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2022 JAN 10 AM 9:37

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12
13 **PEOPLE OF THE STATE OF
CALIFORNIA,**

14 Plaintiff,

Case No. BA498273

**FELONY COMPLAINT FOR
ARREST WARRANT**

15
16 v.

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18 (1) **JAMES YAO KUO**
19 (DOB: [REDACTED]),

20 (2) **JESSIE ANTHONY CARRILLO**
21 (DOB: [REDACTED])

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24 Defendants.

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

On or about and between October 29, 2017 through March 19, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant JAMES YAO KUO, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, One Thousand Twenty-One Dollars and Sixty-Seven Cents (\$1,021.67)

COUNT 2

On or about July 9, 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 JAMES YAO KUO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 3

On or about October 5, 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 JAMES YAO KUO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 4

On or about December 14, 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 JAMES YAO KUO, 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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COUNT 5

On or about December 21, 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 JAMES YAO KUO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 6

On or about March 22, 2018, 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 JAMES YAO KUO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 7

On or about and between February 22, 2017 through March 29, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant JESSIE ANTHONY CARRILLO, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Eight Thousand One Hundred Twenty Dollars and Fifty-Four Cents (\$8,120.54)

COUNT 8

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 JESSIE ANTHONY CARRILLO, 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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COUNT 9

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 JESSIE ANTHONY CARRILLO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 10

On or about January 19, 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 JESSIE ANTHONY CARRILLO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 11

On or about February 7, 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 JESSIE ANTHONY CARRILLO, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 12

On or about January 4, 2018, 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 JESSIE ANTHONY CARRILLO, 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 SPECIAL ALLEGATION

2 STATUTE OF LIMITATION-LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-12, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of January 2022, at Los Angeles, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California



NATASHA HOWARD
Deputy Attorney General

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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."

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Keith Phillips of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant James Yao KUO: Grand Theft in violation of Penal Code section 487(a) and Presentation of False Claim in violation of Penal Code section 72.

Therefore, you are commanded to arrest James Yao KUO, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$_____.

Dated: _____

Time Issued: _____ (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Keith Phillips of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant Jessie Anthony CARRILLO: Grand Theft in violation of Penal Code section 487(a) and Presentation of False Claim in violation of Penal Code section 72.

Therefore, you are commanded to arrest Jessie Anthony CARRILLO, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$_____.

Dated: _____

Time Issued: _____ (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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| Defendant | DOB | CII | CDL | Bail Requested |
|------------------------------|---------------------------|------------|------------|-----------------------|
| KUO, James Yao | ████████ | | ████████ | \$0 |
| CARRILLO, Jessie Anthony | ████████ | | ████████ | \$0 |
| Investigating Agency | CHP Southern Division ISU | | | |
| Investigating Officer | Sgt. Kevin Reese | | | |
| Phone No. | (213) 744-2331 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 *(Strike out or add as applicable)*

6 **JAMES YAO KUO**

| 7 <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|--------------|---------------|---------------------|-------------------|----------------------|
| 8 1 | PC 487(a) | 16-2-3 | | |
| 9 2 | PC 72 | 16-2-3 | | |
| 10 3 | PC 72 | 16-2-3 | | |
| 11 4 | PC 72 | 16-2-3 | | |
| 12 5 | PC 72 | 16-2-3 | | |
| 13 6 | PC 72 | 16-2-3 | | |

14
15 **JESSIE ANTHONY CARRILLO**

| 16 <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---------------|---------------|---------------------|-------------------|----------------------|
| 17 7 | PC 487(a) | 16-2-3 | | |
| 18 8 | PC 72 | 16-2-3 | | |
| 19 9 | PC 72 | 16-2-3 | | |
| 20 10 | PC 72 | 16-2-3 | | |
| 21 11 | PC 72 | 16-2-3 | | |
| 22 12 | PC 72 | 16-2-3 | | |

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24 I ORDER that the defendants named below be held to answer for the above-described
25 offenses and allegations and be admitted to bail in the sum of:

26 James Yao KUO \$ _____

27 Jessie Anthony CARRILLO \$ _____

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And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California

CR
WARRANT ISSUED

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 CHRISTOPHER G. SANCHEZ
Deputy Attorney General
5 PAUL S. THIES
Deputy Attorney General
6 State Bar No. 305084
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013
Telephone: (213) 269-6070
8 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
9 Attorneys for the People of the State of California

Central District
Los Angeles Superior Court

2022 FEB -2 AM 10:45

FILED

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

13 PEOPLE OF THE STATE OF
14 CALIFORNIA,

Case No. BA498276

15 Plaintiff,

FELONY COMPLAINT FOR ARREST
WARRANT

16 v.

18 (1) GIOVANNI BEMBI
(DOB: [REDACTED])

19 (2) CONNIE MARIE GUZMAN
(DOB: [REDACTED])

21 (3) WILLIAM PRECIADO
(DOB: [REDACTED])

22 (4) EDMUND ZORRILLA
(DOB: [REDACTED])

24 (5) LUIS MANUEL MENDOZA
(DOB: [REDACTED])

25 (6) WILLIAM MATTHEW FOUNTAIN
(DOB: [REDACTED])

26 Defendants.
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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 Defendant **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 November 22, 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 **GIOVANNI BEMBI**, who did unlawfully and with intent
13 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
14 and writing.

15 COUNT 3

16 On or about October 11, 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 **GIOVANNI BEMBI**, who did unlawfully and with intent
19 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
20 and writing.

21 COUNT 4

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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1 **COUNT 5**

2 On or about September 29, 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
5 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
6 and writing.

7 **COUNT 6**

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 **GIOVANNI BEMBI**, who did unlawfully and with intent
11 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
12 and writing.

13 **COUNT 7**

14 On or about and between March 29, 2016, through July 29, 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 Defendant **CONNIE MARIE GUZMAN**, who did unlawfully take
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
18 Thousand One Hundred Ninety-Eight Dollars and Eighty-Two Cents (\$3,198.82).

19 **COUNT 8**

20 On or about July 29, 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 **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 9**

26 On or about February 4, 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 **CONNIE MARIE GUZMAN**, 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 10

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

9 COUNT 11

10 On or about October 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 **CONNIE MARIE GUZMAN**, 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 12

16 On or about June 28, 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 **CONNIE MARIE GUZMAN**, 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 13

22 On or about and between August 12, 2016, through December 20, 2017, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **WILLIAM PRECIADO**, who did unlawfully take money
25 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Five
26 Hundred Seventy-Three Dollars and Five Cents (\$1,573.05).

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COUNT 14

On or about December 21, 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 **WILLIAM PRECIADO**, 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 December 20, 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 **WILLIAM PRECIADO**, 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 August 27, 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 **WILLIAM PRECIADO**, 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 December 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 **WILLIAM PRECIADO**, 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 and between January 21, 2016, through August 25, 2016, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **EDMUND ZORRILLA**, who did unlawfully take money

1 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Five
2 Hundred Ninety-One Dollars and Ninety-Four Cents (\$4,591.94).

3 COUNT 19

4 On or about August 25, 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 **EDMUND ZORRILLA**, 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 20

10 On or about July 12, 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
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
14 and writing.

15 COUNT 21

16 On or about June 7, 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
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
20 and writing.

21 COUNT 22

22 On or about March 14, 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
25 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
26 and writing.

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COUNT 23

On or about February 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 24

On or about and between March 29, 2016, through July 29, 2017, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **LUIS MANUEL MENDOZA**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three Thousand Nine Hundred Ninety-Five Dollars and Thirty-Five Cents (\$3,995.35).

COUNT 25

On or about January 17, 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 26

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 27

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

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

3 **COUNT 28**

4 On or about November 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 **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 29**

10 On or about August 3, 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 **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 30**

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

21 **COUNT 31**

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 **WILLIAM MATTHEW FOUNTAIN**, who did
25 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
26 claim, bill, account, voucher and writing.

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COUNT 32

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 **WILLIAM MATTHEW FOUNTAIN**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 33

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 **WILLIAM MATTHEW FOUNTAIN**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 34

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 **WILLIAM MATTHEW FOUNTAIN**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 35

On or about February 11, 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 **WILLIAM MATTHEW FOUNTAIN**, 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 SPECIAL ALLEGATION

2 STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-35, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California



PAUL S. THIES
Deputy Attorney General
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."

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

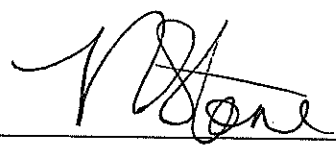
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **GIOVANI BEMBI**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **GIOVANI BEMBI**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 15

Dated: 2/2/22

Time Issued: 3:58 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles



NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST

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6 The People of the State of California to any peace officer of said State:

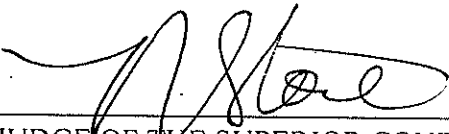
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8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **CONNIE MARIE GUZMAN**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **CONNIE MARIE GUZMAN**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

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19 Dated: 2/2/02

20 Time Issued: 3:59 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

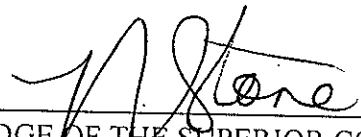
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **WILLIAM PRECIADO**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **WILLIAM PRECIADO**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 25.

Dated: 2/2/22

Time Issued: 3:59 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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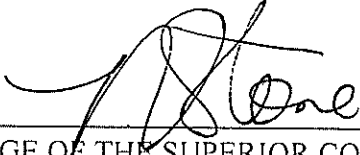
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **EDMUND ZORRILLA**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **EDMUND ZORRILLA**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

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19 Dated: 7/2/22

20 Time Issued: 4:00 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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2 SUPERIOR COURT OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 WARRANT OF ARREST

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6 The People of the State of California to any peace officer of said State:

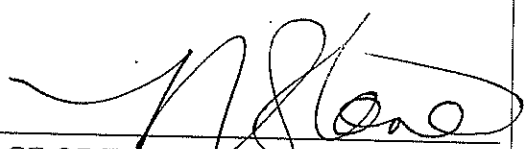
7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **LUIS MANUEL MENDOZA**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **LUIS MANUEL MENDOZA**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 15.

