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| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10 |  | E STATE OF CALIFORNIA                                       |
| 11<br>12<br>13<br>14<br>15<br>16<br>17          | <b>PEOPLE OF THE STATE OF</b><br><b>CALIFORNIA,</b><br>Plaintiff,<br>V.                          | Case No. BAY98273<br>FELONY COMPLAINT FOR<br>ARREST WARRANT |
| 18<br>19<br>20<br>21<br>22<br>23                | <ul> <li>(1) JAMES YAO KUO<br/>(DOB:,</li> <li>(2) JESSIE ANTHONY CARRILLO<br/>(DOB:)</li> </ul> |   |
| 24  | Defendants.  |   |
| 25  | The Attorney Consult of the State - CO 1'C   | unia apartas the above sourced D. C. J                      |
| 26  |  | ornia accuses the above-named Defendants of the             |
| 27<br>28  | following offenses, which are connected to each  | other in their commission:                                  |
|   | FELONY COMPL   | AINT FOR ARREST WARRANT (AG #LA2021304718)                  |

| 4 - 4 | Ć Ć   |
|-------|---|
| 1     | COUNT 1   |
| 2     | On or about and between October 29, 2017 through March 19, 2018, 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 JAMES YAO KUO, who did unlawfully take money and             |
| 5     | property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, One Thousand Twenty-  |
| 6     | One Dollars and Sixty-Seven Cents (\$1,021.67)  |
| 7     | COUNT 2   |
| 8     | On or about July 9, 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 JAMES YAO KUO, 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 3   |
| 14    | On or about October 5, 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 JAMES YAO KUO, 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    | <u>COUNT 4</u>  |
| 20    | On or about December 14, 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 JAMES YAO KUO, 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    |   |
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|       | 2   |
|       | FELONY COMPLAINT FOR ARREST WARRANT (AG #LA2021304718)  |

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| 1  |  | COUNT 5   |
| 2  | On or about December 2                 | 21, 2017, in the County of Los Angeles, the crime of        |
| 3  | PRESENTATION OF FRAUDULE               | ENT CLAIM in violation of PENAL CODE SECTION 72, a          |
| 4  | Felony, was committed by Defendat      | nt JAMES YAO KUO, who did unlawfully and with intent to     |
| 5  | defraud, present for allowance and p   | ayment a false and fraudulent claim, bill, account, voucher |
| 6  | and writing.                           |   |
| 7  |  | COUNT 6   |
| 8  | On or about March 22, 2                | 2018, in the County of Los Angeles, the crime of            |
| 9  | PRESENTATION OF FRAUDULE               | NT CLAIM in violation of PENAL CODE SECTION 72, a           |
| 10 | Felony, was committed by Defendar      | nt JAMES YAO KUO, who did unlawfully and with intent to     |
| 11 | defraud, present for allowance and p   | ayment a false and fraudulent claim, bill, account, voucher |
| 12 | and writing.                           |   |
| 13 |  | COUNT 7   |
| 14 | On or about and between Febr           | uary 22, 2017 through March 29, 2018, in the County of Los  |
| 15 | Angeles, the crime of GRAND THE        | EFT in violation of PENAL CODE SECTION 487(a), a            |
| 16 | Felony, was committed by Defendar      | nt JESSIE ANTHONY CARRILLO, who did unlawfully take         |
| 17 | money and property of a value excee    | eding Nine Hundred Fifty Dollars (\$950), to wit, Eight     |
| 18 | Thousand One Hundred Twenty Do         | llars and Fifty-Four Cents (\$8,120.54)                     |
| 19 |  | COUNT 8   |
| 20 | On or about January 3, 2               | 2017, in the County of Los Angeles, the crime of            |
| 21 | PRESENTATION OF FRAUDULE               | NT CLAIM in violation of PENAL CODE SECTION 72, a           |
| 22 | Felony, was committed by Defendar      | nt JESSIE ANTHONY CARRILLO, who did unlawfully and          |
| 23 | with intent to defraud, present for al | lowance and payment a false and fraudulent claim, bill,     |
| 24 | account, voucher and writing.          |   |
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|    | FEI                                    | LONY COMPLAINT FOR ARREST WARRANT (AG #LA2021304718)        |

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| 1  | COUNT 9   |
| 2  | On or about January 4, 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 JESSIE ANTHONY CARRILLO, 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  | <u>COUNT 10</u>   |
| 8  | On or about January 19, 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 JESSIE ANTHONY CARRILLO, 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 | <u>COUNT 11</u>   |
| 14 | On or about February 7, 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 JESSIE ANTHONY CARRILLO, 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 | <u>COUNT 12</u>   |
| 20 | On or about January 4, 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 JESSIE ANTHONY CARRILLO, 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 | /////   |
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|    | FELONY COMPLAINT FOR ARREST WARRANT (AG #LA2021304718)  |

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| 1   | SPECIAL ALLEGATION   |
| 2   | STATUE 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.  |
| 25  | /////  |
| 26  | /////  |
| 27  | /////  |
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|     | 5<br>FELONY COMPLAINT FOR ARREST WARRANT (AG #LA2021304718)  |

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| 1  | CON   | CLUSION   |
| 2  | All of the foregoing is contrary to the fo      | rm, force, and effect of the above-named statutes,              |
| 3  | and is against the peace and dignity of the Peo | ple of the State of California.                                 |
| 4  | Attached hereto and incorporated by refe        | erence is a declaration in support of an arrest                 |
| 5  | warrant and complaint with accompanying off     | ficial reports and documents of a law enforcement               |
| 6  | agency.   |   |
| 7  | I declare under penalty of perjury that the     | e foregoing is true and correct. Executed this 10 <sup>th</sup> |
| 8  | day of January 2022, at Los Angeles, Californ   | ia.   |
| 9  |   | Respectfully Submitted,   |
| 10 |   | ROB BONTA   |
| 11 |   | Attorney General of California                                  |
| 12 |   | AAA   |
| 13 |   | All   |
| 14 |   | NATASHA HOWARD<br>Deputy Attorney General                       |
| 15 |   |   |
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| 1  | NOTICE TO DEFENDANTS AND ATTORNEYS  |
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |
| 4  | Code section 1054.3.  |
| 5  | NOTICE TO ATTORNEYS   |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2,    |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |
| 11 | hearing and a showing of good cause."   |
| 12 |   |
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| 1        | SUPERIOR COUR                                     | <b>RT OF CALIFORNIA</b>   |
| 2        | 2 COUNTY OF                                       | LOS ANGELES   |
| 3        |   |   |
| 4        | WARRANT   | <b>COF ARREST</b>   |
| 5        |   |   |
| 6        | The People of the State of California to an       | ny peace officer of said State:   |
| 7        | Proof by declaration under penalty of perj        | ury having been made this day to me by                                    |
| 8        | Lieutenant Keith Phillips of the California High  | way Patrol, and as described in the accompanying                          |
| 9        | felony complaint, I find there is probable cause  | to believe that the following crimes have been                            |
| 10       | committed by Defendant James Yao KUO: Grar        | nd Theft in violation of Penal Code section 487(a)                        |
| 11       | and Presentation of False Claim in violation of H | Penal Code section 72.  |
| 12       | Therefore, you are commanded to arrest Ja         | ames Yao KUO, and to bring said Defendant                                 |
| 13       | before any magistrate in Los Angeles County pu    | ursuant to Sections 821, 825, 826, and 848 of the                         |
| 14       | California Penal Code.                            |   |
| 15       | Defendant is to be admitted to bail in the s      | sum of \$   |
| 16       | Dated:  | _   |
| 17       | Time Issued:(am/pm                                | n)  |
| 18       |   |   |
| 19       |   |   |
| 20       |   | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles |
| 21       |   |   |
| 22       |   |   |
| 23       |   |   |
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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  | Proof by declaration under penalty of perjury having been made this day to me by                |
| 8  | Lieutenant Keith Phillips of the California Highway Patrol, and as described in the accompanyin |
| 9  | felony complaint, I find there is probable cause to believe that the following crimes have been |
| 10 | committed by Defendant Jessie Anthony CARRILLO: Grand Theft in violation of Penal Code          |
| 11 | section 487(a) and Presentation of False Claim in violation of Penal Code section 72.           |
| 12 | Therefore, you are commanded to arrest Jessie Anthony CARRILLO, and to bring said               |
| 13 | Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and   |
| 14 | 848 of the California Penal Code.   |
| 15 | Defendant is to be admitted to bail in the sum of \$  |
| 16 | Dated:  |
| 17 | Time Issued: (am/pm)  |
| 18 |   |
| 19 |   |
| 20 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                       |
| 21 |   |
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| Defendant                | DOB           | CII           | CDL | <b>Bail Requested</b> |
|--------------------------|---------------|---------------|-----|-----------------------|
| KUO, James Yao           |               |               |     | \$                    |
| CARRILLO, Jessie Anthony |               |               |     | \$                    |
| Investigating Agency     | CHP Southern  | n Division IS | SU  |                       |
| Investigating Officer    | Sgt. Kevin Re | eese          |     |                       |
| Phone No.                | (213) 744-233 | 31            |     |                       |
| Prelim Estimate          | 1 day         |               |     |                       |
|                          |               |               |     |                       |
|                          |               |               |     |                       |
|                          |               |               |     |                       |
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| 1  |            | FELONY COMP          | LAINT – ORDER I        | IOLDING     | TO ANSWER -           | <b>P.C. SECTION 872</b> |
|----|------------|----------------------|------------------------|-------------|-----------------------|-------------------------|
| 2  |            | It appearing to m    | e from the evidence    | presented t | hat the following o   | offense(s) has/have bee |
| 3  | com        | mitted and that the  | re is sufficient cause | to believe  | that the following    | defendant(s) guilty     |
| 4  | there      | eof, to wit:         |                        |             |                       |                         |
| 5  |            |                      | (Strike out or         | add as app  | olicable)             |                         |
| 6  | JAN        | AES YAO KUO          |                        |             |                       |                         |
| 7  | <u>Ct.</u> | Charge               | Charge Range           | 2           | Allegation            | Alleg. Effect           |
| 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 | JES        | SIE ANTHONY (        | CARRILLO               |             |                       |                         |
| 16 | <u>Ct.</u> | Charge               | Charge Range           | 2           | Allegation            | Alleg. Effect           |
| 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                 |             |                       |                         |
| 23 |            |                      |                        |             |                       |                         |
| 24 |            | I ORDER that the     | e defendants named l   | below be he | eld to answer for the | he above-described      |
| 25 | offer      | nses and allegations | s and be admitted to   | bail in the | sum of:               |                         |
| 26 |            | James Yao            | KUO                    | \$          |                       | -                       |
| 27 |            | Jessie Anth          | ony CARRILLO           | \$          |                       | _                       |
| 28 |            |                      |                        |             |                       |                         |
|    |            |                      |                        | 11          |                       | RANT (AG #LA20213047    |

| 1        | And that said defendant be co   | mmitted to the custody of the | e Sheriff until such bail |
|----------|---------------------------------|-------------------------------|---------------------------|
| 2 The da | ate of Felony arraignment is se | et for:                       |                           |
| 3        |                                 |                               |                           |
| 4        | (Date)                          | in Department                 | ata.m.                    |
| 5        |                                 |                               |                           |
| 6        | Magistrate                      | Date                          |                           |
| 7        | Superior Court of               | California                    |                           |
| 8        |                                 |                               |                           |
| 9        |                                 |                               |                           |
| 10       |                                 |                               |                           |
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| 28       |                                 |                               |                           |



| l  | 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.   |  |  |  |
| 27 | ////   |  |  |  |
| 28 | ////   |  |  |  |
|    | 2<br>AC #L A2021204220   |  |  |  |
|    | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT   |  |  |  |

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COUNT 5

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

# COUNT 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.

## COUNT 7

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 CONNIE MARIE GUZMAN, who did unlawfully take
money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
Thousand One Hundred Ninety-Eight Dollars and Eighty-Two Cents (\$3,198.82).

# <u>COUNT 8</u>

On or about July 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 CONNIE MARIE GUZMAN, 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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On or about February 4, 2017, in the County of Los Angeles, the crime of

COUNT 9

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  | <u>COUNT 11</u>   |  |
| 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  |  |
| 16<br>17   | On or about June 28, 2016, in the County of Los Angeles, the crime of PRESENTATION<br>OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  |  |
|  |   |  |
| 17   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  |  |
| 17<br>18   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to  |  |
| 17<br>18<br>19   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  |  |
| 17<br>18<br>19<br>20   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.  |  |
| 17<br>18<br>19<br>20<br>21   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><u>COUNT 13</u>   |  |
| 17<br>18<br>19<br>20<br>21<br>22   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><b>COUNT 13</b><br>On or about and between August 12, 2016, through December 20, 2017, in the County of   |  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>                                     | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><u>COUNT 13</u><br>On or about and between August 12, 2016, through December 20, 2017, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a   |  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>                         | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><u>COUNT 13</u><br>On or about and between August 12, 2016, through December 20, 2017, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully take money   |  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>             | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant <b>CONNIE MARIE GUZMAN</b> , who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><u>COUNT 13</u><br>On or about and between August 12, 2016, through December 20, 2017, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully take money<br>and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Five   |  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol> | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was<br>committed by Defendant CONNIE MARIE GUZMAN, who did unlawfully and with intent to<br>defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher<br>and writing.<br><u>COUNT 13</u><br>On or about and between August 12, 2016, through December 20, 2017, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant WILLIAM PRECIADO, who did unlawfully take money<br>and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Five<br>Hundred Seventy-Three Dollars and Five Cents (\$1,573.05). |  |

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| 1  | COUNT 14  |  |  |
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| 2  | On or about December 21, 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 WILLIAM PRECIADO, 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 December 20, 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 WILLIAM PRECIADO, 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 August 27, 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 WILLIAM PRECIADO, 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 | <u>COUNT 17</u>   |  |  |
| 20 | On or about December 1, 2016, in the County of Los Angeles, the crime of                          |  |  |
| 21 | PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a                         |  |  |
| 22 | Felony, was committed by Defendant WILLIAM PRECIADO, 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 | <u>COUNT 18</u>   |  |  |
| 26 | On or about and between January 21, 2016, through August 25, 2016, 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 EDMUND ZORRILLA, who did unlawfully take money                 |  |  |
|    | AC #L A2021304230   |  |  |

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AG #LA2021304330

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FELONY COMPLAINT FOR ARREST WARRANT

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| 1   | and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Five   |
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| 2   | Hundred Ninety-One Dollars and Ninety-Four Cents (\$4,591.94).  |
| 3   |   |
| 4   | COUNT 19<br>On or about August 25, 2016, in the Court of Charles in the court of the Court of Charles in the court of the cou |
| 5   | On or about August 25, 2016, in the County of Los Angeles, the crime of   |
| 6   | PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a   |
| 7   | Felony, was committed by Defendant <b>EDMUND ZORRILLA</b> , who did unlawfully and with   |
|     | 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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FELONY COMPLAINT FOR ARREST WARRANT

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**COUNT 23** 

2 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 3 Felony, was committed by Defendant EDMUND ZORRILLA, who did unlawfully and with 4 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 5 6 voucher and writing. 7 **COUNT 24** 

On or about and between March 29, 2016, through July 29, 2017, in the County of Los 8 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 9 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully take 10 11 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three 12 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 14 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 15 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and 16 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, 17 18 account, voucher and writing.

#### <u>COUNT 26</u>

On or about January 12, 2017, in the County of Los Angeles, the crime of 20 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 21 Felony, was committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and 22 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, 23 24 account, voucher and writing.

# COUNT 27

On or about January 4, 2017, in the County of Los Angeles, the crime of PRESENTATION 26 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was 27

committed by Defendant LUIS MANUEL MENDOZA, who did unlawfully and with intent to 28

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| 1  | defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher |
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| 2  | and writing.  |
| 3  | <u>COUNT 28</u>   |
| 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 | <u>COUNT 31</u>   |
| 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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| 28 | /////   |
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|    | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT  |

| Image: state of the state | (<br>- |    |   |
|--|--------|----|---|
| 2       On or about August 23, 2016, in the County of Los Angeles, the crime of         3       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         4       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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 33         8       On or about August 17, 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 WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35 <td< th=""><th></th><th></th><th></th></td<>   |        |    |   |
| 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.         7       COUNT 33         8       On or about August 17, 2016, in the County of Los Angeles, the orime of         9       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         10       pelony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         10       On or about February 11, 2016, in the County of Los Angeles, the crime of         11       PRESENTATION OF FRAUDULENT CLAIM in violation  |        | 1  | COUNT 32  |
| <ul> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>COUNT 33</li> <li>On or about August 17, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION</li> <li>OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was</li> <li>committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>///</li> <li>///</li></ul>   |        | 2  | On or about August 23, 2016, in the County of Los Angeles, the crime of                           |
| <ul> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>COUNT 33</li> <li>On or about August 17, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION</li> <li>OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was</li> <li>committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>///</li> <li>///</li></ul>   |        | 3  |   |
| s       unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent         claim, bill, account, voucher and writing.         7       COUNT 33         8       On or about August 17, 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 WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         10       On or about February 11, 2016, in the County of Los Angeles, the crime of         11       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         12       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did         13  |        | 4  |   |
| claim, bill, account, voucher and writing.         7       COUNT 33         8       On or about August 17, 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 WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         10       On or about February 11, 2016, in the County of Los Angeles, the crime of         11       intent to defraud, present for allowance and payment a false and fraudulent         11       intent to defraud, present for allowance and payment a false and fraudulent         12       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         12       Felon  |        | 5  |   |
| 8       On or about August 17, 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 WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         20       On or about February 11, 2016, in the County of Los Angeles, the crime of         21       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         22       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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       /////       /////   |        | 6  |   |
| <ul> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>COUNT 34</li> <li>On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION</li> <li>OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was</li> <li>committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>COUNT 35</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>indusfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> </ul>   |        | 7  | COUNT 33  |
| 10       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         10       On or about February 11, 2016, in the County of Los Angeles, the crime of         11       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         12       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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.         17       Inflama         18       unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent         13       unlawfully and with intent to defraud, present for allowance and payment a  |        | 8  | On or about August 17, 2016, in the County of Los Angeles, the crime of                           |
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| 12       claim, bill, account, voucher and writing.         13       COUNT 34         14       On or about August 8, 2016, in the County of Los Angeles, the crime of PRESENTATION         15       OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was         16       committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with         17       intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,         18       voucher and writing.         19       COUNT 35         20       On or about February 11, 2016, in the County of Los Angeles, the crime of         21       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         22       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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       /////         26       /////         27       /////         28       /////   |        | 10 | Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did                              |
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| <ul> <li>OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was</li> <li>committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with</li> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,</li> <li>voucher and writing.</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> </ul>   |        | 13 | COUNT 34  |
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| <ul> <li>intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher and writing.</li> <li>COUNT 35</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> </ul>  |        | 15 | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was                          |
| <ul> <li>voucher and writing.</li> <li>19 COUNT 35</li> <li>On or about February 11, 2016, in the County of Los Angeles, the crime of</li> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> </ul>   |        | 16 | committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did unlawfully and with                      |
| 19COUNT 3520On or about February 11, 2016, in the County of Los Angeles, the crime of21PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a22Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did23unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent24claim, bill, account, voucher and writing.25////26/////27////28////   |        | 17 | intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, |
| 20       On or about February 11, 2016, in the County of Los Angeles, the crime of         21       PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a         22       Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, 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       /////         26       /////         27       /////         28       ////  | •      | 18 | voucher and writing.  |
| <ul> <li>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a</li> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>////</li> <li>////</li> <li>////</li> </ul>  |        | 19 | COUNT 35  |
| <ul> <li>Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did</li> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>////</li> </ul>   |        | 20 | On or about February 11, 2016, in the County of Los Angeles, the crime of                         |
| <ul> <li>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent</li> <li>claim, bill, account, voucher and writing.</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>/////</li> <li>////</li> <li>////</li> </ul>  |        | 21 | PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a                         |
| <ul> <li>claim, bill, account, voucher and writing.</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>////</li> <li>9</li> </ul>  |        | 22 | Felony, was committed by Defendant WILLIAM MATTHEW FOUNTAIN, who did                              |
| <ul> <li>25 /////</li> <li>26 /////</li> <li>27 /////</li> <li>28 /////</li> <li>9</li> </ul>  |        | 23 | unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent   |
| 26 /////<br>27 /////<br>28 /////<br>9  |        | 24 | claim, bill, account, voucher and writing.  |
| 27 /////<br>28 /////<br>9  |        | 25 | ////  |
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| FELONY COMPLAINT FOR ARREST WARRANT  |        |    |   |
|  |        |    | FELONY COMPLAINT FOR ARREST WARRANT   |
|  |        |    |   |

