1 2 3 4 5 6 7 8	ROB BONTA Attorney General of California THOMAS BRENNAN Supervising Deputy Attorney General ED GRUBAUGH Deputy Attorney General State Bar No. 280220 Division of Medi-Cal Fraud and Elder Abuse 2329 Gateway Oaks Dr., Suite 200 Sacramento, CA 95833-4252 Telephone: (916) 621-1833 Fax: (916) 274-2929 E-mail: Ed.Grubaugh@doj.ca.gov Attorneys for the People of the State of California	Electronically Filed Superior Court of California County of Santa Cruz January 28, 2025 Clerk of the Court by Deput Hong, Betty
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
10	COUNTY OF SANTA CRUZ	
11		
12	THE PEOPLE OF THE STATE OF	Case No. 25CR00310
13	CALIFORNIA,	FELONY COMPLAINT
14	Plaintiff,	AG Case Nos. SF2023301477,
15	v.	SF2024305620
16	Candie Gomez Rogers,	P6
17	Librada Gomez Najera,	
18	Defendants.	
19		
20	The People of the State of California hereby allege that in the County of Santa Cruz, State	
21	of California, before the making of this criminal complaint, the above-named defendants,	
22	CANDIE GOMEZ ROGERS (DOB and LIBRADA GOMEZ NAJERA (DOB ,	
23	committed the following criminal offense:	
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25	111	
26	///	
27	///	`
28	///	
	1 FELONY COMPLAINT (SF2023301477, SF2024305620)	
I	FELON I COMPLAIN I (SP2023301477, SP2024303020)	

COUNT 1 Penal Code § 368(b)(1) – Felony Elder Neglect 2, 3, or 4 years

On or about or between November 13, 2022, and November 14, 2022, in the County of Santa Cruz, and elsewhere, defendants CANDIE GOMEZ ROGERS and LIBRADA GOMEZ NAJERA did, under circumstances and conditions likely to produce great bodily harm and death, knowingly and willfully cause and permit the victim, ANDREW HEGARTY, an elder and dependent adult, to suffer, or, having the care and custody of said victim, willfully caused and permitted him to be placed in a situation in which his health was endangered, and knew and reasonably should have known that said person, ANDREW HEGARTY, was an elder and dependent adult, in violation of section 368, subdivision (b)(1) of the Health and Safety Code, a felony.

It is further alleged, pursuant to section 368(b)(3)(B), that the defendants proximately caused the death of said victim, age 88 years.

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SPECIAL ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION Penal Code § 1170(b)(2) As to Count 1, it is further alleged pursuant to section 1170, subdivision (b)(2) of the Penal

As to Count 1, it is further alleged pursuant to section 1170, subdivision (b)(2) of the Penal Code that the following circumstances in aggravation as defined in section 4.421 of the California Rules of Court apply and justify the imposition of the upper term of imprisonment for defendants CANDIE GOMEZ ROGERS and LIBRADA GOMEZ NAJERA:

- (a)(1) The crime involved . . . acts disclosing a high degree of . . . callousness;
- (a)(3) The victim was particularly vulnerable.

I declare under penalty of perjury, on information and belief, pursuant to the laws of the State of California, that the foregoing is true and correct.

Dated: January 24, 2025

Respectfully Submitted,

ROB BONTA Attorney General of California

Ed Grubaugh Grubaugh Date: 2025.01.24 15:00:41

ED GRUBAUGH
Deputy Attorney General
Attorneys for the People of the State of
California