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19 Dated: 2/2/22

20 Time Issued: 4:00 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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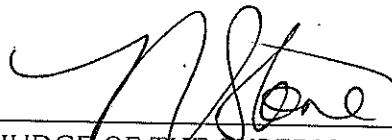
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **WILLIAM MATTHEW FOUNTAIN**: Grand Theft
12 in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **WILLIAM MATTHEW FOUNTAIN**, and to
15 bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,
16 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 2-

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19 Dated: 2/2/22

20 Time Issued: 4:01 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|------------------------------|------------------|-----|------------|----------------|
| BEMBI, Giovanni | [REDACTED] | | [REDACTED] | \$0 |
| GUZMAN, Connie Marie | [REDACTED] | | [REDACTED] | \$0 |
| PRECIADO, William | [REDACTED] | | [REDACTED] | \$0 |
| ZORRILLA, Edmund | [REDACTED] | | [REDACTED] | \$0 |
| MENDOZA, Luis Manuel | [REDACTED] | | [REDACTED] | \$0 |
| FOUNTAIN, William Matthew | [REDACTED] | | [REDACTED] | \$0 |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

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1 FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872

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

5 GIOVANNI BEMBI

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 CONNIE MARIE GUZMAN

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 WILLIAM PRECIADO

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |

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1 EDMUND ZORRILLA

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 18 | PC 487(a) | 16-2-3 | | |
| 4 | 19 | PC 72 | 16-2-3 | | |
| 5 | 20 | PC 72 | 16-2-3 | | |
| 6 | 21 | PC 72 | 16-2-3 | | |
| 7 | 22 | PC 72 | 16-2-3 | | |
| 8 | 23 | PC 72 | 16-2-3 | | |

9 LUIS MANUEL MENDOZA

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 24 | PC 487(a) | 16-2-3 | | |
| 12 | 25 | PC 72 | 16-2-3 | | |
| 13 | 26 | PC 72 | 16-2-3 | | |
| 14 | 27 | PC 72 | 16-2-3 | | |
| 15 | 28 | PC 72 | 16-2-3 | | |
| 16 | 29 | PC 72 | 16-2-3 | | |

17 WILLIAM MATTHEW FOUNTAIN

| 18 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 19 | 30 | PC 487(a) | 16-2-3 | | |
| 20 | 31 | PC 72 | 16-2-3 | | |
| 21 | 32 | PC 72 | 16-2-3 | | |
| 22 | 33 | PC 72 | 16-2-3 | | |
| 23 | 34 | PC 72 | 16-2-3 | | |
| 24 | 35 | PC 72 | 16-2-3 | | |
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1 I ORDER that the defendants named below be held to answer for the above-described
2 offenses and allegations and be admitted to bail in the sum of:

3
4 Giovanni Bembi \$ _____
5 Connie Marie Guzman \$ _____
6 William Preciado \$ _____
7 Edmund Zorrilla \$ _____
8 Luis Manuel Mendoza \$ _____
9 William Matthew Fountain \$ _____

10
11 And that said defendant be committed to the custody of the Sheriff until such bail is given.

12 The date of Felony arraignment is set for:

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14 _____ in Department _____ at _____ a.m.
(Date)

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17 _____
18 Magistrate Date
Superior Court of California

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ROB BONTA
Attorney General of California
LANCE WINTERS
Chief Assistant Attorney General
JOHNETTE JAURON
Senior Assistant Attorney General
CHRISTOPHER G. SANCHEZ
Deputy Attorney General
PAUL S. THIES
Deputy Attorney General
State Bar No. 305084
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6070
Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
Attorneys for the People of the State of California

CR
WARRANT ISSUED

CR
2022 FEB -2 AM 10:42
Filed
Office of the Attorney General
Department of Justice

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

(1) RUBEN ROBLES
(DOB: [REDACTED])

(2) REY DAVID THORNE
(DOB: [REDACTED])

(3) MARTIN GERARDO VASQUEZ
(DOB: [REDACTED])

Defendants.

Case No. BA498277

FELONY COMPLAINT FOR ARREST WARRANT

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

COUNT 1

On or about and between February 8, 2016, through April 19, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a

1 Felony, was committed by Defendant **RUBEN ROBLES**, who did unlawfully take money and
2 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Eight Thousand Six
3 Hundred Sixty-Seven Dollars and Sixty-Seven Cents (\$8,667.67), the property of the State of
4 California.

5 **COUNT 2**

6 On or about and between March 4, 2016, through April 20, 2018, in the County of Los
7 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
8 Felony, was committed by Defendant **RUBEN ROBLES**, who did unlawfully take money and
9 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Twelve Thousand Nine
10 Hundred Nine Dollars and Ten Cents (\$12,909.10), the property of the County of Los Angeles.

11 **COUNT 3**

12 On or about March 1, 2018, in the County of Los Angeles, the crime of PRESENTATION
13 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was
14 committed by Defendant **RUBEN ROBLES**, who did unlawfully and with intent to defraud,
15 present for allowance and payment a false and fraudulent claim, bill, account, voucher and
16 writing.

17 **COUNT 4**

18 On or about October 2, 2017, in the County of Los Angeles, the crime of PRESENTATION
19 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was
20 committed by Defendant **RUBEN ROBLES**, who did unlawfully and with intent to defraud,
21 present for allowance and payment a false and fraudulent claim, bill, account, voucher and
22 writing.

23 **COUNT 5**

24 On or about September 19, 2017, in the County of Los Angeles, the crime of
25 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a
26 Felony, was committed by Defendant **RUBEN ROBLES**, who did unlawfully and with intent to
27 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
28 and writing.

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COUNT 6

On or about November 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 **RUBEN ROBLES**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 7

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 **RUBEN ROBLES**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 8

On or about and between October 5, 2016, through March 26, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **REY DAVID THORNE**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Six Thousand Eight Hundred Fifty-Three Dollars and Sixty-Five Cents (\$6,853.65), the property of the State of California.

COUNT 9

On or about and between March 15, 2017, through January 3, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **REY DAVID THORNE**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Three Hundred Twenty Dollars and Twenty-Eight Cents (\$4,320.28), the property of the County of Los Angeles.

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COUNT 10

On or about December 18, 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 **REY DAVID THORNE**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 11

On or about November 29, 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 **REY DAVID THORNE**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 12

On or about October 16, 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 **REY DAVID THORNE**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 13

On or about October 11, 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 **REY DAVID THORNE**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 14

On or about February 22, 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 **REY DAVID THORNE**, 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 15

4 On or about and between January 19, 2017, through January 31, 2018, 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 Defendant **MARTIN GERARDO VASQUEZ**, who did unlawfully
7 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One
8 Thousand One Hundred Fifty Dollars and Fifty-Eight Cents (\$1,150.58), the property of the
9 County of Los Angeles.

10 COUNT 16

11 On or about January 2, 2018, 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 **MARTIN GERARDO VASQUEZ**, who did unlawfully and with
14 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,
15 voucher and writing.

16 COUNT 17

17 On or about December 11, 2017, in the County of Los Angeles, the crime of
18 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a
19 Felony, was committed by Defendant **MARTIN GERARDO VASQUEZ**, who did unlawfully
20 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
21 account, voucher and writing.

22 COUNT 18

23 On or about September 27, 2017, in the County of Los Angeles, the crime of
24 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a
25 Felony, was committed by Defendant **MARTIN GERARDO VASQUEZ**, who did unlawfully
26 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
27 account, voucher and writing.

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COUNT 19

On or about May 5, 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 **MARTIN GERARDO VASQUEZ**, 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 February 7, 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 **MARTIN GERARDO VASQUEZ**, 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 SPECIAL ALLEGATION

2 STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-20, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,
ROB BONTA
Attorney General of California

PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **RUBEN ROBLES**: Grand Theft in violation of Penal
12 Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

13 Therefore, you are commanded to arrest **RUBEN ROBLES**, and to bring said Defendant
14 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
15 California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ 1-

17
18 Dated: 2/2/22

19 Time Issued: 3:56 (am/pm)



Natalie Stone
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST.
5

6 The People of the State of California to any peace officer of said State:
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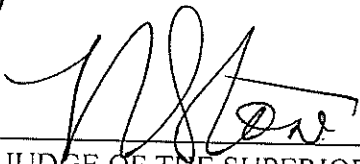
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **REY DAVID THORNE**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **REY DAVID THORNE**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 2 -
18

19 Dated: 2/2/22

20 Time Issued: 3:56 (am/pm)

21
22 
23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
25
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
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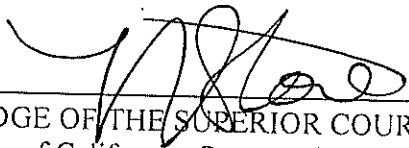
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **MARTIN GERARDO VASQUEZ**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **MARTIN GERARDO VASQUEZ**, and to bring
15 said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 4
18

19 Dated: 2/2/20

20 Time Issued: 3:56 (am/pm)
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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|-------------------------|------------------|-----|------------|----------------|
| ROBLES, Ruben | [REDACTED] | | [REDACTED] | |
| THORNE, Rey David | [REDACTED] | | [REDACTED] | |
| VASQUEZ, Martin Gerardo | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **RUBEN ROBLES**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 487(a) | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |
| 13 | 7 | PC 72 | 16-2-3 | | |

14 **REY DAVID THORNE**

| 15 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 16 | 8 | PC 487(a) | 16-2-3 | | |
| 17 | 9 | PC 487(a) | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |
| 21 | 13 | PC 72 | 16-2-3 | | |
| 22 | 14 | PC 72 | 16-2-3 | | |

23 **MARTIN GERARDO VASQUEZ**

| 24 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 25 | 15 | PC 487(a) | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

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19 PC 72 16-2-3
20 PC 72 16-2-3

I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

Ruben Robles \$ _____
Rey David Thorne \$ _____
Martin Gerardo Vasquez \$ _____

And that said defendant be committed to the custody of the Sheriff until such bail is given.
The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California

WARRANT ISSUED
[Signature]

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 CHRISTOPHER G. SANCHEZ
Deputy Attorney General
5 PAUL S. THIES
Deputy Attorney General
6 State Bar No. 305084
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013
Telephone: (213) 269-6070
8 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
9 *Attorneys for the People of the State of California*

Filed
2022 FEB -2 AM 10:54
[Signature]

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

14 **PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. BA498278

15 Plaintiff,

FELONY COMPLAINT FOR ARREST WARRANT

16 v.

- 17 (1) **RAMIRO DURAZO**
18 (DOB: [REDACTED])
19 (2) **ROMAN GARDEA**
20 (DOB: [REDACTED])
21 (3) **RAMON MARTINEZ JR.**
(DOB: [REDACTED])
22 (4) **ROBERT ANDRES FELIX**
23 (DOB: [REDACTED])
24 (5) **KYLE CLAYTON HARTMAN**
(DOB: [REDACTED])

25 Defendants.

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 November 23, 2016, and March 27, 2018, 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 Defendant **RAMIRO DURAZO**, who did unlawfully take money and
7 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Ten Thousand One
8 Hundred Seventy-Six Dollars and Thirty-Eight Cents (\$10,176.38).

9 COUNT 2

10 On or about November 21, 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 **RAMIRO DURAZO**, who did unlawfully and with intent
13 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
14 and writing.

15 COUNT 3

16 On or about July 23, 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 **RAMIRO DURAZO**, 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 March 1, 2017, 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 **RAMIRO DURAZO**, 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 5

On or about January 23, 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 **RAMIRO DURAZO**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 6

On or about November 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 **RAMIRO DURAZO**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 7

On or about and between January 5, 2017, and March 26, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **ROMAN GARDEA**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Eight Thousand Two Hundred Eighty-Two Dollars and Eighty Cents (\$8,282.80).

COUNT 8

On or about December 20, 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 **ROMAN GARDEA**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 9

On or about December 6, 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 **ROMAN GARDEA**, who did unlawfully and with intent

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

3 COUNT 10

4 On or about November 6, 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 **ROMAN GARDEA**, who did unlawfully and with intent
7 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
8 and writing.

9 COUNT 11

10 On or about July 31, 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 **ROMAN GARDEA**, 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 January 5, 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 **ROMAN GARDEA**, 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 and between June 2, 2016, and September 15, 2016, in the County of Los
23 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **RAMON MARTINEZ JR.**, who did unlawfully take
25 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
26 Thousand Four Hundred Eight Dollars and Eight Cents (\$2,408.80).