# SPECIAL ALLEGATION

# STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

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

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

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

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

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| 1  | CO  | DNCLUSION  |  |
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| 3  | and is against the peace and dignity of the P |  |  |
| 4  |   | reference is a declaration in support of an arrest   |  |
| 5  |   | official reports and documents of a law enforcement  |  |
| 6  | agency.                                       |  |  |
| 7  | I declare under penalty of periury that       | the foregoing is true and correct. Executed this 1st |  |
| 8  | day of February, 2022, at Los Angeles, Calif  |  |  |
| 9  | , , , , , , , , , , , , , , , , , , ,         |  |  |
| 10 |   | Respectfully Submitted,<br>ROB BONTA                 |  |
| 11 |   | Attorney General of California                       |  |
| 12 |   |  |  |
| 13 | *   | Dur C. Time  |  |
| 14 |   | PAUL S. THIES<br>Deputy Attorney General             |  |
| 15 | y . •   | Attorneys for People                                 |  |
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| -  | AG #LA2021304330                              | FELONY COMPLAINT FOR ARREST WARRAN                   |  |

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| 1        | NOTICE TO DEFENDANTS AND ATTORNEYS                   |
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| 3        | the respective of the state of California hereby     |
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| 5        | NOTICE TO ATTORNEYS                                  |
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| 11       | hearing and a showing of good cause."                |
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|          | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT |

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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 GIOVANI BEMBI: 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 GIOVANI BEMBI, 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 \$  |
|    | 17 |   |
|    | 18 | Dated: 2222   |
|    | 19 | Time Issued: 3.58 (ani/pm)  |
|    | 20 | 1 RA  |
|    | 21 | 1 Oone  |
|    | 22 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                                       |
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|    | 24 | NATALIE STONE   |
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|    | 26 | and a second |
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|    | I  | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT  |

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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 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 $-4$   |
| 18<br>19 | Dated: $\partial \partial \partial \partial$   |
| 20       | Time Issued: <u>3:59</u> (am/pm))  |
| 21       |  |
| 22       | 1. XOL   |
| 23       | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 24       | State of Camornia, County of Los Aligeres  |
| 25       |  |
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|          | 14   |
|          | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1       SUPERIOR COURT OF CALIFORNIA         2       COUNTY OF LOS ANGELES         3       WARRANT OF ARREST         5       The People of the State of California to any peace officer of said State:         7       Proof by declaration under penalty of perjury having been made this day to me         9       Licutenant 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 fol         11       crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i         12       Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod         13       72.         14       Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brim         15       Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82         16       848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$         18       Dated: |         |
|---|---------|
| COUNTY OF LOS ANGELES<br>COUNTY OF LOS ANGELES<br>COUNTY OF LOS ANGELES<br>COUNTY OF LOS ANGELES<br>WARRANT OF ARREST<br>The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me<br>Licutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol<br>crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i<br>Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod<br>72.<br>Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin<br>Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82<br>848 of the California Penal Code.<br>Defendant is to be admitted to bail in the sum of \$   |         |
| 2COUNTY OF LOS ANGELES3WARRANT OF ARREST5The People of the State of California to any peace officer of said State:7Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the10accompanying felony complaint, I find there is probable cause to believe that the foll11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated:3: 5119Dated:3: 5120Time Issued:3: 5121Addenee   |         |
| 3WARRANT OF ARREST5The People of the State of California to any peace officer of said State:7Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i11Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated: $2d/dcd$ 19Dated: $3:51$ (ampm)2122   |         |
| 5The People of the State of California to any peace officer of said State:7Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated:  |         |
| 5The People of the State of California to any peace officer of said State:7Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated:  |         |
| 78Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated: $2/2/22$ 20Time Issued: 3: 5121Campmi   |         |
| 78Proof by declaration under penalty of perjury having been made this day to me9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated: $2/2/22$ 20Time Issued: 3: 5121Campmi   |         |
| 9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated: $2d/ddd$ 20Time Issued: $3:59$ (am/pm)2122   |         |
| 9Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the fol10accompanying felony complaint, I find there is probable cause to believe that the fol11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$18Dated: $2d/ddd$ 20Time Issued: $3:59$ (am/pm)2122   | ie by   |
| <ul> <li>accompanying felony complaint, I find there is probable cause to believe that the fold</li> <li>crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i</li> <li>Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod</li> <li>72.</li> <li>Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin</li> <li>Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   |         |
| 11crimes have been committed by Defendant WILLIAM PRECIADO: Grand Theft i12Penal Code section 487(a), and Presentation of False Claims in violation of Penal Cod1372.14Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin15Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 8216848 of the California Penal Code.17Defendant is to be admitted to bail in the sum of \$  |         |
| <ul> <li>Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code</li> <li>72.</li> <li>Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin</li> <li>Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li> <li>Dated:</li> <li>Dated:</li> <li>Time Issued:</li> <li>3: 59(am/pm)</li> </ul>  |         |
| 13       72.         14       Therefore, you are commanded to arrest WILLIAM PRECIADO, and to brin         15       Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82         16       848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$   |         |
| 15       Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82         16       848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$  |         |
| 15       Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82         16       848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$  | ng said |
| 16       848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$  |         |
| 18<br>19 Dated: $2 \overline{2} \overline{2} \overline{2} \overline{2} \overline{2}$<br>20 Time Issued: $3:59$ (am/pm)<br>21<br>22 $4\overline{2} \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} $  |         |
| 19 Dated: $2 \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} \overline{2} 2$  | 4       |
| 20     Time Issued: 3:59 (am/pm)       21     (am/pm)       22     1  |         |
| $\frac{21}{22}$   |         |
| 22 Jone   |         |
| - 1. Autre  |         |
|   |         |
| 23 JUDGE OF THE SUPERIOR C<br>State of California, County of L  | COURT   |
| 24  | geres   |
| 25  |         |
| 26  |         |
| 27  |         |
| 28  |         |
| AG #LA2021304330 FELONY COMPLAINT FOR ARRES   |         |

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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 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 \$   |
| 18       | $\sim 1$   |
| 19       | Dated: ADD   |
| 20       | Time Issued: $(27)$ (am/pm)  |
| 21       |  |
| 22       | JUDGE OF THE SUPERIOR COURT  |
| 23       | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 24       |  |
| 25       |  |
| 26<br>27 |  |
| 27       |  |
| 28       | 16   |
|          | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT   |

| 1  | SUPERIOR COURT OF CALIFORNIA   |
|----|--|
| 2  |  |
| 3  |  |
| 4  | WARRANT OF ARREST  |
| 5  |  |
| 6  | The People of the State of California to any peace officer of said State:                      |
| 7  | printe officer of said State.  |
| 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 \$   |
| 18 |  |
| 19 | Dated: 222   |
| 20 | Time Issued: $\underline{4':OU}$ (am/pm)   |
| 21 |  |
| 22 | - KOno   |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 24 | State of Camolina, County of Los Angeles   |
| 25 |  |
| 26 |  |
| 27 |  |
| 28 |  |
|    | 17<br>AG #LA2021304330 FELONX COMPLAINT FOR ARREST WILDOW                                      |
| ]] | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT   |

| 1       SUPERIOR COURT OF CALIFORNIA         2       COUNTY OF LOS ANGELES         3       WARRANT OF ARREST         5       The People of the State of California to any peace officer of said State:         7       Proof by declaration under penalty of perjury having been made this day to me by         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 The         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, 82         16       826, and 848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$   |    |  |
|---|----|--|
| COUNTY OF LOS ANGELES |    |  |
| 2       COUNTY OF LOS ANGELES         3       WARRANT OF ARREST         5       The People of the State of California to any peace officer of said State:         7       Proof by declaration under penalty of perjury having been made this day to me by         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 The         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, 82         16       826, and 848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$  | 1  | SUPERIOR COURT OF CALIFORNIA   |
| 3       WARRANT OF ARREST         5       The People of the State of California to any peace officer of said State:         7       Proof by declaration under penalty of perjury having been made this day to me by         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 The         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, 82         16       826, and 848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$  | 2  |  |
| 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 MATTHEW FOUNTAIN: Grand The         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, 82         16       826, and 848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$   | 3  |  |
| 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 MATTHEW FOUNTAIN: Grand The         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, 82         16       826, and 848 of the California Penal Code.         17       Defendant is to be admitted to bail in the sum of \$         18       9         19       Dated:         12       JDDGH OF THE SUPERIOR COURT         13       Output Defender Court of California Penal Code.         19       Dated:       JDOGH OF THE SUPERIOR COURT         21       22       JUDGH OF THE SUPERIOR COURT         23       State of California, County of Los Angeles  | 4  | WARRANT OF ARREST  |
| <ul> <li>Proof by declaration under penalty of perjury having been made this day to me by</li> <li>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the</li> <li>accompanying felony complaint, I find there is probable cause to believe that the following</li> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 5  |  |
| <ul> <li>Proof by declaration under penalty of perjury having been made this day to me by</li> <li>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the</li> <li>accompanying felony complaint, I find there is probable cause to believe that the following</li> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 6  | The People of the State of California to any peace officer of said State.        |
| <ul> <li>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the</li> <li>accompanying felony complaint, I find there is probable cause to believe that the following</li> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 7  | r and of any power of said state.  |
| <ul> <li>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the</li> <li>accompanying felony complaint, I find there is probable cause to believe that the following</li> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 8  | Proof by declaration under penalty of perjury having been made this day to me by |
| <ul> <li>accompanying felony complaint, I find there is probable cause to believe that the following</li> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>  | 9  | · ·  |
| <ul> <li>crimes have been committed by Defendant WILLIAM MATTHEW FOUNTAIN: Grand The</li> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 10 |  |
| <ul> <li>in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.</li> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 11 |  |
| <ul> <li>Code section 72.</li> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 12 |  |
| <ul> <li>Therefore, you are commanded to arrest WILLIAM MATTHEW FOUNTAIN, and to</li> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li></ul>   | 13 |  |
| <ul> <li>bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 82</li> <li>826, and 848 of the California Penal Code.</li> <li>Defendant is to be admitted to bail in the sum of \$</li> <li>Dated:</li> <li>Dated:</li> <li>Time Issued: <u>U:O</u> (am/pm)</li> <li>JUDGE OF THE SUPERIOR COURT State of California, County of Los Angeles</li> </ul>  | 14 |  |
| <ul> <li>16 826, and 848 of the California Penal Code.</li> <li>17 Defendant is to be admitted to bail in the sum of \$</li></ul>   | 15 |  |
| <ul> <li>Defendant is to be admitted to bail in the sum of \$</li> <li>Dated:</li> <li>Dated:</li> <li>Time Issued: <u>U'O</u> (ath/pm)</li> <li>JUDGH OF TIME SUPERIOR COURT State of California, County of Los Angeles</li> </ul>   | 16 |  |
| <ul> <li>18</li> <li>19 Dated: <u>20 00</u></li> <li>20 Time Issued: <u>U'OI</u> (am/pm)</li> <li>21</li> <li>22</li> <li>23 JUDGE OF THE SUPERIOR COURT<br/>State of California, County of Los Angeles</li> </ul>  | 17 |  |
| <ul> <li>19 Dated: <u>2000</u></li> <li>20 Time Issued: <u>4'O</u> (am/pm)</li> <li>21</li> <li>22</li> <li>23 JUDGE OF THE SUPERIOR COURT<br/>State of California, County of Los Angeles</li> </ul>  | 18 |  |
| <ul> <li>20 Time Issued: <u><u><u>U</u>:O</u> (am/pm)</u></li> <li>21</li> <li>22</li> <li>23 JUDGE OF THE SUPERIOR COURT<br/>State of California, County of Los Angeles</li> </ul>   | 19 | Dated: 2222  |
| 21<br>22<br>23<br>JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles   | 20 |  |
| 23<br>JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles   | 21 |  |
| State of California, County of Los Angeles  | 22 | (XOn O   |
| State of California, County of Los Angeles  | 23 | JUDGE OF THE SUPERIOR COURT  |
| 24  | 24 | State of California, County of Los Angeles                                       |
| 25  | 25 |  |
| 26  | 26 |  |
| 27  | 27 |  |
| 28  | 28 |  |
| 18  |    | 18   |
| AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRAN   |    | AG #LA2021304330 FELONY COMPLAINT FOR ARREST WARRANT                             |

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| 1        | Defendant                 | DOB         | CII      | DMV                                    | Bail Requested |
|----------|---------------------------|-------------|----------|--|----------------|
| 2        | BEMBI, Giovani            |             |          |  | \$0            |
| 3        |                           |             |          |  |                |
| 4        |                           |             |          |  | \$0            |
| 5        | PRECIADO, William         |             |          |  | \$0            |
| 6        | ZORRILLA, Edmund          |             |          |  | \$0            |
| 7        | MENDOZA, Luis Manuel      |             |          |  | \$0            |
| 8        | FOUNTAIN, William Matthew |             |          |  | \$0            |
| 9        | Investigating Agency      | СНР         | <u>-</u> |  |                |
| 10       | Investigating Officer     | Lt. Tannon  | Brown    | · · · · · ·                            |                |
| 11<br>12 | Phone No.                 | (714) 288-0 |          | ······································ |                |
| 12       | Prelim Estimate           | 1 day       |          |  | -              |
| 14       |                           |             |          |  |                |
| 15       |                           |             |          |  |                |
| 16       |                           |             | ,        |  |                |
| 17       |                           |             |          |  |                |
| 18       |                           |             |          |  |                |
| 19       |                           |             |          |  |                |
| 20       |                           |             | ·        |  |                |
| 21       |                           |             |          |  | ·              |
| 22       |                           |             |          |  |                |
| 3        |                           |             |          |  |                |
| 4        |                           |             |          |  |                |
| 5        |                           |             |          |  |                |
| 6        |                           |             |          | ,                                      |                |
| 7        |                           |             |          |  |                |
| .8       |                           |             |          |  |                |
| -        |                           | 19          |          |  |                |
|          | AG #LA2021304330          |             |          |  |                |

LONY COMPLAINT FOR ARREST WARRANT |

|    |  | C)                  |                             | · (_) ·           |                           |  |  |
|----|--|---------------------|-----------------------------|-------------------|---------------------------|--|--|
| 1  |  | FFI ONV COL         |                             |                   |                           |  |  |
| 2  |  | FELONY CON          | <u> 1PLAINT – ORDER HOI</u> | DING TO ANSWER    | <u>– P.C. SECTION 872</u> |  |  |
|    | have been been the following offense(s) has/have been  |                     |                             |                   |                           |  |  |
|    | committed and that there is sufficient cause to believe that the following defendant(s) guilty |                     |                             |                   |                           |  |  |
| 4  |  | ereof, to wit:      |                             |                   | <i>'</i>                  |  |  |
| 5  | -  | OVANNI BEMB         | <u>1</u>                    |                   |                           |  |  |
| 6  | <u>Ct.</u>   | Charge              | Charge Range                | Allegation        | Alleg. Effect             |  |  |
| 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 | <u>CO</u>  | <u>NNIE MARIE G</u> | UZMAN                       |                   |                           |  |  |
| 14 | <u>Ct.</u>   | <u>Charge</u>       | Charge Range                | Allegation        | Alleg. Effect             |  |  |
| 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 | <u>WIL</u>   | LIAM PRECIAI        | 00                          |                   |                           |  |  |
| 22 | <u>Ct.</u>   | Charge              | Charge Range                | <u>Allegation</u> | <u>Alleg. Effect</u>      |  |  |
| 23 | 13   | PC 487(a)           | 16-2-3                      | mogunon           | Alleg. Effect             |  |  |
| 24 | 14   | PC 72               | 16-2-3                      |                   |                           |  |  |
| 25 | 15   | PC 72               | 16-2-3                      | · ·               |                           |  |  |
| 6  | 16   | PC 72               | 16-2-3                      |                   |                           |  |  |
| 7  | 17   | PC 72               | 16-2-3                      |                   |                           |  |  |
| 8  | /////  |                     | -                           |                   |                           |  |  |
|    |  |                     | 20                          |                   |                           |  |  |

FELONY COMPLAINT FOR ARREST WARRANT

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|    | ļ              | $\bigcirc$         |                    |    | $\bigcirc$         |                      |
|----|----------------|--------------------|--------------------|----|--------------------|----------------------|
|    |                |                    |                    |    |                    |                      |
| 1  | ED             | MUND ZORRII        | LLA                |    | •                  |                      |
| 2  | <u>Ct.</u>     | Charge             | Charge Range       |    | Allegation         | <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  | LUI            | <u>S MANUEL MI</u> | ENDOZA             |    |                    |                      |
| 10 | <u>Ct.</u>     | <u>Charge</u>      | Charge Range       |    | Allegation         | Alleg. Effect        |
| 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 | WIL            | LIAM MATTH         | <u>EW FOUNTAIN</u> |    |                    |                      |
| 18 | <u>Ct.</u>     | <u>Charge</u>      | Charge Range       |    | Allegation         | Alleg. Effect        |
| 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             |    |                    |                      |
| 25 | /////          |                    |                    |    |                    |                      |
| 26 | /////          |                    |                    |    | · ·                |                      |
| 27 | /////          |                    |                    |    |                    |                      |
| 28 |                |                    |                    |    |                    |                      |
|    | Δ <u>Ω</u> #1  | A2021304330        |                    | 21 |                    |                      |
| I  | 11 <b>0</b> #L | 120-120-1200       |                    |    | FELONY COMPLAINT I | OR ARREST WARRANT    |

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| 1       I ORDER that the defendants named below be held to answer for the above-describe         2       offenses and allegations and be admitted to bail in the sum of:         3       Giovanni Bembi         4       Giovanni Bembi         5       Connie Marie Guzman         6       William Preciado         7       Edmund Zorrilla         8       Luis Manuel Mendoza         9       William Matthew Fountain         10       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      in Departmentata.m. |     |
|--|-----|
| 2       offenses and allegations and be admitted to bail in the sum of:         3       Giovanni Bembi       \$  |     |
| 2       offenses and allegations and be admitted to bail in the sum of:         3       Giovanni Bembi       \$  |     |
| 3       4       Giovanni Bembi       \$  | bed |
| 5       Connie Marie Guzman       \$   |     |
| 5       Connie Marie Guzman       \$   |     |
| 6       William Preciado       \$  |     |
| 7       Edmund Zorrilla       \$   |     |
| <ul> <li>8 Luis Manuel Mendoza \$</li></ul>  |     |
| <ul> <li>9 William Matthew Fountain \$</li></ul>   |     |
| <ul> <li>And that said defendant be committed to the custody of the Sheriff until such bail is given.</li> <li>The date of Felony arraignment is set for:</li> <li>in Department at a.m.</li> </ul>  |     |
| 12       The date of Felony arraignment is set for:         13   |     |
| 12       The date of Felony arraignment is set for:         13   |     |
| 14 in Department at a.m.   |     |
| (Date)   |     |
|  |     |
| 15   |     |
| 16   |     |
| 17 Magistrate Date   |     |
| Magistrate     Date       18     Superior Court of California  |     |
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| AG #LA2021304330 FELONY COMPLAINT FOR ARREST WAR   |     |

|    |   | M.   |
|----|---|--|
| 1  | Attorney General of California                              | irant issued   |
| 2  | Chief Assistant Attorney General                            | seense of the source of the so |
| 3  | JOHNETTE JAURON<br>Senior Assistant Attorney General        |  |
| 4  | CHRISTOPHER G. SANCHEZ<br>Deputy Attorney General           |  |
| 5  | PAUL S. THIES<br>Deputy Attorney General                    | E a V-   |
| 6  | State Bar No. 305084<br>300 South Spring Street, Suite 1702 |  |
| 7  | Los Angeles, CA 90013<br>Telephone: (213) 269-6070          |  |
| 8  | Cell: (213) 269-2148<br>E-mail: Paul.Thies@doj.ca.gov       | , ~  |
| 9  | Attorneys for the People of the State of California         | N  |
| 10 | SUPERIOR COURT OF THE                                       | E STATE OF CALIFORNIA  |
| 11 | COUNTY OF L   | OS ANGELES   |
| 12 |   |  |
| 13 |   |  |
| 14 | PEOPLE OF THE STATE OF<br>CALIFORNIA,                       | Case No. BA498277  |
| 15 | Plaintiff,  |  |
| 16 | ν.  | FELONY COMPLAINT FOR ARREST<br>WARRANT   |
| 17 | (1) RUBEN ROBLES  |  |
| 18 | (DOB:   |  |
| 19 | (2) REY DAVID THORNE<br>(DOB:                               |  |
| 20 | (3) MARTIN GERARDO VASQUEZ                                  |  |
| 21 | (DOB:   |  |
| 22 | Defendants.   |  |
| 23 |   | · · ·  |
| 24 |   | rnia accuses the above-named Defendants of the   |
| 25 | following offenses, which are connected to each o           |  |
| 26 | COU   |  |
| 27 |   | through April 19, 2018, in the County of Los   |
| 28 | Angeles, the crime of GRAND THEFT in violation              | on of PENAL CODE SECTION 487(a), a   |

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

#### COUNT 2

On or about and between March 4, 2016, through April 20, 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 RUBEN ROBLES, who did unlawfully take money and
property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Twelve Thousand Nine
Hundred Nine Dollars and Ten Cents (\$12,909.10), the property of the County of Los Angeles.

COUNT 3

On or about March 1, 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 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 4

On or about October 2, 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 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 5

2

On or about September 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 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.

