

 **COPY**

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*Attorneys for People*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

2022 JAN 10 AM 9:37

**PEOPLE OF THE STATE OF  
CALIFORNIA,**

Plaintiff,

v.

**(1) JAMES YAO KUO  
(DOB: 9/9/1982),**

**(2) JESSIE ANTHONY CARRILLO  
(DOB: 12/18/1971)**

Defendants.

Case No. BA498273

**FELONY COMPLAINT FOR  
ARREST WARRANT**

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

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 **COUNT 4**

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.

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1 **COUNT 5**

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

7 **COUNT 6**

8 On or about March 22, 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 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 7**

14 On or about and between February 22, 2017 through March 29, 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 JESSIE ANTHONY CARRILLO, who did unlawfully take  
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Eight  
18 Thousand One Hundred Twenty Dollars and Fifty-Four Cents (\$8,120.54)

19 **COUNT 8**

20 On or about January 3, 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 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.

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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 **COUNT 10**

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 **COUNT 11**

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 **COUNT 12**

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.

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**SPECIAL ALLEGATION**

**STATUTE OF LIMITATION-LATE DISCOVERY (ZAMORA ALLEGATION)**

It is further alleged for Counts 1-12, 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 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 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 the audit, Captain Margaris discovered inaccuracies surrounding Caltrans overtime details, 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.

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

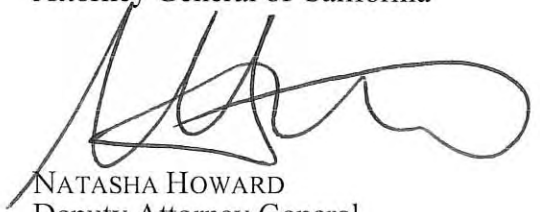
2 All of the foregoing is contrary to the form, force, and effect of the above-named statutes,  
3 and is against the peace and dignity of the People of the State of California.

4 Attached hereto and incorporated by reference is a declaration in support of an arrest  
5 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 10<sup>th</sup>  
8 day of January 2022, at Los Angeles, California.

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

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14 NATASHA HOWARD  
15 Deputy Attorney General  
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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."

# WARRANT OF ARREST

# WARRANT OF ARREST



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Defendant	DOB	CII	CDL	Bail Requested
KUO, James Yao	9/9/1982		B9526262	\$0
CARRILLO, Jessie Anthony	12/18/1971		A4001343	\$0
Investigating Agency	CHP Southern Division ISU			
Investigating Officer	Sgt. Kevin Reese			
Phone No.	(213) 744-2331			
Prelim Estimate	1 day			

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

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

*(Strike out or add as applicable)*

**JAMES YAO KUO**

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

**JESSIE ANTHONY CARRILLO**

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

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

James Yao KUO \$ \_\_\_\_\_

Jessie Anthony CARRILLO \$ \_\_\_\_\_

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

The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

\_\_\_\_\_  
Date

CR  
WARRANT ISSUED

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

Controlled  
by the State Bar of California

2022 FEB -2 AM 10:45

FILED

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

13 PEOPLE OF THE STATE OF  
14 CALIFORNIA,

Case No. BA498276

15 Plaintiff,

FELONY COMPLAINT FOR ARREST  
WARRANT

16 v.

17  
18 (1) GIOVANNI BEMBI  
(DOB: 08/30/1978)

19 (2) CONNIE MARIE GUZMAN  
20 (DOB: 12/25/1963)

21 (3) WILLIAM PRECIADO  
(DOB: 09/04/1964)

22 (4) EDMUND ZORRILLA  
23 (DOB: 03/03/1973)

24 (5) LUIS MANUEL MENDOZA  
(DOB: 12/23/1975)

25 (6) WILLIAM MATTHEW FOUNTAIN  
26 (DOB: 08/09/1982)

27 Defendants.  
28

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

3 COUNT 1

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

9 COUNT 2

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

15 COUNT 3

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

21 COUNT 4

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

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1 COUNT 5

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

7 COUNT 6

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

13 COUNT 7

14 On or about and between March 29, 2016, through July 29, 2017, in the County of Los  
15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
16 Felony, was committed by Defendant **CONNIE MARIE GUZMAN**, who did unlawfully take  
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three  
18 Thousand One Hundred Ninety-Eight Dollars and Eighty-Two Cents (\$3,198.82).

19 COUNT 8

20 On or about July 29, 2017, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant **CONNIE MARIE GUZMAN**, who did unlawfully and with intent to  
23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
24 and writing.

25 COUNT 9

26 On or about February 4, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **CONNIE MARIE GUZMAN**, who did unlawfully and

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

3 COUNT 10

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

9 COUNT 11

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

15 COUNT 12

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

21 COUNT 13

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

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1 COUNT 14

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 COUNT 17

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 COUNT 18

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

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

3 COUNT 19

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

9 COUNT 20

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

15 COUNT 21

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

21 COUNT 22

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

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1 COUNT 23

2 On or about February 25, 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 **EDMUND ZORRILLA**, 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 24

8 On or about and between March 29, 2016, through July 29, 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 **LUIS MANUEL MENDOZA**, who did unlawfully take  
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).

13 COUNT 25

14 On or about January 17, 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 MANUEL MENDOZA**, 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 26

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 MANUEL MENDOZA**, 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 January 4, 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 **LUIS MANUEL MENDOZA**, who did unlawfully and with intent to



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

3 **COUNT 28**

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

9 **COUNT 29**

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

15 **COUNT 30**

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

21 **COUNT 31**

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

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1 COUNT 32

2 On or about August 23, 2016, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **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

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.

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1 **SPECIAL ALLEGATION**

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

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

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

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

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

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1 CONCLUSION

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

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

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

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

12 

13 PAUL S. THIES  
14 Deputy Attorney General  
15 *Attorneys for People*  
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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."



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

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

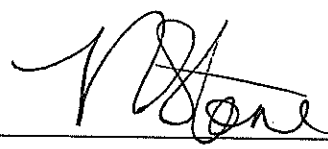
Therefore, you are commanded to arrest **GIOVANI BEMBI**, and to bring said Defendant  
before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the  
California Penal Code.

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

Dated: 2/2/22

Time Issued: 3:58 (am/pm)



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

NATALIE STONE

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:

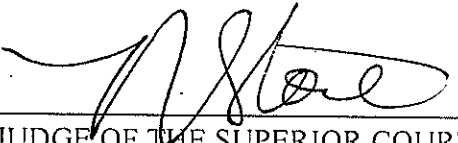
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **CONNIE MARIE GUZMAN**: 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 **CONNIE MARIE GUZMAN**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/2/22

Time Issued: 3:59 (am/pm)

  
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:

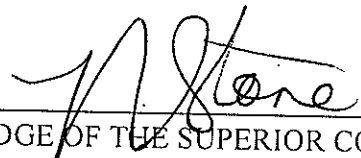
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **WILLIAM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

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

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

Dated: 2/2/22

Time Issued: 3:59 (am/pm)

  
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:

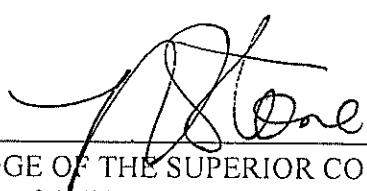
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **EDMUND ZORRILLA**: 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 **EDMUND ZORRILLA**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 7/2/22

Time Issued: 4:00 (am/pm)

  
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:

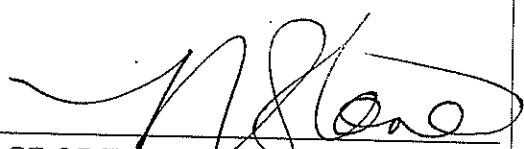
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **LUIS MANUEL MENDOZA**: 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 **LUIS MANUEL MENDOZA**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/2/22

Time Issued: 4:00 (am/pm)

  
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:

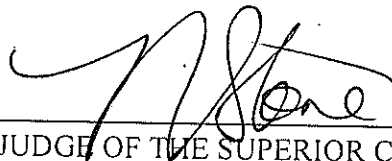
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **WILLIAM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

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

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

Dated: 2/2/22

Time Issued: 4:01 (am/pm)

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

Defendant	DOB	CII	DMV	Bail Requested
BEMBI, Giovanni	08/30/1978		B5360951	\$0
GUZMAN, Connie Marie	12/25/1963		C2001176	\$0
PRECIADO, William	09/04/1964		C1692147	\$0
ZORRILLA, Edmund	03/03/1975		A5395624	\$0
MENDOZA, Luis Manuel	12/23/1975		A8364440	\$0
FOUNTAIN, William Matthew	08/09/1982		B9544283	\$0
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

