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

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

14 **Plaintiff,**

15 **v.**

16 **DON AZUL, AKA DON AZUL**
17 **BARRAMEDA (DOB: [REDACTED])**

18 **Defendant.**

Case No. *NA120260*

**FELONY COMPLAINT FOR ARREST
WARRANT**

Special Allegations:

PC § 186.11(a)(3): White Collar Crime
Enhancement (Loss > \$100,000)

PC § 186.11(a)(2): White Collar Crime
Enhancement (Loss > \$500,000)

PC § 1203.045(a): Probation Limitation
(Theft > \$100,000)

PC § 1170(b)—Rules of Court 4.421(a)(8),
(9), (11)

22 The Attorney General of the State of California accuses the above-named defendant of the
23 following offenses, which are connected to one another in their commission:

24 Count 1
25 **GRAND THEFT**
PENAL CODE §487

26 On or between August 7, 2018, and February 22, 2022, at and in the County of Los
27 Angeles, the crime of GRAND THEFT, in violation of PENAL CODE §487(a), a felony, was
28 committed by DON AZUL, who did unlawfully steal, take, carry, lead and drive away money and
personal property of a value exceeding nine hundred and fifty dollars (\$950), from another, to

1 wit: money for tuition owed by [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]
2 and [REDACTED] in the amount of \$288,827.00, from another, to wit: REGENTS OF THE
3 UNIVERSITY OF CALIFORNIA.

4
5 Count 2
6 GRAND THEFT
7 PENAL CODE §487

8 On or between October 2, 2018, and February 11, 2022, at and in the County of Los
9 Angeles, the crime of GRAND THEFT, in violation of PENAL CODE §487(a), a felony, was
10 committed by DON AZUL, who did unlawfully steal, take, carry, lead and drive away money and
11 personal property of a value exceeding nine hundred and fifty dollars (\$950), to wit: money for
12 tuition owed by [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]
13 [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]
14 [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]
15 [REDACTED] and [REDACTED] in the amount of \$216,969.00, from another, to wit: CALIFORNIA
16 STATE UNIVERSITY OFFICE OF THE CHANCELLOR.

17
18 Count 3
19 GRAND THEFT
20 PENAL CODE §487

21 On or between October 1, 2018, and July 8, 2019, at and in the County of Los Angeles, the
22 crime of GRAND THEFT, in violation of PENAL CODE §487(a), a felony, was committed by
23 DON AZUL, who did unlawfully steal, take, carry, lead and drive away money and personal
24 property of a value exceeding nine hundred and fifty dollars (\$950), to wit: money, in the amount
25 of \$1,017.65, the property of [REDACTED]

26
27 Count 4
28 GRAND THEFT
PENAL CODE §487

On or between August 8, 2019, and August 14, 2019, at and in the County of Los Angeles,
the crime of GRAND THEFT, in violation of PENAL CODE §487(a), a felony, was committed
by DON AZUL, who did unlawfully steal, take, carry, lead and drive away money and personal
property of a value exceeding nine hundred and fifty dollars (\$950), to wit: money, in the amount
of \$1,260, the property of [REDACTED] and [REDACTED]

Count 5
GRAND THEFT
PENAL CODE §487

On or between September 28, 2018, and July 26, 2019, in the County of Los Angeles, the
crime of GRAND THEFT, in violation of PENAL CODE §487(a), a felony, was committed by
DON AZUL, who did unlawfully steal, take, carry, lead and drive away money and personal

1 property of a value exceeding nine hundred and fifty dollars (\$950), to wit: money, in the amount
2 of \$1,020, the property of [REDACTED] and [REDACTED]

3
4 Count 6
GRAND THEFT
PENAL CODE §487

5 On or around July 23, 2021, at and in the County of Los Angeles, the crime of GRAND
6 THEFT, in violation of PENAL CODE §487(a), a felony, was committed by DON AZUL, who
7 did unlawfully steal, take, carry, lead and drive away money and personal property of a value
8 exceeding nine hundred and fifty dollars (\$950), to wit: money, in the amount of \$1,040, the
property of [REDACTED] and [REDACTED]