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| 1  | COUNT 6   |
|----|---|
| 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 RUBEN ROBLES, 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 7   |
| 8  | On or about April 20, 2016, in the County of Los Angeles, the crime of PRESENTATION             |
| 9  | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was                        |
| 10 | committed by Defendant RUBEN ROBLES, who did unlawfully and with intent to defraud,             |
| 11 | present for allowance and payment a false and fraudulent claim, bill, account, voucher and      |
| 12 | writing.  |
| 13 | COUNT 8   |
| 14 | On or about and between October 5, 2016, through March 26, 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 REY DAVID THORNE, who did unlawfully take money              |
| 17 | and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Six Thousand Eight |
| 18 | Hundred Fifty-Three Dollars and Sixty-Five Cents (\$6,853.65), the property of the State of     |
| 19 | California.   |
| 20 | <u>COUNT 9</u>  |
| 21 | On or about and between March 15, 2017, through January 3, 2018, in the County of Los           |
| 22 | Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a                  |
| 23 | Felony, was committed by Defendant <b>REY DAVID THORNE</b> , who did unlawfully take money      |
| 24 | and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand      |
| 25 | Three Hundred Twenty Dollars and Twenty-Eight Cents (\$4,320.28), the property of the County    |
| 26 | of Los Angeles.   |
| 27 |   |
| 28 |   |
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AG #LA2021304325

FELONY COMPLAINT FOR ARREST WARRANT .

| 1  | COUNT 10  |  |  |  |  |  |
|----|---|--|--|--|--|--|
| 2  | On or about December 18, 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 REY DAVID THORNE, 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 11  |  |  |  |  |  |
| 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 REY DAVID THORNE, 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 12  |  |  |  |  |  |
| 14 | On or about October 16, 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 REY DAVID THORNE, 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 13  |  |  |  |  |  |
| 20 | On or about October 11, 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 REY DAVID THORNE, 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 14  |  |  |  |  |  |
| 26 | On or about February 22, 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 <b>REY DAVID THORNE</b> , who did unlawfully and with 4        |  |  |  |  |  |
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AG #LA2021304325

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FELONY COMPLAINT FOR ARREST WARRANT

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intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 1 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 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 5 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 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 14 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. 28 5

FELONY COMPLAINT FOR ARREST WARRANT

| 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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| 6<br>AG #LA2021304325<br>EELONY COMPLAINT FOR ARREST WARPANT                                      |  |  |  |  |  |  |
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FELONY COMPLAINT FOR ARREST WARRANT

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## SPECIAL ALLEGATION

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## STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

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

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

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

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

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|----|---|--|--|--|--|--|--|
| 1  | CO  | NCLUSION   |  |  |  |  |  |
| 2  | All of the foregoing is contrary to the f   | form, force, and effect of the above-named statutes, |  |  |  |  |  |
| 3  | and is against the peace and dignity of the Pe  | cople 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 t   | he foregoing is true and correct. Executed this      |  |  |  |  |  |
| 8  | day of February, 2022, at Los Angeles, C  |  |  |  |  |  |  |
| 9  |   | Respectfully Submitted,                              |  |  |  |  |  |
| 10 | н   | Rob Bonta  |  |  |  |  |  |
| 11 |   | Attorney General of California                       |  |  |  |  |  |
| 12 |   |  |  |  |  |  |  |
| 13 |   | PAUL S. THIES  |  |  |  |  |  |
| 14 |   | Deputy Attorney General<br>Attorneys for People      |  |  |  |  |  |
| 15 |   |  |  |  |  |  |  |
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|    | AG #LA2021304325  | 8  |  |  |  |  |  |
| I  |   | FELONY COMPLAINT FOR ARREST WARRANT                  |  |  |  |  |  |

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| 1      | NOTICE TO DEFENDANTS AND ATTORNEYS   |  |  |  |  |  |  |
|--------|--|--|--|--|--|--|--|
| 2      | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby   |  |  |  |  |  |  |
| 3      | informally request that defense counsel provide discovery to the People as required by Penal   |  |  |  |  |  |  |
| 4      | Code section 1054.3.   |  |  |  |  |  |  |
| 5      | NOTICE TO ATTORNEYS  |  |  |  |  |  |  |
| 6      | Any materials accompanying this complaint or provided by the People in this case may   |  |  |  |  |  |  |
| 7      | contain information about witnesses. Such information is subject to Penal Code section 1054.2,   |  |  |  |  |  |  |
| ,<br>8 |  |  |  |  |  |  |  |
| 9      | 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 |  |  |  |  |  |  |
| 10     | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to  |  |  |  |  |  |  |
| 11     | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."                                      |  |  |  |  |  |  |
| 12     | nearing and a showing of good cause.   |  |  |  |  |  |  |
| 12     |  |  |  |  |  |  |  |
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AG #LA2021304325

FELONY COMPLAINT FOR ARREST WARRANT

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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  | and the day peace officer of said State.   |
| 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 Pena         |
| 12 | Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.   |
| 13 | Therefore, you are commanded to arrest <b>RUBEN ROBLES</b> , 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 $1 - 1$                                      |
| 17 |  |
| 18 | Dated: 122   |
| 19 | Time Issued: 3.55 (am/pm)  |
| 20 | TOF CALID  |
| 21 | BORNE DOND   |
| 22 | JUDGE OF THE SUPERIOR COURT  |
| 23 | State of California, County of Los Angeles   |
| 24 | NATALIE STONE  |
| 25 |  |
| 26 |  |
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| 1  | SOLEKIOK COUKT OF CALIFORNIA   |
| 2  | COUNT 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 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 \$   |
| 18 |  |
| 19 | Dated: $\partial \partial \partial \partial$   |
| 20 | Time Issued: 3:56 (ampm)   |
| 21 | INA  |
| 22 | A Dr.  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 24 |  |
| 25 |  |
| 26 | · · ·  |
| 27 |  |
| 28 |  |
|    | II<br>AG #LA2021304325 FELONY COMPLAINT FOR ADDEST WARDS IN T                                  |
| II | AG #LA2021304325 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1             | SUPERIOR COURT OF CALIFORNIA   |
| 2             | SOLEKIOK COORT OF CALIFORNIA   |
| 3             | COUNT FOF LUS ANGELES  |
| 4             | WARDANT OF ADDRESS   |
| 5             | WARRANT OF ARREST  |
| 6             | The People of the State of California to any peace officer of said State:                      |
| 7             | successful of the state of cumonina to any peace officer of said State:                        |
| 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 \$   |
| 18            |  |
| 19            | Dated: 222   |
| 20            | Time Issued: $3.56$ (am/pm)  |
| 21            |  |
| 22            |  |
| 23            | JUDGE OF THE SUPERIOR COURT  |
| 24            | State of California, County of Los Angeles   |
| 25            |  |
| 26            |  |
| 27            |  |
| 28            |  |
|               | 12   |
|               | AG #LA2021304325 FELONY COMPLAINT FOR ARREST WARRANT   |

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| Defendant               | DOB        | CII   | DMV      | Bail Requester |
|-------------------------|------------|-------|----------|----------------|
| ROBLES, Ruben           |            |       |          |                |
| THORNE, Rey David       |            |       |          | ·              |
| VASQUEZ, Martin Gerardo |            |       |          |                |
| Investigating Agency    | СНР        |       |          |                |
| Investigating Officer   | Lt. Tannor | Brown | - 12     | -<br>          |
| Phone No.               | (714) 288- |       | <u>.</u> |                |
|                         |            | 0330  |          |                |
| Prelim Estimate         | l day      |       |          | s.             |
|                         |            |       |          |                |
|                         |            |       |          |                |
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|                         |            |       |          |                |
| 7                       | 13         |       |          |                |

| 1  |            | FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. SECTION 872                                  |                            |                   |                   |  |  |  |  |
|----|------------|--|----------------------------|-------------------|-------------------|--|--|--|--|
| 2  | 14.<br>12. |  | o me from the evidence pre |                   |                   |  |  |  |  |
| 3  | cor        | committed and that there is sufficient cause to believe that the following defendant(s) guilty |                            |                   |                   |  |  |  |  |
| 4  |            | thereof, to wit:   |                            |                   |                   |  |  |  |  |
| 5  | RU         | BEN ROBLES   |                            |                   |                   |  |  |  |  |
| 6  | <u>Ct.</u> | Charge   | Charge Range               | <u>Allegation</u> | Alleg. Effect     |  |  |  |  |
| 7  | 1          | PC 487(a)  | 16-2-3                     |                   | <u></u>           |  |  |  |  |
| 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        | Y DAVID THOI   | RNE                        |                   |                   |  |  |  |  |
| 15 | <u>Ct.</u> | Charge   | Charge Range               | Allegation        | Alleg. Effect     |  |  |  |  |
| 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                     | •<br>•            |                   |  |  |  |  |
| 23 | MAI        | RTIN GERARD  | <u>O VASQUEZ</u>           |                   |                   |  |  |  |  |
| 24 | <u>Ct.</u> | <u>Charge</u>  | Charge Range               | Allegation        | Alleg. Effect     |  |  |  |  |
| 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                     |                   |                   |  |  |  |  |
|    | A 0 11-    | 4202122425   | 1                          | 4                 |                   |  |  |  |  |
|    | AG #L      | A2021304325  | 1                          |                   | FOR ARREST WARRAN |  |  |  |  |

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| 1   |         |                      |                   |                   |                                       |             |                                       |               |        |
|---|---------|----------------------|-------------------|-------------------|---------------------------------------|-------------|---------------------------------------|---------------|--------|
| 2   |         | PC 72                | 16-2-3            |                   |                                       |             |                                       |               |        |
| 3   | 20 ]    | PC 72                | 16-2-3            |                   |                                       |             |                                       |               |        |
| 4   |         |                      |                   |                   |                                       |             |                                       |               |        |
| 5   | I       | ORDER that th        | e defendants nar  | ned below         | / he held t                           | ົດລາຄາມ     | ar far th                             | o obovo du    |        |
| 6   |         |                      | s and be admitte  |                   |                                       |             |                                       | e above-des   | scribe |
| 7   |         |                      |                   |                   |                                       | 01.         |                                       |               |        |
| 8   |         | Ruben Rob            | oles              | \$                |                                       |             | •                                     |               |        |
| 9   |         | Rey David            | Thorne            | \$                | , , , , , , , , , , , , , , , , , , , |             |                                       |               |        |
| 10  |         | Martin Ger           | ardo Vasquez      | \$                |                                       | -wu         |                                       | ,             |        |
| 11  |         |                      |                   |                   |                                       | <del></del> | •                                     |               |        |
| 12  | And tha | t said defendant     | t be committed t  | o the custo       | ody of the                            | Sherift     | funtil su                             | ich hail is o | iven   |
|   |         |                      | ignment is set fo |                   |                                       |             |                                       | ion buil 13 g | rven.  |
|   |         | o of i ofolly affa   | ignment is set ic | or:               |                                       |             |                                       |               |        |
| 4   |         |                      | ignment is set it | or:               |                                       |             |                                       |               |        |
|   |         |                      |                   | or:<br>in Departr | nent                                  | at          | •                                     | a.m.          |        |
| 4   |         | (Date)               |                   |                   | nent                                  | at          | •                                     | a.m.          |        |
| .5  |         |                      |                   |                   | nent                                  | at          |                                       | a.m.          |        |
| 4<br>5<br>6   |         | (Date)               |                   |                   |                                       | at          | · · ·                                 | a.m.          |        |
| 14<br>5<br>6<br>7   |         | (Date)<br>Magistrate |                   | in Departm        | nent<br>Date                          | at          | •                                     | a.m.          |        |
| 4<br>5<br>6<br>7<br>8                                     |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | ·                                     | a.m.          |        |
| 4<br>5<br>6<br>7<br>8<br>9                                |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | ·<br>·                                | a.m.          |        |
| 4<br>5<br>6<br>7<br>8<br>9<br>0                           |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          |                                       | a.m.          |        |
| 4<br>5<br>6<br>7<br>8<br>9<br>0<br>1                      |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | •                                     | a.m.          |        |
| 14<br>5<br>6<br>7<br>8<br>9<br>0<br>1<br>2                |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | ·<br>·                                | a.m.          |        |
| 14<br>5<br>6<br>7<br>8<br>9<br>0<br>1<br>1<br>2<br>3      |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | ·<br>·                                | a.m.          |        |
| 14<br>5<br>6<br>7<br>8<br>9<br>0<br>1<br>1<br>2<br>3<br>4 |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | ·<br>·                                | a.m.          |        |
| 4<br>5<br>6<br>7<br>8<br>9<br>0<br>1<br>2<br>3<br>4<br>5  |         | (Date)<br>Magistrate |                   | in Departm        |                                       | at          | · · · · · · · · · · · · · · · · · · · | a.m.          |        |

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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   | <u>COUNT 1</u>   |  |  |  |  |  |
| 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  | <u>COUNT 3</u>   |  |  |  |  |  |
| 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  | <u>COUNT 4</u>   |  |  |  |  |  |
| 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.   |  |  |  |  |  |
| 27  | ////   |  |  |  |  |  |
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| 1              | COUNT 5  |
| 2              | On or about January 23, 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 RAMIRO DURAZO, 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              | <u>COUNT 6</u>   |
| 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 RAMIRO DURAZO, 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 January 5, 2017, and March 26, 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 ROMAN GARDEA, who did unlawfully take money and                 |
| 17             | property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Eight Thousand Two        |
| 18             | Hundred Eighty-Two Dollars and Eighty Cents (\$8,282.80).  |
| 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 ROMAN GARDEA, who did unlawfully and with intent                |
| 23             | to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher |
| 24             | and writing.   |
| 25             | <u>COUNT 9</u>   |
| 26             | On or about December 6, 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 ROMAN GARDEA, who did unlawfully and with intent 3              |
|                | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |

| 1  | to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher |
|----|--|
| 2  | and writing.   |
| 3  | <u>COUNT 10</u>  |
| 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  | <u>COUNT 11</u>  |
| 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 | <u>COUNT 12</u>  |
| 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 | <u>COUNT 13</u>  |
| 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  | <u>COUNT 14</u>   |
| 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  | <u>COUNT 15</u>   |
| 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 | <u>COUNT 16</u>   |
| 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 | <u>COUNT 17</u>   |
| 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 | <u>COUNT 18</u>   |
| 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 <b>ROBERT ANDRES FELIX</b> , who did unlawfully take 5         |
|    | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT  |

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| 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   | <u>COUNT 19</u>  |
| 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   | <u>COUNT 20</u>  |
| 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  | <u>COUNT 21</u>  |
| 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.   |
| 27  | ////   |
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| •      | •   |
| 1      | COUNT 23  |
| 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 <b>ROBERT ANDRES FELIX</b> , 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      | <u>COUNT 24</u>   |
| 8      | On or about and between October 27, 2016, and December 21, 2017, in the County of Los             |
| 9      | Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a                    |
| 10     | Felony, was committed by Defendant KYLE CLAYTON HARTMAN, who did unlawfully take                  |
| 11     | money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two            |
| 12     | Thousand Thirty-Two Dollars and Thirteen Cents (\$2,032.13).                                      |
| 13     | <u>COUNT 25</u>   |
| 14     | On or about September 21, 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 KYLE CLAYTON HARTMAN, 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     | <u>COUNT 26</u>   |
| 20     | On or about August 23, 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 KYLE CLAYTON HARTMAN, 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     | <u>COUNT 27</u>   |
| 26     | On or about January 3, 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 <b>KYLE CLAYTON HARTMAN</b> , who did unlawfully and with intent 7         |
|        | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT  |

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|        |  |
| 1      | to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher |
| 2      | and writing.   |
| 3      | <u>COUNT 28</u>  |
| 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      | <u>COUNT 29</u>  |
| 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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|        | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1      | SPECIAL ALLEGATION   |
| 2      | STATUE 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.  |
| 25     | ////   |
| 26     | ////   |
| 27     | ////   |
| 28     | ////   |
|        | 9 AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |
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| · 1  | CONCLUSION   |
| 2    | All of the foregoing is contrary to the form, force, and effect of the above-named statutes, |
| 3    | and is against the peace and dignity of the People of the State of California.               |
| 4    | Attached hereto and incorporated by reference is a declaration in support of an arrest       |
| 5    | warrant and complaint with accompanying official reports and documents of a law enforcement  |
| 6    | agency.  |
| 7    | I declare under penalty of perjury that the foregoing is true and correct. Executed this     |
| 8    | day of February, 2022, at Los Angeles, California.   |
| 9    | Respectfully Submitted,  |
| 10   | ROB BONTA  |
| 11   | Attorney General of California   |
| . 12 |  |
| 13   | PAUL S. THIES  |
| 14   | Deputy Attorney General<br>Attorneys for People  |
| 15   |  |
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|      | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1  | NOTICE TO DEFENDANTS AND ATTORNEYS  |
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |
| 4  | Code section 1054.3.  |
| 5  | NOTICE TO ATTORNEYS   |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2,    |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |
| 11 | hearing and a showing of good cause."   |
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| ×  | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT  |

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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 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 \$   |
| 18     |  |
| 19     | Dated: $2222$  |
| 20     | Time Issued: $4:0[\rho m_{(am/pm)}]$   |
| 21     | TIRT OF COM  |
| 22     | JUDGE OF THE SUPERIOR COURT  |
| 23     | State of California, County of Los Angeles   |
| 24     | NATALIE STONE  |
| 25     | 39/1V SOT NO.  |
| 26     |  |
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| 28     | . 12   |
|        | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |

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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 ROMAN GARDEA: 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 ROMAN GARDEA, 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 \$  |
| 18       |   |
| 19       | Dated:  |
| 20       | Time Issued: $4:01$ (am/pm)   |
| 21       | 1 Xoo   |
| 22       | JUDGE OF THE SUPERIOR COURT   |
| 23<br>24 | State of California, County of Los Angeles  |
| 24       |   |
| 23<br>26 |   |
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| 20       | 13  |
|          | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT  |

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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 RAMON MARTINEZ JR.: 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 RAMON MARTINEZ 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 \$  |
| 18<br>19 | Dated: 2222   |
| 20       | Time Issued: $\underline{4'.0.7}$ (am/pm)   |
| 21       |   |
| 22       | XONO  |
| 23       | JUDGE OF THE SUPERIOR COURT   |
| 24       | State of California, County of Los Angeles  |
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| Í        | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT  |

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| 1        | SUPERIOR COURT OF CALIFORNIA   |
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| 2        | COUNTY OF LOS ANGELES  |
| 3        | COONTTOT LOS ANGELES   |
| 4        | WARRANT OF ARREST  |
| 5        | WARRANT OF ARREST  |
| 6        | The People of the State of California to any peace officer of said State:                    |
| 7        | The respice of the state of Camorina to any peace officer of said State:                     |
| 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 ROBERT ANDRES FELIX: Grand Theft in                  |
| 12       | violation of Penal Code section 487(a), and Presentation of False Claims in violation of Pen |
| 13       | Code section 72.   |
| 14       | Therefore, you are commanded to arrest ROBERT ANDRES FELIX, and to bring s                   |
| 15       | Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826     |
| 16       | 848 of the California Penal Code.  |
| 17       | Defendant is to be admitted to bail in the sum of $\frac{1}{2}$                              |
| 18<br>19 | Dated: $2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2$   |
| 20       |  |
| 21       | Time Issued: $\underline{-7.02}$ (am/pm)   |
| 22       | Xa a   |
| 23       | JUDGE OF THE SUPERIOR COURT  |
| 24       | State of California, County of Los Ang   |
| 25       |  |
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| 27       |  |
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|          | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARR  |

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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 KYLE CLAYTON HARTMAN: 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 KYLE CLAYTON HARTMAN, 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 \$   |
| 18       |  |
| 19       | Dated: $\frac{\partial}{\partial d}$   |
| 20       | Time Issued:   |
| 21       | 1 1 0 0 0  |
| 22       | JUDGE OF THE SUPERIOR COURT  |
| 23       | State of California, County of Los Angeles   |
| 24       |  |
| 25       |  |
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|          | AG #LA2022300231 FELONY COMPLAINT FOR ARREST WARRANT   |

| Defendant             | DOB        | CII        | DMV | Bail Requested |
|-----------------------|------------|------------|-----|----------------|
| DURAZO, Ramiro        |            |            |     |                |
| GARDEA, Roman         |            |            |     |                |
| MARTINEZ JR., Ramon   |            |            |     |                |
| FELIX, Robert Andres  |            |            |     |                |
| HARTMAN, Kyle Clayton |            |            |     |                |
| Investigating Agency  | СНР        |            |     |                |
| Investigating Officer | Lt. Tannor | n Brown    |     |                |
| Phone No.             | (714) 288- | 6336       |     |                |
| Prelim Estimate       | 1 day      |            |     |                |
|                       |            |            |     |                |
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| 1   |            | FFI ONV COM  | DI AINT ODDED HOL   | DINC TO ANOMED                         |                      |  |  |
| 2   |            | FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. SECTION 872                                  |                     |  |                      |  |  |
| 3   | 0.000      | It appearing to me from the evidence presented that the following offense(s) has/have been     |                     |  |                      |  |  |
| 4   |            | committed and that there is sufficient cause to believe that the following defendant(s) guilty |                     |  |                      |  |  |
| 5   |            | thereof, to wit:<br><u>RAMIRO DURAZO</u>   |                     |  |                      |  |  |
| 6   | <u>Ct.</u> | <u>Charge</u>  | <u>Charge Range</u> | Allogation                             | Aller Effect         |  |  |
| 7   | 1          | PC 487(a)  | 16-2-3              | Allegation                             | <u>Alleg. Effect</u> |  |  |
| 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  |            | MAN GARDEA   |                     |  |                      |  |  |
| 14  | <u>Ct.</u> | Charge   | Charge Range        | Allegation                             | Alleg. Effect        |  |  |
| 15  | 7          | PC 487(a)  | 16-2-3              | Q                                      | <u> </u>             |  |  |
| 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  | RAN        | MON MARTINI  | EZ JR.              |  |                      |  |  |
| 22  | <u>Ct.</u> | Charge   | Charge Range        | Allegation                             | Alleg. Effect        |  |  |
| 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  | /////      |  |                     |  |                      |  |  |
|     |            | LA2022300231   | 1                   | ······································ |                      |  |  |
|     |            | LA2022300231   |                     | FELUNY COMPLAINT                       | FOR ARREST WARRANT   |  |  |