**GIOVANNI BEMBI**

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

**CONNIE MARIE GUZMAN**

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

**WILLIAM PRECIADO**

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

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**EDMUND ZORRILLA**

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

**LUIS MANUEL MENDOZA**

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

**WILLIAM MATTHEW FOUNTAIN**

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
30	PC 487(a)	16-2-3		
31	PC 72	16-2-3		
32	PC 72	16-2-3		
33	PC 72	16-2-3		
34	PC 72	16-2-3		
35	PC 72	16-2-3		

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

3  
4 Giovanni Bembi \$ \_\_\_\_\_  
5 Connie Marie Guzman \$ \_\_\_\_\_  
6 William Preciado \$ \_\_\_\_\_  
7 Edmund Zorrilla \$ \_\_\_\_\_  
8 Luis Manuel Mendoza \$ \_\_\_\_\_  
9 William Matthew Fountain \$ \_\_\_\_\_  
10

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

12 The date of Felony arraignment is set for:

13  
14 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
15 (Date)

16  
17 \_\_\_\_\_  
18 Magistrate Date  
19 Superior Court of California  
20  
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1 ROB BONTA  
Attorney General of California  
2 LANCE WINTERS  
Chief Assistant Attorney General  
3 JOHNETTE JAURON  
Senior Assistant Attorney General  
4 CHRISTOPHER G. SANCHEZ  
Deputy Attorney General  
5 PAUL S. THIES  
Deputy Attorney General  
6 State Bar No. 305084  
300 South Spring Street, Suite 1702  
7 Los Angeles, CA 90013  
Telephone: (213) 269-6070  
8 Cell: (213) 269-2148  
E-mail: Paul.Thies@doj.ca.gov  
9 Attorneys for the People of the State of California

CR  
**WARRANT ISSUED**

2022 FEB -2 AM 10:42

CR  
**Filed**

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES  
12

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

Plaintiff,

16 v.  
17

18 **(1) RUBEN ROBLES**  
**(DOB: 03/09/1978)**

19 **(2) REY DAVID THORNE**  
**(DOB: 06/22/1967)**

20 **(3) MARTIN GERARDO VASQUEZ**  
21 **(DOB: 07/10/1969)**

22 Defendants.  
23

Case No. BA498277

**FELONY COMPLAINT FOR ARREST  
WARRANT**

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

26 **COUNT 1**

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

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

5 **COUNT 2**

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

11 **COUNT 3**

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

17 **COUNT 4**

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

23 **COUNT 5**

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

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 COUNT 9

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 **REY DAVID THORNE**, 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.

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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 **REY DAVID THORNE**, who did unlawfully and with

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

3 COUNT 15

4 On or about and between January 19, 2017, through January 31, 2018, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **MARTIN GERARDO VASQUEZ**, who did unlawfully  
7 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One  
8 Thousand One Hundred Fifty Dollars and Fifty-Eight Cents (\$1,150.58), the property of the  
9 County of Los Angeles.

10 COUNT 16

11 On or about January 2, 2018, in the County of Los Angeles, the crime of PRESENTATION  
12 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
13 committed by Defendant **MARTIN GERARDO VASQUEZ**, who did unlawfully and with  
14 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
15 voucher and writing.

16 COUNT 17

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

22 COUNT 18

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





1 **SPECIAL ALLEGATION**

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

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

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

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

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

25 ////

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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 1st 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  
15 *Attorneys for People*

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**NOTICE TO DEFENDANTS AND ATTORNEYS**

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**NOTICE TO ATTORNEYS**

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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

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

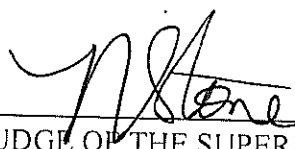
Therefore, you are commanded to arrest **RUBEN ROBLES**, and to bring said Defendant  
before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the  
California Penal Code.

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

Dated: 2/2/22

Time Issued: 3:56 (am/pm)



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

NATALIE STONE

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:

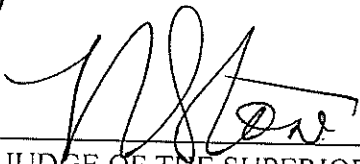
Proof by declaration under penalty of perjury having been made this day to me by  
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
accompanying felony complaint, I find there is probable cause to believe that the following  
crimes have been committed by Defendant **REY DAVID THORNE**: 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 **REY DAVID THORNE**, and to bring said  
Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
848 of the California Penal Code.

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

Dated: 2/2/22

Time Issued: 3:56 (am/pm)

  
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:

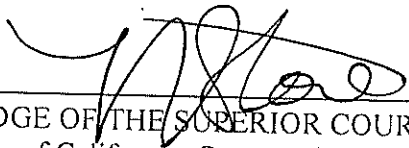
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **MARTIN GERARDO VASQUEZ**: 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 **MARTIN GERARDO VASQUEZ**, 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 \$ 4-

Dated: 2/2/20

Time Issued: 3:56 (am/pm)

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

Defendant	DOB	CII	DMV	Bail Requested
ROBLES, Ruben	03/09/1978		B5018340	
THORNE, Rey David	06/22/1967		U5018340	
VASQUEZ, Martin Gerardo	07/10/1969		C5833180	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

**RUBEN ROBLES**

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

**REY DAVID THORNE**

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
8	PC 487(a)	16-2-3		
9	PC 487(a)	16-2-3		
10	PC 72	16-2-3		
11	PC 72	16-2-3		
12	PC 72	16-2-3		
13	PC 72	16-2-3		
14	PC 72	16-2-3		

**MARTIN GERARDO VASQUEZ**

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



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

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

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

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

The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate Date  
Superior Court of California

WARRANT ISSUED

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

Filed  
2022 FEB -2 AM 10:54  
Clerk of Superior Court  
Los Angeles County

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,  
  
Plaintiff,  
  
v.  
  
(1) RAMIRO DURAZO  
(DOB: 09/18/1973)  
  
(2) ROMAN GARDEA  
(DOB: 10/04/1967)  
  
(3) RAMON MARTINEZ JR.  
(DOB: 12/22/1982)  
  
(4) ROBERT ANDRES FELIX  
(DOB: 01/31/1975)  
  
(5) KYLE CLAYTON HARTMAN  
(DOB: 02/22/1990)  
  
Defendants.

Case No. BA498278  
  
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, and March 27, 2018, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **RAMIRO DURAZO**, who did unlawfully take money and  
7 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Ten Thousand One  
8 Hundred Seventy-Six Dollars and Thirty-Eight Cents (\$10,176.38).

9 COUNT 2

10 On or about November 21, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **RAMIRO DURAZO**, who did unlawfully and with intent  
13 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 COUNT 3

16 On or about July 23, 2017, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **RAMIRO DURAZO**, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 COUNT 4

22 On or about March 1, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **RAMIRO DURAZO**, who did unlawfully and with intent to defraud,  
25 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
26 writing.

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

3 COUNT 10

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

9 COUNT 11

10 On or about July 31, 2017, in the County of Los Angeles, the crime of PRESENTATION  
11 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
12 committed by Defendant **ROMAN GARDEA**, who did unlawfully and with intent to defraud,  
13 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
14 writing.

15 COUNT 12

16 On or about January 5, 2017, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **ROMAN GARDEA**, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 COUNT 13

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

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1 COUNT 14

2 On or about September 15, 2016, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **RAMON MARTINEZ JR.**, who did unlawfully and with  
5 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
6 voucher and writing.

7 COUNT 15

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

13 COUNT 16

14 On or about June 30, 2016, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant **RAMON MARTINEZ JR.**, who did unlawfully and with intent to  
17 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
18 and writing.

19 COUNT 17

20 On or about June 2, 2016, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant **RAMON MARTINEZ JR.**, who did unlawfully and with intent to  
23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
24 and writing.

25 COUNT 18

26 On or about and between November 23, 2016, and March 4, 2018, in the County of Los  
27 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
28 Felony, was committed by Defendant **ROBERT ANDRES FELIX**, who did unlawfully take

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

3 **COUNT 19**

4 On or about March 4, 2018, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant **ROBERT ANDRES FELIX**, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 **COUNT 20**

10 On or about December 19, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **ROBERT ANDRES FELIX**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 **COUNT 21**

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

21 **COUNT 22**

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

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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 **ROBERT ANDRES FELIX**, 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 24

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 COUNT 25

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 COUNT 26

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 COUNT 27

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



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

3 **COUNT 28**

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

9 **COUNT 29**

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

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1 **SPECIAL ALLEGATION**

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

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

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

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

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

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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 1st day of February, 2022, at Los Angeles, California.

