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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SACRAMENTO

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

Case No.

16 Plaintiff,

17 v.

FELONY COMPLAINT

18 **BRANDY IGLESIAS,**
19 (DOB [REDACTED])
20 X-ref# [REDACTED]

Defendant.

21 The Attorney General of the State of California hereby accuses BRANDY IGLESIAS of
22 the following criminal offenses:

23 **COUNT ONE**

24 **(OFFERING A FALSE STATEMENT TO OBTAIN UNEMPLOYMENT INSURANCE**
25 **BENEFITS)**

26 On or about April 7, 2020, in the County of Sacramento, the crime of OFFERING A
27 FALSE STATEMENT, REPRESENTATION OR CONCEALMENT TO OBTAIN
28 UNEMPLOYMENT INSURANCE BENEFITS, in violation of Unemployment Insurance Code

1 section 2101(a), a felony, was committed by BRANDY IGLESIAS, who did knowingly make a
2 false statement or representation, or fail to disclose a material fact, when making an application
3 for unemployment benefits filed with the Employment Development Department of the State of
4 California in the name of Brandy Iglesias.

5
6 **COUNT TWO**

7 **(GRAND THEFT BY FALSE PRETENSES)**

8 On or about the period of April 28, 2020 through September 15, 2021, in the County of
9 Sacramento, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony,
10 was committed by BRANDY IGLESIAS, who knowingly and designedly, by a false and
11 fraudulent representation and pretense, obtained money, real and personal property by fraud,
12 which had a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Unemployment
13 Insurance benefits in the amount of \$51,750.

14
15 **COUNT THREE**

16 **(OFFERING A FALSE STATEMENT TO OBTAIN UNEMPLOYMENT INSURANCE**
17 **BENEFITS)**

18 On or about June 16, 2020, in the County of Sacramento, the crime of OFFERING A
19 FALSE STATEMENT, REPRESENTATION OR CONCEALMENT TO OBTAIN
20 UNEMPLOYMENT INSURANCE BENEFITS, in violation of Unemployment Insurance Code
21 section 2101(a), a felony, was committed by BRANDY IGLESIAS, who did knowingly make a
22 false statement or representation, or fail to disclose a material fact, when making an application
23 for unemployment benefits filed with the Employment Development Department of the State of
24 California in the name of Scott Peterson.

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COUNT FOUR

(FORGERY)

On or about June 16, 2020, in the County of Sacramento, the crime of FORGERY, in violation of Penal Code section 470(a), a felony, was committed by BRANDY IGLESIAS, who knowingly and with intent to defraud, falsely signed the name of another person to a contract for money submitted under penalty of perjury, to wit: application for unemployment benefits filed with the Employment Development Department of the State of California in the name of Scott Peterson.

COUNT FIVE

(UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION)

On or about June 16, 2020, in the County of Sacramento, the crime of UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, in violation of Penal Code section 530.5(a), a felony, was committed by BRANDY IGLESIAS, who willfully obtained the personal identifying information of another person and used that information for an unlawful purpose, to wit: fraudulently obtaining unemployment benefits from the Employment Development Department of the State of California, using the name of Scott Peterson.

COUNT SIX

(GRAND THEFT BY FALSE PRETENSES)

On or about the period of June 18, 2020 through January 7, 2020, in the County of Sacramento, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by BRANDY IGLESIAS, who knowingly and designedly, by a false and fraudulent representation and pretense, obtained money, real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Unemployment Insurance benefits intended for Scott Peterson in the amount of \$18,562.

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COUNT SEVEN

(OFFERING A FALSE STATEMENT TO OBTAIN UNEMPLOYMENT INSURANCE BENEFITS)

On or about July 21, 2020, in the County of Sacramento, the crime of OFFERING A FALSE STATEMENT, REPRESENTATION OR CONCEALMENT TO OBTAIN UNEMPLOYMENT INSURANCE BENEFITS, in violation of Unemployment Insurance Code section 2101(a), a felony, was committed by BRANDY IGLESIAS, who did knowingly make a false statement or representation, or fail to disclose a material fact, when making an application for unemployment benefits filed with the Employment Development Department of the State of California in the name of Cary Stayner.

COUNT EIGHT

(FORGERY)

On or about July 21, 2020, in the County of Sacramento, the crime of FORGERY, in violation of Penal Code section 470(a), a felony, was committed by BRANDY IGLESIAS, who knowingly and with intent to defraud, falsely signed the name of another person to a contract for money submitted under penalty of perjury, to wit: application for unemployment benefits filed with the Employment Development Department of the State of California in the name of Cary Stayner.

COUNT NINE

(UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION)

On or about July 21, 2020, in the County of Sacramento, the crime of UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, in violation of Penal Code section 530.5(a), a felony, was committed by BRANDY IGLESIAS, who willfully obtained the personal identifying information of another person and used that information for an unlawful purpose, to wit: fraudulently obtaining unemployment benefits from the Employment Development Department of the State of California, using the name of Cary Stayner.

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COUNT TEN

(GRAND THEFT BY FALSE PRETENSES)

On or about the period of September 11, 2020 through November 16, 2020, in the County of Sacramento, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by BRANDY IGLESIAS, who knowingly and designedly, by a false and fraudulent representation and pretense, obtained money, real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Unemployment Insurance benefits intended for Cary Stayner in the amount of \$20,194.

ALLEGATIONS

IT IS FURTHER ALLEGED, as to COUNT ONE through COUNT TEN, that pursuant to Penal Code Sections 1170.12(a) through 1170.12(d) and 667(b) through 667(i), the said defendant, Brandy Iglesias, has suffered the following prior conviction of a serious or violent felony: Penal Code section 212.5, Robbery in the First Degree, on October 5, 2005, in the County of Contra Costa.

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

DECLARATION

I verify under information and belief, pursuant to Penal Code section 806, that the forgoing is true and correct.

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Dated: August 11, 2022

Respectfully Submitted,

ROB BONTA
Attorney General of California

JAMES ROOT
Senior Assistant Attorney General

RANDY MAILMAN
Supervising Deputy Attorney General

MYLES CAMPBELL
Deputy Attorney General

Margaret Pettigrew
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