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| 2   | 11         |                     |              |         |                   |                       |
|-----|------------|---------------------|--------------|---------|-------------------|-----------------------|
| * * |            |                     |              |         |                   |                       |
| 1   | ROI        | BERT ANDRES         | FELIX        |         |                   |                       |
| 2   | <u>Ct.</u> | Charge              | Charge Range |         | Allegation        | <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   | <u>KYI</u> | <u>LE CLAYTON H</u> | ARTMAN       |         |                   |                       |
| 10  | <u>Ct.</u> | <u>Charge</u>       | Charge Range |         | Allegation        | Alleg. Effect         |
| 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  | /////      |                     |              |         |                   |                       |
| 18  | /////      |                     |              |         |                   |                       |
| 19  |            |                     |              |         |                   |                       |
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| 22  |            |                     |              |         |                   |                       |
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| 25  | /////      |                     |              |         |                   |                       |
| 26  | /////      |                     |              |         |                   |                       |
| 27  |            |                     |              |         |                   |                       |
| 28  | /////      |                     |              |         |                   |                       |
|     | AG #I      | A2022300231         |              | 19<br>I | ΈΙ ΟΝΥ ΓΟΜΡΙ ΔΙΝΤ | FOR ARREST WARRANT    |
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| 1  | LOPDER that the defendants as          | mad halows h   | a hald to average for the above date it al  |
|----|--|----------------|---|
|    |  |                | be held to answer for the above-described   |
| 2  | offenses and allegations and be admitt | ted to bail in | the sum of:                                 |
| 3  |  | <b>.</b>       |   |
| 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 custo   | ly of the Sheriff until such bail is given. |
| 11 | The date of Felony arraignment is set  | for:           |   |
| 12 |  | in Donorton    | ant ot own                                  |
| 13 | (Date)                                 | _ in Departin  | ent at a.m.                                 |
| 14 |  |                |   |
| 15 |  |                |   |
| 16 | Magistrate                             | <u>_</u>       | Date  |
| 17 | Superior Court of Californ             | nia            |   |
| 18 |  |                |   |
| 19 |  |                |   |
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|    | · · · · · · · · · · · · · · · · · · ·  | 20             |   |
|    | AG #LA2022300231                       |                | FELONY COMPLAINT FOR ARREST WARRANT         |



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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  | <u>COUNT 1</u>  |
| 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  | <u>COUNT 2</u>  |
| 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 | <u>COUNT 4</u>  |
| 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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FELONY COMPLAINT FOR ARREST WARRANT

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| I  | 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  | <u>COUNT 6</u>  |
| 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 | <u>COUNT 7</u>  |
| 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 | <u>COUNT 8</u>  |
| 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 <b>REMIGIO BEMBI JR.</b> , who did unlawfully and with 3       |

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FELONY COMPLAINT FOR ARREST WARRANT

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| 1  | intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, |
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| 2  | voucher and writing.  |
| 3  | <u>COUNT 10</u>   |
| 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 | <u>COUNT 12</u>   |
| 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   | <u>COUNT 14</u>   |
| 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  | <u>COUNT 18</u>   |
| 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 5                |
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AG #LA2022300229

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FELONY COMPLAINT FOR ARREST WARRANT

| intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, |
|---|
| voucher and writing.  |
| <u>COUNT 19</u>   |
| On or about June 28, 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 PEDRO CHAVEZ JR., who did unlawfully and with intent to defraud,           |
| present for allowance and payment a false and fraudulent claim, bill, account, voucher and        |
| writing.  |
| <u>COUNT 20</u>   |
| 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 BILLY JOEL GUILLEN, 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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| 6 AG #LA2022300229 FELONY COMPLAINT FOR ARREST WARRANT  |
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## SPECIAL ALLEGATION

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## STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

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

On March 20, 2018, California Highway Patrol ("CHP") Captain Chris Margaris conducted 6 a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through 7 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 expenditures compared to the CHP station covering the largest geographic area. In his review of 10 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details, 11 leading him to believe that officers at the East Los Angeles station may have submitted for and 12 13 received compensation for overtime assignments not physically worked.

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

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

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| 1  |                                      | <u>CO</u>              | NCLUSION              | 90<br>19                        |              |
|----|--------------------------------------|------------------------|-----------------------|---------------------------------|--------------|
| 2  | All of the foregoing                 | g is contrary to the f | orm, force, and effe  | ect of the above-name           | ed statutes, |
| 3  | and is against the peace a           | nd dignity of the Pe   | ople of the State of  | California.                     |              |
| 4  | Attached hereto and                  | d incorporated by re   | ference is a declarat | tion in support of an           | arrest       |
| 5  | warrant and complaint wi             | th accompanying of     | ficial reports and de | ocuments of a law er            | nforcement   |
| 6  | agency.                              |                        |                       |                                 |              |
| 7  | I declare under pen                  | alty of perjury that t | he foregoing is true  | and correct. Execute            | ed this      |
| 8  | $\frac{1}{5t}$ day of February, 2022 | 2, at Los Angeles, C   | alifornia.            | anta<br>M                       |              |
| 9  |                                      |                        | Respectfully          | Submitted,                      |              |
| 10 |                                      |                        | ROB BONTA             |                                 |              |
| 11 |                                      |                        | Attorney Ge           | eneral of California            |              |
| 12 |                                      |                        |                       |                                 |              |
| 13 |                                      |                        | PAUL S. THI           |                                 |              |
| 14 | 6                                    |                        | Attorneys for         | rney General<br>r <i>Pèople</i> |              |
| 15 |                                      |                        |                       |                                 |              |
| 16 |                                      |                        |                       |                                 |              |
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|    | AG #LA2022300229                     |                        |                       | AINT FOR ARREST W               | ARRANT       |

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| NOTICE TO DEFEN<br>Pursuant to Penal Code section 1054.5(<br>Informally request that defense counsel provided<br>Code section 1054.3.<br>NOTICE T<br>Any materials accompanying this compontain information about witnesses. Such in<br>which provides, "No attorney may disclose of<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec<br>earing and a showing of good cause." | (b), the People of<br>de discovery to<br>FO ATTORNE<br>plaint or provide<br>formation is sul<br>r permit to be di<br>se name is discl | of the State of<br>the People as<br><u><b>XS</b></u><br>bject to Penal<br>isclosed to a c<br>osed to the at | California hereby<br>s required by Penal<br>ple in this case may<br>l Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to |
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| nformally request that defense counsel provi<br>Code section 1054.3.<br><u>NOTICE 7</u><br>Any materials accompanying this comp<br>ontain information about witnesses. Such in<br>which provides, "No attorney may disclose of<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec   | de discovery to<br><u>FO ATTORNE</u><br>plaint or provide<br>iformation is sul<br>r permit to be di<br>se name is discl               | the People as<br><b>XYS</b><br>d by the Peop<br>bject to Penal<br>isclosed to a c<br>osed to the at         | s required by Penal<br>ple in this case may<br>l Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to                      |
| Code section 1054.3.<br><u>NOTICE 7</u><br>Any materials accompanying this comp<br>ontain information about witnesses. Such in<br>which provides, "No attorney may disclose of<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec   | TO ATTORNE<br>Daint or provide<br>Iformation is sul<br>r permit to be di<br>se name is discl  | E <u>YS</u><br>to by the Peop<br>bject to Penal<br>isclosed to a c<br>osed to the at                        | ple in this case may<br>I Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to   |
| NOTICE 7<br>Any materials accompanying this comp<br>ontain information about witnesses. Such in<br>which provides, "No attorney may disclose of<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec  | plaint or provide<br>formation is sul<br>r permit to be di<br>se name is discl  | d by the Peop<br>bject to Penal<br>isclosed to a c<br>osed to the at  | l Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to   |
| Any materials accompanying this compontain information about witnesses. Such in which provides, "No attorney may disclose of elephone number of a victim or witness who ubdivision (a) of Section 1054.1 unless spec   | plaint or provide<br>formation is sul<br>r permit to be di<br>se name is discl  | d by the Peop<br>bject to Penal<br>isclosed to a c<br>osed to the at  | l Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to   |
| ontain information about witnesses. Such in<br>which provides, "No attorney may disclose of<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec  | formation is sul<br>r permit to be di<br>se name is discl   | bject to Penal<br>sclosed to a c<br>osed to the at  | l Code section 1054.2,<br>defendant the address of<br>ttorney pursuant to   |
| which provides, "No attorney may disclose o<br>elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec  | r permit to be di<br>se name is discl   | isclosed to a c<br>osed to the at   | defendant the address or<br>torney pursuant to  |
| elephone number of a victim or witness who<br>ubdivision (a) of Section 1054.1 unless spec   | se name is discl  | osed to the at  | ttorney pursuant to   |
| ubdivision (a) of Section 1054.1 unless spec   |   |   |   |
|  | ifically permitte   | d to do so by   | the court after a   |
| earing and a showing of good cause."   |   | 、   |   |
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|                  | 1  | SUPERIOR COURT OF CALIFORNIA   |
|                  | 2  | COUNTY OF LOS ANGELES  |
|                  | 3  |  |
|                  | 4  | WARRANT OF ARREST  |
| æ Å              | 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                 |
| .e. 17           | 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   |
| . 1              | 18 |  |
|                  | 19 | Dated: 2322  |
|                  | 20 | Time Issued: 4:50 (ampm)   |
|                  | 20 | Time issued. <u>I. SE</u>  |
|                  |    |  |
|                  | 22 | JUDGE OF THE SUPERIOR COURT  |
|                  | 23 | State of California, County of Los Angeles   |
| 14               | 24 | MATALIE STONE  |
|                  | 25 |  |
|                  | 26 |  |
| a 2 <sup>1</sup> | 27 |  |
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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 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  |
| 18   |  |
| 19   | Dated: 23/22   |
| 20   | Time Issued: 4:50 (am/pm)  |
| 21   | $\cap OI$  |
| . 22 | Xou  |
| 23   | JUDGE OF THE SUPERIOR COURT  |
| 24   | State of California, County of Los Angeles   |
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|      | AG #LA2022300229 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1  | SUPERIOR COURT OF CALIFORNIA   |
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| 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 $\frac{1}{2}$                                |
| 18 |  |
| 19 | Dated: $23/22$   |
| 20 | Time Issued: $4:5$ (am/pm)   |
| 21 |  |
| 22 | Xore   |
| 23 | JUDGE OF PHD SUPERIOR COURT<br>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 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 $1 - 2$ .                                    |
|        | 18 |  |
|        | 19 | Dated: $2/3/22$  |
|        | 20 | Time Issued: 4:51 (am/pm)  |
|        | 21 | $\wedge \circ$   |
|        | 22 | Kore   |
|        | 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
|        | 24 |  |
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|        |    | 13       AG #LA2022300229       FELONY COMPLAINT FOR ARREST WARRANT                            |
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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  |
|   | 18 | a) 1   |
|   | 19 | Dated: $2322$  |
|   | 20 | Time Issued: <u>4: S</u> (and pm)  |
|   | 21 |  |
|   | 22 | Acre   |
|   | 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
|   | 24 |  |
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|   | 26 |  |
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|   |    | 14   |
|   |    | AG #LA2022300229 FELONY COMPLAINT FOR ARREST WARRANT   |

| 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 \$  |
| 17 |   |
| 18 | Dated: 2322   |
| 19 | Time Issued: $\underline{M; G}$ (am/pm)   |
| 20 |   |
| 21 |   |
| 22 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                     |
| 23 |   |
| 24 |   |
| 25 |   |
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|    | AG #LA2022300229 FELONY COMPLAINT FOR ARREST WARRANT  |
|    | AG #LA2022300229 FELONY COMPLAINT FOR ARREST WARRANT  |

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FELONY COMPLAINT FOR ARREST WARRANT

| Defendant                | DOB              | CII  | DMV | Bail Requeste |
|--------------------------|------------------|------|-----|---------------|
| McKEE, Jeffery Robert    |                  |      |     |               |
| BEMBI JR., Remigio       |                  |      |     |               |
| SANTELICES, Andrew James |                  |      |     |               |
| GONZALEZ, Javier         |                  |      | •   |               |
| CHAVEZ JR., Pedro        |                  |      |     |               |
| GUILLEN, Billy Joel      |                  | •    |     |               |
| Investigating Agency     | СНР              |      | · · |               |
| Investigating Officer    | Lt. Tannon Brown |      |     |               |
| Phone No.                | (714) 288-       | 6336 | •   | •             |
| Prelim Estimate          | l day            |      |     |               |
|                          |                  |      | 100 |               |
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| 1  | ]  | FELONY COMPI          |                         | LDING TO     | <u> DANSWER –</u> | P.C. SECTION 872        |
|----|--|-----------------------|-------------------------|--------------|-------------------|-------------------------|
| 2  |  | It appearing to me    | e from the evidence pro | esented that | the following o   | ffense(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>   | Charge                | Charge Range            | 4            | Allegation        | Alleg. Effect           |
| 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 | <u>REN</u>   | <u>IIGIO BEMBI JR</u> | <u>.</u>                |              | •                 |                         |
| 12 | <u>Ct.</u>   | Charge                | Charge Range            | 4            | Allegation        | Alleg. Effect           |
| 13 | 5  | PC 487(a)             | 16-2-3                  |              |                   |                         |
| 14 | 6  | PC 72                 | 16-2-3                  |              |                   |                         |
| 15 | 7  | PC 72                 | 16-2-3                  |              |                   | I                       |
| 16 | 8  | PC 72                 | 16-2-3                  |              |                   |                         |
| 17 | 9  | PC 72                 | 16-2-3                  |              |                   |                         |
| 18 | ANI  | DREW JAMES SA         | NTELICES                |              |                   |                         |
| 19 | <u>Ct.</u>   | Charge                | Charge Range            | 4            | Allegation        | Alleg. Effect           |
| 20 | 10   | PC 487(a)             | 16-2-3                  |              |                   |                         |
| 21 | 11   | PC 72                 | 16-2-3                  |              |                   |                         |
| 22 | 12   | PC 72                 | 16-2-3                  |              |                   |                         |
| 23 | <u>JAV</u>   | IER GONZALEZ          | <u>-</u>                |              |                   |                         |
| 24 | <u>Ct.</u>   | Charge                | Charge Range            | 4            | Allegation        | Alleg. Effect           |
| 25 | 13   | PC 487(a)             | 16-2-3                  |              |                   |                         |
| 26 | 14   | PC 72                 | 16-2-3                  |              |                   |                         |
| 27 | 15   | PC 72                 | 16-2-3                  |              |                   |                         |
| 28 | /////  |                       |                         |              |                   |                         |
|    | <u>۸</u> , 4   | LA2022300229          |                         | 17<br>FELONY |                   | DR ARREST WARRANT       |
|    | AU#  | LM2022300229          |                         | relon y      | COMPLAINT FU      | JA AKKESI WAKKANI       |

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| 1                                      | PED         | RO CHAVEZ J                              | <u>R.</u>          |                    |             |                |                    |
|--|-------------|--|--------------------|--------------------|-------------|----------------|--------------------|
| 2                                      | <u>Ct.</u>  | <u>Charge</u>                            | Charge Ran         | ge                 | <u>Alle</u> | gation         | <u>Alleg. Effe</u> |
| 3                                      | 16          | PC 487(a)                                | 16-2-3             |                    |             |                |                    |
| 4                                      | 17          | PC 72                                    | 16-2-3             |                    |             |                |                    |
| 5                                      | 18          | PC 72                                    | 16-2-3             |                    |             |                |                    |
| 6                                      | 19          | PC 72                                    | 16-2-3             |                    | ,           |                | · .                |
| 7                                      | BIL         | LY JOEL GUIL                             | LEN                |                    |             |                |                    |
| 8                                      | <u>Ct.</u>  | Charge                                   | Charge Ran         | ge                 | Alle        | gation         | <u>Alleg. Effe</u> |
| 9                                      | 20          | PC 72                                    | 16-2-3             |                    |             |                |                    |
| 10                                     |             |  |                    |                    |             | •              |                    |
| 11                                     |             | I ORDER that the                         | ne defendants nan  | ned below b        | e held to a | inswer for th  | ne above-describ   |
| 12                                     | offe        | nses and allegation                      | ns and be admitte  | d to bail in t     | he sum of   |                |                    |
| 13                                     |             | <b>、</b>                                 |                    |                    | *           |                |                    |
| 14                                     |             | Jeffrey Ro                               | bert McKee         | \$                 |             |                |                    |
| 15                                     |             | Remigio I                                | Bembi Jr.          | \$                 |             |                |                    |
| 16                                     |             | Andrew Ja                                | ames Santelices    | \$                 | •           |                |                    |
| 17                                     |             | Javier Go                                | nzalez             | \$                 |             |                |                    |
| 18                                     | -<br>-<br>- | Pedro Cha                                | avez Jr.           | \$                 |             |                |                    |
|  |             | Billy Joel                               | Guillen            | \$                 | •           | ······ •       |                    |
| 19                                     |             |  |                    |                    |             |                |                    |
| 19<br>20                               |             |  |                    |                    |             | heriff until ( | such bail is give  |
|  | And         | that said defenda                        | nt be committed t  | to the custod      | y of the S  | norm unur a    | Ð                  |
| 20                                     |             | that said defenda<br>date of Felony arr  |                    |                    | y of the S  | norm untri     | ,                  |
| 20<br>21                               |             |  | aignment is set fo | or:                |             |                |                    |
| 20<br>21<br>22                         |             | date of Felony an                        | aignment is set fo |                    |             |                |                    |
| 20<br>21<br>22<br>23                   |             |  | aignment is set fo | or:                |             |                |                    |
| 20<br>21<br>22<br>23<br>24             | The         | date of Felony an                        | aignment is set fo | or:                |             |                |                    |
| 20<br>21<br>22<br>23<br>24<br>25       | The         | date of Felony and (Date)                | aignment is set fo | or:                | ent         |                |                    |
| 20<br>21<br>22<br>23<br>24<br>25<br>26 | The         | date of Felony an<br>(Date)<br>Magistrat | aignment is set fo | or:<br>in Departme |             |                |                    |



| 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  | <u>COUNT 1</u>  |
| 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  | <u>COUNT 2</u>  |
| 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 | <u>COUNT 3</u>  |
| 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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FELONY COMPLAINT FOR ARREST WARRANT

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| 1  | COUNT 5   |
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| 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  | <u>COUNT 6</u>  |
| 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                |
|    | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT  |

FELONY COMPLAINT FOR ARREST WARRANT

| 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  | <u>COUNT 11</u>  |
| 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  |
| 16<br>17   |  |
|  | On or about November 23, 2016, in the County of Los Angeles, the crime of  |
| 17   | 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  |
| 17<br>18   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did   |
| 17<br>18<br>19   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  |
| 17<br>18<br>19<br>20   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.  |
| 17<br>18<br>19<br>20<br>21   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  |
| 17<br>18<br>19<br>20<br>21<br>22   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant FRANCISCO JAVIER FONSECA JR., who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of  |
| 17<br>18<br>19<br>20<br>21<br>22<br>23   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>                         | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>JOSE ANTONIO RAMIREZ</b> , who did unlawfully take  |
| 17<br>18<br>19<br>20<br>21<br>22<br>23<br>24<br>25   | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>JOSE ANTONIO RAMIREZ</b> , who did unlawfully take<br>money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Seven  |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol> | On or about November 23, 2016, in the County of Los Angeles, the crime of<br>PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a<br>Felony, was committed by Defendant <b>FRANCISCO JAVIER FONSECA JR.</b> , who did<br>unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent<br>claim, bill, account, voucher and writing.<br><u>COUNT 13</u><br>On or about and between January 17, 2017, through February 20, 2018, in the County of<br>Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>JOSE ANTONIO RAMIREZ</b> , who did unlawfully take<br>money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Seven<br>Thousand Seven Hundred Forty-Five Dollars and Forty-Three Cents (\$7,745.43). |

| 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  | <u>COUNT 15</u>   |
| 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 | <u>COUNT 17</u>   |
| 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 5               |
|    | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT  |

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FELONY COMPLAINT FOR ARREST WARRANT