9
10 Count 7
GRAND THEFT
PENAL CODE §487

11 On or around March 25, 2021, at and in the County of Los Angeles, the crime of GRAND
12 THEFT, in violation of PENAL CODE §487(a), a felony, was committed by DON AZUL, who
13 did unlawfully steal, take, carry, lead and drive away money and personal property of a value
14 exceeding nine hundred and fifty dollars (\$950), to wit: money, in the amount of \$1,040, the
property of [REDACTED]

15
16 Count 8
FORGERY
PENAL CODE §470(d)

17 On or between September 16, 2018, and July 10, 2019, at and in the County of Los
18 Angeles, the crime of forgery by passing or attempting to use a forged document, a felony, in
19 violation of PENAL CODE §470(d), was committed by DON AZUL, who with the intent to
defraud, falsely uttered, published, passed and attempted or offered to pass as true and genuine, a
20 document with the power to receive money, to wit: California Department of Veterans Affairs
College Fee Waiver Program for Veteran Dependents Application for [REDACTED] knowing the
21 same to be false, altered, forged, or counterfeited.

22
23 Count 9
FORGERY
PENAL CODE §470(d)

24 On or between September 27, 2018, and July 8, 2019, at and in the County of Los Angeles,
25 the crime of forgery by passing or attempting to use a forged document, a felony, in violation of
26 PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
27 uttered, published, passed and attempted or offered to pass as true and genuine, a document with
the power to receive money, to wit: California Department of Veterans Affairs College Fee
28

1 Waiver Program for Veteran Dependents Applications, for [REDACTED] knowing the same to be
2 false, altered, forged, or counterfeited.

3
4 Count 10
FORGERY
PENAL CODE §470(d)

5 On or between July 30, 2019, and August 13, 2019, at and in the County of Los Angeles,
6 the crime of forgery by passing or attempting to use a forged document, a felony, in violation of
7 PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
8 uttered, published, passed and attempted or offered to pass as true and genuine, a document with
9 the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to be
false, altered, forged, or counterfeited.

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11 Count 11
FORGERY
PENAL CODE §470(d)

12 On or between July 9, 2019, and July 11, 2019, at and in the County of Los Angeles, the
13 crime of forgery by passing or attempting to use a forged document, a felony, in violation of
14 PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
15 uttered, published, passed and attempted or offered to pass as true and genuine, a document with
16 the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to be
false, altered, forged, or counterfeited.

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18 Count 12
FORGERY
PENAL CODE §470(d)

19 On or between July 23, 2019, and July 25, 2019, at and in the County of Los Angeles, the
20 crime of forgery by passing or attempting to use a forged document, a felony, in violation of
21 PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
22 uttered, published, passed and attempted or offered to pass as true and genuine, a document with
23 the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to be
false, altered, forged, or counterfeited.

24
25 Count 13
FORGERY
PENAL CODE §470(d)

26 On or between July 15, 2019, and July 16, 2019, at and in the County of Los Angeles, the
27 crime of forgery by passing or attempting to use a forged document, a felony, in violation of
28

1 PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
2 uttered, published, passed and attempted or offered to pass as true and genuine, a document with
3 the power to receive money, to wit: California Department of Veterans Affairs College Fee
4 Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to be
5 false, altered, forged, or counterfeited.

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Count 14
FORGERY
PENAL CODE §470(d)

On or between July 30, 2019, and August 13, 2019, at and in the County of Los Angeles,
the crime of forgery by passing or attempting to use a forged document, a felony, in violation of
PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
uttered, published, passed and attempted or offered to pass as true and genuine, a document with
the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to
be false, altered, forged, or counterfeited.

Count 15
FORGERY
PENAL CODE §470(d)

On or between August 3, 2019, and August 7, 2019, at and in the County of Los Angeles,
the crime of forgery by passing or attempting to use a forged document, a felony, in violation of
PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
uttered, published, passed and attempted or offered to pass as true and genuine, a document with
the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Applications, for [REDACTED] and [REDACTED]
knowing the same to be false, altered, forged, or counterfeited.