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1 COUNT 14

2 On or about September 15, 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 **RAMON MARTINEZ JR.**, 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 15

8 On or about August 11, 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 **RAMON MARTINEZ JR.**, 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 16

14 On or about June 30, 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 **RAMON MARTINEZ JR.**, 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 17

20 On or about June 2, 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 **RAMON MARTINEZ JR.**, 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 18

26 On or about and between November 23, 2016, and March 4, 2018, 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 Defendant **ROBERT ANDRES FELIX**, who did unlawfully take

1 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
2 Thousand Three Hundred Thirty-Seven Dollars and Seventy-Seven Cents (\$3,337.77).

3 **COUNT 19**

4 On or about March 4, 2018, 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 **ROBERT ANDRES FELIX**, 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 20**

10 On or about December 19, 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 **ROBERT ANDRES FELIX**, 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 21**

16 On or about April 27, 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 **ROBERT ANDRES FELIX**, 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 22**

22 On or about January 26, 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 **ROBERT ANDRES FELIX**, 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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COUNT 23

On or about November 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 **ROBERT ANDRES FELIX**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 24

On or about and between October 27, 2016, and December 21, 2017, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **KYLE CLAYTON HARTMAN**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two Thousand Thirty-Two Dollars and Thirteen Cents (\$2,032.13).

COUNT 25

On or about September 21, 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 **KYLE CLAYTON HARTMAN**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 26

On or about August 23, 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 **KYLE CLAYTON HARTMAN**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 27

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 **KYLE CLAYTON HARTMAN**, who did unlawfully and with intent

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

3 **COUNT 28**

4 On or about December 20, 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 **KYLE CLAYTON HARTMAN**, 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 29**

10 On or about October 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 **KYLE CLAYTON HARTMAN**, 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.

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1 SPECIAL ALLEGATION

2 STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-29, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,
ROB BONTA
Attorney General of California


PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **RAMIRO DURAZO**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **RAMIRO DURAZO**, and to bring said Defendant
15 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
16 California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 15.

18
19 Dated: 2/2/22

20 Time Issued: 4:01 pm (am/pm)



Natalie Stone
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:


Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **ROMAN GARDEA**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **ROMAN GARDEA**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1-.

Dated: 2/2/22

Time Issued: 4:01 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

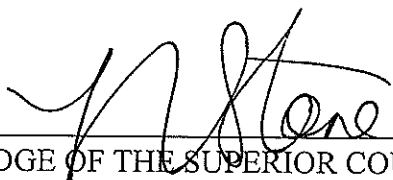
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **RAMON MARTINEZ JR.**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **RAMON MARTINEZ JR.**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 2-

Dated: 2/2/22

Time Issued: 4:02 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

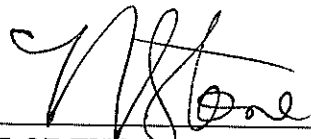
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **ROBERT ANDRES FELIX**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **ROBERT ANDRES FELIX**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 2-

Dated: 2/2/22

Time Issued: 4:02 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

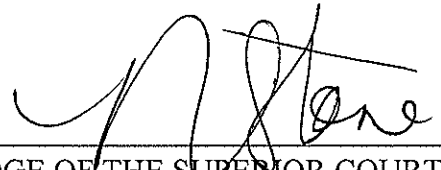
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **KYLE CLAYTON HARTMAN**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **KYLE CLAYTON HARTMAN**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1-.

Dated: 2/2/22

Time Issued: 4:02 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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| Defendant | DOB | CII | DMV | Bail Requested |
|------------------------------|------------------|------------|------------|-----------------------|
| DURAZO, Ramiro | [REDACTED] | | [REDACTED] | |
| GARDEA, Roman | [REDACTED] | | [REDACTED] | |
| MARTINEZ JR., Ramon | [REDACTED] | | [REDACTED] | |
| FELIX, Robert Andres | [REDACTED] | | [REDACTED] | |
| HARTMAN, Kyle Clayton | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **RAMIRO DURAZO**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **ROMAN GARDEA**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **RAMON MARTINEZ JR.**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |

28 //

1 **ROBERT ANDRES FELIX**

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 18 | PC 487(a) | 16-2-3 | | |
| 4 | 19 | PC 72 | 16-2-3 | | |
| 5 | 20 | PC 72 | 16-2-3 | | |
| 6 | 21 | PC 72 | 16-2-3 | | |
| 7 | 22 | PC 72 | 16-2-3 | | |
| 8 | 23 | PC 72 | 16-2-3 | | |

9 **KYLE CLAYTON HARTMAN**

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 24 | PC 487(a) | 16-2-3 | | |
| 12 | 25 | PC 72 | 16-2-3 | | |
| 13 | 26 | PC 72 | 16-2-3 | | |
| 14 | 27 | PC 72 | 16-2-3 | | |
| 15 | 28 | PC 72 | 16-2-3 | | |
| 16 | 29 | PC 72 | 16-2-3 | | |
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1 I ORDER that the defendants named below be held to answer for the above-described
2 offenses and allegations and be admitted to bail in the sum of:

3
4 Ramiro Durazo \$ _____
5 Roman Gardea \$ _____
6 Ramon Martinez Jr. \$ _____
7 Robert Andres Felix \$ _____
8 Kyle Clayton Hartman \$ _____
9

10 And that said defendant be committed to the custody of the Sheriff until such bail is given.

11 The date of Felony arraignment is set for:

12
13 _____ in Department _____ at _____ a.m.
14 (Date)

15
16 _____ Date _____
17 Magistrate
18 Superior Court of California
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WARRANT ISSUED
[Handwritten signature]

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 CHRISTOPHER G. SANCHEZ
Deputy Attorney General
5 PAUL S. THIES
Deputy Attorney General
6 State Bar No. 305084
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013
Telephone: (213) 269-6070
8 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
9 *Attorneys for the People of the State of California*

Vertical stamp:
2022 FEB -2 PM 3:27
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Vertical stamp: Central District
Los Angeles Superior Court

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

14 **PEOPLE OF THE STATE OF CALIFORNIA,**
15
16 **Plaintiff,**
17
18 **v.**
19 **(1) JEFFREY ROBERT MCKEE**
(DOB: [REDACTED])
20 **(2) REMIGIO BEMBI JR.**
(DOB: [REDACTED])
21 **(3) ANDREW JAMES SANTELICES**
(DOB: [REDACTED])
22 **(4) JAVIER GONZALEZ**
(DOB: [REDACTED])
23 **(5) PEDRO CHAVEZ JR.**
24 **(DOB: [REDACTED])**
25 **(6) BILLY JOEL GUILLEN**
26 **(DOB: [REDACTED])**
27
28 **Defendants.**

Case No. BA498279
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 September 15, 2016, and November 23, 2016, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **JEFFREY ROBERT MCKEE**, who did unlawfully take
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One
8 Thousand Eight Hundred Forty-Nine Dollars and Forty-Four Cents (\$1,849.44).

9 COUNT 2

10 On or about November 23, 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 **JEFFREY ROBERT MCKEE**, 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 3

16 On or about September 29, 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 **JEFFREY ROBERT MCKEE**, 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 4

22 On or about September 15, 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 **JEFFREY ROBERT MCKEE**, 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 5

2 On or about and between January 25, 2017, and December 13, 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 Defendant **REMIGIO BEMBI JR.**, who did unlawfully take money
5 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Six
6 Hundred Ninety-Two Dollars and Twenty-Eight Cents (\$1,692.28).

7 COUNT 6

8 On or about December 13, 2017, 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 **REMIGIO BEMBI JR.**, 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 7

14 On or about October 3, 2017, 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 **REMIGIO BEMBI JR.**, who did unlawfully and with intent to defraud,
17 present for allowance and payment a false and fraudulent claim, bill, account, voucher and
18 writing.

19 COUNT 8

20 On or about September 20, 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 **REMIGIO BEMBI JR.**, 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 9

26 On or about January 15, 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 **REMIGIO BEMBI JR.**, 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 10**

4 On or about and between October 6, 2016, and December 8, 2016, 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 Defendant **ANDREW JAMES SANTELICES**, who did unlawfully
7 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One
8 Thousand Two Hundred Eighteen Dollars and Eighty-Eight Cents (\$1,218.88).

9 **COUNT 11**

10 On or about December 8, 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 **ANDREW JAMES SANTELICES**, 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 12**

16 On or about October 6, 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 **ANDREW JAMES SANTELICES**, 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 13**

22 On or about and between September 15, 2016, and November 23, 2016, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **JAVIER GONZALEZ**, who did unlawfully take money
25 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand One
26 Hundred Ninety-Nine Dollars and Sixty-Eight Cents (\$1,199.68).

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1 COUNT 14

2 On or about November 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 **JAVIER GONZALEZ**, 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 15

8 On or about September 15, 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 **JAVIER GONZALEZ**, 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 16

14 On or about and between June 28, 2016, and February 7, 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 Defendant **PEDRO CHAVEZ JR.**, who did unlawfully take money
17 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand
18 Twenty-Eight Dollars and Seventy-Four Cents (\$1,028.74).

19 COUNT 17

20 On or about February 7, 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 **PEDRO CHAVEZ JR.**, 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 18

26 On or about August 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 **PEDRO CHAVEZ JR.**, 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 19

4 On or about June 28, 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 **PEDRO CHAVEZ JR.**, 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 20

10 On or about November 23, 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 **BILLY JOEL GUILLEN**, 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.

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1 SPECIAL ALLEGATION

2 STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-20, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California



PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

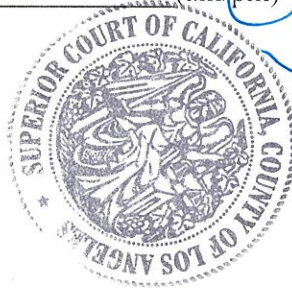
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **JEFFREY ROBERT MCKEE**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **JEFFREY ROBERT MCKEE**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/3/22

20 Time Issued: 4:50 (am/pm)



Natalie Stone
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **REMIGIO BEMBI JR.**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **REMIGIO BEMBI JR.**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/3/22

20 Time Issued: 4:50 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **ANDREW JAMES SANTELICES**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **ANDREW JAMES SANTELICES**, and to bring
15 said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1_____.

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19 Dated: 2/3/20

20 Time Issued: 4:51 (am/pm) pm

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **JAVIER GONZALEZ**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **JAVIER GONZALEZ**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

18
19 Dated: 2/3/22

20 Time Issued: 4:51 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **PEDRO CHAVEZ JR.**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **PEDRO CHAVEZ JR.**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1.

18
19 Dated: 2/3/22

20 Time Issued: 4:51 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **BILLY JOEL GUILLEN**: Presentation of False
12 Claims in violation of Penal Code section 72.