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| 1  | with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,   |
|----|---|
| 2  | account, voucher and writing.   |
| 3  | <u>COUNT 19</u>   |
| 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.   |
| 27 |   |
| 28 |   |
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FELONY COMPLAINT FOR ARREST WARRANT

| 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  | <u>COUNT 24</u>   |
| 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 | <u>COUNT 25</u>   |
| 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 | <u>COUNT 26</u>   |
| 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 <b>FRANCISCO JAVIER VILLALOBOS</b> , who did unlawfully and with 7       |
|    | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT  |

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intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 1 2 voucher and writing. 3 COUNT 28 On or about March 2, 2017, in the County of Los Angeles, the crime of PRESENTATION 4 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was 5 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 On or about January 26, 2017, in the County of Los Angeles, the crime of 10 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 11 Felony, was committed by Defendant FRANCISCO JAVIER VILLALOBOS, who did 12 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 On or about December 20, 2016, in the County of Los Angeles, the crime of 16 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 17 Felony, was committed by Defendant FRANCISCO JAVIER VILLALOBOS, who did 18 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent 19 20 claim, bill, account, voucher and writing. 21 <u>COUNT 31</u> On or about and between April 26, 2016, through February 16, 2018, in the County of Los 22 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 23 Felony, was committed by Defendant NIMA VAEZI, who did unlawfully take money and 24 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five Thousand Seven 25 Hundred Seventy-Nine Dollars and Forty-Eight Cents (\$5,779.48). 26 27 ///// 28 ///// 8

| 1   | COUNT 32  |
|-----|---|
| 2   | On or about July 31, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present   |
| 5   | for allowance and payment a false and fraudulent claim, bill, account, voucher and writing. |
| 6   | COUNT 33  |
| 7   | On or about June 11, 2017, in the County of Los Angeles, the crime of PRESENTATION          |
| 8   | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was                    |
| 9   | committed by Defendant NIMA VAEZI, who did unlawfully and with intent to defraud, present   |
| 10  | for allowance and payment a false and fraudulent claim, bill, account, voucher and writing. |
| I 1 | <u>COUNT 34</u>   |
| 12  | On or about May 13, 2017, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present   |
| 15  | for allowance and payment a false and fraudulent claim, bill, account, voucher and writing. |
| 16  | <u>COUNT 35</u>   |
| 17  | On or about January 3, 2017, in the County of Los Angeles, the crime of PRESENTATION        |
| 18  | OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was                    |
| 19  | committed by Defendant NIMA VAEZI, who did unlawfully and with intent to defraud, present   |
| 20  | for allowance and payment a false and fraudulent claim, bill, account, voucher and writing. |
| 21  | COUNT 36  |
| 22  | On or about April 26, 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 NIMA VAEZI, who did unlawfully and with intent to defraud, present   |
| 25  | for allowance and payment a false and fraudulent claim, bill, account, voucher and writing. |
| 26  | ////  |
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|     | 9   |
|     | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT  |

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## SPECIAL ALLEGATION

STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

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

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

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

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

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FELONY COMPLAINT FOR ARREST WARRANT

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| t., |    |   |   |
|     | 1  |   | CONCLUSION  |
|     | 2  | All of the foregoing is contrary        | to the form, force, and effect of the above-named statutes, |
| x   | 3  | and is against the peace and dignity of |   |
|     | 4  |   | d by reference is a declaration in support of an arrest     |
|     | 5  |   | ying official reports and documents of a law enforcement    |
| . S | 6  | agency.                                 |   |
|     | 7  | I declare under penalty of perjur       | y that the foregoing is true and correct. Executed this     |
|     | 8  | day of February, 2022, at Los Angeles   |   |
|     | 9  |   | Respectfully Submitted,                                     |
|     | 10 |   | Rob Bonta   |
|     | 11 |   | Attorney General of California                              |
|     | 12 |   |   |
|     | 13 |   | PAUL S. THIES   |
|     | 14 |   | Deputy Attorney General<br>Attorneys for People             |
|     | 15 |   | inorneys for Teople   |
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|     |    |   | 11  |

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." AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT

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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:                      |
| <u>x</u> = = = = | 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 DORIS PENICHE: Grand Theft in violation of Penal       |
|                  | 12 | Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.   |
| n                | 13 | Therefore, you are commanded to arrest DORIS PENICHE, 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.   |
| 9<br>9           | 16 | Defendant is to be admitted to bail in the sum of $1 - 1$                                      |
|                  | 17 |  |
|                  | 18 | Dated: 2322  |
|                  | 19 | Time Issued: <u><u>4</u>:<u>4</u><u>(am/pm)</u></u>  |
|                  | 20 | CALIFORNI"   |
|                  | 21 | Regise Albe  |
|                  | 22 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
|                  | 23 | EXPANSE  |
|                  | 24 | NATALIE STONE  |
|                  | 25 |  |
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| /                |    | 13       AG #LA2022300200       FELONY COMPLAINT FOR ARREST WARRANT                            |

| 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 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 \$  |
| 18 | 2/21  |
| 19 | Dated: 322  |
| 20 | Time Issued: 4:44 (am/pm)   |
| 21 | ADI   |
| 22 |   |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                         |
| 24 |   |
| 25 |   |
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| -  | 14       AG #LA2022300200       FELONY COMPLAINT FOR ARREST WARRANT                               |

| 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 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  |  |  |  |  |  |  |  |
| 18 | 1  |  |  |  |  |  |  |  |
| 19 | Dated: $2322$  |  |  |  |  |  |  |  |
| 20 | Time Issued: <u>4.45</u> (am/pm)   |  |  |  |  |  |  |  |
| 21 | MOT  |  |  |  |  |  |  |  |
| 22 | Allene   |  |  |  |  |  |  |  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |  |  |  |  |  |  |  |
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|    | 15<br>AG #LA2022300200 EELONY COMPLAINT FOR ARREST WARDANT                                     |  |  |  |  |  |  |  |
| 11 | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT   |  |  |  |  |  |  |  |

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| 11.<br>14        |    |  |
|                  | 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  |
| a v <sup>2</sup> | 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 |  |
|                  | 15 | Therefore, you are commanded to arrest <b>MARTIN CHRISTOPHER GONZALES</b> , and the bring said Defendant before any magistude in the standard set. |
|                  | 16 | bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825 826, and 848 of the California Penal Code.          |
|                  | 17 |  |
|                  | 18 | Defendant is to be admitted to bail in the sum of \$   |
|                  | 18 | 2/3/22   |
|                  |    | Dated: $d 3 d d$   |
|                  | 20 | Time Issued: $\underline{4}$ ; $\underline{4}$ (am/pm)   |
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|                  | 22 | 1 Alere  |
|                  | 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles  |
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|    | 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 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 \$  |  |  |  |  |  |  |  |
| 18 |   |  |  |  |  |  |  |  |
| 19 | Dated: 2323   |  |  |  |  |  |  |  |
| 20 | Time Issued: <u>4:45</u> (am/pm)  |  |  |  |  |  |  |  |
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| 22 | - 100   |  |  |  |  |  |  |  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                         |  |  |  |  |  |  |  |
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| -  | 17     AG #LA2022300200     FELONY COMPLAINT FOR ARREST WARRANT                                   |  |  |  |  |  |  |  |

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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 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 <b>NIMA VAEZI</b> , 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 | 1.7  |  |  |  |  |  |  |  |
| 18 | Dated: $23/22$   |  |  |  |  |  |  |  |
| 19 | Time Issued: 4:,4 (am/pm)  |  |  |  |  |  |  |  |
| 20 |  |  |  |  |  |  |  |  |
| 21 | Xao  |  |  |  |  |  |  |  |
| 22 | JUDGE OF THE SUPERIOR COURT  |  |  |  |  |  |  |  |
| 23 | State of California, County of Los Angeles   |  |  |  |  |  |  |  |
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|    | AG #LA2022300200 FELONY COMPLAINT FOR ARREST WARRANT   |  |  |  |  |  |  |  |

| Defendant                     | DOB              | CII | DMV             | <b>Bail Requested</b> |  |
|-------------------------------|------------------|-----|-----------------|-----------------------|--|
| PENICHE, Doris                |                  |     |                 |                       |  |
| FONSECA JR., Francisco Javier |                  |     |                 |                       |  |
| RAMIREZ, Jose Antonio         |                  |     |                 |                       |  |
| GONZALES, Martin Christopher  |                  |     |                 |                       |  |
| VILLALOBOS, Francisco Javier  |                  |     |                 |                       |  |
| VAEZI, Nima                   |                  |     |                 |                       |  |
| Investigating Agency          | CHP              |     |                 |                       |  |
| Investigating Officer         | Lt. Tannon Brown |     |                 |                       |  |
| Phone No.                     | (714) 288-       |     | - 1841 - 1840 - |                       |  |
| Prelim Estimate               | 1 day            |     |                 |                       |  |
|                               |                  | ,   | ~ ~~~           |                       |  |
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|                               | 19               | )   |                 |                       |  |
| AG #LA2022300200              | 13               |     |                 |                       |  |

| 1        |            |                     | <u> PLAINT – ORDER HO</u>   |           |                   |                      |
|----------|------------|---------------------|-----------------------------|-----------|-------------------|----------------------|
| 2        |            |                     | me from the evidence pre    |           |                   |                      |
| 3        |            |                     | nere is sufficient cause to | believe t | hat the following | defendant(s) guilt   |
| 4        |            |                     |                             |           |                   |                      |
| 5        |            | RIS PENICHE         |                             |           |                   |                      |
| 6        | <u>Ct.</u> | <u>Charge</u>       | Charge Range                |           | Allegation        | Alleg. Effect        |
| 7        |            | 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       |            |                     | <u>ER FONSECA JR.</u>       |           |                   |                      |
| 14       | <u>Ct.</u> | Charge              | Charge Range                |           | Allegation        | <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<br>00 | 11         | PC 72               | . 16-2-3                    |           |                   |                      |
| 20       | 12         | PC 72               | 16-2-3                      | •         |                   |                      |
| 21       |            | <u>E ANTONIO RA</u> |                             |           |                   |                      |
| 22       | <u>Ct.</u> | <u>Charge</u>       | Charge Range                |           | Allegation        | Alleg. Effect        |
| 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                      | •         |                   | , <b>.</b>           |
| 27       | 17         | PC 72               | 16-2-3                      |           |                   |                      |
| 28       | 18         | PC 72               | 16-2-3                      |           |                   |                      |

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| 1  | MARTIN CHRISTOPHER GONZALES |               |               |    |                  |                                       |  |  |  |
|----|-----------------------------|---------------|---------------|----|------------------|---------------------------------------|--|--|--|
| 2  | <u>Ct.</u>                  | Charge        | Charge Range  |    | Allegation       | Alleg. Effect                         |  |  |  |
| 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  | <u>FR</u>                   | ANCISCO JAVI  | ER VILLALOBOS |    | · •              |                                       |  |  |  |
| 10 | <u>Ct.</u>                  | Charge        | Charge Range  |    | Allegation       | Alleg. Effect                         |  |  |  |
| 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 | <u>NIM</u>                  | IA VAEZI      |               |    |                  |                                       |  |  |  |
| 18 | <u>Ct.</u>                  | <u>Charge</u> | Charge Range  |    | Allegation       | Alleg. Effect                         |  |  |  |
| 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        |    |                  |                                       |  |  |  |
| 25 | /////                       |               |               |    | •                |                                       |  |  |  |
| 26 | /////                       |               |               |    |                  |                                       |  |  |  |
| 27 | /////                       |               |               |    |                  |                                       |  |  |  |
| 28 | /////                       | ·             |               |    |                  |                                       |  |  |  |
|    |                             | 4200000000    |               | 21 |                  |                                       |  |  |  |
| ļ  | AU #L                       | A2022300200   |               |    | FELONY COMPLAINT | FOR ARREST WARRANT                    |  |  |  |

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| r.<br>F |    |   | •  |
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| 4, ×    |    |   |  |
|         | 1  | I ORDER that the defendants named b         | below be held to answer for the above-described  |
|         | 2  | offenses and allegations and be admitted to |  |
|         | 3  |   |  |
|         | 4  | Doris Peniche                               | \$   |
|         | 5  | Francisco Javier Fonseca Jr.                | \$   |
|         | 6  | Jose Antonio Ramirez                        | \$   |
|         | 7  | Martin Christopher Gonzales                 | \$   |
|         | 8  | Francisco Javier Villalobos                 | \$   |
|         | 9  | Nima Vaezi                                  | \$   |
|         | 10 |   |  |
|         | 11 |   | custody of the Sheriff until such bail is given. |
|         | 12 | The date of Felony arraignment is set for:  |  |
|         | 13 |   |  |
|         | 14 | (Date) In De                                | partment ata.m.                                  |
|         | 15 |   | · ·  |
|         | 16 |   |  |
|         | 17 | Magistrate                                  | Date   |
|         | 18 | Superior Court of California                |  |
|         | 19 |   |  |
|         | 20 |   |  |
|         | 21 |   |  |
|         | 22 |   |  |
|         | 23 |   |  |
|         | 24 |   | •  |
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|         | 26 |   |  |
| •       | 27 |   | •  |
|         | 28 |   | 22   |
|         | -  | AG #LA2022300200                            | 22<br>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 | <u>COUNT 4</u>  |
| 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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| l  | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT  |

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| - 1  | COUNT 5   |
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| 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    | <u>COUNT 6</u>  |
| 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 3                |
|      | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT  |

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| 1  | with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, |
|----|---|
| 2  | account, voucher and writing.   |
| 3  | <u>COUNT 10</u>   |
| 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  | <u>COUNT 11</u>   |
| 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 | <u>COUNT 12</u>   |
| 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 | <u>COUNT 13</u>   |
| 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  | <u>COUNT 14</u>   |  |
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| 2  | On or about October 5, 2017, in the County of Los Angeles, the crime of PRESENTATION          |  |
| 3  |   |  |
| 4  |   |  |
| 5  |   |  |
| 6  | and writing.  |  |
| 7  | <u>COUNT 15</u>   |  |
| 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 | <u>COUNT 16</u>   |  |
| 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             |  |
|    | 5<br>AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT                                     |  |
| fl | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT  |  |

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FELONY COMPLAINT FOR ARREST WARRANT

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

## <u>COUNT 19</u>

On or about and between May 14, 2017, through March 27, 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 SAMMY SANTOS SALAZAR, who did unlawfully take
money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five
Thousand Two Hundred Nineteen Dollars and Sixty-One Cents (\$5,219.61).
COUNT 20

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 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.

15 <u>COUNT 21</u>
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.

21COUNT 2222On or about December 21, 2017, in the County of Los Angeles, the crime of23PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a24Felony, was committed by Defendant SAMMY SANTOS SALAZAR, who did unlawfully and25with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,26account, voucher and writing.27/////

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| 1  | COUNT 23  |
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| 2  | On or about September 14, 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 SAMMY SANTOS SALAZAR, 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 24  |
| 8  | On or about June 8, 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 SAMMY SANTOS SALAZAR, who did unlawfully and with intent to                |
| 11 | defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher   |
| 12 | and writing.  |
| 13 | COUNT 25  |
| 14 | On or about and between November 23, 2016, through December 12, 2017, in the County               |
| 15 | of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a             |
| 16 | Felony, was committed by Defendant AGUSTIN AGUILERA, who did unlawfully take money                |
| 17 | and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand Six    |
| 18 | Hundred Sixty-Five Dollars and Seventy-Five Cents (\$4,665.75).                                   |
| 19 | <u>COUNT 26</u>   |
| 20 | On or about October 14, 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 AGUSTIN AGUILERA, 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 | <u>COUNT 27</u>   |
| 26 | On or about October 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 AGUSTIN AGUILERA, who did unlawfully and with<br>7             |
|    | AG #1 A2022300220   |

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FELONY COMPLAINT FOR ARREST WARRANT

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| 1                    | intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,   |
|----------------------|---|
| 2                    |   |
| 3                    | <u>COUNT 28</u>   |
| 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                    | <u>COUNT 29</u>   |
| 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                   | <u>COUNT 31</u>   |
| 22                   |   |
|                      | On or about and between January 12, 2017, through January 17, 2018, in the County of Los  |
| 23                   |   |
|                      | On or about and between January 12, 2017, through January 17, 2018, in the County of Los  |
| 23                   | On or about and between January 12, 2017, through January 17, 2018, in the County of Los<br>Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  |
| 23<br>24             | On or about and between January 12, 2017, through January 17, 2018, in the County of Los<br>Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>TYLER RANDAL OLSON</b> , who did unlawfully take  |
| 23<br>24<br>25       | On or about and between January 12, 2017, through January 17, 2018, in the County of Los<br>Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>TYLER RANDAL OLSON</b> , who did unlawfully take<br>money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four   |
| 23<br>24<br>25<br>26 | On or about and between January 12, 2017, through January 17, 2018, in the County of Los<br>Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a<br>Felony, was committed by Defendant <b>TYLER RANDAL OLSON</b> , who did unlawfully take<br>money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four<br>Thousand Three Hundred Ninety-Nine Dollars and Six Cents (\$4,399.06). |

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1 <u>COUNT 32</u> On or about December 17, 2017, in the County of Los Angeles, the crime of 2 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 3 Felony, was committed by Defendant TYLER RANDAL OLSON, who did unlawfully and with 4 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 5 6 voucher and writing. 7 COUNT 33 On or about November 29, 2017, in the County of Los Angeles, the crime of 8 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 9 Felony, was committed by Defendant TYLER RANDAL OLSON, who did unlawfully and with 10 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, 11 12 voucher and writing. 13 COUNT 34 On or about May 4, 2017, in the County of Los Angeles, the crime of PRESENTATION 14 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was 15 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 On or about March 2, 2017, in the County of Los Angeles, the crime of PRESENTATION 20 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was 21 committed by Defendant TYLER RANDAL OLSON, who did unlawfully and with intent to 22 23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher 24 and writing. 25 <u>COUNT 36</u> On or about January 12, 2017, in the County of Los Angeles, the crime of 26 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 27 Felony, was committed by Defendant TYLER RANDAL OLSON, who did unlawfully and with 28

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FELONY COMPLAINT FOR ARREST WARRANT

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

## SPECIAL ALLEGATION

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# STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

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

8 On March 20, 2018, California Highway Patrol ("CHP") Captain Chris Margaris conducted a departmental audit of overtime use by officers at the East Los Angeles station for 2016 through 9 2017. The audit was prompted by the fact that the East Los Angeles station, which covers the 10 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 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details, 13 leading him to believe that officers at the East Los Angeles station may have submitted for and 14 received compensation for overtime assignments not physically worked. 15

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

22 The alleged offenses were not discovered earlier because the supervisors who would have been the ones to report these activities were also committing the fraud. Moreover, the fraud 23 typically took place during graveyard hours, which was outside of the normal working hours of 24 office managers. No one had constructive or actual knowledge of the offenses alleged in this 25 26 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                                    | and is against the peace and dignity of the People of the State of California. |  |  |
| 4  | Attached hereto and incorporated by reference is a   | a declaration in support of an arrest  |  |  |
| 5  | warrant and complaint with accompanying official report                                      | rts and documents of a law enforcement   |  |  |
| 6  |  | *  |  |  |
| 7  | I declare under penalty of perjury that the foregoir   | ng is true and correct. Executed this 1st                                      |  |  |
| 8  | day of February, 2022, at Los Angeles, California.   |  |  |  |
| 9  | Res  | pectfully Submitted,   |  |  |
| 10 | Roi  | 3 Bonta  |  |  |
| 11 | Atto   | orney General of California  |  |  |
| 12 |  |  |  |  |
| 13 | PAL  | JL S. THIES  |  |  |
| 14 | Dep<br>Atto  | outy Attorney General  |  |  |
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|    | AG #LA2022300220   | DNY COMPLAINT FOR ARREST WARRANT   |  |  |

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| 1  | NOTICE TO DEFENDANTS AND ATTORNEYS  |  |  |  |
|----|---|--|--|--|
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |  |  |  |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |  |  |  |
| 4  | Code section 1054.3.  |  |  |  |
| 5  | NOTICE TO ATTORNEYS   |  |  |  |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |  |  |  |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2,    |  |  |  |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |  |  |  |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |  |  |  |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |  |  |  |
| 11 | hearing and a showing of good cause."   |  |  |  |
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|    | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT  |  |  |  |

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| SUPERIOR COURT OF CALIFORNI | A |
|-----------------------------|---|
| 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 MICHAEL STEPHEN PEARSON: 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 MICHAEL STEPHEN PEARSON, 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.

(am/pm)

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

Dated: Time Issued: 4'.