Count 16
FORGERY
PENAL CODE §470(d)

On or between August 3, 2019, and August 7, 2019, at and in the County of Los Angeles,
the crime of forgery by passing or attempting to use a forged document, a felony, in violation of
PENAL CODE §470(d), was committed by DON AZUL, who with the intent to defraud, falsely
uttered, published, passed and attempted or offered to pass as true and genuine, a document with
the power to receive money, to wit: California Department of Veterans Affairs College Fee
Waiver Program for Veteran Dependents Application, for [REDACTED] knowing the same to be
false, altered, forged, or counterfeited.

Count 17
FORGERY
PENAL CODE §472

1 On or between September 16, 2018, and July 10, 2019, at and in the County of Los
2 Angeles, the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472,
3 was committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a
4 government seal and seal of a legally authorized public officer, to wit: Department of Veterans
Affairs Entitlement Benefits letter dated August 7, 2017, in the name of [REDACTED]

5
6 Count 18
7 FORGERY
8 PENAL CODE §472

9 On or between September 27, 2018, and July 8, 2019, at and in the County of Los Angeles,
10 the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
11 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
12 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
13 Entitlement Benefits letters dated August 7, 2007, in the name of [REDACTED]

14 Count 19
15 FORGERY
16 PENAL CODE §472

17 On or between July 30, 2019, and August 13, 2019, at and in the County of Los Angeles,
18 the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
19 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
20 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
21 Entitlement Benefits letter dated August 15, 2018, in the name of [REDACTED]

22 Count 20
23 FORGERY
24 PENAL CODE §472

25 On or between July 9, 2019, and July 11, 2019, at and in the County of Los Angeles, the
26 crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
27 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
28 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
Entitlement Benefits letter dated August 7, 2017, in the name of [REDACTED]

Count 21
FORGERY
PENAL CODE §472

On or between July 23, 2019, and July 25, 2019, at and in the County of Los Angeles, the
crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government

1 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
2 Entitlement Benefits letter dated August 7, 2018, in the name of [REDACTED]

3
4 Count 22
FORGERY
PENAL CODE §472

5 On or between July 30, 2019, and August 13, 2019, at and in the County of Los Angeles,
6 the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
7 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
8 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
Entitlement Benefits letter dated August 7, 2018, in the name of [REDACTED]

9
10 Count 23
FORGERY
PENAL CODE §472

11 On or between July 15, 2019, and July 16, 2019, at and in the County of Los Angeles, the
12 crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
13 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
14 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
Entitlement Benefits letter dated August 7, 2018, in the name of [REDACTED]

15
16 Count 24
FORGERY
PENAL CODE §472

17 On or between August 3, 2019, and August 7, 2019, at and in the County of Los Angeles,
18 the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was
19 committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government
20 seal and seal of a legally authorized public officer, to wit: Department of Veterans Affairs VA
Entitlement Benefits letter dated August 7, 2018, in the name of [REDACTED]

21
22 Count 25
FORGERY
PENAL CODE §472

23 On or between December 28, 2018, and January 11, 2019, at and in the County of Los
24 Angeles, the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472,
25 was committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a
26 government seal and seal of a legally authorized public officer, to wit: Department of Veterans
Affairs VA Entitlement Benefits letter dated December 7, 2018, in the name of [REDACTED]

1 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
2 [REDACTED] and did unlawfully use and attempt to use that information for an unlawful
3 purpose, without the consent of [REDACTED] and [REDACTED]

4 Count 30
5 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
6 PENAL CODE §530.5(a)

7 On or between September 16, 2018, and July 10, 2019, at and in the County of Los
8 Angeles, the crime of unauthorized use of personal identifying information, in violation of
9 PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and
unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of
[REDACTED] and did unlawfully use and attempt to use that information for an unlawful
purpose, without the consent of [REDACTED]

10 Count 31
11 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
12 PENAL CODE §530.5(a)

13 On or between August 3, 2019, and August 7, 2019, at and in the County of Los Angeles,
14 the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
15 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
16 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
did unlawfully use and attempt to use that information for an unlawful purpose, without the
consent of [REDACTED]