13 Therefore, you are commanded to arrest **BILLY JOEL GUILLEN**, and to bring said
14 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
15 848 of the California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ A) 1-

17
18 Dated: 2/3/22

19 Time Issued: 4:51 (am/pm)

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22 JUDGE OF THE SUPERIOR COURT
23 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|--------------------------|------------------|-----|------------|----------------|
| McKEE, Jeffery Robert | [REDACTED] | | [REDACTED] | |
| BEMBI JR., Remigio | [REDACTED] | | [REDACTED] | |
| SANTELICES, Andrew James | [REDACTED] | | [REDACTED] | |
| GONZALEZ, Javier | [REDACTED] | | [REDACTED] | |
| CHAVEZ JR., Pedro | [REDACTED] | | [REDACTED] | |
| GUILLEN, Billy Joel | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **JEFFREY ROBERT MCKEE**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |

11 **REMIGIO BEMBI JR.**

| 12 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 13 | 5 | PC 487(a) | 16-2-3 | | |
| 14 | 6 | PC 72 | 16-2-3 | | |
| 15 | 7 | PC 72 | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |

18 **ANDREW JAMES SANTELICES**

| 19 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 20 | 10 | PC 487(a) | 16-2-3 | | |
| 21 | 11 | PC 72 | 16-2-3 | | |
| 22 | 12 | PC 72 | 16-2-3 | | |

23 **JAVIER GONZALEZ**

| 24 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 25 | 13 | PC 487(a) | 16-2-3 | | |
| 26 | 14 | PC 72 | 16-2-3 | | |
| 27 | 15 | PC 72 | 16-2-3 | | |

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PEDRO CHAVEZ JR.

| <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|------------|---------------|---------------------|-------------------|----------------------|
| 16 | PC 487(a) | 16-2-3 | | |
| 17 | PC 72 | 16-2-3 | | |
| 18 | PC 72 | 16-2-3 | | |
| 19 | PC 72 | 16-2-3 | | |

BILLY JOEL GUILLEN

| <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|------------|---------------|---------------------|-------------------|----------------------|
| 20 | PC 72 | 16-2-3 | | |

I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

- Jeffrey Robert McKee \$ _____
- Remigio Bembi Jr. \$ _____
- Andrew James Santelices \$ _____
- Javier Gonzalez \$ _____
- Pedro Chavez Jr. \$ _____
- Billy Joel Guillen \$ _____

And that said defendant be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California

CR
WARRANT ISSUED

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 CHRISTOPHER G. SANCHEZ
Deputy Attorney General
5 PAUL S. THIES
Deputy Attorney General
6 State Bar No. 305084
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013
Telephone: (213) 269-6070
8 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
9 *Attorneys for the People of the State of California*

2022 FEB -2 2 PM 4:07
S
Clerk of Superior Court
Los Angeles County
F11001

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

13 **PEOPLE OF THE STATE OF**
14 **CALIFORNIA,**

15 Plaintiff,

16 v.

Case No. BA498280

FELONY COMPLAINT FOR ARREST
WARRANT

18 (1) **DORIS PENICHE**
(DOB: [REDACTED])

19 (2) **FRANCISCO JAVIER FONSECA JR.**
(DOB: [REDACTED])

21 (3) **JOSE ANTONIO RAMIREZ**
(DOB: [REDACTED])

22 (4) **MARTIN CHRISTOPHER GONZALES**
(DOB: [REDACTED])

24 (5) **FRANCISCO JAVIER VILLALOBOS**
(DOB: [REDACTED])

25 (6) **NIMA VAEZI**
(DOB: [REDACTED])

27 Defendants.
28

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 November 23, 2016, through March 19, 2018, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **DORIS PENICHE**, who did unlawfully take money and
7 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Ten Thousand Five
8 Hundred Seventy-Five Dollars and Seventy-One Cents (\$10,575.71).

9 COUNT 2

10 On or about December 21, 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 **DORIS PENICHE**, 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 26, 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 **DORIS PENICHE**, 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 4

22 On or about January 19, 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 **DORIS PENICHE**, 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 January 5, 2017, 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 **DORIS PENICHE**, 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 6

8 On or about November 23, 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 **DORIS PENICHE**, 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 and between November 23, 2016, through February 27, 2018, in the County of
15 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
16 Felony, was committed by Defendant **FRANCISCO JAVIER FONSECA JR.**, who did
17 unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to
18 wit Eight Thousand Eight Hundred Eighty-Three Dollars and Forty-Two Cents (\$8,831.42).

19 COUNT 8

20 On or about September 28, 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 **FRANCISCO JAVIER FONSECA JR.**, who did
23 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
24 claim, bill, account, voucher and writing.

25 COUNT 9

26 On or about May 9, 2017, 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 **FRANCISCO JAVIER FONSECA JR.**, 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 10

4 On or about January 26, 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 **FRANCISCO JAVIER FONSECA JR.**, who did
7 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
8 claim, bill, account, voucher and writing.

9 COUNT 11

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 **FRANCISCO JAVIER FONSECA JR.**, who did
13 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
14 claim, bill, account, voucher and writing.

15 COUNT 12

16 On or about November 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 **FRANCISCO JAVIER FONSECA JR.**, who did
19 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
20 claim, bill, account, voucher and writing.

21 COUNT 13

22 On or about and between January 17, 2017, through February 20, 2018, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **JOSE ANTONIO RAMIREZ**, who did unlawfully take
25 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Seven
26 Thousand Seven Hundred Forty-Five Dollars and Forty-Three Cents (\$7,745.43).

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1 COUNT 14

2 On or about December 20, 2017, 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 **JOSE ANTONIO RAMIREZ**, who did unlawfully and
5 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
6 account, voucher and writing.

7 COUNT 15

8 On or about May 24, 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 **JOSE ANTONIO RAMIREZ**, 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 16

14 On or about May 9, 2017, 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 **JOSE ANTONIO RAMIREZ**, 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 17

20 On or about January 26, 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 **JOSE ANTONIO RAMIREZ**, who did unlawfully and
23 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
24 account, voucher and writing.

25 COUNT 18

26 On or about January 19, 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 **JOSE ANTONIO RAMIREZ**, 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 19

4 On or about and between January 12, 2017, through March 26, 2018, 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 Defendant **MARTIN GONZALEZ**, who did unlawfully take money
7 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Six Thousand Seven
8 Hundred Eighty-Nine Dollars and Sixty-Nine Cents (\$6,789.69).

9 COUNT 20

10 On or about July 23, 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 **MARTIN CHRISTOPHER GONZALES**, 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 21

16 On or about June 17, 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 **MARTIN CHRISTOPHER GONZALES**, 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 22

22 On or about May 13, 2017, 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 **MARTIN CHRISTOPHER GONZALES**, 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 23

2 On or about January 26, 2017, 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 **MARTIN CHRISTOPHER GONZALES**, who did
5 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
6 claim, bill, account, voucher and writing.

7 COUNT 24

8 On or about January 12, 2017, 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 **MARTIN CHRISTOPHER GONZALES**, who did
11 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
12 claim, bill, account, voucher and writing.

13 COUNT 25

14 On or about and between December 12, 2016, through October 14, 2017, in the County of
15 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
16 Felony, was committed by Defendant **FRANCISCO JAVIER VILLALOBOS**, who did
17 unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to
18 wit Six Thousand Six Hundred Four Dollars and Five Cents (\$6,604.05).

19 COUNT 26

20 On or about September 6, 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 **FRANCISCO JAVIER VILLALOBOS**, who did
23 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
24 claim, bill, account, voucher and writing.

25 COUNT 27

26 On or about March 16, 2017, 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 **FRANCISCO JAVIER VILLALOBOS**, 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 March 2, 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 **FRANCISCO JAVIER VILLALOBOS**, 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 January 26, 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 **FRANCISCO JAVIER VILLALOBOS**, who did
13 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
14 claim, bill, account, voucher and writing.

15 COUNT 30

16 On or about December 20, 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 **FRANCISCO JAVIER VILLALOBOS**, who did
19 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
20 claim, bill, account, voucher and writing.

21 COUNT 31

22 On or about and between April 26, 2016, through February 16, 2018, in the County of Los
23 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **NIMA VAEZI**, who did unlawfully take money and
25 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five Thousand Seven
26 Hundred Seventy-Nine Dollars and Forty-Eight Cents (\$5,779.48).

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COUNT 32

On or about July 31, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 33

On or about June 11, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 34

On or about May 13, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 35

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 NIMA VAEZI, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 36

On or about April 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 NIMA VAEZI, 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 SPECIAL ALLEGATION

2 STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-36, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,
ROB BONTA
Attorney General of California


PAUL S. THIES
Deputy Attorney General
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."

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **DORIS PENICHE**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **DORIS PENICHE**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1-

Dated: 2/3/22

Time Issued: 4:44 (am/pm)



N Stone

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

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6 The People of the State of California to any peace officer of said State:


7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **FRANCISCO JAVIER FONSECA JR.**: Grand
12 Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of
13 Penal Code section 72.

14 Therefore, you are commanded to arrest **FRANCISCO JAVIER FONSECA JR.**, and to
15 bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,
16 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/3/22

20 Time Issued: 4:44 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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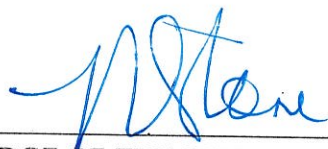
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **JOSE ANTONIO RAMIREZ**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **JOSE ANTONIO RAMIREZ**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

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19 Dated: 2/3/22

20 Time Issued: 4:45 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES
3

4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **MARTIN CHRISTOPHER GONZALES**: Grand
12 Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of
13 Penal Code section 72.

14 Therefore, you are commanded to arrest **MARTIN CHRISTOPHER GONZALES**, and to
15 bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,
16 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1
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19 Dated: 2/3/22

20 Time Issued: 4:45 (am/pm) B
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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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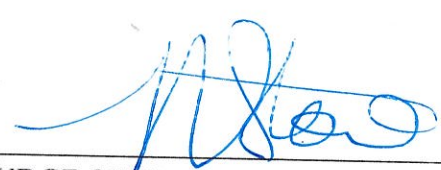
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **FRANCISCO JAVIER VILLALOBOS**: Grand
12 Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of
13 Penal Code section 72.

14 Therefore, you are commanded to arrest **FRANCISCO JAVIER VILLALOBOS**, and to
15 bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,
16 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

18
19 Dated: 2/3/22

20 Time Issued: 4:45 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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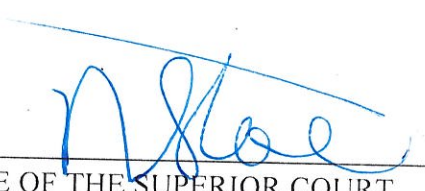
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **NIMA VAEZI**: Grand Theft in violation of Penal
12 Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

13 Therefore, you are commanded to arrest **NIMA VAEZI**, and to bring said Defendant
14 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
15 California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ 1-

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18 Dated: 2/3/22

19 Time Issued: 4:46 (am/pm) o

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22 JUDGE OF THE SUPERIOR COURT
23 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|-------------------------------|------------------|-----|------------|----------------|
| PENICHE, Doris | [REDACTED] | | [REDACTED] | |
| FONSECA JR., Francisco Javier | [REDACTED] | | [REDACTED] | |
| RAMIREZ, Jose Antonio | [REDACTED] | | [REDACTED] | |
| GONZALES, Martin Christopher | [REDACTED] | | [REDACTED] | |
| VILLALOBOS, Francisco Javier | [REDACTED] | | [REDACTED] | |
| VAEZI, Nima | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

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1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **DORIS PENICHE**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **FRANCISCO JAVIER FONSECA JR.**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **JOSE ANTONIO RAMIREZ**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

1 **MARTIN CHRISTOPHER GONZALES**

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 19 | PC 487(a) | 16-2-3 | | |
| 4 | 20 | PC 72 | 16-2-3 | | |
| 5 | 21 | PC 72 | 16-2-3 | | |
| 6 | 22 | PC 72 | 16-2-3 | | |
| 7 | 23 | PC 72 | 16-2-3 | | |
| 8 | 24 | PC 72 | 16-2-3 | | |