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

## NATALIE STONE

AG #LA2022300220

FELONY COMPLAINT FOR ARREST WARRANT

| 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: 2502  |
| 20 | Time Issued: <u>U: 48</u> (am/pm)  |
| 21 |  |
| 22 |  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
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|    | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT   |

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FELONY COMPLAINT FOR ARREST WARRANT

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|                  |    |  |
|                  | 1  | SUPERIOR COURT OF CALIFORNIA   |
|                  | 2  | COUNTY OF LOS ANGELES  |
| 8 - S<br>- S     | 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                 |
| . A              | 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 $ 1 $  |
|                  | 18 | , 7  |
|                  | 19 | Dated: $2322$  |
|                  | 20 | Time Issued: $4:48$ (am/pm)  |
|                  | 21 | DUA  |
| . 1              | 22 | - / Stone  |
|                  | 23 | JUDGE OF THE SUPERIOR COURT  |
|                  | 24 | State of California, County of Los Angeles   |
| a                | 25 |  |
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| 1. <sup>19</sup> | -  | 15   |
|                  |    | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT   |
|                  |    |  |
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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 \$   |
| 18 |  |
| 19 | Dated: 013.22  |
| 20 | Time Issued: 4: 4% (am/pm)   |
| 21 | A Maria  |
| 22 |  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
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| -  | 16<br>AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARDANT                                     |
| II | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT   |

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| SUPERIOR COURT OF CALIFORNIA   |
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| COUNTY OF LOS ANGELES  |
|  |
| WARRANT OF ARREST  |
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| 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 AGUSTIN AGUILERA: 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 AGUSTIN AGUILERA, 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   2   2   2   2   2   2   2   2   2  |
| Dated:   |
| Time Issued: <u>4:45 (ampm)</u>  |
|  |
| UDGE OF THE SUPPLICE SUPPLICE  |
| JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
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| AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT   |
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| 1  | SUPERIOR COURT OF CALIFORNIA   |
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| 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  | y ponte on said state.   |
| 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 \$   |
| 18 | 1  |
| 19 | Dated: $2322$  |
| 20 | Time Issued: 4:48 (am/pm)  |
| 21 |  |
| 22 | 1 XOn O  |
| 23 | JUDGE OF THE SUPERIOR COURT  |
| 24 | State of California, County of Los Angeles   |
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|    | AG #LA2022300220 FELONY COMPLAINT FOR ARREST WARRANT   |
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| Defendant                             | DOB         | CII         | DMV   | Bail Requeste |
|---------------------------------------|-------------|-------------|---|---------------|
| PEARSON, Michael Stephen              |             |             |   |               |
| SANCHEZ JR., Guillermo                |             |             |   | · ·           |
| BRAVO JR., Luis Enrique               |             |             |   | -             |
| SALAZAR, Sammy Santos                 |             |             |   |               |
| AGUILERA, Agustin                     |             |             |   |               |
| OLSON, Tyler Randal                   |             |             |   |               |
| Investigating Agency                  | СНР         |             |   |               |
| Investigating Officer                 | Lt. Tannon  | Brown       |   |               |
| Phone No.                             | (714) 288-6 | 5336        | · <u>·</u> ·································· |               |
| Prelim Estimate                       | l day       | . <u></u> . |   |               |
| · · · · · · · · · · · · · · · · · · · |             |             | *   |               |
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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   | com        | mitted and that the  | e is sufficient cause to believe | e that the following d | efendant(s) guilty |  |  |
| 4   |            | eof, to wit:   |                                  |                        | (-) 8              |  |  |
| 5   | MIC        | CHAEL STEPHEN  | <u>N PEARSON</u>                 |                        |                    |  |  |
| 6   | <u>Ct.</u> | Charge   | Charge Range                     | Allegation             | Alleg. Effect      |  |  |
| 7   | 1          | PC 487(a)  | 16-2-3                           |                        |                    |  |  |
| 8   | 2          | PC 72  | 16-2-3                           |                        |                    |  |  |
| 9   | 3          | PC 72  | 16-2-3                           | <i>.</i> .             |                    |  |  |
| 10  | 4          | PC 72  | 16-2-3                           |                        |                    |  |  |
| 11  | 5          | PC 72  | 16-2-3                           |                        |                    |  |  |
| 12  | 6          | PC 72  | 16-2-3                           |                        |                    |  |  |
| 13  | <u>GUI</u> | LLERMO SANCH   | IEZ JR.                          |                        |                    |  |  |
| 14  | <u>Ct.</u> | Charge   | Charge Range                     | Allegation             | Alleg. Effect      |  |  |
| 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                           | •                      |                    |  |  |

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| 20  | 12             | PC 72               | 16-2-3                                 |    |            |               |  |  |
|-----|----------------|---------------------|--|----|------------|---------------|--|--|
| 21  | LUI            | <u>S ENRIQUE BI</u> | ENRIQUE BRAVO JR.                      |    |            |               |  |  |
| 22  | <u>Ct.</u>     | <u>Charge</u>       | Charge Range                           |    | Allegation | Alleg. Effect |  |  |
| 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                                 |    |            |               |  |  |
| ĺ   |                |                     |  | 20 |            |               |  |  |
|     | $\Lambda G \#$ | T A 2022200220      | ······································ |    |            |               |  |  |

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AG #LA2022300220

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FELONY COMPLAINT FOR ARREST WARRANT

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| 1  | <u>SA</u>         | MMY SANTO     | <u>S SALAZAR</u> |  | <b>`</b>             |
|----|-------------------|---------------|------------------|--|----------------------|
| 2  | <u><u>Ct.</u></u> | <u>Charge</u> | Charge Range     | Allegation                             | Alleg. Effect        |
| 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  | AG                | USTIN AGUIL   | ERA              |  |                      |
| 10 | <u>Ct.</u>        | <u>Charge</u> | Charge Range     | Allegation                             | <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 | <u>TYI</u>        | LER RANDAL    | <u>OLSON</u>     |  |                      |
| 18 | <u>Ct.</u>        | <u>Charge</u> | Charge Range     | Allegation                             | Alleg. Effect        |
| 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           | •                                      |                      |
| 25 |                   |               |                  |  |                      |
| 26 | ////              |               |                  |  |                      |
| 27 | /////             |               |                  | •                                      |                      |
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|    | <u>۸۵ ۳</u>       | 42022200200   | 2                | ······································ |                      |
|    | <u>л0 #1</u>      | A2022300220   |                  | FELONY COMPLAINT                       | FOR ARREST WARRANT   |

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FELONY COMPLAINT FOR ARREST WARRANT

|        |          | H          |                                |            |            |  |                   |              |
|--------|----------|------------|--------------------------------|------------|------------|--|-------------------|--------------|
| ** • * | ч        |            |                                |            |            |  |                   |              |
|        | 1        | 10         | RDER that the defendants na    | amed below | / be held  | to answer for                          | the above descui  | · 11         |
|        | 2        |            | and allegations and be admit   |            |            |  | the above-descri  | ibea         |
|        | 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       |            | aid defendant be committed     |            | ody of the | Sheriff until                          | such bail is give | n.           |
|        | 12       | The date c | of Felony arraignment is set f | or:        |            |  |                   |              |
|        | 13       |            |                                | tu D       |            |  |                   |              |
|        | 14       | :          | (Date)                         | in Departn | nent       | at                                     | a.m.              |              |
|        | 15       |            |                                |            |            |  | · .               |              |
|        | 16       |            |                                |            |            |  |                   |              |
|        | 17       |            | Magistrate                     |            | Date       | ************************************** |                   |              |
|        | 18<br>19 |            | Superior Court of Californi    | а          |            |  |                   |              |
| . :    | 20       | -          |                                |            |            | •                                      |                   |              |
|        | 20       |            |                                |            |            |  |                   |              |
|        | 22       |            |                                |            |            |  |                   |              |
| . ·    | 23       |            |                                |            |            |  |                   |              |
|        | 24       |            |                                |            |            |  |                   |              |
|        | 25       |            |                                |            |            |  |                   |              |
|        | 26       |            | ·                              |            |            | •                                      |                   |              |
|        | 27       |            |                                |            |            |  |                   |              |
|        | 28       |            |                                |            |            |  |                   |              |
|        | -        |            |                                | 22         |            |  |                   |              |
|        |          | AG #LA2022 | 300220                         |            | FELONY     | COMPLAINT                              | FOR ARREST WA     | <b>D</b> 124 |



AG #LA2022300221

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:

## <u>COUNT 1</u>

On or about and between November 23, 2016, through January 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 LEONARD DUENAS, who did unlawfully take money
and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand
Three Hundred Thirty-Nine Dollars and Two Cents (\$4,339.02).

#### COUNT 2

On or about May 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 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 3

On or about May 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 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 4

2

On or about March 2, 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.

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FELONY COMPLAINT FOR ARREST WARRANT

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

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 LEONARD DUENAS, 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.

## 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

27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a

28 Felony, was committed by Defendant MARIO SENCION, who did unlawfully and with intent to

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

## <u>COUNT 10</u>

On or about February 1, 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.

## <u>COUNT 11</u>

On or about January 25, 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.

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#### <u>COUNT 12</u>

On or about September 25, 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 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.

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### COUNT 13

On or about and between November 23, 2016, through March 27, 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 RUBEN GERARD MARTINEZ, who did unlawfully
take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three
Thousand Eight Hundred Fifty-Nine Dollars and Seven Cents (\$3,859.07).

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<u>COUNT 14</u>

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.

## <u>COUNT 15</u>

8 On or about July 27, 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 RUBEN GERARD MARTINEZ, 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.

## <u>COUNT 16</u>

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.

#### <u>COUNT 17</u>

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 RUBEN GERARD MARTINEZ, 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.

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## <u>COUNT 18</u>

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 **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  | <u>COUNT 19</u>   |
| 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  | <u>COUNT 20</u>   |
| 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 | <u>COUNT 21</u>   |
| 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 | <u>COUNT 22</u>   |
| 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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FELONY COMPLAINT FOR ARREST WARRANT

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| COUNT 23         2       On or about January 19, 2017, in the County of Los Angeles, the crime of |                |
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| <u>COULT 25</u>   |                |
| 2 On or about January 19, 2017, in the County of Los Angeles, the crime of                        |                |
|   |                |
| 3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SI                                  | ECTION 72, a   |
| 4 Felony, was committed by Defendant SCOTT ALAN SUTTON, who did unlawf                            | · .            |
| 5 intent to defraud, present for allowance and payment a false and fraudulent claim,              |                |
| 6 voucher and writing.  |                |
| 7 <u>COUNT 24</u>   |                |
| 8 On or about November 23, 2016, in the County of Los Angeles, the crime of                       | f              |
| 9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SE                                  | ECTION 72, a   |
| 10 Felony, was committed by Defendant SCOTT ALAN SUTTON, who did unlawf                           |                |
| 11 intent to defraud, present for allowance and payment a false and fraudulent claim,             | bill, account, |
| 12 voucher and writing.   |                |
| 13 <u>COUNT 25</u>  |                |
| 14 On or about and between March 3, 2016, through August 31, 2017, in the Co                      | ounty of Los   |
| 15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION                           | 487(a), a      |
| 16 Felony, was committed by Defendant <b>JAMES HOREJS</b> , who did unlawfully take               | e money and    |
| 17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three The             | ousand Sixty-  |
| 18 Three Dollars and Twenty- Nine Cents (\$3,063.29).   |                |
| 19 <u>COUNT 26</u>  |                |
| 20 On or about August 31, 2017, in the County of Los Angeles, the crime of                        |                |
| 21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SE                                 | ECTION 72, a   |
| Felony, was committed by Defendant JAMES HOREJS, who did unlawfully and                           | with intent to |
| 23 defraud, present for allowance and payment a false and fraudulent claim, bill, accord          | unt, voucher   |
| and writing.  |                |
| 25 <u>COUNT 27</u>  |                |
| 26 On or about March 28, 2017, in the County of Los Angeles, the crime of PRE                     | ESENTATION     |
| 27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felon                             | ıy, was        |
| 28 committed by Defendant JAMES HOREJS, who did unlawfully and with intent to 7                   | o defraud,     |

| 1  | present for allowance and payment a false and fraudulent claim, bill, account, voucher and      |
|----|---|
| 2  | writing.  |
| 3  | <u>COUNT 28</u>   |
| 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  | <u>COUNT 29</u>   |
| 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 |
| [4 | 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 | <u>COUNT 31</u>   |
| 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).                           |
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|    | AG #LA2022300221 EELONY COMPLAINT FOR ARREST WARNANT  |
| 1  | AG #LA2022300221 FELONY COMPLAINT FOR ARREST WARRANT  |

| 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 | <u>COUNT 34</u>   |
| 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 | <u>COUNT 36</u>   |
| 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                  |
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FELONY COMPLAINT FOR ARREST WARRANT

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

### SPECIAL ALLEGATION

## STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

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

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

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

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

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|        | 1  | CONCLUSIO   | N  |
|        | 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  |  |
|        | 5  | warrant and complaint with accompanying official reports and documents of a law enforcement |  |
| ಜ ್    | 6  | agency.   | a number of a naw emotechnetic   |
|        | 7  | I declare under penalty of perjury that the foregoin  | g is true and correct. Executed this 1st   |
|        | 8  | day of February, 2022, at Los Angeles, California.  | g is the und confect. Executed this  |
| li.    | 9  |   |  |
|        | 10 |   | pectfully Submitted,   |
|        | 11 | Atto  | BONTA<br>rney General of California  |
|        | 12 |   | 21/1   |
|        | 13 |   |  |
|        | 14 | Depu  | L S. THIES<br>Ity Attorney General   |
|        | 15 | Allor   | rneys for People   |
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|        |    | AG #LA2022300221  |  |

AG #LA2022300221

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FELONY COMPLAINT FOR ARREST WARRANT

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|----|---|--|--|--|--|
| 1  | NOTICE TO DEFENDANTS AND ATTORNEYS  |  |  |  |  |
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |  |  |  |  |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |  |  |  |  |
| 4  | Code section 1054.3.  |  |  |  |  |
| 5  | NOTICE TO ATTORNEYS   |  |  |  |  |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |  |  |  |  |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2,    |  |  |  |  |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |  |  |  |  |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |  |  |  |  |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |  |  |  |  |
| 11 | hearing and a showing of good cause."   |  |  |  |  |
| 12 |   |  |  |  |  |
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| -  | 12       AG #LA2022300221       FELONY COMPLAINT FOR ARREST WARRANT                               |  |  |  |  |

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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 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 \$   |  |  |
| 18 |  |  |  |
| 19 | Dated: $242$   |  |  |
| 20 | Time Issued: <u>Or</u> : <u>IU</u> (am/pm)   |  |  |
| 21 | IOS ANGEZA   |  |  |
| 22 |  |  |  |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |  |  |
| 24 |  |  |  |
| 25 | NATALIE STONE  |  |  |
| 26 | MAIALIE STONE  |  |  |
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| -  | AG #LA2022300221 FELONY COMPLAINT FOR ARREST WARRANT   |  |  |
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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 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 <b>MARIO SENCION</b> , and to bring said Defendant                             |
| 15       |   |
| 16       | before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code. |
| 17       |   |
|          | Defendant is to be admitted to bail in the sum of \$  |
| 18       |   |
| 19<br>20 | Dated: $2422$<br>Time Issued: $9:14$ (am)pm)  |
|          | Time Issued: <u>9.19</u> (am)pm)  |
| 21       | 1/10.   |
| 22       | JUDGE OF THE SUPERIOR COURT   |
| 23       | State of California, County of Los Angeles  |
| 24       |   |
| 25       |   |
| 26       |   |
| 27       |   |
| 28       |   |
|          | 14       AG #LA2022300221       FELONY COMPLAINT FOR ARREST WARRANT   |
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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 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 \$   |
| 18<br>19 | Dated: 2422  |
| 20       |  |
| 20       | Time Issued: $\underline{\neg}$ : $\underline{\neg}$ ( $\underline{an}/pm$ )                   |
| 22       | ALTONO   |
| 23       | JUDGE OF THE SUPERIOR COURT  |
| 24       | State of California, County of Los Angeles   |
| 25       |  |
| 26       |  |
| 27       |  |
| 28       |  |
|          | 15   |
|          | AG #LA2022300221 FELONY COMPLAINT FOR ARREST WARRANT   |

FELONY COMPLAINT FOR ARREST WARRANT

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| 1        | 1 SUPERIOR COURT OF CALIFORN   | IA                             |
|----------|--|--------------------------------|
| 2        |  | •                              |
| 3        | 3  |                                |
| 4        | 4 WARRANT OF ARREST  |                                |
| 5        | 5  | •                              |
| 6        | 6 The People of the State of California to any peace officer of s  | aid State:                     |
| 7        |  |                                |
| 8        | a second and a second and a penalty of perjury having been ma  |                                |
| 9        | and as   |                                |
| 10       | T y B complaint, T find there is probable cause to be  |                                |
| 11       | Scorr alan Solit   |                                |
| 12       | resentation of raise Claims in v   | iolation of Penal Code section |
| 13       | n automatica de la companya de la co  | ×                              |
| 14       | and the second and the second and the second and s |                                |
| 15       | in Los Angeles County pursuant to  | Sections 821, 825, 826, and    |
| 16       | 1  |                                |
| 17       |  |                                |
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| 20       |  |                                |
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| 22       |  | Xtono                          |
| 23       |  | IE SUPERIOR COURT              |
| 24       | State of Califor   | nia, County of Los Angeles     |
| 25       |  |                                |
| 26       |  |                                |
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|          | 16   |                                |
|          | AG #LA2022300221 FELONY COMPL  | AINT FOR ARREST WARRANT        |

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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 JAMES HOREJS: 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 JAMES HOREJS, 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 $1 - 1$ .                                    |
| 17 |  |
| 18 | Dated: 242   |
| 19 | Time Issued: <u>q:</u> (am/pm)   |
| 20 |  |
| 21 | NOCE OF THE SUPERIOR SOLUTE  |
| 22 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 23 |  |
| 24 |  |
| 25 |  |
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|    | AG #LA2022300221 FELONY COMPLAINT FOR ARREST WARRANT   |
|    | EDOWT COM EANY FOR ARREST WARRANT  |

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| 1  | SUPERIOR COURT O                                     | FCALIFORNIA   |
|----|--|---|
| 2  | COUNTY OF LOS  |   |
| 3  |  |   |
| 4  | WARRANT OF   | ARREST  |
| 5  |  |   |
| 6  | The People of the State of California to any pe      | ace officer of said State   |
| 7  | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1                | and officer of suite state.   |
| 8  | Proof by declaration under penalty of perjury l      | naving been made this day to me by  |
| 9  | Lieutenant Tannon Brown of the California Highwa     | K K K K K K K K K K K K K K K K K K K                                     |
| 10 | accompanying felony complaint, I find there is proba |   |
| 11 | crimes have been committed by Defendant ANTHO        |   |
| 12 | violation of Penal Code section 487(a), and Presenta |   |
| 13 | Code section 72.                                     |   |
| 14 | Therefore, you are commanded to arrest ANTI          | HONY JOSEPH MARTIN SR. and to   |
| 15 | bring said Defendant before any magistrate in Los A  |   |
| 16 | 826, and 848 of the California Penal Code.           |   |
| 17 | Defendant is to be admitted to bail in the sum of    | of \$ 1   |
| 18 |  |   |
| 19 | Dated: <u> </u>                                      | •   |
| 20 | Time Issued: <u>Q:1</u> (am/pm)                      |   |
| 21 |  | $\int \int - \frac{1}{2}$   |
| 22 |  | Althe   |
| 23 |  | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles |
| 24 |  | State of Camorina, County of Los Angeles                                  |
| 25 | л<br>Х   |   |
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| Defendant                  | DOB        | CII   | DMV   | Bail Requested                        |
|----------------------------|------------|-------|-------|---------------------------------------|
|                            | 202        | Chi   | DIVIY | Dan Requested                         |
| DUENAS, Leonard            |            |       |       |                                       |
| SENCION, Mario             |            |       |       |                                       |
| MARTINEZ, Ruben Gerard     |            |       |       | <b>F</b>                              |
| SUTTON, Scott Alan         |            |       |       | · · · · · · · · · · · · · · · · · · · |
| L                          |            |       |       |                                       |
| HOREJS, James              |            |       |       |                                       |
| MARTIN SR., Anthony Joseph |            |       |       |                                       |
| Investigating Agency       | СНР        |       |       |                                       |
| Investigating Officer      | Lt. Tannor | Brown |       |                                       |
| Phone No.                  |            |       |       | ·                                     |
|                            | (714) 288- | 6336  |       |                                       |
| Prelim Estimate            | 1 day      |       | -     |                                       |
|                            | l          |       |       |                                       |
|                            |            |       |       |                                       |
|                            |            |       |       | ·                                     |
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|---|----|------------|--------------------|-------------------------------|--------------------------|----------------------|
| • |    |            |                    |                               | •                        |                      |
|   | 1  |            |                    | PLAINT – ORDER HOL            |                          |                      |
|   | 2  |            |                    | me from the evidence prese    |                          |                      |
|   | 3  | com        | mitted and that th | ere is sufficient cause to be | lieve that the following | defendant(s) guilty  |
|   | 4  | ther       | eof, to wit:       |                               |                          |                      |
|   | 5  | LEC        | ONARD DUENA        | <u>.s</u>                     |                          | ,                    |
|   | 6  | <u>Ct.</u> | Charge             | Charge Range                  | Allegation               | Alleg. Effect        |
|   | 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 | MA         | RIO SENCION        |                               |                          |                      |
|   | 14 | <u>Ct.</u> | Charge             | Charge Range                  | Allegation               | Alleg. Effect        |
|   | 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 | <u>RUE</u> | EN GERARD N        | <u>IARTINEZ</u>               |                          |                      |
|   | 22 | <u>Ct.</u> | Charge             | Charge Range                  | Allegation               | <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                        |                          |                      |
|   |    |            |                    | 20                            |                          |                      |