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

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

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

**NOTICE TO ATTORNEYS**

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

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


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

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

18  
19 Dated: 2/2/22

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



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

NATALIE STONE

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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


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

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

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

Dated: 2/2/22

Time Issued: 4:01 (am/pm)

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

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

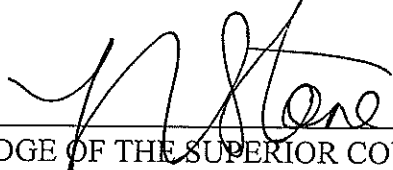
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **RAMON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

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

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

Dated: 2/2/22

Time Issued: 4:02 (am/pm)

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

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

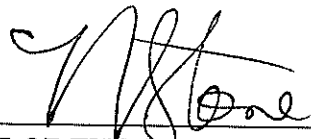
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **ROBERT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

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

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

Dated: 2/2/22

Time Issued: 4:02 (am/pm)

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



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

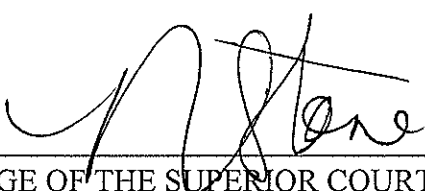
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **KYLE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

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

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

Dated: 2/2/22

Time Issued: 4:02 (am/pm)

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

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Defendant	DOB	CII	DMV	Bail Requested
DURAZO, Ramiro	09/18/1973		A7328424	
GARDEA, Roman	10/04/1967		C3851815	
MARTINEZ JR., Ramon	12/22/1982		D2166967	
FELIX, Robert Andres	01/31/1971		A8599477	
HARTMAN, Kyle Clayton	02/22/1990		D8958149	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

5        **RAMIRO DURAZO**

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

13       **ROMAN GARDEA**

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

21       **RAMON MARTINEZ JR.**

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

28       /////

1 **ROBERT ANDRES FELIX**

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

9 **KYLE CLAYTON HARTMAN**

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

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

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

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

11 The date of Felony arraignment is set for:

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

15  
16 \_\_\_\_\_  
17 Magistrate  
Superior Court of California

\_\_\_\_\_  
Date

WARRANT ISSUED

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

FILED  
2022 FEB -2 PM 3:27  
Clerk of Superior Court  
Los Angeles County

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

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

15 Plaintiff,

16 v.

Case No. BA498279

**FELONY COMPLAINT FOR ARREST  
WARRANT**

17 (1) **JEFFREY ROBERT MCKEE**  
18 **(DOB: 08/02/1981)**

19 (2) **REMIGIO BEMBI JR.**  
20 **(DOB: 07/15/1973)**

21 (3) **ANDREW JAMES SANTELICES**  
**(DOB: 05/03/1988)**

22 (4) **JAVIER GONZALEZ**  
23 **(DOB: 09/05/1982)**

24 (5) **PEDRO CHAVEZ JR.**  
**(DOB: 11/25/1972)**

25 (6) **BILLY JOEL GUILLEN**  
26 **(DOB: 08/13/1981)**

27 Defendants.  
28

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

3 COUNT 1

4 On or about and between September 15, 2016, and November 23, 2016, in the County of  
5 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **JEFFREY ROBERT MCKEE**, who did unlawfully take  
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One  
8 Thousand Eight Hundred Forty-Nine Dollars and Forty-Four Cents (\$1,849.44).

9 COUNT 2

10 On or about November 23, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **JEFFREY ROBERT MCKEE**, who did unlawfully and  
13 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 COUNT 3

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

21 COUNT 4

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

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1 COUNT 5

2 On or about and between January 25, 2017, and December 13, 2017, in the County of Los  
3 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
4 Felony, was committed by Defendant **REMIGIO BEMBI JR.**, who did unlawfully take money  
5 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Six  
6 Hundred Ninety-Two Dollars and Twenty-Eight Cents (\$1,692.28).

7 COUNT 6

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

13 COUNT 7

14 On or about October 3, 2017, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant **REMIGIO BEMBI JR.**, who did unlawfully and with intent to defraud,  
17 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
18 writing.

19 COUNT 8

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

25 COUNT 9

26 On or about January 15, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **REMIGIO BEMBI JR.**, who did unlawfully and with



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

3 **COUNT 10**

4 On or about and between October 6, 2016, and December 8, 2016, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **ANDREW JAMES SANTELICES**, who did unlawfully  
7 take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One  
8 Thousand Two Hundred Eighteen Dollars and Eighty-Eight Cents (\$1,218.88).

9 **COUNT 11**

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

15 **COUNT 12**

16 On or about October 6, 2016, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **ANDREW JAMES SANTELICES**, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 **COUNT 13**

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

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1 COUNT 14

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

7 COUNT 15

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

13 COUNT 16

14 On or about and between June 28, 2016, and February 7, 2017, in the County of Los  
15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
16 Felony, was committed by Defendant **PEDRO CHAVEZ JR.**, who did unlawfully take money  
17 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand  
18 Twenty-Eight Dollars and Seventy-Four Cents (\$1,028.74).

19 COUNT 17

20 On or about February 7, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **PEDRO CHAVEZ JR.**, who did unlawfully and with  
23 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
24 voucher and writing.

25 COUNT 18

26 On or about August 11, 2016, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **PEDRO CHAVEZ JR.**, who did unlawfully and with

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

3 COUNT 19

4 On or about June 28, 2016, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant **PEDRO CHAVEZ JR.**, who did unlawfully and with intent to defraud,  
7 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
8 writing.

9 COUNT 20

10 On or about November 23, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **BILLY JOEL GUILLEN**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

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1 **SPECIAL ALLEGATION**

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

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

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

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

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

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

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

Respectfully Submitted,

ROB BONTA  
Attorney General of California



PAUL S. THIES  
Deputy Attorney General  
*Attorneys for People*

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**NOTICE TO DEFENDANTS AND ATTORNEYS**

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

**NOTICE TO ATTORNEYS**

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

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:

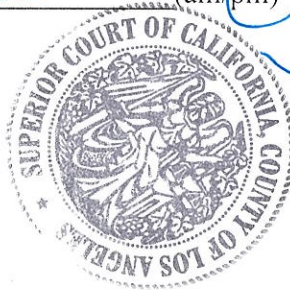
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **JEFFREY ROBERT MCKEE**: 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 **JEFFREY ROBERT MCKEE**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:50 (am/pm)



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

NATALIE STONE

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 **REMIGIO BEMBI JR.**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

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

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

Dated: 2/3/22

Time Issued: 4:50 (am/pm)

  
\_\_\_\_\_  
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 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 **ANDREW JAMES SANTELICES**: 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 **ANDREW JAMES SANTELICES**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/20

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

  
\_\_\_\_\_  
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 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 **JAVIER GONZALEZ**: 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 **JAVIER GONZALEZ**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:51 (am/pm)

  
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 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 **PEDRO CHAVEZ JR.**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

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

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

Dated: 2/3/22

Time Issued: 4:51 (am/pm)

  
\_\_\_\_\_  
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  
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 **BILLY JOEL GUILLEN**: Presentation of False  
Claims in violation of Penal Code section 72.

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

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

15

Dated: 2/3/22

Time Issued: 4:51

(am/pm)

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

Defendant	DOB	CII	DMV	Bail Requested
McKEE, Jeffery Robert	08/02/1981		B7811153	
BEMBI JR., Remigio	07/15/1973		A4697447	
SANTELICES, Andrew James	05/03/1988		D3986370	
GONZALEZ, Javier	09/05/1982		D2170982	
CHAVEZ JR., Pedro	11/25/1972		A5748935	
GUILLEN, Billy Joel	08/13/1981		B8727398	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

**JEFFREY ROBERT MCKEE**

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 487(a)	16-2-3		
2	PC 72	16-2-3		
3	PC 72	16-2-3		
4	PC 72	16-2-3		

**REMIGIO BEMBI JR.**

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

**ANDREW JAMES SANTELICES**

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

**JAVIER GONZALEZ**

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

////

**PEDRO CHAVEZ JR.**

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

**BILLY JOEL GUILLEN**

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

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

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

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

The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

Magistrate	Date
Superior Court of California	

WARRANT ISSUED

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

FILED  
2022 FEB -2 PM 4:07  
CLERK OF COURT  
LOS ANGELES

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

v.