9 **FRANCISCO JAVIER VILLALOBOS**

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 25 | PC 487(a) | 16-2-3 | | |
| 12 | 26 | PC 72 | 16-2-3 | | |
| 13 | 27 | PC 72 | 16-2-3 | | |
| 14 | 28 | PC 72 | 16-2-3 | | |
| 15 | 29 | PC 72 | 16-2-3 | | |
| 16 | 30 | PC 72 | 16-2-3 | | |

17 **NIMA VAEZI**

| 18 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 19 | 31 | PC 487(a) | 16-2-3 | | |
| 20 | 32 | PC 72 | 16-2-3 | | |
| 21 | 33 | PC 72 | 16-2-3 | | |
| 22 | 34 | PC 72 | 16-2-3 | | |
| 23 | 35 | PC 72 | 16-2-3 | | |
| 24 | 36 | PC 72 | 16-2-3 | | |
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I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

| | |
|------------------------------|----------|
| Doris Peniche | \$ _____ |
| Francisco Javier Fonseca Jr. | \$ _____ |
| Jose Antonio Ramirez | \$ _____ |
| Martin Christopher Gonzales | \$ _____ |
| Francisco Javier Villalobos | \$ _____ |
| Nima Vaezi | \$ _____ |

And that said defendant be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

| | |
|------------------------------|-------|
| _____ | _____ |
| Magistrate | Date |
| Superior Court of California | |

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 CHRISTOPHER G. SANCHEZ
Deputy Attorney General
5 PAUL S. THIES
Deputy Attorney General
6 State Bar No. 305084
300 South Spring Street, Suite 1702
7 Los Angeles, CA 90013
Telephone: (213) 269-6070
8 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
9 *Attorneys for the People of the State of California*

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CRIMINAL DIVISION
LOS ANGELES

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

13 PEOPLE OF THE STATE OF
14 CALIFORNIA,
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16 Plaintiff,
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18 v.
19 (1) MICHAEL STEPHEN PEARSON
(DOB: [REDACTED])
20 (2) GUILLERMO SANCHEZ JR.
(DOB: [REDACTED])
21 (3) LUIS ENRIQUE BRAVO JR.
(DOB: [REDACTED])
22 (4) SAMMY SANTOS SALAZAR
23 (DOB: [REDACTED])
24 (5) AGUSTIN AGUILERA
(DOB: [REDACTED])
25 (6) TYLER RANDAL OLSON
26 (DOB: [REDACTED])
27
28 Defendants.

Case No. BA498281

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 November 23, 2016, through February 26, 2018, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **MICHAEL STEPHEN PEARSON**, who did unlawfully
7 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five
8 Thousand Seven Hundred Twenty-Eight Dollars and Sixty-Six Cents (\$5,728.66).

9 COUNT 2

10 On or about November 21, 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 **MICHAEL STEPHEN PEARSON**, 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 3

16 On or about September 28, 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 **MICHAEL STEPHEN PEARSON**, 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 4

22 On or about May 24, 2017, 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 **MICHAEL STEPHEN PEARSON**, 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 5

2 On or about February 22, 2017, 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 **MICHAEL STEPHEN PEARSON**, who did unlawfully
5 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
6 account, voucher and writing.

7 COUNT 6

8 On or about November 23, 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 **MICHAEL STEPHEN PEARSON**, who did unlawfully
11 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
12 account, voucher and writing.

13 COUNT 7

14 On or about and between November 23, 2016, through March 21, 2018, in the County of
15 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
16 Felony, was committed by Defendant **GUILLERMO SANCHEZ JR.**, who did unlawfully take
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five
18 Thousand Seven Hundred Eight Dollars and Twenty-Two Cents (\$5,708.22).

19 COUNT 8

20 On or about December 20, 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 **GUILLERMO SANCHEZ JR.**, who did unlawfully and
23 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
24 account, voucher and writing.

25 COUNT 9

26 On or about February 7, 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 **GUILLERMO SANCHEZ JR.**, 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 10

4 On or about January 19, 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 **GUILLERMO SANCHEZ JR.**, 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 11

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 **GUILLERMO SANCHEZ JR.**, 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 12

16 On or about November 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 **GUILLERMO SANCHEZ JR.**, 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 13

22 On or about and between November 23, 2016, through March 14, 2018, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **LUIS ENRIQUE BRAVO JR.**, who did unlawfully take
25 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five
26 Thousand Two Hundred Eighty-Two Dollars and Ninety-Four Cents (\$5,282.94).

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1 COUNT 14

2 On or about October 5, 2017, 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 ENRIQUE BRAVO JR.**, 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 15

8 On or about February 7, 2017, 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 **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and
11 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
12 account, voucher and writing.

13 COUNT 16

14 On or about January 26, 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 **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and
17 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
18 account, voucher and writing.

19 COUNT 17

20 On or about January 12, 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 **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and
23 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
24 account, voucher and writing.

25 COUNT 18

26 On or about November 23, 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 **LUIS ENRIQUE BRAVO JR.**, 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 19

4 On or about and between May 14, 2017, through March 27, 2018, 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 Defendant **SAMMY SANTOS SALAZAR**, who did unlawfully take
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five
8 Thousand Two Hundred Nineteen Dollars and Sixty-One Cents (\$5,219.61).

9 COUNT 20

10 On or about March 22, 2018, 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 **SAMMY SANTOS SALAZAR**, 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 21

16 On or about March 20, 2018, 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 **SAMMY SANTOS SALAZAR**, 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 22

22 On or about December 21, 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 **SAMMY SANTOS SALAZAR**, 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 23

On or about September 14, 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 **SAMMY SANTOS SALAZAR**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 24

On or about June 8, 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 **SAMMY SANTOS SALAZAR**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 25

On or about and between November 23, 2016, through December 12, 2017, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **AGUSTIN AGUILERA**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Six Hundred Sixty-Five Dollars and Seventy-Five Cents (\$4,665.75).

COUNT 26

On or about October 14, 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 **AGUSTIN AGUILERA**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 27

On or about October 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 **AGUSTIN AGUILERA**, 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 September 30, 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 **AGUSTIN AGUILERA**, 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 September 27, 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 **AGUSTIN AGUILERA**, 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 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 **AGUSTIN AGUILERA**, 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 and between January 12, 2017, through January 17, 2018, in the County of Los
23 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **TYLER RANDAL OLSON**, who did unlawfully take
25 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four
26 Thousand Three Hundred Ninety-Nine Dollars and Six Cents (\$4,399.06).

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1 COUNT 32

2 On or about December 17, 2017, 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 **TYLER RANDAL OLSON**, 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 November 29, 2017, 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 **TYLER RANDAL OLSON**, 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 34

14 On or about May 4, 2017, 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 **TYLER RANDAL OLSON**, 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 March 2, 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 **TYLER RANDAL OLSON**, 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 January 12, 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 **TYLER RANDAL OLSON**, 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 **SPECIAL ALLEGATION**

4 **STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)**

5 It is further alleged for Counts 1-36, that the above violations were not discovered until
6 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
7 801.5 and 803(c).

8 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
9 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
10 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
11 smallest geographic area in its division, had nearly three times the amount of overtime
12 expenditures compared to the CHP station covering the largest geographic area. In his review of
13 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
14 leading him to believe that officers at the East Los Angeles station may have submitted for and
15 received compensation for overtime assignments not physically worked.

16 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
17 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
18 investigation into every officer who worked a Caltrans overtime detail within the previous two
19 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
20 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
21 specific offenses now charged in the complaint.

22 The alleged offenses were not discovered earlier because the supervisors who would have
23 been the ones to report these activities were also committing the fraud. Moreover, the fraud
24 typically took place during graveyard hours, which was outside of the normal working hours of
25 office managers. No one had constructive or actual knowledge of the offenses alleged in this
26 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California



PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **MICHAEL STEPHEN PEARSON**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **MICHAEL STEPHEN PEARSON**, and to bring
15 said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 7

18
19 Dated: 2/3/22

20 Time Issued: 4:48 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

Natalie Stone
NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **GUILLERMO SANCHEZ JR.**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **GUILLERMO SANCHEZ JR.**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

18
19 Dated: 2/3/02

20 Time Issued: 4:48 (am/pm) 0

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **LUIS ENRIQUE BRAVO JR.**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **LUIS ENRIQUE BRAVO JR.**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 2-

18
19 Dated: 2/3/22

20 Time Issued: 4:48 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **SAMMY SANTOS SALAZAR**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **SAMMY SANTOS SALAZAR**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 7.

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19 Dated: 2/3/22

20 Time Issued: 4:48 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **AGUSTIN AGUILERA**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **AGUSTIN AGUILERA**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/3/22

20 Time Issued: 4:48 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **TYLER RANDAL OLSON**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **TYLER RANDAL OLSON**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 25.

18
19 Dated: 2/3/22

20 Time Issued: 4:48 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|--------------------------|------------------|-----|------------|----------------|
| PEARSON, Michael Stephen | [REDACTED] | | [REDACTED] | |
| SANCHEZ JR., Guillermo | [REDACTED] | | [REDACTED] | |
| BRAVO JR., Luis Enrique | [REDACTED] | | [REDACTED] | |
| SALAZAR, Sammy Santos | [REDACTED] | | [REDACTED] | |
| AGUILERA, Agustin | [REDACTED] | | [REDACTED] | |
| OLSON, Tyler Randal | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **MICHAEL STEPHEN PEARSON**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **GUILLERMO SANCHEZ JR.**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **LUIS ENRIQUE BRAVO JR.**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

1 SAMMY SANTOS SALAZAR

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 19 | PC 487(a) | 16-2-3 | | |
| 4 | 20 | PC 72 | 16-2-3 | | |
| 5 | 21 | PC 72 | 16-2-3 | | |
| 6 | 22 | PC 72 | 16-2-3 | | |
| 7 | 23 | PC 72 | 16-2-3 | | |
| 8 | 24 | PC 72 | 16-2-3 | | |

9 AGUSTIN AGUILERA

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 25 | PC 487(a) | 16-2-3 | | |
| 12 | 26 | PC 72 | 16-2-3 | | |
| 13 | 27 | PC 72 | 16-2-3 | | |
| 14 | 28 | PC 72 | 16-2-3 | | |
| 15 | 29 | PC 72 | 16-2-3 | | |
| 16 | 30 | PC 72 | 16-2-3 | | |

17 TYLER RANDAL OLSON

| 18 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 19 | 31 | PC 487(a) | 16-2-3 | | |
| 20 | 32 | PC 72 | 16-2-3 | | |
| 21 | 33 | PC 72 | 16-2-3 | | |
| 22 | 34 | PC 72 | 16-2-3 | | |
| 23 | 35 | PC 72 | 16-2-3 | | |
| 24 | 36 | PC 72 | 16-2-3 | | |

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1 I ORDER that the defendants named below be held to answer for the above-described
2 offenses and allegations and be admitted to bail in the sum of:

3
4 Michael Stephen Pearson \$ _____
5 Guillermo Sanchez Jr. \$ _____
6 Luis Enrique Bravo Jr. \$ _____
7 Sammy Santos Salazar \$ _____
8 Agustin Aguilera \$ _____
9 Tyler Randal Olson \$ _____

10
11 And that said defendant be committed to the custody of the Sheriff until such bail is given.
12 The date of Felony arraignment is set for:

13
14 _____ in Department _____ at _____ a.m.
(Date)

15
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17 _____
18 Magistrate Date
Superior Court of California

WARRANT ISSUED

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ROB BONTA
Attorney General of California
LANCE WINTERS
Chief Assistant Attorney General
JOHNETTE JAURON
Senior Assistant Attorney General
CHRISTOPHER G. SANCHEZ
Deputy Attorney General
PAUL S. THIES
Deputy Attorney General
State Bar No. 305084
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6070
Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
Attorneys for the People of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

(1) LEONARD DUENAS
(DOB: [REDACTED])

(2) MARIO SENCION
(DOB: [REDACTED])

(3) RUBEN GERARD MARTINEZ
(DOB: [REDACTED])

(4) SCOTT ALAN SUTTON
(DOB: [REDACTED])

(5) JAMES HOREJS
(DOB: [REDACTED])

(6) ANTHONY JOSEPH MARTIN SR.
(DOB: [REDACTED])

Defendants.

