaration in support of an arrest  
5 warrant and complaint with accompanying official reports and documents of a law enforcement  
6 agency.

7 I declare under penalty of perjury that the foregoing is true and correct. Executed this 8<sup>th</sup>  
8 day of July, 2021, at Los Angeles, California.

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

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13 PAUL S. THIES  
14 Deputy Attorney General  
15 *Attorneys for People*  
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**NOTICE TO DEFENDANTS AND ATTORNEYS**

Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

**NOTICE TO ATTORNEYS**

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."