- (1) DORIS PENICHE  
(DOB: 11/27/1974)  
(2) FRANCISCO JAVIER FONSECA JR.  
(DOB: 04/08/1978)  
(3) JOSE ANTONIO RAMIREZ  
(DOB: 06/22/1973)  
(4) MARTIN CHRISTOPHER GONZALES  
(DOB: 03/13/1984)  
(5) FRANCISCO JAVIER VILLALOBOS  
(DOB: 10/06/1962)  
(6) NIMA VAEZI  
(DOB: 04/01/1978)

Defendants.

Case No. BA498280

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

9 COUNT 2

10 On or about December 21, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **DORIS PENICHE**, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 COUNT 3

16 On or about January 26, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **DORIS PENICHE**, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 COUNT 4

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

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1 COUNT 5

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

7 COUNT 6

8 On or about November 23, 2016, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **DORIS PENICHE**, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 7

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

19 COUNT 8

20 On or about September 28, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **FRANCISCO JAVIER FONSECA JR.**, who did  
23 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
24 claim, bill, account, voucher and writing.

25 COUNT 9

26 On or about May 9, 2017, in the County of Los Angeles, the crime of PRESENTATION  
27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
28 committed by Defendant **FRANCISCO JAVIER FONSECA JR.**, who did unlawfully and with

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

3 COUNT 10

4 On or about January 26, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **FRANCISCO JAVIER FONSECA JR.**, who did  
7 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
8 claim, bill, account, voucher and writing.

9 COUNT 11

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

15 COUNT 12

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

21 COUNT 13

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

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1 COUNT 14

2 On or about December 20, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **JOSE ANTONIO RAMIREZ**, who did unlawfully and  
5 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
6 account, voucher and writing.

7 COUNT 15

8 On or about May 24, 2017, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant **JOSE ANTONIO RAMIREZ**, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 16

14 On or about May 9, 2017, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant **JOSE ANTONIO RAMIREZ**, who did unlawfully and with intent to  
17 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
18 and writing.

19 COUNT 17

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

25 COUNT 18

26 On or about January 19, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **JOSE ANTONIO RAMIREZ**, who did unlawfully and

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

3 COUNT 19

4 On or about and between January 12, 2017, through March 26, 2018, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **MARTIN GONZALEZ**, who did unlawfully take money  
7 and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Six Thousand Seven  
8 Hundred Eighty-Nine Dollars and Sixty-Nine Cents (\$6,789.69).

9 COUNT 20

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

15 COUNT 21

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

21 COUNT 22

22 On or about May 13, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **MARTIN CHRISTOPHER GONZALES**, who did unlawfully and  
25 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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1 COUNT 23

2 On or about January 26, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **MARTIN CHRISTOPHER GONZALES**, who did  
5 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
6 claim, bill, account, voucher and writing.

7 COUNT 24

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

13 COUNT 25

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

19 COUNT 26

20 On or about September 6, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **FRANCISCO JAVIER VILLALOBOS**, who did  
23 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
24 claim, bill, account, voucher and writing.

25 COUNT 27

26 On or about March 16, 2017, in the County of Los Angeles, the crime of PRESENTATION  
27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
28 committed by Defendant **FRANCISCO JAVIER VILLALOBOS**, who did unlawfully and with

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

3 COUNT 28

4 On or about March 2, 2017, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant **FRANCISCO JAVIER VILLALOBOS**, who did unlawfully and with  
7 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
8 voucher and writing.

9 COUNT 29

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

15 COUNT 30

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

21 COUNT 31

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

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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.

11 COUNT 34

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 COUNT 35

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.

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1 **SPECIAL ALLEGATION**

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

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

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

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

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

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

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

ROB BONTA  
Attorney General of California

  
PAUL S. THIES  
Deputy Attorney General  
*Attorneys for People*

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**NOTICE TO DEFENDANTS AND ATTORNEYS**

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

**NOTICE TO ATTORNEYS**

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed by Defendant **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.

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.

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

17  
18 Dated: 2/3/22

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



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

NATALIE STONE

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 **FRANCISCO JAVIER FONSECA JR.**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

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

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

Dated: 2/3/22

Time Issued: 4:44 (am/pm)

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

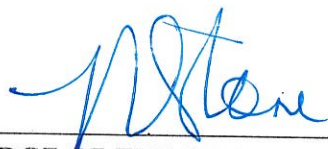
7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed 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 \$ 1-

18  
19 Dated: 2/3/22

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

21  
22   
23 JUDGE OF THE SUPERIOR COURT  
24 State of California, County of Los Angeles  
25  
26  
27  
28



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 **MARTIN CHRISTOPHER GONZALES**: 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 **MARTIN CHRISTOPHER GONZALES**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:45 (am/pm)

  
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:

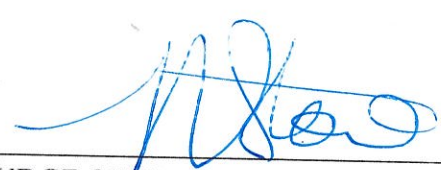
Proof by declaration under penalty of perjury having been made this day to me by  
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
accompanying felony complaint, I find there is probable cause to believe that the following  
crimes have been committed by Defendant **FRANCISCO JAVIER VILLALOBOS**: 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 **FRANCISCO JAVIER VILLALOBOS**, and to  
bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825,  
826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:45 (am/pm)

  
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:

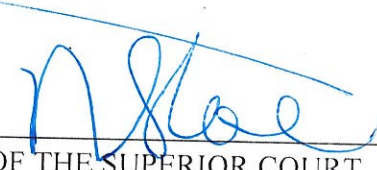
Proof by declaration under penalty of perjury having been made this day to me by  
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
accompanying felony complaint, I find there is probable cause to believe that the following  
crimes have been committed by Defendant **NIMA VAEZI**: 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 **NIMA VAEZI**, and to bring said Defendant  
before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the  
California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:46 (am/pm) PM

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

<b>Defendant</b>	<b>DOB</b>	<b>CII</b>	<b>DMV</b>	<b>Bail Requested</b>
PENICHE, Doris	11/27/1974		A9282771	
FONSECA JR., Francisco Javier	04/08/1978		B5215894	
RAMIREZ, Jose Antonio	06/22/1973		A8339913	
GONZALES, Martin Christopher	03/13/1984		B6828470	
VILLALOBOS, Francisco Javier	10/06/1962		U0072454	
VAEZI, Nima	04/01/1978		B9946849	
<b>Investigating Agency</b>	CHP			
<b>Investigating Officer</b>	Lt. Tannon Brown			
<b>Phone No.</b>	(714) 288-6336			
<b>Prelim Estimate</b>	1 day			

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

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

**DORIS PENICHE**

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

**FRANCISCO JAVIER FONSECA JR.**

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

**JOSE ANTONIO RAMIREZ**

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

**MARTIN CHRISTOPHER GONZALES**

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

**FRANCISCO JAVIER VILLALOBOS**

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
25	PC 487(a)	16-2-3		
26	PC 72	16-2-3		
27	PC 72	16-2-3		
28	PC 72	16-2-3		
29	PC 72	16-2-3		
30	PC 72	16-2-3		

**NIMA VAEZI**

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
31	PC 487(a)	16-2-3		
32	PC 72	16-2-3		
33	PC 72	16-2-3		
34	PC 72	16-2-3		
35	PC 72	16-2-3		
36	PC 72	16-2-3		

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

3  
4 Doris Peniche \$ \_\_\_\_\_  
5 Francisco Javier Fonseca Jr. \$ \_\_\_\_\_  
6 Jose Antonio Ramirez \$ \_\_\_\_\_  
7 Martin Christopher Gonzales \$ \_\_\_\_\_  
8 Francisco Javier Villalobos \$ \_\_\_\_\_  
9 Nima Vaezi \$ \_\_\_\_\_  
10

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

13  
14 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
15 (Date)

16  
17 \_\_\_\_\_  
18 Magistrate Date  
19 Superior Court of California  
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1 ROB BONTA  
Attorney General of California  
2 LANCE WINTERS  
Chief Assistant Attorney General  
3 JOHNETTE JAURON  
Senior Assistant Attorney General  
4 CHRISTOPHER G. SANCHEZ  
Deputy Attorney General  
5 PAUL S. THIES  
Deputy Attorney General  
6 State Bar No. 305084  
300 South Spring Street, Suite 1702  
7 Los Angeles, CA 90013  
Telephone: (213) 269-6070  
8 Cell: (213) 269-2148  
E-mail: Paul.Thies@doj.ca.gov  
9 *Attorneys for the People of the State of California*

CR  
**WARRANT ISSUED**

FILED  
202 FEB -2 PM 3:50  
CLERK OF COURT  
LOS ANGELES

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

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

15 Plaintiff,

16 v.