FELONY COMPLAINT FOR ARREST WARRANT

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|    |            |                    |                     |    | Sec.               |                   |
|----|------------|--------------------|---------------------|----|--------------------|-------------------|
| 1  | <u>sc</u>  | COTT ALAN SU       | JTTON               |    |                    |                   |
| 2  | Į.         |                    | Charge Range        |    | A 11               |                   |
| 3  | 19         | PC 487(a)          | 16-2-3              |    | Allegation         | Alleg. Effect     |
| 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  | JAN        | MES HOREJS         |                     |    |                    |                   |
| 10 | <u>Ct.</u> | Charge             | Charge Range        |    | Allegation         |                   |
| 11 | 25         | PC 487(a)          | 16-2-3              |    | <u>oguton</u>      | Alleg. Effect     |
| 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 | ANT        | <u>'HONY JOSPE</u> | <u>H MARTIN JR.</u> |    |                    |                   |
| 18 | <u>Ct.</u> | Charge             | Charge Range        |    | Allegation         | Alleg. Effect     |
| 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              |    |                    |                   |
| 25 | /////      |                    |                     |    |                    |                   |
| 26 | /////      |                    |                     |    |                    |                   |
| 27 | /////      |                    |                     |    |                    |                   |
| 28 | /////      |                    |                     |    |                    |                   |
| -  | AG #L      | A2022300221        |                     | 21 |                    |                   |
| 11 |            |                    |                     |    | FELONY COMPLAINT F | OR ARREST WARRANT |

FELONY COMPLAINT FOR ARREST WARRANT

| 1  | I ORDER that the defendants name          |                       |                                       | ne above-dese   |
|--|---|-----------------------|---------------------------------------|-----------------|
|  | ses and allegations and be admitte        | ed to bail in the sum | ı of:                                 | , · ·           |
| 3  |   |                       |                                       |                 |
| 4  | Leonard Duenas                            | \$                    |                                       |                 |
| 5  | Mario Sencion                             | \$                    |                                       |                 |
| 6  | Ruben Gerard Martinez                     | \$                    |                                       |                 |
| 7  | Scott Alan Sutton                         | \$                    |                                       |                 |
| 8  | James Horejs                              | \$                    |                                       |                 |
| 9  | Anthony Joseph Martin Jr.                 | \$                    |                                       |                 |
| 10   |   |                       |                                       |                 |
|  | hat said defendant be committed t         |                       | e Sheriff until                       | such bail is gi |
|  | ate of Felony arraignment is set fo       | or:                   |                                       | •               |
| 13   |   | in Donauturout        | - 4                                   |                 |
| 14   | (Date)                                    | in Department         | at                                    | a.m.            |
|  |   |                       |                                       |                 |
| 15   |   |                       |                                       |                 |
| 16   |   |                       | •                                     |                 |
| 16<br>17   | Magistrate                                | Date                  | ·                                     |                 |
| 16<br>17<br>18   | Magistrate<br>Superior Court of Californi |                       | •<br>•                                |                 |
| 16<br>17<br>18<br>19                                     |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20                               |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21                         |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21<br>22                   |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23             |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24       |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24<br>25 |   |                       |                                       |                 |
| 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24       |   |                       | · · · · · · · · · · · · · · · · · · · |                 |

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| 1  | The Attorney General of the State of California accuses the above-named Defendants of the       |
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| 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                  |
| б  | 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.   |
| 27 |   |
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FELONY COMPLAINT FOR ARREST WARRANT

| с. <sup>16</sup> г. |   |
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| e - *               |   |
| 1                   | COUNTS  |
| -                   | <u>COUNT 5</u><br>On or shout March 12, 2017, in the Courts of Lee Angeles, the mine of DBUSCIDITATION. |
| 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                   | <u>COUNT 6</u>  |
| 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                  |
| :                   | 3   |
|                     | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |

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

## COUNT 10

4 On or about November 12, 2017, in the County of Los Angeles, the crime of PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 5 Felony, was committed by Defendant FLAVIO NAVAR, who did unlawfully and with intent to 6 7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher 8 and writing.

COUNT 11

On or about January 26, 2017, in the County of Los Angeles, the crime of 10 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 11 Felony, was committed by Defendant FLAVIO NAVAR, who did unlawfully and with intent to 12 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher 13 14 and writing.

15 COUNT 12 On or about November 23, 2016, in the County of Los Angeles, the crime of 16 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 17 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.

COUNT 13 On or about and between November 23, 2016, through September 11, 2017, in the County 22 of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 23 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 <b>THOMAS SANTIAGO</b> , who did unlawfully and with 5         |
|     |            | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |

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

### COUNT 19

On or about and between January 26, 2017, through December 19, 2017, in the County of 4 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 5 Felony, was committed by Defendant PAUL LUKE MARTINEZ, who did unlawfully take 6 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two 7 8 Thousand Five Hundred Seven Dollars and Thirteen Cents (\$2,507.13). 9 COUNT 20 On or about December 19, 2017, in the County of Los Angeles, the crime of 10 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 11 Felony, was committed by Defendant PAUL LUKE MARTINEZ, who did unlawfully and with 12

13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account.

 14
 voucher and writing.

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 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.

COUNT 22

22On or about March 30, 2017, in the County of Los Angeles, the crime of PRESENTATION23OF 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

6

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                   |
|    | 7   |
|    | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |

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

### <u>COUNT 28</u>

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

**COUNT 29** 

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

COUNT 30

On or about October 6, 2016, in the County of Los Angeles, the crime of PRESENTATION
OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was
committed by Defendant ROBERTO CESAR FLORES, 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 31

8

On or about and between February 1, 2017, through December 18, 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 WILLIAM LINDSEY GODMAN, who did unlawfully
take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two
Thousand One Hundred Thirty-Five Dollars and Forty-Nine Cents (\$2,135,49).

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FELONY COMPLAINT FOR ARREST WARRANT

| 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 | <u>COUNT 34</u>  |
| 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 |
| i8 | 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<br>9                 |
|    |  |

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FELONY COMPLAINT FOR ARREST WARRANT

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

### SPECIAL ALLEGATION

# STATUE OF LIMITATIONS – LATE DISCOVERY (ZAMORA ALLEGATION)

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

On March 20, 2018, California Highway Patrol ("CHP") Captain Chris Margaris conducted 8 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 the audit. Captain Margaris discovered inaccuracies surrounding Caltrans overtime details, 13 leading him to believe that officers at the East Los Angeles station may have submitted for and 14 15 received compensation for overtime assignments not physically worked. 16 On May 4, 2018, Captain Margaris prepared a Confidential Memorandum of the findings

revealed through the audit. Based on the findings in the audit, CHP launched an administrative
investigation into every officer who worked a Caltrans overtime detail within the previous two
years. A criminal investigation into overtime fraud in the East Los Angeles station began on June
20, 2018. Consequently, CHP investigators Tannon Brown and Keith Phillips discovered the
specific offenses now charged in the complaint.

The alleged offenses were not discovered earlier because the supervisors who would have been the ones to report these activities were also committing the fraud. Moreover, the fraud typically took place during graveyard hours, which was outside of the normal working hours of office managers. No one had constructive or actual knowledge of the offenses alleged in this 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.             |  |  |  |  |
| 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 $\frac{1/3}{2}$ |  |  |  |  |
| 8  | day of February, 2022. at Los Angeles, California.   |  |  |  |  |
| 2  | Respectfully Submitted,  |  |  |  |  |
| 10   | ROB BONTA Attorney General of California   |  |  |  |  |
| 11   |  |  |  |  |  |
| 12   |  |  |  |  |  |
| 13<br>14   | PAUL S. THIES<br>Deputy Attorney General   |  |  |  |  |
| 15   | Attorneys for People   |  |  |  |  |
| 16   |  |  |  |  |  |
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| 1  | NOTICE TO DEFENDANTS AND ATTORNEYS  |  |  |  |  |  |  |
|----|---|--|--|--|--|--|--|
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |  |  |  |  |  |  |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |  |  |  |  |  |  |
| 4  | Code section 1054.3.  |  |  |  |  |  |  |
| 5  | NOTICE TO ATTORNEYS   |  |  |  |  |  |  |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |  |  |  |  |  |  |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2.    |  |  |  |  |  |  |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |  |  |  |  |  |  |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |  |  |  |  |  |  |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |  |  |  |  |  |  |
| 11 | hearing and a showing of good cause."   |  |  |  |  |  |  |
| 12 |   |  |  |  |  |  |  |
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|    | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |  |  |  |  |  |  |

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| l  | 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   |
| 18 |   |
| 19 | Dated: 24 20-   |
| 20 | Time Issued: 9:25 (am/pm)   |
| 21 | LOS ANGELES   |
| 22 |   |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                         |
| 24 |   |
| 25 | NATALIE STONE   |
| 26 |   |
| 27 |   |
| 28 |   |
|    | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |
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| 1  | SUPERIOR COURT OF CALIFORNIA   |  |  |  |  |  |
|----|--|--|--|--|--|--|
| 2  | COUNTY OF LOS ANGELES  |  |  |  |  |  |
| 3  |  |  |  |  |  |  |
| 4  | WARRANT OF ARREST  |  |  |  |  |  |
| 5  | 3 N S  |  |  |  |  |  |
| 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  |  |  |  |  |  |
| 17 |  |  |  |  |  |  |
| 18 | Dated: <u>XYZZ</u>   |  |  |  |  |  |
| 19 | Time Issued: <u>1:25 (am/pm)</u>   |  |  |  |  |  |
| 20 |  |  |  |  |  |  |
| 21 |  |  |  |  |  |  |
| 22 | JUDGE OF THE SURERIOR COURT<br>State of California, County of Los Angeles                      |  |  |  |  |  |
| 23 |  |  |  |  |  |  |
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|    | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT   |  |  |  |  |  |

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| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11 | SUPERIOR COURT OF CALIFORNIA<br>COUNTY OF LOS ANGELES<br>WARRANT OF ARREST<br>The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant THOMAS SANTIAGO: Grand Theft in violation of<br>Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section |
|---|---|
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10            | COUNTY OF LOS ANGELES<br>WARRANT OF ARREST<br>The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10            | COUNTY OF LOS ANGELES<br>WARRANT OF ARREST<br>The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                 | WARRANT OF ARREST<br>The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of  |
| 4<br>5<br>7<br>8<br>9<br>10                           | The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of   |
| 5<br>6<br>7<br>8<br>9<br>10                           | The People of the State of California to any peace officer of said State:<br>Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of   |
| 7<br>8<br>9<br>10                                     | Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of  |
| 8<br>9<br>10  | Proof by declaration under penalty of perjury having been made this day to me by<br>Lieutenant Tannon Brown of the California Highway Patrol, and as described in the<br>accompanying felony complaint, I find there is probable cause to believe that the following<br>crimes have been committed by Defendant <b>THOMAS SANTIAGO</b> : Grand Theft in violation of  |
| 9<br>10   | 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 THOMAS SANTIAGO: Grand Theft in violation of  |
| 10  | accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant THOMAS SANTIAGO: Grand Theft in violation of  |
|   | crimes have been committed by Defendant THOMAS SANTIAGO: Grand Theft in violation of  |
| 11  |   |
| 11  | Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section  |
| 12  |   |
| 13  | 72.   |
| 14  | Therefore, you are commanded to arrest THOMAS SANTIAGO, and to bring said   |
| 3 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: 2422   |
| 20  | Time Issued: 9:26 (am/pm)   |
| 21  | $-n\sqrt{-1}$   |
| 22  | JUDGE OF THE SUPERIOR COURT   |
| 23  | State of California, County of Los Angeles  |
| 24  |   |
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| 26  |   |
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| 28  | 15  |
| -   | AG #LA2022300223 FELONY COMPLAINT FOR ARREST WARRANT  |

# 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 PAUL LUKE MARTINEZ: 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 PAUL LUKE MARTINEZ, and to bring said
Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and

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16 848 of the California Penal Code.

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

Dated: Time Issued: (am/bm)

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

# 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 8 9 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 10 crimes have been committed by Defendant ROBERTO CESAR FLORES: Grand Theft in 11 violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal 12 13 Code section 72.

14 Therefore, you are commanded to arrest ROBERTO CESAR FLORES, and to bring said 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 \$ 17 18 19 Dated: (am)pm) 20 Time Issued: 21 22 JUDGE OF THE SUPERIOR COURT 23

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State of California, County of Los Angeles

AG #LA2022300223

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FELONY COMPLAINT FOR ARREST WARRANT

| 1  | SUPERIOR COURT OF CALIFORNIA   |
|----|--|
| 2  | COUNTY OF LOS ANGELES  |
| 3  |  |
| 4  | WARRANT OF ARREST  |
| 5  |  |
| б  | 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 \$   |
| 18 |  |
| 19 | Dated: 2422  |
| 20 | Time Issued: <u>B.28</u> (am/pm)   |
| 21 | 101-   |
| 22 | HIPCI OF THE OPPOSIT   |
| 23 | JUDGE OF THE SUPERIOR COURT<br>State of California, County of Los Angeles                      |
| 24 |  |
| 25 |  |
| 26 |  |
| 27 |  |
| 28 |  |
|    | 18       AG #LA2022300223       FELONY COMPLAINT FOR ARREST WARRAN                             |

| 1      | Defendant                     | DOB            | CII   | DMV | Bail Requested |  |  |
|--------|-------------------------------|----------------|-------|-----|----------------|--|--|
|        | NELSON, Donald Rodrick Grimes |                |       |     |                |  |  |
|        | NAVAR, Flavio                 |                | ,     |     |                |  |  |
| 4<br>5 | SANTIAGO, Thomas              |                |       |     |                |  |  |
|        | MARTINEZ, Paul Luke           |                |       |     |                |  |  |
|        | FLORES, Roberto Cesar         |                |       |     | "              |  |  |
|        | GODMAN, William Lindsey       |                |       |     |                |  |  |
| I      | Investigating Agency          | СНР            |       |     |                |  |  |
| ł      | Investigating Officer         | Lt. Tannon     | Brown |     |                |  |  |
|        | Phone No.                     | (714) 288-6336 |       |     |                |  |  |
|        | Prelim Estimate               | 1 day          |       |     |                |  |  |
|        |                               |                | ix.   |     |                |  |  |
| ,      |                               |                |       |     |                |  |  |
| j      |                               |                |       |     |                |  |  |
| r      |                               |                |       |     |                |  |  |
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| )      |                               |                |       |     |                |  |  |
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| 3      | >                             |                |       |     |                |  |  |
| ŀ      |                               |                |       |     |                |  |  |
| 5      |                               |                |       |     |                |  |  |
| 5      |                               |                | 15    |     |                |  |  |
| 7      | 7                             |                |       |     |                |  |  |
| 28     | 3                             |                | 19    |     |                |  |  |

| 1  | FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. SECTION 872                                  |                      |                      |         |                |             |                      |  |
|----|--|----------------------|----------------------|---------|----------------|-------------|----------------------|--|
| 2  |  | It appearing to me f | rom the evidence pre | esented | that the follo | wing offe   | nse(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  | DON  | ALD RODRICK G        | RIMES NELSON         |         |                |             |                      |  |
| 6  | <u>C1.</u>   | Charge               | Charge Range         |         | Allegatio      | <u>11</u> • | Alleg. Effect        |  |
| 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               |         |                |             | 24                   |  |
| 12 | 6  | PC 72                | 16-2-3               |         |                |             |                      |  |
| 13 | <u>FLA</u>   | VIO NAVAR            |                      |         |                |             |                      |  |
| 14 | <u>Ct.</u>   | Charge               | Charge Range         |         | Allegatio      | n           | Alleg. Effect        |  |
| 15 | 7  | PC 487(a)            | 16-2-3               |         |                |             | а<br>с 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 | <u>THO</u>   | MAS SANTIAGO         |                      |         |                |             |                      |  |
| 22 | <u>Ct.</u>   | Charge               | Charge Range         |         | Allegatio      | <u>n</u> .  | Alleg. Effect        |  |
| 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               |         |                | Þ           |                      |  |
| 27 | 17   | PC 72                | 16-2-3               |         |                |             |                      |  |
| 28 | 18   | PC 72                | 16-2-3               |         |                |             | 3                    |  |
|    |  |                      |                      | 20      | -              |             |                      |  |
|    | AG #I  | .A2022300223         |                      |         | FELONY COME    | PLAINT FO   | DR ARREST WARRANT    |  |

| 1               | <u>PAU</u> | L LUKE MARTIN  | EZ           |    |               |                   |                 |
|-----------------|------------|----------------|--------------|----|---------------|-------------------|-----------------|
| 2               | <u>Ct.</u> | Charge         | Charge Range |    | Allegation    | A                 | lleg. Effect    |
| 3               | 19         | PC 487(a)      | 16-2-3       |    |               |                   |                 |
| 4               | 20         | PC 72          | 16-2-3       |    |               |                   |                 |
| 5               | 21         | PC 72          | 16-2-3       |    | 8             |                   |                 |
| 6               | 22         | PC 72          | 16-2-3       |    |               |                   |                 |
| 7               | 23         | PC 72          | 16-2-3       |    |               |                   |                 |
| 8               | 24         | PC 72          | 16-2-3       |    |               |                   |                 |
| 9               | <u>ROB</u> | ERTO CESAR FLO | ORES         |    |               |                   |                 |
| 10              | <u>Ct.</u> | Charge         | Charge Range |    | Allegation    | A                 | lleg. Effect    |
| 11              | 25         | PC 487(a)      | 16-2-3       |    | o             |                   | t inc           |
| 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       |    | 2 U           |                   |                 |
| 16              | 30         | PC 72          | 16-2-3       |    |               |                   |                 |
| 17              | <u>W1L</u> | LIAM LINDSEY G | ODMAN        |    |               |                   |                 |
| <sup>~</sup> 18 | <u>Ct.</u> | Charge         | Charge Range |    | Allegation    | A                 | lleg. Effect    |
| 19              | 31         | PC 487(a)      | 16-2-3       |    |               |                   |                 |
| 20              | 32         | PC 72          | 16-2-3       |    |               |                   |                 |
| 21              | 33         | PC 72          | 16-2-3       |    | e.            |                   |                 |
| 22              | 34         | PC 72          | 16-2-3       |    |               |                   |                 |
| 23              | 35         | PC 72          | 16-2-3       |    |               |                   |                 |
| 24              | 36         | PC 72          | 16-2-3       |    |               |                   |                 |
| 25              | 11111      |                |              |    |               |                   |                 |
| 26              | /////      |                |              |    |               |                   |                 |
| 27              | 11111      |                |              |    |               |                   |                 |
| 28              | 1111       |                |              |    | 30 ·          |                   |                 |
|                 |            | 1 4 2022200222 |              | 21 | EELONY COMPLA | DUT EOD           | ADDECT WADDANPT |
|                 | A0#        | LA2022300223   |              |    | FELONT COMPEN | aivi ruk <i>i</i> | ARREST WARRANT  |

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| 1 ORDER that the defendants named be           | low be held to  | o answer for t  | he above-do  | scribed                               |
|--|---|---|--|---------------------------------------|
| offenses and allegations and be admitted to ba | ul in the sum   | of:   |  |                                       |
|  |   |   |  |                                       |
| Donald Rodrick Grimes Nelson                   | \$  |   | wahite   |                                       |
| Flavio Navar                                   | \$  | -   | _  |                                       |
| Thomas Santiago                                | \$  |   |  |                                       |
| Paul Luke Martinez                             | \$  | •   | çanı.  |                                       |
| Roberto Cesar Flores                           |   |   |  |                                       |
| William Lindsey Godman                         | \$  |   |  |                                       |
|  |   |   |  |                                       |
| And that said defendant be committed to the c  | sustody of the  | Sheriff until   | such bail is   | given.                                |
| The date of Felony arraignment is set for:     |   |   |  |                                       |
|  |   |   |  |                                       |
| (Date) in Dep                                  | bartment  | at  | a.m.   |                                       |
|  |   |   |  |                                       |
|  |   |   |  |                                       |
|  |   |   |  |                                       |
| Superior Court of California                   | LFUIT   |   |  |                                       |
|  |   |   |  |                                       |
|  |   | •   |  |                                       |
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|  |   |   |  |                                       |
|  |   | - <sup>19</sup>   |  |                                       |
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|  |   |   |  |                                       |
|  |   |   |  |                                       |
|  | 22  |   |  | CTTT 11/ 4 TO TS 4 TO TS              |
|  | offenses and allegations and be admitted to be<br>Donald Rodrick Grimes Nelson<br>Flavio Navar<br>Thomas Santiago<br>Paul Luke Martinez<br>Roberto Cesar Flores<br>William Lindsey Godman<br>And that said defendant be committed to the of<br>The date of Felony arraignment is set for:<br>(Date) | ofTenses and allegations and be admitted to bail in the sum Donald Rodrick Grimes Nelson Flavio Navar S Flavio Navar S Thomas Santiago Paul Luke Martinez Roberto Cesar Flores William Lindsey Godman S And that said defendant be committed to the custody of the The date of Felony arraignment is set for: (Date) Magistrate Superior Court of California Date | offenses and allegations and be admitted to bail in the sum of:          Donald Rodrick Grimes Nelson       \$ | Donald Rodrick Grimes Nelson       \$ |

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|-----|----------------------------|---|-------------------------------------|
| 1   |                            |   |                                     |
|     | 1<br>2<br>3<br>4<br>5<br>6 | ROB BONTA<br>Attorney General of California<br>LANCE WINTERS<br>Chief Assistant Attorney General<br>JOHNETTE JAURON<br>Senior Assistant Attorney General<br>PAUL S. THIES<br>Deputy Attorney General<br>State Bar No. 305084<br>300 South Spring Street, Suite 1702<br>Los Angeles, CA 90013<br>Telephone: (213) 269-6070 | ED TO                               |
|     | 7<br>8<br>9                | Cell: (213) 269-2148<br>E-mail: Paul.Thies@doj.ca.gov<br>Attorneys for the People of the State of Californ  | mia<br>HE STATE OF CALIFORNIA       |
|     | 10                         | COUNTY OF LOS ANGELES   |                                     |
|     |                            |   |                                     |
|     | 12                         | PEOPLE OF THE STATE OF  | Case No. BA498284                   |
|     | 13                         | CALIFORNIA,<br>Plaintii   | ff                                  |
|     | 14                         |   | FELONY COMPLAINT FOR ARREST         |
|     | 15                         | V.  | WARRANT                             |
|     | 16                         | (1) THOMAS MORENO IV<br>(DOB:   |                                     |
|     | 17<br>18                   | (2) TAREK GRAVES<br>(DOB:   |                                     |
|     | 18                         | (3) JUAN CARLOS ULLOA<br>(DOB:  |                                     |
|     | 20                         | (4) MARIO BRISENO II<br>(DOB:   | 些                                   |
|     | 21                         | (5) RALPH PATRICK GOMEZ   |                                     |
|     | 22                         | (DOB:   |                                     |
|     | 23                         | (6) URIEL GOMEZ<br>(DOB:  | 2                                   |
|     | 24                         | (7) RAMON MACIEL MORAN  |                                     |
|     | 25                         | (DOB:   |                                     |
|     | 26<br>27                   | (8) VIN <u>CENT BARRERA</u><br>(DOB:  |                                     |
|     | 28                         | Defendan  | ts.                                 |
|     |                            |   | 1                                   |
|     |                            | AG #LA2022300318  | FELONY COMPLAINT FOR ARREST WARRANT |

1 The Attorney General of the State of California accuses the above-named Defendants of the 2 following offenses, which are connected to each other in their commission: 3 COUNT 1 4 On or about and between January 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).