Case No. BA498282

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 November 23, 2016, through January 29, 2018, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **LEONARD DUENAS**, who did unlawfully take money
7 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand
8 Three Hundred Thirty-Nine Dollars and Two Cents (\$4,339.02).

9 COUNT 2

10 On or about May 11, 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 **LEONARD DUENAS**, 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 3

16 On or about May 4, 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 **LEONARD DUENAS**, 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 March 2, 2017, 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 **LEONARD DUENAS**, 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 5

On or about January 1, 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 **LEONARD DUENAS**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 6

On or about November 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 **LEONARD DUENAS**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 7

On or about and between August 23, 2016, through March 22, 2018, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **MARIO SENCION**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand One Hundred Eighty-Six Dollars and Eighty-One Cents (\$4,186.81).

COUNT 8

On or about March 22, 2018, 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 **MARIO SENCION**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 9

On or about February 8, 2018, 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 **MARIO SENCION**, who did unlawfully and with intent to

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

3 COUNT 10

4 On or about February 1, 2018, 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 **MARIO SENCION**, 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 11

10 On or about January 25, 2018, 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 **MARIO SENCION**, 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 12

16 On or about September 25, 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 **MARIO SENCION**, 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 13

22 On or about and between November 23, 2016, through March 27, 2018, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **RUBEN GERARD MARTINEZ**, who did unlawfully
25 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
26 Thousand Eight Hundred Fifty-Nine Dollars and Seven Cents (\$3,859.07).

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COUNT 14

On or about January 8, 2018, 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 **RUBEN GERARD MARTINEZ**, 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 July 27, 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 **RUBEN GERARD MARTINEZ**, 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 April 18, 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 **RUBEN GERARD MARTINEZ**, 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 January 26, 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 **RUBEN GERARD MARTINEZ**, 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 November 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 **RUBEN GERARD MARTINEZ**, 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 19**

4 On or about and between November 23, 2016, through March 14, 2018, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **SCOTT ALAN SUTTON**, who did unlawfully take
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
8 Thousand Five Hundred Forty-Two Dollars and Twenty-Four Cents (\$3,542.24).

9 **COUNT 20**

10 On or about December 19, 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 **SCOTT ALAN SUTTON**, 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 21**

16 On or about December 14, 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 **SCOTT ALAN SUTTON**, 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 22**

22 On or about September 14, 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 **SCOTT ALAN SUTTON**, 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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COUNT 23

On or about January 19, 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 **SCOTT ALAN SUTTON**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 24

On or about November 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 **SCOTT ALAN SUTTON**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 25

On or about and between March 3, 2016, through August 31, 2017, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **JAMES HOREJS**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three Thousand Sixty- Three Dollars and Twenty- Nine Cents (\$3,063.29).

COUNT 26

On or about August 31, 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 **JAMES HOREJS**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 27

On or about March 28, 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 **JAMES HOREJS**, 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 28

4 On or about February 28, 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 **JAMES HOREJS**, 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 29

10 On or about November 23, 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 **JAMES HOREJS**, 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 30

16 On or about March 3, 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 **JAMES HOREJS**, 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 31

22 On or about and between October 10, 2017, through March 21, 2018, in the County of Los
23 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully
25 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
26 Thousand Nine Hundred Seven Dollars and Fifty-Two Cents (\$2,907.52).

27 ////

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1 COUNT 32

2 On or about February 26, 2018, 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 **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully
5 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
6 account, voucher and writing.

7 COUNT 33

8 On or about February 8, 2018, 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 **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully
11 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
12 account, voucher and writing.

13 COUNT 34

14 On or about January 22, 2018, 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 **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully
17 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
18 account, voucher and writing.

19 COUNT 35

20 On or about January 11, 2018, 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 **ANTHONY JOSEPH MARTIN SR.**, 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 36

26 On or about October 17, 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 **ANTHONY JOSEPH MARTIN SR.**, 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 **SPECIAL ALLEGATION**

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

5 It is further alleged for Counts 1-36, that the above violations were not discovered until
6 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
7 801.5 and 803(c).

8 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
9 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
10 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
11 smallest geographic area in its division, had nearly three times the amount of overtime
12 expenditures compared to the CHP station covering the largest geographic area. In his review of
13 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
14 leading him to believe that officers at the East Los Angeles station may have submitted for and
15 received compensation for overtime assignments not physically worked.

16 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
17 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
18 investigation into every officer who worked a Caltrans overtime detail within the previous two
19 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
20 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
21 specific offenses now charged in the complaint.

22 The alleged offenses were not discovered earlier because the supervisors who would have
23 been the ones to report these activities were also committing the fraud. Moreover, the fraud
24 typically took place during graveyard hours, which was outside of the normal working hours of
25 office managers. No one had constructive or actual knowledge of the offenses alleged in this
26 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,

ROB BONTA
Attorney General of California



PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **LEONARD DUENAS**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **LEONARD DUENAS**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1
18

19 Dated: 2/4/22

20 Time Issued: 9:14 (am/pm)



N Stone
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **MARIO SENCION**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **MARIO SENCION**, and to bring said Defendant
15 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
16 California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

18
19 Dated: 2/4/22

20 Time Issued: 9:14 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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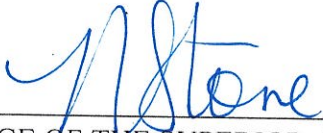
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **RUBEN GERARD MARTINEZ**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **RUBEN GERARD MARTINEZ**, and to bring
15 said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 15
18

19 Dated: 2/4/22

20 Time Issued: 9:14 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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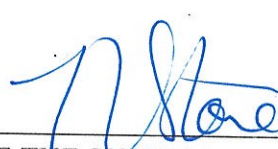
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **SCOTT ALAN SUTTON**: Grand Theft in violation
12 of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **SCOTT ALAN SUTTON**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1.

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19 Dated: 2/4/22

20 Time Issued: 9:15 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **JAMES HOREJS**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **JAMES HOREJS**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 2-

Dated: 2/4/02

Time Issued: 9:15 (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES
3

4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **ANTHONY JOSEPH MARTIN SR.**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **ANTHONY JOSEPH MARTIN SR.**, and to
15 bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,
16 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1-

18
19 Dated: 2/4/22

20 Time Issued: 9:15 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|------------------------------|------------------|------------|------------|-----------------------|
| DUENAS, Leonard | [REDACTED] | | [REDACTED] | |
| SENCION, Mario | [REDACTED] | | [REDACTED] | |
| MARTINEZ, Ruben Gerard | [REDACTED] | | [REDACTED] | |
| SUTTON, Scott Alan | [REDACTED] | | [REDACTED] | |
| HOREJS, James | [REDACTED] | | [REDACTED] | |
| MARTIN SR., Anthony Joseph | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **LEONARD DUENAS**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **MARIO SENCION**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **RUBEN GERARD MARTINEZ**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

1 **SCOTT ALAN SUTTON**

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 19 | PC 487(a) | 16-2-3 | | |
| 4 | 20 | PC 72 | 16-2-3 | | |
| 5 | 21 | PC 72 | 16-2-3 | | |
| 6 | 22 | PC 72 | 16-2-3 | | |
| 7 | 23 | PC 72 | 16-2-3 | | |
| 8 | 24 | PC 72 | 16-2-3 | | |

9 **JAMES HOREJS**

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 25 | PC 487(a) | 16-2-3 | | |
| 12 | 26 | PC 72 | 16-2-3 | | |
| 13 | 27 | PC 72 | 16-2-3 | | |
| 14 | 28 | PC 72 | 16-2-3 | | |
| 15 | 29 | PC 72 | 16-2-3 | | |
| 16 | 30 | PC 72 | 16-2-3 | | |

17 **ANTHONY JOSPEH MARTIN JR.**

| 18 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 19 | 31 | PC 487(a) | 16-2-3 | | |
| 20 | 32 | PC 72 | 16-2-3 | | |
| 21 | 33 | PC 72 | 16-2-3 | | |
| 22 | 34 | PC 72 | 16-2-3 | | |
| 23 | 35 | PC 72 | 16-2-3 | | |
| 24 | 36 | PC 72 | 16-2-3 | | |

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I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

| | |
|---------------------------|----------|
| Leonard Duenas | \$ _____ |
| Mario Sencion | \$ _____ |
| Ruben Gerard Martinez | \$ _____ |
| Scott Alan Sutton | \$ _____ |
| James Horejs | \$ _____ |
| Anthony Joseph Martin Jr. | \$ _____ |

And that said defendant be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate
Superior Court of California

Date

WARRANT ISSUED

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ROB BONTA
Attorney General of California
LANCE WINTERS
Chief Assistant Attorney General
JOHNETTE JAURON
Senior Assistant Attorney General
CHRISTOPHER G. SANCHEZ
Deputy Attorney General
PAUL S. THIES
Deputy Attorney General
State Bar No. 305084
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6070
Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
Attorneys for the People of the State of California

2002 FEB -3 PM 2:04

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

(1) DONALD RODRICK GRIMES NELSON
(DOB: [REDACTED])

(2) FLAVIO NAVAR
(DOB: [REDACTED])

(3) THOMAS SANTIAGO
(DOB: [REDACTED])

(4) PAUL LUKE MARTINEZ
(DOB: [REDACTED])

(5) ROBERTO CESAR FLORES
(DOB: [REDACTED])

(6) WILLIAM LINDSEY GODMAN
(DOB: [REDACTED])

Defendants.

Case No. BA498283

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 February 5, 2017, through March 4, 2018, 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 Defendant DONALD RODRICK GRIMES NELSON, who did
7 unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to
8 wit Two Thousand Seven Hundred Forty-Six Dollars and Seventy-Two Cents (\$2,746.72).

9 COUNT 2

10 On or about October 15, 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 DONALD RODRICK GRIMES NELSON, who did
13 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
14 claim, bill, account, voucher and writing.

15 COUNT 3

16 On or about September 23, 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 DONALD RODRICK GRIMES NELSON, who did
19 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
20 claim, bill, account, voucher and writing.

21 COUNT 4

22 On or about June 11, 2017, 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 DONALD RODRICK GRIMES NELSON, 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 5

2 On or about March 12, 2017, 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 DONALD RODRICK GRIMES NELSON, who did unlawfully and
5 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
6 account, voucher and writing.

7 COUNT 6

8 On or about February 5, 2017, 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 DONALD RODRICK GRIMES NELSON, who did
11 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
12 claim, bill, account, voucher and writing.

13 COUNT 7

14 On or about and between November 23, 2016, through January 29, 2018, in the County of
15 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
16 Felony, was committed by Defendant FLAVIO NAVAR, who did unlawfully take money and
17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two Thousand Six
18 Hundred Sixty-Seven Dollars and Eighty Cents (\$2,667.80).