Case No. BA498281

**FELONY COMPLAINT FOR ARREST  
WARRANT**

18 **(1) MICHAEL STEPHEN PEARSON**  
**(DOB: 07/05/1977)**

19 **(2) GUILLERMO SANCHEZ JR.**  
20 **(DOB: 12/07/1968)**

21 **(3) LUIS ENRIQUE BRAVO JR.**  
22 **(DOB: 11/06/1968)**

23 **(4) SAMMY SANTOS SALAZAR**  
**(DOB: 04/12/1968)**

24 **(5) AGUSTIN AGUILERA**  
**(DOB: 10/20/1974)**

25 **(6) TYLER RANDAL OLSON**  
26 **(DOB: 05/23/1991)**

27 Defendants.  
28

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

3 COUNT 1

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

9 COUNT 2

10 On or about November 21, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **MICHAEL STEPHEN PEARSON**, who did unlawfully  
13 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 COUNT 3

16 On or about September 28, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **MICHAEL STEPHEN PEARSON**, who did unlawfully  
19 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
20 account, voucher and writing.

21 COUNT 4

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

27 /////

28 /////

1 COUNT 5

2 On or about February 22, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **MICHAEL STEPHEN PEARSON**, who did unlawfully  
5 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
6 account, voucher and writing.

7 COUNT 6

8 On or about November 23, 2016, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **MICHAEL STEPHEN PEARSON**, who did unlawfully  
11 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
12 account, voucher and writing.

13 COUNT 7

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

19 COUNT 8

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

25 COUNT 9

26 On or about February 7, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **GUILLERMO SANCHEZ JR.**, who did unlawfully and



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

3 COUNT 10

4 On or about January 19, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **GUILLERMO SANCHEZ JR.**, who did unlawfully and  
7 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
8 account, voucher and writing.

9 COUNT 11

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

15 COUNT 12

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

21 COUNT 13

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

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1 COUNT 14

2 On or about October 5, 2017, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and with intent to  
5 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 COUNT 15

8 On or about February 7, 2017, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and  
11 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
12 account, voucher and writing.

13 COUNT 16

14 On or about January 26, 2017, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and  
17 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
18 account, voucher and writing.

19 COUNT 17

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

25 COUNT 18

26 On or about November 23, 2016, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **LUIS ENRIQUE BRAVO JR.**, who did unlawfully and

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

3 COUNT 19

4 On or about and between May 14, 2017, through March 27, 2018, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **SAMMY SANTOS SALAZAR**, who did unlawfully take  
7 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Five  
8 Thousand Two Hundred Nineteen Dollars and Sixty-One Cents (\$5,219.61).

9 COUNT 20

10 On or about March 22, 2018, in the County of Los Angeles, the crime of PRESENTATION  
11 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
12 committed by Defendant **SAMMY SANTOS SALAZAR**, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 COUNT 21

16 On or about March 20, 2018, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **SAMMY SANTOS SALAZAR**, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 COUNT 22

22 On or about December 21, 2017, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant **SAMMY SANTOS SALAZAR**, who did unlawfully and  
25 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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28 /////

1 COUNT 23

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 COUNT 26

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 COUNT 27

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

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

3 COUNT 28

4 On or about September 30, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **AGUSTIN AGUILERA**, who did unlawfully and with  
7 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
8 voucher and writing.

9 COUNT 29

10 On or about September 27, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **AGUSTIN AGUILERA**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 COUNT 30

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

21 COUNT 31

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

27 /////

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1 COUNT 32

2 On or about December 17, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **TYLER RANDAL OLSON**, who did unlawfully and with  
5 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
6 voucher and writing.

7 COUNT 33

8 On or about November 29, 2017, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **TYLER RANDAL OLSON**, who did unlawfully and with  
11 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
12 voucher and writing.

13 COUNT 34

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

19 COUNT 35

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

25 COUNT 36

26 On or about January 12, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **TYLER RANDAL OLSON**, who did unlawfully and with

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

3 **SPECIAL ALLEGATION**

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

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

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

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

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

27 /////

28 /////

1 CONCLUSION

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

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

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

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

12 

13 PAUL S. THIES  
14 Deputy Attorney General  
15 *Attorneys for People*



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**NOTICE TO DEFENDANTS AND ATTORNEYS**

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

**NOTICE TO ATTORNEYS**

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

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 **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.

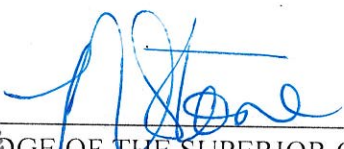
Therefore, you are commanded to arrest **MICHAEL STEPHEN PEARSON**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:48 (am/pm)



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

NATALIE STONE

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 **GUILLERMO SANCHEZ JR.**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

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

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

Dated: 2/3/02

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

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

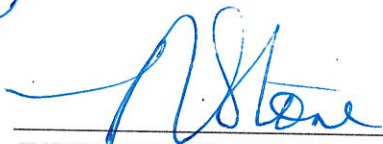
7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed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

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

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

18  
19 Dated: 2/3/22

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

21  
22 

23 JUDGE OF THE SUPERIOR COURT  
24 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 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 **SAMMY SANTOS SALAZAR**: 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 **SAMMY SANTOS SALAZAR**, 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 \$ 75.

Dated: 2/3/22

Time Issued: 4:48 (am/pm)

  
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  
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 \$ 1

Dated: 2/3/22

Time Issued: 4:48 (am/pm)

  
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:

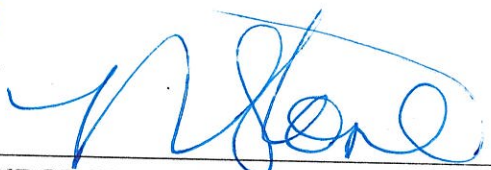
Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **TYLER RANDAL OLSON**: 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 **TYLER RANDAL OLSON**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/3/22

Time Issued: 4:48 (am/pm)

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

Defendant	DOB	CII	DMV	Bail Requested
PEARSON, Michael Stephen	07/05/1977		B3678138	
SANCHEZ JR., Guillermo	12/07/1968		A1876660	
BRAVO JR., Luis Enrique	11/06/1968		C5009560	
SALAZAR, Sammy Santos	04/12/1968		C4453492	
AGUILERA, Agustin	10/20/1974		A9730239	
OLSON, Tyler Randal	05/23/1991		D9359374	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			



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

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

**MICHAEL STEPHEN PEARSON**

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

**GUILLERMO SANCHEZ JR.**

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

**LUIS ENRIQUE BRAVO JR.**

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

1 SAMMY SANTOS SALAZAR

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

9 AGUSTIN AGUILERA

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

17 TYLER RANDAL OLSON

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

25 /////

26 /////

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28 /////

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

3  
4 Michael Stephen Pearson \$ \_\_\_\_\_  
5 Guillermo Sanchez Jr. \$ \_\_\_\_\_  
6 Luis Enrique Bravo Jr. \$ \_\_\_\_\_  
7 Sammy Santos Salazar \$ \_\_\_\_\_  
8 Agustin Aguilera \$ \_\_\_\_\_  
9 Tyler Randal Olson \$ \_\_\_\_\_  
10

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

13  
14 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

15  
16  
17 \_\_\_\_\_  
18 Magistrate Date  
Superior Court of California  
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WARRANT ISSUED

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

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES  
12

13 PEOPLE OF THE STATE OF  
14 CALIFORNIA,

15 Plaintiff,

16 v.  
17

18 (1) LEONARD DUENAS  
(DOB: 01/19/1973)

19 (2) MARIO SENCION  
20 (DOB: 08/15/1979)

21 (3) RUBEN GERARD MARTINEZ  
(DOB: 06/10/1976)

22 (4) SCOTT ALAN SUTTON  
23 (DOB: 04/21/1969)

24 (5) JAMES HOREJS  
(DOB: 12/28/1973)

25 (6) ANTHONY JOSEPH MARTIN SR.  
26 (DOB: 09/12/1966)

27 Defendants.  
28

Case No. BA498282

FELONY COMPLAINT FOR ARREST  
WARRANT

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

3 COUNT 1

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

9 COUNT 2

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

15 COUNT 3

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

21 COUNT 4

22 On or about March 2, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **LEONARD DUENAS**, who did unlawfully and with intent to defraud,  
25 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
26 writing.

