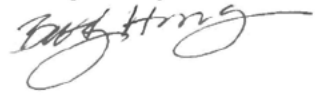


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County of Santa Cruz
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Hong, Betty



9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SANTA CRUZ

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

14 Plaintiff,

15 v.

16 **Candie Gomez Rogers,**
17 **Librada Gomez Najera,**

18 Defendants.

Case No. 25CR00310

FELONY COMPLAINT

AG Case Nos. SF2023301477,
SF2024305620

DB

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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 [REDACTED]) and LIBRADA GOMEZ NAJERA (DOB [REDACTED]),
23 committed the following criminal offense:

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

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

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

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