#### COUNT 2

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 THOMAS MORENO IV, 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 3

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 THOMAS MORENO IV, 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 June 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 THOMAS MORENO IV, 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 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 THOMAS MORENO IV, 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

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.

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### COUNT 7

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 TAREK GRAVES, who did unlawfully take money and
property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Six
Hundred Seventy-Eight Dollars and Eighty Cents (\$1,678.80).

### COUNT 8

On or about March 19, 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 TAREK GRAVES, 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 15, 2018, in the County of Los Angeles, the crime of
 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

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FELONY COMPLAINT FOR ARREST WARRANT

defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher 1 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, youcher 8 and writing. 9 COUNT 11 On or about January 11, 2018, in the County of Los Angeles, the crime of 10 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 11 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 and writing. 20 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 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One 25 26 Thousand Five Hundred Forty-Seven Dollars and Eighty-One Cents (\$1,547.81). 27 11111 28 ///// AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT

### COUNT 14

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

## <u>COUNT 15</u>

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.

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# COUNT 16

On or about September 25, 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 JUAN CARLOS ULLOA, 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 September 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 JUAN CARLOS ULLOA, 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 July 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 JUAN CARLOS ULLOA, who did unlawfully and with intent to
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|    |  |
| 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 Flundred 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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| 28 | <i>H</i> /// • • • • • • • • • • • • • • • • • •   |
|    | 6  |
|    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT   |

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1 COUNT 23 2 On or about August 18, 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 MARIO BRISENO II, who did unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher 5 6 and writing. 7 COUNT 24 8 On or about June 19, 2016, in the County of Los Angeles, the crime of PRESENTATION 9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was 10 committed by Defendant MARIO BRISENO II, who did unlawfully and with intent to defraud, 11 present for allowance and payment a false and fraudulent claim, bill, account, voucher and 12 writing. 13 COUNT 25 14 On or about and between November 23, 2016, through September 28, 2017, in the County 15 of Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a 16 Felony, was committed by Defendant RALPH PATRICK GOMEZ, who did unlawfully take 17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One 18 Thousand Four Hundred Twenty-Three Dollars and Eighty-One Cents (\$1,423.81). 19 COUNT 26 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 RALPH PATRICK GOMEZ, 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 August 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 RALPH PATRICK GOMEZ, who did unlawfully and 7

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

# <u>COUNT 28</u>

On or about May 10, 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.

### <u>COUNT 29</u>

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 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.

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### COUNT 30

On or about and between November 23, 2016, through February 8, 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 URIEL GOMEZ, who did unlawfully take money and
property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand One
Hundred Eighty-Five Dollars and Fifty-Five Cents (\$1,185.55).

### COUNT 31

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 URIEL GOMEZ, 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 32 1 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 and writing. 6 7 COUNT 33 On or about August 18, 2017, in the County of Los Angeles, the crime of 8 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a 9 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 On or about November 23, 2016, in the County of Los Angeles, the crime of 20 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 9

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| 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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|    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT  |

| I  | <u>COUNT 41</u>   |
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| 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.   |
| 7  | COUNT 42  |
| 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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## SPECIAL ALLEGATION

STATUE OF LIMITATIONS - LATE DISCOVERY (ZAMORA ALLEGATION)

It is further alleged for Counts 1-42, that the above violations were not discovered until May 4, 2018, within the four-year statute of limitations period established by Penal Code sections 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 expenditures compared to the CHP station covering the largest geographic area. In his review of 10 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.

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

The alleged offenses were not discovered earlier because the supervisors who would have been the ones to report these activities were also committing the fraud. Moreover, the fraud typically took place during graveyard hours, which was outside of the normal working hours of office managers. No one had constructive or actual knowledge of the offenses alleged in this 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 <sup>1</sup> | ф. | 5  | warrant and complaint with accompanying official reports and documents of a law enforcement            | t  |
|                |    | 6  | agency.  |    |
|                |    | 7  | I declare under penalty of perjury that the foregoing is true and correct. Executed this $\frac{1}{3}$ | 1  |
| 12             |    | 8  | day of February, 2022, at Los Angeles, California.   |    |
|                |    | 9  | Respectfully Submitted,  |    |
|                |    | 10 | ROB BONTA  | 8  |
|                |    | 11 | Attorney General of California   |    |
|                |    | 12 |  |    |
|                |    | 13 | PAUL S. THIES  |    |
|                |    | 14 | Deputy Attorney General<br>Attorneys for People  |    |
|                |    | 15 |  |    |
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|                |    |    |  |    |
|                |    |    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRA   | NI |

| i  | NOTICE TO DEFENDANTS AND ATTORNEYS  |
|----|---|
| 2  | Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby            |
| 3  | informally request that defense counsel provide discovery to the People as required by Penal      |
| 4  | Code section 1054.3.  |
| 5  | NOTICE TO ATTORNEYS   |
| 6  | Any materials accompanying this complaint or provided by the People in this case may              |
| 7  | contain information about witnesses. Such information is subject to Penal Code section 1054.2,    |
| 8  | which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or |
| 9  | telephone number of a victim or witness whose name is disclosed to the attorney pursuant to       |
| 10 | subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a     |
| 11 | hearing and a showing of good cause."   |
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|    | 14<br>EELONY COMPLAINT FOR ARREST WARDANT   |
|    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT  |

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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 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                        |
| 3  | 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 \$  |
|    | 18       |   |
|    | 19       | Dated: $2 4 \partial O$   |
|    | 20       | Time Issued: 0:. 16 (am/pm)   |
| τ. | 21       | OF LOS ANGELES  |
|    | 22       | JUDGE OF THE SUPERIOR COURT   |
|    | 23       | State of California, County of Los Angeles  |
|    | 24       | NATALIE STONE   |
|    | 25       |   |
|    | 26<br>27 |   |
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|    | 20       | 15  |
|    |          | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT  |

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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 TAREK GRAVES: 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 <b>TAREK GRAVES</b> , 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 $\frac{2}{2}$ .                              |
|   | 17    |  |
|   | 18    | Dated: $\frac{\partial \left[ 4 \right] \partial \partial}{\partial t}$                        |
|   | 19    | Time Issued: <u>4: [6 (am/pm)</u>  |
|   | 20    | 1 Xtono  |
|   | 21    | JUDGE OF THE SUPERIOR COURT  |
|   | 22    | State of California, County of Los Angeles   |
|   | 23    |  |
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|   |       | 16       AG #LA2022300318       FELONY COMPLAINT FOR ARREST WARRANT                            |

| 8 | <i>.</i> , <i>.</i> | 2   |
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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 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 \$  |
|   | 18                  | 2/4/22  |
|   | 19                  | Dated: $219100$<br>Time Issued: $9:17$ (am/pm)  |
|   | 20<br>21            | Time Issued: 9:11 (am/pm)   |
|   | 21                  | 1. Xtone  |
|   | 22                  | JUDGE OF THE SUPERIOR COURT   |
|   | 24                  | State of California, County of Los Angeles  |
|   | 25                  |   |
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|   | 27                  |   |
|   | 28                  |   |
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|   |                     | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT  |

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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  | s  |
| 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 BRISENO II: 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 BRISENO II, 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 $\frac{1}{2}$ .                              |
| 18 |  |
| 19 | Dated: $2 4 22$  |
| 20 | Time Issued: 9:16 (am/pm)  |
| 21 | 1/10/-   |
| 22 | /XLON  |
| 23 | JUDGE/OF <sup>L</sup> THE SUPERIOR COURT<br>State of California, County of Los Angeles         |
| 24 | N. AN  |
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|    | 18<br>AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT                                     |
|    | E AVERLA2022JUUTIO FELONE COMPLAINT PUR ARREAT WARRANT   |

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|          |         | 1  | SUPERIOR COURT OF CALIFORNIA   |
|          |         | 2  | COUNTY OF LOS ANGELES  |
|          |         | 3  |  |
|          |         | 4  | <sup>10</sup> 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 RALPH PATRICK GOMEZ: Grand Theft in                    |
|          |         | 12 | violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal |
| 1        |         | 13 | Code section 72.   |
|          |         | 14 | Therefore, you are commanded to arrest RALPH PATRICK GOMEZ, 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: 214122  |
|          |         | 20 | Time Issued:(anypm)  |
|          |         | 21 |  |
|          |         | 22 | JUDGE OF THE SUPERIOR COURT  |
|          |         | 23 | State of California, County of Los Angeles   |
|          |         | 24 |  |
|          |         | 25 |  |
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| <i>z</i> |         | 28 | 19   |
|          |         |    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT   |

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|    | 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 URIEL GOMEZ: 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 URIEL GOMEZ, 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(4/20  |
| 19 | Time Issued: 9:16 (am/pm)  |
| 20 | 1 An-  |
| 21 | JUDGE OF THE SUPERIOR COURT  |
| 22 | State of California, County of Los Angeles   |
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| 28 | 20   |
|    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT   |

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| 1  | SUDEDIOD COURT OF CALLEODNIA   |
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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 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 \$   |
| 18 |  |
| 19 | Dated: 214102  |
| 20 | Time Issued: $9:/7$ (am/pm)  |
| 21 | 1.1.1.000  |
| 22 | JUDGE OF THE SUPERIOR COURT  |
| 23 | State of California, County of Los Angeles   |
| 24 |  |
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| 27 | 12. 14   |
| 28 | 21   |
|    | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT   |

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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 VINCENT BARRERA: 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 VINCENT BARRERA, 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 $\_$   |
|    | 18       | 7/4/27   |
|    | 19       | Dated: 2/9/00  |
|    | 20       | Time Issued: <u>1' [X (am/pm)</u>  |
|    | 21<br>22 | Xtono  |
|    | 22       | JUDGE OF THE SUPERIOR COURT  |
|    | 23       | State of California, County of Los Angeles   |
|    | 25       |  |
|    | 26       |  |
|    | 27       |  |
|    | 28       |  |
|    |          | 22   |
|    |          | AG #LA2022300318 FELONY COMPLAINT FOR ARREST WARRANT   |

| Defendant             | DOB        | CII            | DMV | Bail Requeste |  |  |  |
|-----------------------|------------|----------------|-----|---------------|--|--|--|
| MORENO IV, Thomas     |            |                |     |               |  |  |  |
| GRAVES, Tarek         |            |                |     |               |  |  |  |
| ULLOA, Juan Carlos    |            |                |     |               |  |  |  |
| BRISENO II, Mario     |            |                |     |               |  |  |  |
| GOMEZ, Ralph Patrick  |            |                |     |               |  |  |  |
| GOMEZ, Uriel          |            |                |     |               |  |  |  |
| MORAN, Ramon Maciel   |            |                |     | -             |  |  |  |
| BARRERA, Vincent      |            |                |     |               |  |  |  |
| Investigating Agency  | СНР        |                |     |               |  |  |  |
| Investigating Officer | Lt. Tannoi | Brown          | 2   | 19<br>19      |  |  |  |
| Phone No.             | (714) 288- | (714) 288-6336 |     |               |  |  |  |
| Prelim Estimate       | l day      |                | T1: |               |  |  |  |
| 8 27                  |            | e              |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
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|                       |            |                |     |               |  |  |  |
| a)                    |            |                |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
|                       |            | 24             |     |               |  |  |  |
|                       |            |                |     |               |  |  |  |
|                       |            | 23             |     |               |  |  |  |

| 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  | com   | committed and that there is sufficient cause to believe that the following defendant(s) guilty |              |                  |                    |  |  |  |  |
| 4  | there   | thereof, to wit:   |              |                  |                    |  |  |  |  |
| 5  | THO   | THOMAS MORENO IV   |              |                  |                    |  |  |  |  |
| 6  | <u>Ct.</u>  | Charge   | Charge Range | Allegation       | Alleg. Effect      |  |  |  |  |
| 7  | 1   | PC 487(a)  | 16-2-3       |                  |                    |  |  |  |  |
| 8  | 2   | PC 72  | 16-2-3       |                  | 4                  |  |  |  |  |
| 9  | 3   | PC 72  | 16-2-3       | 4                |                    |  |  |  |  |
| 10 | 4   | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
| п  | 5   | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
| 12 | 6   | PC 72  | 16-2-3       | ·                |                    |  |  |  |  |
| 13 | TAR   | REK GRAVES   |              |                  |                    |  |  |  |  |
| 14 | <u>Ct.</u>  | <u>Charge</u>  | Charge Range | Allegation       | Alleg. Effect      |  |  |  |  |
| 15 | 7   | PC 487(a)  | 16-2-3       | з.               | 3<br>20            |  |  |  |  |
| 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       | W                |                    |  |  |  |  |
| 20 | 12  | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
| 21 | JUAN CARLOS ULLOA   |  |              |                  |                    |  |  |  |  |
| 22 | <u>Ct.</u>  | Charge   | Charge Range | Allegation       | Alleg. Effect      |  |  |  |  |
| 23 | 13  | PC 487(a)  | 16-2-3       |                  |                    |  |  |  |  |
| 24 | 14  | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
| 25 | 15  | PC 72  | 16-2-3       | •                | 8                  |  |  |  |  |
| 26 | 16  | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
| 27 | 17  | PC 72  | 16-2-3       |                  | ×                  |  |  |  |  |
| 28 | 18  | PC 72  | 16-2-3       |                  |                    |  |  |  |  |
|    | AG #  | LA2022300318   | 24           | FELONY COMPLAINT | FOR ARREST WARRANT |  |  |  |  |
|    |   |  |              |                  |                    |  |  |  |  |

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| l   | MARIO BRISENO II |               |              |    | s .             | it<br>R             |
|-----|------------------|---------------|--------------|----|-----------------|---------------------|
| 2   | <u>Ct.</u>       | <u>Charge</u> | Charge Range |    | Allegation      | Alleg. Effect       |
| 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       |    |                 | 14 (191).           |
| 8   | 24               | PC 72         | 16-2-3       |    |                 |                     |
| 9   | RAL              | PH PATRICK GO | MEZ          |    |                 |                     |
| 10  | <u>Ct.</u>       | Charge        | Charge Range |    | Allegation      | Alleg. Effect       |
| П   | 25               | PC 487(a)     | 16-2-3       |    | с .             |                     |
| 12  | 26               | PC 72         | 16-2-3       |    |                 |                     |
| 13  | 27               | PC 72         | 16-2-3       |    |                 |                     |
| 14  | 28               | PC 72         | 16-2-3       |    | ۰.              |                     |
| 15  | 29               | PC 72         | 16-2-3       |    |                 |                     |
| 16  | <u>URI</u>       | EL GOMEZ      |              |    |                 |                     |
| 17  | <u>Ct.</u>       | Charge        | Charge Range |    | Allegation      | Alleg. Effect       |
| ा ८ | 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  | RAN              | 10N MACIEL MO | RAN          |    |                 |                     |
| 25  | <u>Ct.</u>       | Charge        | Charge Range |    | Allegation      | Alleg, Effect       |
| 26  | 36               | PC 487(a)     | 16-2-3       |    |                 |                     |
| 27  | 37               | PC 72         | 16-2-3       |    | 5               |                     |
| 28  | 38               | PC 72         | 16-2-3       | 25 |                 |                     |
|     | AG #             | LA2022300318  |              | 23 | FELONY COMPLAIN | TFOR ARREST WARRANT |
|     | AG #             | LA2022300318  |              |    | FELONY COMPLAIN | TFOR ARREST WARRA   |

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|    |                     |                             |              |                 |            |           |            | L:            |           |
|----|---------------------|-----------------------------|--------------|-----------------|------------|-----------|------------|---------------|-----------|
| t  | 0-0                 |                             |              |                 |            |           |            |               |           |
| 2  | 39 P                | C 72                        | 16-2-3       |                 |            |           |            |               |           |
|    | 40 P                | C 72                        | 16-2-3       |                 |            |           |            |               |           |
| 3  | 41 P                | C 72                        | 16-2-3       |                 |            |           | •          |               |           |
| 4  | VINCE               | NT BARRERA                  |              |                 |            |           |            | St.           |           |
| 5  | <u>Ct.</u> <u>C</u> | harge                       | Charge Ra    | ange            | A          | llegation |            | Alleg. Effec  | <u>ct</u> |
| 6  | 42 P                | C 72                        | 16-2-3       |                 |            |           |            |               |           |
| 7  |                     |                             |              |                 |            |           |            |               |           |
| 8  | 10                  | DRDER that the d            | efendants n  | amed below      | be held to | o answer  | for the al | bove-describ  | ed        |
| 9  | offenses            | and allegations a           | nd be admit  | tted to bail in | the sum    | oſ:       |            |               |           |
| 10 | 24                  |                             |              |                 |            |           |            |               |           |
| 11 | )()                 | Thomas More                 | no IV        | 5               |            |           |            |               |           |
| 12 |                     | Tarek Graves                |              | \$              |            |           |            |               |           |
| 13 |                     | Juan Carlos U               | lloa         |                 | 6_1        |           | L          |               |           |
| [4 |                     | Mario Brisenc               | ) II         | \$              |            | <u></u>   |            |               |           |
| 15 |                     | Ralph Patrick               | Gomez        | \$              |            |           |            |               |           |
| 16 |                     | Uriel Gomez                 |              | \$              | 63         |           |            |               |           |
| 17 |                     | Ramon Macie                 | l Moran      | \$              |            | 22        |            |               |           |
| 18 | 3                   | Vincent Barre               | ra           | \$              |            |           |            |               |           |
| 19 |                     |                             |              |                 |            |           | •          |               |           |
| 20 | And that            | said defendant bo           | e committee  | to the custo    | dy of the  | Sheriffu  | intil such | bail is given | 4         |
| 21 | The date            | of Felony arraigr           | ment is set  | for:            |            |           |            |               |           |
| 22 |                     |                             |              |                 | 2.0        |           |            |               |           |
| 23 |                     | (Date)                      |              | _ in Departm    | ent        | at        |            | _a.m.         |           |
| 24 |                     | (Date)                      |              |                 |            |           |            |               |           |
| 25 |                     |                             |              |                 |            |           |            |               |           |
| 26 |                     |                             |              |                 | 1          |           |            |               |           |
| 27 |                     | Magistrate<br>Superior Cour | t of Califor | nia             | Date       |           |            |               |           |
| 28 |                     |                             |              | ~~              |            |           |            |               |           |
|    | AG #LA2             | 022300318                   |              | 26              | FELON      | Y COMPL   | AINT FO    | R ARREST W    | ARRANT    |