27 ////

28 ////

1 COUNT 5

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

7 COUNT 6

8 On or about November 23, 2016, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **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.

13 COUNT 7

14 On or about and between August 23, 2016, through March 22, 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 **MARIO SENCION**, who did unlawfully take money and  
17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Four Thousand One  
18 Hundred Eighty-Six Dollars and Eighty-One Cents (\$4,186.81).

19 COUNT 8

20 On or about March 22, 2018, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant **MARIO SENCION**, who did unlawfully and with intent to defraud,  
23 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
24 writing.

25 COUNT 9

26 On or about February 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

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

3 **COUNT 10**

4 On or about February 1, 2018, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **MARIO SENCION**, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 **COUNT 11**

10 On or about January 25, 2018, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **MARIO SENCION**, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 **COUNT 12**

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

21 **COUNT 13**

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

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1 COUNT 14

2 On or about January 8, 2018, 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 **RUBEN GERARD MARTINEZ**, 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 15

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.

13 COUNT 16

14 On or about April 18, 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 **RUBEN GERARD MARTINEZ**, who did unlawfully and with intent  
17 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
18 and writing.

19 COUNT 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 **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.

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 **RUBEN GERARD MARTINEZ**, who did unlawfully and



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

3 **COUNT 19**

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

9 **COUNT 20**

10 On or about December 19, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **SCOTT ALAN SUTTON**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 **COUNT 21**

16 On or about December 14, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **SCOTT ALAN SUTTON**, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 **COUNT 22**

22 On or about September 14, 2017, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant **SCOTT ALAN SUTTON**, who did unlawfully and with  
25 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
26 voucher and writing.

27 ////

28 ////

1 COUNT 23

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 SECTION 72, a  
4 Felony, was committed by Defendant **SCOTT ALAN SUTTON**, 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 24

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 **SCOTT ALAN SUTTON**, 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 March 3, 2016, through August 31, 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 **JAMES HOREJS**, who did unlawfully take money and  
17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Three Thousand Sixty-  
18 Three Dollars and Twenty- Nine Cents (\$3,063.29).

19 COUNT 26

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 SECTION 72, a  
22 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, account, voucher  
24 and writing.

25 COUNT 27

26 On or about March 28, 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 **JAMES HOREJS**, who did unlawfully and with intent to defraud,

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

3 COUNT 28

4 On or about February 28, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **JAMES HOREJS**, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 COUNT 29

10 On or about November 23, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **JAMES HOREJS**, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 COUNT 30

16 On or about March 3, 2016, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **JAMES HOREJS**, who did unlawfully and with intent to defraud,  
19 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
20 writing.

21 COUNT 31

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

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28 /////

1 **COUNT 32**

2 On or about February 26, 2018, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully  
5 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
6 account, voucher and writing.

7 **COUNT 33**

8 On or about February 8, 2018, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully  
11 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
12 account, voucher and writing.

13 **COUNT 34**

14 On or about January 22, 2018, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully  
17 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
18 account, voucher and writing.

19 **COUNT 35**

20 On or about January 11, 2018, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully  
23 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
24 account, voucher and writing.

25 **COUNT 36**

26 On or about October 17, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **ANTHONY JOSEPH MARTIN SR.**, who did unlawfully

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

3 **SPECIAL ALLEGATION**

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

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

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

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

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

27 /////

28 /////

1 CONCLUSION

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

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

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

9 Respectfully Submitted,

10 ROB BONTA  
11 Attorney General of California

12 

13 PAUL S. THIES  
14 Deputy Attorney General  
15 *Attorneys for People*  
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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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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 **LEONARD DUENAS**: 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 **LEONARD DUENAS**, and to bring said  
Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:14 (am/pm)



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

NATALIE STONE



SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

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

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

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

Dated: 2/4/22

Time Issued: 9:14 (am/pm)

  
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  
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 **RUBEN GERARD 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 **RUBEN GERARD MARTINEZ**, and to bring  
said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,  
and 848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:14 (am/pm)

M Stone  
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:

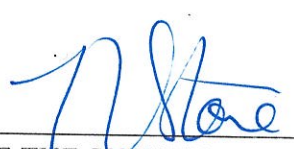
Proof by declaration under penalty of perjury having been made this day to me by  
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
accompanying felony complaint, I find there is probable cause to believe that the following  
crimes have been committed by Defendant **SCOTT ALAN SUTTON**: 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 **SCOTT ALAN SUTTON**, and to bring said  
Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:15 (am/pm)

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

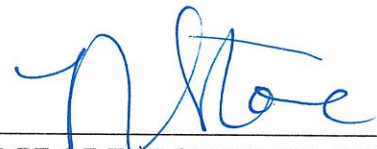
7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed 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-

17  
18 Dated: 2/4/22

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

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

WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **ANTHONY JOSEPH MARTIN SR.**: 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 **ANTHONY JOSEPH MARTIN SR.**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:15 (am/pm)

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

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Defendant	DOB	CII	DMV	Bail Requested
DUENAS, Leonard	01/19/1973		A8653131	
SENCION, Mario	08/15/1979		B7437885	
MARTINEZ, Ruben Gerard	06/10/1976		B3979067	
SUTTON, Scott Alan	04/21/1969		B3558003	
HOREJS, James	12/28/1973		B5906071	
MARTIN SR., Anthony Joseph	09/12/1966		C5010332	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

5 **LEONARD DUENAS**

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

13 **MARIO SENCION**

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

21 **RUBEN GERARD MARTINEZ**

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

1 **SCOTT ALAN SUTTON**

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

9 **JAMES HOREJS**

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

17 **ANTHONY JOSPEH MARTIN JR.**

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

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

3  
4 Leonard Duenas \$ \_\_\_\_\_  
5 Mario Sencion \$ \_\_\_\_\_  
6 Ruben Gerard Martinez \$ \_\_\_\_\_  
7 Scott Alan Sutton \$ \_\_\_\_\_  
8 James Horejs \$ \_\_\_\_\_  
9 Anthony Joseph Martin Jr. \$ \_\_\_\_\_  
10

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

13 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
14 (Date)

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17 \_\_\_\_\_  
18 Magistrate Date  
19 Superior Court of California  
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WARRANT ISSUED

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

2012 FEB -3 PM 2:04

PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

v.

(1) DONALD RODRICK GRIMES NELSON  
(DOB: 07/13/1979)

(2) FLAVIO NAVAR  
(DOB: 12/01/1978)

(3) THOMAS SANTIAGO  
(DOB: 10/01/1970)

(4) PAUL LUKE MARTINEZ  
(DOB: 04/28/1966)

(5) ROBERTO CESAR FLORES  
(DOB: 10/09/1976)

(6) WILLIAM LINDSEY GODMAN  
(DOB: 10/31/1981)

Defendants.

Case No. BA498283

FELONY COMPLAINT FOR ARREST  
WARRANT

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

3 COUNT 1

4 On or about and between February 5, 2017, through March 4, 2018, in the County of Los  
5 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
6 Felony, was committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did  
7 unlawfully take money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to  
8 wit Two Thousand Seven Hundred Forty-Six Dollars and Seventy-Two Cents (\$2,746.72).

9 COUNT 2

10 On or about October 15, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did  
13 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
14 claim, bill, account, voucher and writing.

15 COUNT 3

16 On or about September 23, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did  
19 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
20 claim, bill, account, voucher and writing.

21 COUNT 4

22 On or about June 11, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did unlawfully and  
25 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
26 account, voucher and writing.

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1 COUNT 5

2 On or about March 12, 2017, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did unlawfully and  
5 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
6 account, voucher and writing.

7 COUNT 6

8 On or about February 5, 2017, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **DONALD RODRICK GRIMES NELSON**, who did  
11 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent  
12 claim, bill, account, voucher and writing.

13 COUNT 7

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

19 COUNT 8

20 On or about November 30, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **FLAVIO NAVAR**, who did unlawfully and with intent to  
23 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
24 and writing.

25 COUNT 9

26 On or about November 21, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **FLAVIO NAVAR**, who did unlawfully and with intent to

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

3 COUNT 10

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

9 COUNT 11

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

15 COUNT 12

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

21 COUNT 13

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

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1 COUNT 14

2 On or about September 11, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **THOMAS SANTIAGO**, who did unlawfully and with  
5 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
6 voucher and writing.