19 COUNT 8

20 On or about November 30, 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 FLAVIO NAVAR, 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 November 21, 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 FLAVIO NAVAR, who did unlawfully and with intent to

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

3 COUNT 10

4 On or about November 12, 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 **FLAVIO NAVAR**, 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 11

10 On or about January 26, 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 **FLAVIO NAVAR**, 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 12

16 On or about November 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 **FLAVIO NAVAR**, 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 13

22 On or about and between November 23, 2016, through September 11, 2017, in the County
23 of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **THOMAS SANTIAGO**, who did unlawfully take money
25 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two Thousand Six
26 Hundred Thirty Dollars and Fifty-Nine Cents (\$2,630.59).

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1 COUNT 14

2 On or about September 11, 2017, 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 **THOMAS SANTIAGO**, 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 15

8 On or about May 24, 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 **THOMAS SANTIAGO**, 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 16

14 On or about February 28, 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 **THOMAS SANTIAGO**, 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 17

20 On or about January 26, 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 **THOMAS SANTIAGO**, 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 18

26 On or about November 23, 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 **THOMAS SANTIAGO**, 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 19

4 On or about and between January 26, 2017, through December 19, 2017, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant PAUL LUKE MARTINEZ, who did unlawfully take
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
8 Thousand Five Hundred Seven Dollars and Thirteen Cents (\$2,507.13).

9 COUNT 20

10 On or about December 19, 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 PAUL LUKE MARTINEZ, 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 21

16 On or about August 31, 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 PAUL LUKE MARTINEZ, 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 22

22 On or about March 30, 2017, 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 PAUL LUKE MARTINEZ, 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 23

2 On or about March 15, 2017, 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 PAUL LUKE MARTINEZ, 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 24

8 On or about January 26, 2017, 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 PAUL LUKE MARTINEZ, 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 25

14 On or about and between October 6, 2016, through February 16, 2018, 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 Defendant ROBERTO CESAR FLORES, who did unlawfully take
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
18 Thousand Three Hundred Thirty-Nine Dollars and Fifty-Six Cents (\$2,339.56).

19 COUNT 26

20 On or about January 25, 2018, 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 ROBERTO CESAR FLORES, who did unlawfully and
23 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
24 account, voucher and writing.

25 COUNT 27

26 On or about February 16, 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 ROBERTO CESAR FLORES, 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 28

4 On or about November 23, 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 **ROBERTO CESAR FLORES**, 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 29

10 On or about October 20, 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 **ROBERTO CESAR FLORES**, 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 30

16 On or about October 6, 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 **ROBERTO CESAR FLORES**, 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 31

22 On or about and between February 1, 2017, through December 18, 2017, in the County of
23 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **WILLIAM LINDSEY GODMAN**, who did unlawfully
25 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
26 Thousand One Hundred Thirty-Five Dollars and Forty-Nine Cents (\$2,135.49).

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1 COUNT 32

2 On or about October 3, 2017, 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 LINDSEY GODMAN, who did unlawfully and with intent
5 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
6 and writing.

7 COUNT 33

8 On or about July 19, 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 WILLIAM LINDSEY GODMAN, who did unlawfully and with intent
11 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
12 and writing.

13 COUNT 34

14 On or about May 15, 2017, 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 LINDSEY GODMAN, who did unlawfully and with intent
17 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
18 and writing.

19 COUNT 35

20 On or about February 7, 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 WILLIAM LINDSEY GODMAN, 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 36

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 LINDSEY GODMAN, 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 **SPECIAL ALLEGATION**

4 **STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)**

5 It is further alleged for Counts 1-36, that the above violations were not discovered until
6 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
7 801.5 and 803(c).

8 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
9 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
10 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
11 smallest geographic area in its division, had nearly three times the amount of overtime
12 expenditures compared to the CHP station covering the largest geographic area. In his review of
13 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
14 leading him to believe that officers at the East Los Angeles station may have submitted for and
15 received compensation for overtime assignments not physically worked.

16 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
17 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
18 investigation into every officer who worked a Caltrans overtime detail within the previous two
19 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
20 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
21 specific offenses now charged in the complaint.

22 The alleged offenses were not discovered earlier because the supervisors who would have
23 been the ones to report these activities were also committing the fraud. Moreover, the fraud
24 typically took place during graveyard hours, which was outside of the normal working hours of
25 office managers. No one had constructive or actual knowledge of the offenses alleged in this
26 complaint before May 4, 2018.

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CONCLUSION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of February, 2022, at Los Angeles, California.

Respectfully Submitted,
ROB BONTA
Attorney General of California



PAUL S. THIES
Deputy Attorney General
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."

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **DONALD RODRICK GRIMES NELSON**: Grand
12 Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of
13 Penal Code section 72.

14 Therefore, you are commanded to arrest **DONALD RODRICK GRIMES NELSON**, and
15 to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821,
16 825, 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/4/22

20 Time Issued: 9:25 (am/pm)



Natalie Stone

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:


7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant FLAVIO NAVAR: Grand Theft in violation of Penal
12 Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

13 Therefore, you are commanded to arrest FLAVIO NAVAR, and to bring said Defendant
14 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
15 California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ 7-

17
18 Dated: 2/4/22

19 Time Issued: 9:25 (am/pm)

20
21 
22 JUDGE OF THE SUPERIOR COURT
23 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:


7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **THOMAS SANTIAGO**: Grand Theft in violation of
12 Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **THOMAS SANTIAGO**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/4/22

20 Time Issued: 9:26 (am/pm)

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22 
23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST
5

6 The People of the State of California to any peace officer of said State:
7


8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint. I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **PAUL LUKE MARTINEZ**: Grand Theft in violation
12 of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **PAUL LUKE MARTINEZ**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 2-

18
19 Dated: 2/4/22

20 Time Issued: 9:26 (am/pm)

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22 
23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **ROBERTO CESAR FLORES**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **ROBERTO CESAR FLORES**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 7-

18
19 Dated: 2/4/02

20 Time Issued: 9:27 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **WILLIAM LINDSEY GODMAN**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **WILLIAM LINDSEY GODMAN**, and to bring
15 said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 1

18
19 Dated: 2/4/22

20 Time Issued: 9:28 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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| Defendant | DOB | CII | DMV | Bail Requested |
|-------------------------------|------------------|------------|------------|-----------------------|
| NELSON, Donald Rodrick Grimes | [REDACTED] | | [REDACTED] | |
| NAVAR, Flavio | [REDACTED] | | [REDACTED] | |
| SANTIAGO, Thomas | [REDACTED] | | [REDACTED] | |
| MARTINEZ, Paul Luke | [REDACTED] | | [REDACTED] | |
| FLORES, Roberto Cesar | [REDACTED] | | [REDACTED] | |
| GODMAN, William Lindsey | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **DONALD RODRICK GRIMES NELSON**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **FLAVIO NAVAR**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **THOMAS SANTIAGO**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

1 PAUL LUKE MARTINEZ

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 19 | PC 487(a) | 16-2-3 | | |
| 4 | 20 | PC 72 | 16-2-3 | | |
| 5 | 21 | PC 72 | 16-2-3 | | |
| 6 | 22 | PC 72 | 16-2-3 | | |
| 7 | 23 | PC 72 | 16-2-3 | | |
| 8 | 24 | PC 72 | 16-2-3 | | |

9 ROBERTO CESAR FLORES

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 25 | PC 487(a) | 16-2-3 | | |
| 12 | 26 | PC 72 | 16-2-3 | | |
| 13 | 27 | PC 72 | 16-2-3 | | |
| 14 | 28 | PC 72 | 16-2-3 | | |
| 15 | 29 | PC 72 | 16-2-3 | | |
| 16 | 30 | PC 72 | 16-2-3 | | |

17 WILLIAM LINDSEY GODMAN

| 18 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 19 | 31 | PC 487(a) | 16-2-3 | | |
| 20 | 32 | PC 72 | 16-2-3 | | |
| 21 | 33 | PC 72 | 16-2-3 | | |
| 22 | 34 | PC 72 | 16-2-3 | | |
| 23 | 35 | PC 72 | 16-2-3 | | |
| 24 | 36 | PC 72 | 16-2-3 | | |

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I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

| | |
|------------------------------|----------|
| Donald Rodrick Grimes Nelson | \$ _____ |
| Flavio Navar | \$ _____ |
| Thomas Santiago | \$ _____ |
| Paul Luke Martinez | \$ _____ |
| Roberto Cesar Flores | \$ _____ |
| William Lindsey Godman | \$ _____ |

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

| | |
|---|---------------|
| _____ Magistrate Superior Court of California | _____ Date |
|---|---------------|

1 ROB BONTA
Attorney General of California
2 LANCE WINTERS
Chief Assistant Attorney General
3 JOHNETTE JAURON
Senior Assistant Attorney General
4 PAUL S. THIES
Deputy Attorney General
5 State Bar No. 305084
300 South Spring Street, Suite 1702
6 Los Angeles, CA 90013
Telephone: (213) 269-6070
7 Cell: (213) 269-2148
E-mail: Paul.Thies@doj.ca.gov
8 *Attorneys for the People of the State of California*

2022 FEB -3 PM 2:20
CK

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

11
12 **PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. BA498284

13
14 Plaintiff,

15 v.

**FELONY COMPLAINT FOR ARREST
WARRANT**

16 (1) **THOMAS MORENO IV**
(DOB: [REDACTED])

17 (2) **TAREK GRAVES**
(DOB: [REDACTED])

18 (3) **JUAN CARLOS ULLOA**
(DOB: [REDACTED])

19 (4) **MARIO BRISENO II**
(DOB: [REDACTED])

20 (5) **RALPH PATRICK GOMEZ**
(DOB: [REDACTED])

21 (6) **URIEL GOMEZ**
(DOB: [REDACTED])

22 (7) **RAMON MACIEL MORAN**
(DOB: [REDACTED])

23 (8) **VINCENT BARRERA**
(DOB: [REDACTED])

24
25
26
27
28 Defendants.

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 10, 2017, through December 18, 2017, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant THOMAS MORENO IV, who did unlawfully take money
7 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two Thousand
8 Ninety-Seven Dollars and Thirty-Six Cents (\$2,097.36).

9 COUNT 2

10 On or about December 18, 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 THOMAS MORENO IV, 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 3

16 On or about November 29, 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 THOMAS MORENO IV, 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 4

22 On or about June 29, 2017, 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 THOMAS MORENO IV, 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 February 7, 2017, 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 **THOMAS MORENO IV**, 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 6

8 On or about January 10, 2017, 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 **THOMAS MORENO IV**, 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 7

14 On or about and between October 29, 2017, through March 19, 2018, 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 Defendant **TAREK GRAVES**, who did unlawfully take money and
17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Six
18 Hundred Seventy-Eight Dollars and Eighty Cents (\$1,678.80).

19 COUNT 8

20 On or about March 19, 2018, 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 **TAREK GRAVES**, 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 9

26 On or about February 15, 2018, 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 **TAREK GRAVES**, who did unlawfully and with intent to

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

3 COUNT 10

4 On or about January 18, 2018, 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 **TAREK GRAVES**, 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 11

10 On or about January 11, 2018, 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 **TAREK GRAVES**, 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 12

16 On or about November 30, 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 **TAREK GRAVES**, 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 13

22 On or about and between July 23, 2017, through November 27, 2017, in the County of Los
23 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
24 Felony, was committed by Defendant **JUAN CARLOS ULLOA**, who did unlawfully take
25 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One
26 Thousand Five Hundred Forty-Seven Dollars and Eighty-One Cents (\$1,547.81).