7 COUNT 15

8 On or about May 24, 2017, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant **THOMAS SANTIAGO**, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 16

14 On or about February 28, 2017, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant **THOMAS SANTIAGO**, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 COUNT 17

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

25 COUNT 18

26 On or about November 23, 2016, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **THOMAS SANTIAGO**, who did unlawfully and with

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

3 COUNT 19

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

9 COUNT 20

10 On or about December 19, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **PAUL LUKE MARTINEZ**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 COUNT 21

16 On or about August 31, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **PAUL LUKE MARTINEZ**, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 COUNT 22

22 On or about March 30, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **PAUL LUKE MARTINEZ**, who did unlawfully and with intent to  
25 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
26 and writing.

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1 COUNT 23

2 On or about March 15, 2017, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant PAUL LUKE MARTINEZ, who did unlawfully and with intent to  
5 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 COUNT 24

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

13 COUNT 25

14 On or about and between October 6, 2016, through February 16, 2018, in the County of Los  
15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
16 Felony, was committed by Defendant ROBERTO CESAR FLORES, who did unlawfully take  
17 money and property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Two  
18 Thousand Three Hundred Thirty-Nine Dollars and Fifty-Six Cents (\$2,339.56).

19 COUNT 26

20 On or about January 25, 2018, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant ROBERTO CESAR FLORES, who did unlawfully and  
23 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
24 account, voucher and writing.

25 COUNT 27

26 On or about February 16, 2017, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant ROBERTO CESAR FLORES, who did unlawfully and



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

3 COUNT 28

4 On or about November 23, 2016, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **ROBERTO CESAR FLORES**, who did unlawfully and  
7 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill.  
8 account, voucher and writing.

9 COUNT 29

10 On or about October 20, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **ROBERTO CESAR FLORES**, who did unlawfully and  
13 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill.  
14 account, voucher and writing.

15 COUNT 30

16 On or about October 6, 2016, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **ROBERTO CESAR FLORES**, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 COUNT 31

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

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1 COUNT 32

2 On or about October 3, 2017, in the County of Los Angeles, the crime of PRESENTATION  
3 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
4 committed by Defendant **WILLIAM LINDSEY GODMAN**, who did unlawfully and with intent  
5 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 COUNT 33

8 On or about July 19, 2017, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant **WILLIAM LINDSEY GODMAN**, who did unlawfully and with intent  
11 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 34

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

19 COUNT 35

20 On or about February 7, 2017, in the County of Los Angeles, the crime of  
21 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
22 Felony, was committed by Defendant **WILLIAM LINDSEY GODMAN**, who did unlawfully  
23 and with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
24 account, voucher and writing.

25 COUNT 36

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

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

3 **SPECIAL ALLEGATION**

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

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

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

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

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

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CONCLUSION

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

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

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

Respectfully Submitted,

ROB BONTA  
Attorney General of California



PAUL S. THIES  
Deputy Attorney General  
*Attorneys for People*

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**NOTICE TO DEFENDANTS AND ATTORNEYS**

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

**NOTICE TO ATTORNEYS**

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

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

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

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

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

18  
19 Dated: 2/4/22

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



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

NATALIE STONE

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

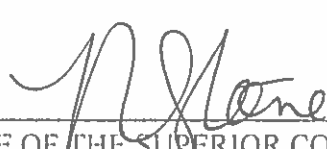
7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed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

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

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

17  
18 Dated: 2/4/22

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

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

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

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

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

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

18  
19 Dated: 2/4/22

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

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

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

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

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

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

18  
19 Dated: 2/4/22

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

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

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

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

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

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

18  
19 Dated: 2/4/22

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

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

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST

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

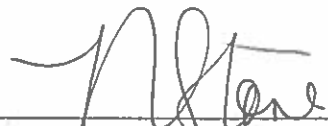
7  
8 Proof by declaration under penalty of perjury having been made this day to me by  
9 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
10 accompanying felony complaint, I find there is probable cause to believe that the following  
11 crimes have been committed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

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

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

18  
19 Dated: 2/4/22

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

21  
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23 JUDGE OF THE SUPERIOR COURT  
24 State of California, County of Los Angeles  
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Defendant	DOB	CII	DMV	Bail Requested
NELSON, Donald Rodrick Grimes	07/13/1979		D2674653	
NAVAR, Flavio	12/01/1978		B9659272	
SANTIAGO, Thomas	10/01/1970		A5814106	
MARTINEZ, Paul Luke	04/28/1966		C4777734	
FLORES, Roberto Cesar	10/09/1976		A8363764	
GODMAN, William Lindsey	10/31/1981		B8348836	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

5 **DONALD RODRICK GRIMES NELSON**

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

13 **FLAVIO NAVAR**

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

21 **THOMAS SANTIAGO**

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

1 PAUL LUKE MARTINEZ

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

9 ROBERTO CESAR FLORES

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

17 WILLIAM LINDSEY GODMAN

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

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

3  
4 Donald Rodrick Grimes Nelson \$ \_\_\_\_\_  
5 Flavio Navar \$ \_\_\_\_\_  
6 Thomas Santiago \$ \_\_\_\_\_  
7 Paul Luke Martinez \$ \_\_\_\_\_  
8 Roberto Cesar Flores \$ \_\_\_\_\_  
9 William Lindsey Godman \$ \_\_\_\_\_  
10

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

12 The date of Felony arraignment is set for:

13 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
14 (Date)

15  
16  
17 \_\_\_\_\_  
18 Magistrate Date  
19 Superior Court of California  
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1 ROB BONTA  
Attorney General of California  
2 LANCE WINTERS  
Chief Assistant Attorney General  
3 JOHNETTE JAURON  
Senior Assistant Attorney General  
4 PAUL S. THIES  
Deputy Attorney General  
5 State Bar No. 305084  
300 South Spring Street, Suite 1702  
6 Los Angeles, CA 90013  
Telephone: (213) 269-6070  
7 Cell: (213) 269-2148  
E-mail: Paul.Thies@doj.ca.gov  
8 *Attorneys for the People of the State of California*

2022 FEB -3 PM 2:20  
ck

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

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

Case No. BA498284

14 Plaintiff,

15 v.

**FELONY COMPLAINT FOR ARREST  
WARRANT**

16 (1) **THOMAS MORENO IV**  
(DOB: 03/15/1976)

17 (2) **TAREK GRAVES**  
(DOB: 01/28/1977)

18 (3) **JUAN CARLOS ULLOA**  
19 (DOB: 04/02/1981)

20 (4) **MARIO BRISENO II**  
(DOB: 07/31/1985)

21 (5) **RALPH PATRICK GOMEZ**  
22 (DOB: 12/28/1962)

23 (6) **URIEL GOMEZ**  
24 (DOB: 10/03/1987)

25 (7) **RAMON MACIEL MORAN**  
(DOB: 10/04/1977)

26 (8) **VINCENT BARRERA**  
27 (DOB: 10/05/1961)

28 Defendants.



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

3 COUNT 1

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

9 COUNT 2

10 On or about December 18, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **THOMAS MORENO IV**, who did unlawfully and with  
13 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
14 voucher and writing.

15 COUNT 3

16 On or about November 29, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **THOMAS MORENO IV**, who did unlawfully and with  
19 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
20 voucher and writing.

21 COUNT 4

22 On or about June 29, 2017, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **THOMAS MORENO IV**, who did unlawfully and with intent to  
25 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
26 and writing.

27 /////

28 /////

1 COUNT 5

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

7 COUNT 6

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

13 COUNT 7

14 On or about and between October 29, 2017, through March 19, 2018, in the County of Los  
15 Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
16 Felony, was committed by Defendant **TAREK GRAVES**, who did unlawfully take money and  
17 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit One Thousand Six  
18 Hundred Seventy-Eight Dollars and Eighty Cents (\$1,678.80).

19 COUNT 8

20 On or about March 19, 2018, in the County of Los Angeles, the crime of PRESENTATION  
21 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
22 committed by Defendant **TAREK GRAVES**, who did unlawfully and with intent to defraud,  
23 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
24 writing.

25 COUNT 9

26 On or about February 15, 2018, in the County of Los Angeles, the crime of  
27 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
28 Felony, was committed by Defendant **TAREK GRAVES**, who did unlawfully and with intent to

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

3 COUNT 10

4 On or about January 18, 2018, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **TAREK GRAVES**, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 COUNT 11

10 On or about January 11, 2018, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **TAREK GRAVES**, who did unlawfully and with intent to  
13 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
14 and writing.

15 COUNT 12

16 On or about November 30, 2017, in the County of Los Angeles, the crime of  
17 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
18 Felony, was committed by Defendant **TAREK GRAVES**, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 COUNT 13

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

27 /////

28 /////

1 COUNT 14

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

7 COUNT 15

8 On or about October 2, 2017, in the County of Los Angeles, the crime of PRESENTATION  
9 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
10 committed by Defendant JUAN CARLOS ULLOA, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 16

14 On or about September 25, 2017, in the County of Los Angeles, the crime of  
15 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
16 Felony, was committed by Defendant JUAN CARLOS ULLOA, who did unlawfully and with  
17 intent to defraud, present for allowance and payment a false and fraudulent claim, bill, account,  
18 voucher and writing.

19 COUNT 17

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

25 COUNT 18

26 On or about July 23, 2017, in the County of Los Angeles, the crime of PRESENTATION  
27 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
28 committed by Defendant JUAN CARLOS ULLOA, who did unlawfully and with intent to

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

3 COUNT 19

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

9 COUNT 20

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

15 COUNT 21

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

21 COUNT 22

22 On or about September 8, 2016, in the County of Los Angeles, the crime of  
23 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
24 Felony, was committed by Defendant **MARIO BRISENO II**, who did unlawfully and with intent  
25 to defraud, present for allowance and payment a false and fraudulent claim, bill, account. voucher  
26 and writing.

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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  
5 to defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
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

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

3 **COUNT 28**

4 On or about May 10, 2017, in the County of Los Angeles, the crime of PRESENTATION  
5 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
6 committed by Defendant **RALPH PATRICK GOMEZ**, who did unlawfully and with intent to  
7 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
8 and writing.

9 **COUNT 29**

10 On or about November 23, 2016, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **RALPH PATRICK GOMEZ**, who did unlawfully and  
13 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 **COUNT 30**

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

21 **COUNT 31**

22 On or about January 4, 2018, in the County of Los Angeles, the crime of PRESENTATION  
23 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
24 committed by Defendant **URIEL GOMEZ**, who did unlawfully and with intent to defraud,  
25 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
26 writing.

27 /////

28 /////

1 COUNT 32

2 On or about November 20, 2017, in the County of Los Angeles, the crime of  
3 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
4 Felony, was committed by Defendant **URIEL GOMEZ**, who did unlawfully and with intent to  
5 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
6 and writing.

7 COUNT 33

8 On or about August 18, 2017, in the County of Los Angeles, the crime of  
9 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
10 Felony, was committed by Defendant **URIEL GOMEZ**, who did unlawfully and with intent to  
11 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
12 and writing.

13 COUNT 34

14 On or about March 7, 2017, in the County of Los Angeles, the crime of PRESENTATION  
15 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
16 committed by Defendant **URIEL GOMEZ**, who did unlawfully and with intent to defraud,  
17 present for allowance and payment a false and fraudulent claim, bill, account, voucher and  
18 writing.

19 COUNT 35

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

25 COUNT 36

26 On or about and between February 22, 2017, through December 20, 2017, in the County of  
27 Los Angeles, the crime of GRAND THEFT in violation of PENAL CODE SECTION 487(a), a  
28 Felony, was committed by Defendant **RAMON MACIEL MORAN**, who did unlawfully take



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

3 **COUNT 37**

4 On or about November 1, 2017, in the County of Los Angeles, the crime of  
5 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
6 Felony, was committed by Defendant **RAMON MACIEL MORAN**, who did unlawfully and  
7 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
8 account, voucher and writing.

9 **COUNT 38**

10 On or about August 15, 2017, in the County of Los Angeles, the crime of  
11 PRESENTATION OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a  
12 Felony, was committed by Defendant **RAMON MACIEL MORAN**, who did unlawfully and  
13 with intent to defraud, present for allowance and payment a false and fraudulent claim, bill,  
14 account, voucher and writing.

15 **COUNT 39**

16 On or about March 24, 2017, in the County of Los Angeles, the crime of PRESENTATION  
17 OF FRAUDULENT CLAIM in violation of PENAL CODE SECTION 72, a Felony, was  
18 committed by Defendant **RAMON MACIEL MORAN**, who did unlawfully and with intent to  
19 defraud, present for allowance and payment a false and fraudulent claim, bill, account, voucher  
20 and writing.

21 **COUNT 40**

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

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1 **SPECIAL ALLEGATION**

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

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

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

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

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

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

Respectfully Submitted,

ROB BONTA  
Attorney General of California



PAUL S. THIES  
Deputy Attorney General  
*Attorneys for People*

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."

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 **THOMAS MORENO IV**: 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 **THOMAS MORENO IV**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:16 (am/pm)



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

**NATALIE STONE**

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

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

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

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

Dated: 2/4/22

Time Issued: 9:16 (am/pm)

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

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 **JUAN CARLOS ULLOA**: 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 **JUAN CARLOS ULLOA**, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

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

Dated: 2/4/22

Time Issued: 9:17 (am/pm)

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



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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

WARRANT OF ARREST

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


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

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

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

Dated: 2/4/22

Time Issued: 9:16 (am/pm)

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

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

WARRANT OF ARREST

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


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

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

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

Dated: 2/4/22

Time Issued: 9:16 (am/pm)

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

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

WARRANT OF ARREST

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

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

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

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

Dated: 2/4/20

Time Issued: 9:16 (am/pm)

  
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  
Lieutenant Tannon Brown of the California Highway Patrol, and as described in the  
accompanying felony complaint, I find there is probable cause to believe that the following  
crimes have been committed by Defendant **RAMON MACIEL MORAN**: Grand Theft in  
violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal  
Code section 72.

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

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

Dated: 2/4/22

Time Issued: 9:17 (am/pm)

  
\_\_\_\_\_  
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 Lieutenant Tannon Brown of the California Highway Patrol, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant **VINCENT BARRERA**: Grand Theft in violation of Penal Code section 487(a), and Presentation of False Claims in violation of Penal Code section 72.

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

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

Dated: 2/4/22

Time Issued: 9:18 (am/pm)



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

Defendant	DOB	CII	DMV	Bail Requested
MORENO IV, Thomas	03/15/1976		A9997108	
GRAVES, Tarek	01/28/1977		D4429821	
ULLOA, Juan Carlos	04/02/1981		B9386994	
BRISENO II, Mario	07/31/1985		D3726985	
GOMEZ, Ralph Patrick	12/28/1962		N9844481	
GOMEZ, Uriel	10/03/1987		D8093652	
MORAN, Ramon Maciel	10/04/1977		B4843068	
BARRERA, Vincent	10/05/1961		N8785708	
Investigating Agency	CHP			
Investigating Officer	Lt. Tannon Brown			
Phone No.	(714) 288-6336			
Prelim Estimate	1 day			

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

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

**THOMAS MORENO IV**

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

**TAREK GRAVES**

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

**JUAN CARLOS ULLOA**

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

1 MARIO BRISENO II

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

9 RALPH PATRICK GOMEZ

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

16 URIEL GOMEZ

17	<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
18	30	PC 487(a)	16-2-3		
19	31	PC 72	16-2-3		
20	32	PC 72	16-2-3		
21	33	PC 72	16-2-3		
22	34	PC 72	16-2-3		
23	35	PC 72	16-2-3		

24 RAMON MACIEL MORAN

25	<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
26	36	PC 487(a)	16-2-3		
27	37	PC 72	16-2-3		
28	38	PC 72	16-2-3		



1 39 PC 72 16-2-3  
2 40 PC 72 16-2-3  
3 41 PC 72 16-2-3

4 **VINCENT BARRERA**

5 Ct. Charge Charge Range Allegation Alleg. Effect  
6 42 PC 72 16-2-3  
7

8 I ORDER that the defendants named below be held to answer for the above-described  
9 offenses and allegations and be admitted to bail in the sum of:  
10

11 Thomas Moreno IV \$ \_\_\_\_\_  
12 Tarek Graves \$ \_\_\_\_\_  
13 Juan Carlos Ulloa \$ \_\_\_\_\_  
14 Mario Briseno II \$ \_\_\_\_\_  
15 Ralph Patrick Gomez \$ \_\_\_\_\_  
16 Uriel Gomez \$ \_\_\_\_\_  
17 Ramon Maciel Moran \$ \_\_\_\_\_  
18 Vincent Barrera \$ \_\_\_\_\_  
19

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

21 The date of Felony arraignment is set for:

22 \_\_\_\_\_  
23 \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
24 (Date)

25 \_\_\_\_\_  
26 Magistrate \_\_\_\_\_ Date \_\_\_\_\_  
27 Superior Court of California  
28