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1 COUNT 14

2 On or about November 27, 2017, 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 JUAN CARLOS ULLOA, 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 15

8 On or about October 2, 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 JUAN CARLOS ULLOA, 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 16

14 On or about September 25, 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 JUAN CARLOS ULLOA, 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 17

20 On or about September 18, 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 JUAN CARLOS ULLOA, 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 18

26 On or about July 23, 2017, 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 JUAN CARLOS ULLOA, who did unlawfully and with intent to

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

3 COUNT 19

4 On or about and between February 29, 2016, through September 26, 2017, in the County of
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
6 Felony, was committed by Defendant **MARIO BRISENO II**, who did unlawfully take money
7 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Four
8 Hundred Forty-Eight Dollars and Five Cents (\$1,448.05).

9 COUNT 20

10 On or about September 26, 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 **MARIO BRISENO II**, who did unlawfully and with intent
13 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
14 and writing.

15 COUNT 21

16 On or about September 11, 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 **MARIO BRISENO II**, who did unlawfully and with intent
19 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
20 and writing.

21 COUNT 22

22 On or about September 8, 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 **MARIO BRISENO II**, who did unlawfully and with intent
25 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher
26 and writing.

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COUNT 23

On or about August 18, 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 **MARIO BRISENO II**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 24

On or about June 19, 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 **MARIO BRISENO II**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 25

On or about and between November 23, 2016, through September 28, 2017, in the County of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a Felony, was committed by Defendant **RALPH PATRICK GOMEZ**, who did unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Four Hundred Twenty-Three Dollars and Eighty-One Cents (\$1,423.81).

COUNT 26

On or about September 28, 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 **RALPH PATRICK GOMEZ**, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.

COUNT 27

On or about August 17, 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 **RALPH PATRICK GOMEZ**, 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 28**

4 On or about May 10, 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 **RALPH PATRICK GOMEZ**, 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 29**

10 On or about November 23, 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 **RALPH PATRICK GOMEZ**, 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 30**

16 On or about and between November 23, 2016, through February 8, 2018, in the County of
17 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a
18 Felony, was committed by Defendant **URIEL GOMEZ**, who did unlawfully take money and
19 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand One
20 Hundred Eighty-Five Dollars and Fifty-Five Cents (\$1,185.55).

21 **COUNT 31**

22 On or about January 4, 2018, 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 **URIEL GOMEZ**, 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 32

2 On or about November 20, 2017, 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 **URIEL GOMEZ**, 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 33

8 On or about August 18, 2017, 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 **URIEL GOMEZ**, 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 March 7, 2017, 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 **URIEL GOMEZ**, who did unlawfully and with intent to defraud,
17 present for allowance and payment a false and fraudulent claim, bill, account, voucher and
18 writing.

19 COUNT 35

20 On or about November 23, 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 **URIEL GOMEZ**, 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 February 22, 2017, 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 Defendant **RAMON MACIEL MORAN**, who did unlawfully take

1 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Nine
2 Hundred Fifty-One Dollars and Twelve Cents (\$951.12).

3 **COUNT 37**

4 On or about November 1, 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 RAMON MACIEL MORAN, 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 38**

10 On or about August 15, 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 RAMON MACIEL MORAN, 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 39**

16 On or about March 24, 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 RAMON MACIEL MORAN, 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 40**

22 On or about March 22, 2017, 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 RAMON MACIEL MORAN, 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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COUNT 41

1
2 On or about February 22, 2017, 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 **RAMON MACIEL MORAN**, who did unlawfully and
5 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,
6 account, voucher and writing.

COUNT 42

7
8 On or about November 23, 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 **VINCENT BARRERA**, 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.

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1 SPECIAL ALLEGATION

2 STATUTE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

3 It is further alleged for Counts 1-42, that the above violations were not discovered until
4 May 4, 2018, within the four-year statute of limitations period established by Penal Code sections
5 801.5 and 803(c).

6 On March 20, 2018, California Highway Patrol (“CHP”) Captain Chris Margaris conducted
7 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through
8 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the
9 smallest geographic area in its division, had nearly three times the amount of overtime
10 expenditures compared to the CHP station covering the largest geographic area. In his review of
11 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details,
12 leading him to believe that officers at the East Los Angeles station may have submitted for and
13 received compensation for overtime assignments not physically worked.

14 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings
15 revealed through the audit. Based on the findings in the audit, CHP launched an administrative
16 investigation into every officer who worked a Caltrans overtime detail within the previous two
17 years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
18 20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
19 specific offenses now charged in the complaint.

20 The alleged offenses were not discovered earlier because the supervisors who would have
21 been the ones to report these activities were also committing the fraud. Moreover, the fraud
22 typically took place during graveyard hours, which was outside of the normal working hours of
23 office managers. No one had constructive or actual knowledge of the offenses alleged in this
24 complaint before May 4, 2018.

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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 1st
8 day of February, 2022, 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."

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **THOMAS MORENO IV**: Grand Theft in violation
12 of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **THOMAS MORENO IV**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 25

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19 Dated: 2/4/22

20 Time Issued: 9:16 (am/pm)



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JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

NATALIE STONE

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
accompanying felony complaint, I find there is probable cause to believe that the following
crimes have been committed by Defendant **TAREK GRAVES**: Grand Theft in violation of Penal
Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **TAREK GRAVES**, and to bring said Defendant
before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1-

Dated: 2/4/22

Time Issued: 9:16 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:


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8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **JUAN CARLOS ULLOA**: Grand Theft in violation
12 of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section
13 72.

14 Therefore, you are commanded to arrest **JUAN CARLOS ULLOA**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 25

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19 Dated: 2/4/02

20 Time Issued: 9:17 (am/pm)

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23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:


Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **MARIO BRISENO II**; Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **MARIO BRISENO II**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1

Dated: 2/4/22

Time Issued: 9:16 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **RALPH PATRICK GOMEZ**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **RALPH PATRICK GOMEZ**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 2-

Dated: 2/4/22

Time Issued: 9:16 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **URIEL GOMEZ**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **URIEL GOMEZ**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 25

Dated: 2/4/20

Time Issued: 9:16 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST

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6 The People of the State of California to any peace officer of said State:

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8 Proof by declaration under penalty of perjury having been made this day to me by
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the
10 accompanying felony complaint, I find there is probable cause to believe that the following
11 crimes have been committed by Defendant **RAMON MACIEL MORAN**: Grand Theft in
12 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal
13 Code section 72.

14 Therefore, you are commanded to arrest **RAMON MACIEL MORAN**, and to bring said
15 Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ 2

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19 Dated: 2/4/22

20 Time Issued: 9:17 (am/pm)

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24 JUDGE OF THE SUPERIOR COURT
25 State of California, County of Los Angeles
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:


Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **VINCENT BARRERA**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

Therefore, you are commanded to arrest **VINCENT BARRERA**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 2

Dated: 2/4/22

Time Issued: 9:18 (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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| Defendant | DOB | CII | DMV | Bail Requested |
|------------------------------|------------------|-----|------------|----------------|
| MORENO IV, Thomas | [REDACTED] | | [REDACTED] | |
| GRAVES, Tarek | [REDACTED] | | [REDACTED] | |
| ULLOA, Juan Carlos | [REDACTED] | | [REDACTED] | |
| BRISENO II, Mario | [REDACTED] | | [REDACTED] | |
| GOMEZ, Ralph Patrick | [REDACTED] | | [REDACTED] | |
| GOMEZ, Uriel | [REDACTED] | | [REDACTED] | |
| MORAN, Ramon Maciel | [REDACTED] | | [REDACTED] | |
| BARRERA, Vincent | [REDACTED] | | [REDACTED] | |
| Investigating Agency | CHP | | | |
| Investigating Officer | Lt. Tannon Brown | | | |
| Phone No. | (714) 288-6336 | | | |
| Prelim Estimate | 1 day | | | |

1 **FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

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

5 **THOMAS MORENO IV**

| 6 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 7 | 1 | PC 487(a) | 16-2-3 | | |
| 8 | 2 | PC 72 | 16-2-3 | | |
| 9 | 3 | PC 72 | 16-2-3 | | |
| 10 | 4 | PC 72 | 16-2-3 | | |
| 11 | 5 | PC 72 | 16-2-3 | | |
| 12 | 6 | PC 72 | 16-2-3 | | |

13 **TAREK GRAVES**

| 14 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 15 | 7 | PC 487(a) | 16-2-3 | | |
| 16 | 8 | PC 72 | 16-2-3 | | |
| 17 | 9 | PC 72 | 16-2-3 | | |
| 18 | 10 | PC 72 | 16-2-3 | | |
| 19 | 11 | PC 72 | 16-2-3 | | |
| 20 | 12 | PC 72 | 16-2-3 | | |

21 **JUAN CARLOS ULLOA**

| 22 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 23 | 13 | PC 487(a) | 16-2-3 | | |
| 24 | 14 | PC 72 | 16-2-3 | | |
| 25 | 15 | PC 72 | 16-2-3 | | |
| 26 | 16 | PC 72 | 16-2-3 | | |
| 27 | 17 | PC 72 | 16-2-3 | | |
| 28 | 18 | PC 72 | 16-2-3 | | |

1 **MARIO BRISENO II**

| 2 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|---|------------|---------------|---------------------|-------------------|----------------------|
| 3 | 19 | PC 487(a) | 16-2-3 | | |
| 4 | 20 | PC 72 | 16-2-3 | | |
| 5 | 21 | PC 72 | 16-2-3 | | |
| 6 | 22 | PC 72 | 16-2-3 | | |
| 7 | 23 | PC 72 | 16-2-3 | | |
| 8 | 24 | PC 72 | 16-2-3 | | |

9 **RALPH PATRICK GOMEZ**

| 10 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 11 | 25 | PC 487(a) | 16-2-3 | | |
| 12 | 26 | PC 72 | 16-2-3 | | |
| 13 | 27 | PC 72 | 16-2-3 | | |
| 14 | 28 | PC 72 | 16-2-3 | | |
| 15 | 29 | PC 72 | 16-2-3 | | |

16 **URIEL GOMEZ**

| 17 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 18 | 30 | PC 487(a) | 16-2-3 | | |
| 19 | 31 | PC 72 | 16-2-3 | | |
| 20 | 32 | PC 72 | 16-2-3 | | |
| 21 | 33 | PC 72 | 16-2-3 | | |
| 22 | 34 | PC 72 | 16-2-3 | | |
| 23 | 35 | PC 72 | 16-2-3 | | |

24 **RAMON MACIEL MORAN**

| 25 | <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|----|------------|---------------|---------------------|-------------------|----------------------|
| 26 | 36 | PC 487(a) | 16-2-3 | | |
| 27 | 37 | PC 72 | 16-2-3 | | |
| 28 | 38 | PC 72 | 16-2-3 | | |

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39 PC 72 16-2-3
40 PC 72 16-2-3
41 PC 72 16-2-3

VINCENT BARRERA

| <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|------------|---------------|---------------------|-------------------|----------------------|
| 42 | PC 72 | 16-2-3 | | |

I ORDER that the defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

- Thomas Moreno IV \$ _____
- Tarek Graves \$ _____
- Juan Carlos Ulloa \$ _____
- Mario Briseno II \$ _____
- Ralph Patrick Gomez \$ _____
- Uriel Gomez \$ _____
- Ramon Maciel Moran \$ _____
- Vincent Barrera \$ _____

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California