17 Count 32
18 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
19 PENAL CODE §530.5(a)

20 On or between August 23, 2019, and August 24, 2020, at and in the County of Los Angeles,
21 the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
22 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
23 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did
unlawfully use and attempt to use that information for an unlawful purpose, without the consent
of [REDACTED]

24 Count 33
25 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
26 PENAL CODE §530.5(a)

27 On or between July 23, 2019, and September 2, 2021, at and in the County of Los Angeles,
28 the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
§530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did

1 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
2 of [REDACTED]

3
4 Count 34
5 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
6 PENAL CODE §530.5(a)

7 On or between July 30, 2019, and July 23, 2021, at and in the County of Los Angeles, the
8 crime of unauthorized use of personal identifying information, in violation of PENAL CODE
9 530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
10 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
11 [REDACTED] and did unlawfully use and attempt to use that information for an unlawful
12 purpose, without the consent of [REDACTED] and [REDACTED]

13
14 Count 35
15 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
16 PENAL CODE §530.5(a)

17 On or between June 15, 2021, and June 16, 2021, at and in the County of Los Angeles, the
18 crime of unauthorized use of personal identifying information, in violation of PENAL CODE
19 530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
20 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did
21 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
22 of [REDACTED]

23
24 Count 36
25 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
26 PENAL CODE §530.5(a)

27 On or between March 25, 2021, and September 2, 2021, at and in the County of Los
28 Angeles, the crime of unauthorized use of personal identifying information, in violation of
PENAL CODE 530.5(a), a felony, was committed by DON AZUL, who did willfully and
unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of
[REDACTED] and [REDACTED] and did unlawfully use and attempt to use that information for
an unlawful purpose, without the consent of [REDACTED] and [REDACTED]

Count 37
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between July 2, 2021, and July 6, 2021, at and in the County of Los Angeles, the
crime of unauthorized use of personal identifying information, in violation of PENAL CODE
§530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did

1 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
2 of [REDACTED]

3
4 Count 38
5 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
6 PENAL CODE §530.5(a)

7 On or between August 15, 2020, and August 17, 2020, at and in the County of Los Angeles,
8 the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
9 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
10 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED]
11 and did unlawfully use and attempt to use that information for an unlawful purpose, without the
12 consent of [REDACTED]

13 Count 39
14 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
15 PENAL CODE §530.5(a)

16 On or between June 16, 2020, and August 6, 2021, at and in the County of Los Angeles, the
17 crime of unauthorized use of personal identifying information, in violation of PENAL CODE
18 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
19 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
20 [REDACTED] and did unlawfully use and attempt to use that information for an unlawful
21 purpose, without the consent of [REDACTED] and [REDACTED]

22 Count 40
23 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
24 PENAL CODE §530.5(a)

25 On or around August 25, 2020, at and in the County of Los Angeles, the crime of
26 unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a
27 felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal
28 identifying information, as defined by PENAL CODE §530.55(b), of [REDACTED] [REDACTED]
and [REDACTED] and did unlawfully use and attempt to use that information for an unlawful
purpose, without the consent of [REDACTED] [REDACTED] and [REDACTED]

Count 41
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between November 16, 2020, and December 4, 2020, at and in the County of Los
Angeles, the crime of unauthorized use of personal identifying information, in violation of
PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and
unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of
[REDACTED], [REDACTED] and [REDACTED] and did unlawfully use and attempt to use that

1 information for an unlawful purpose, without the consent of [REDACTED] and
2 [REDACTED]

3
4 Count 42

5
6 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
7 PENAL CODE §530.5(a)

8 On or between August 11, 2020, and July 2, 2021, at and in the County of Los Angeles, the
9 crime of unauthorized use of personal identifying information, in violation of PENAL CODE
10 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
11 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
12 did unlawfully use and attempt to use that information for an unlawful purpose, without the
13 consent of [REDACTED]

14
15 Count 43

16
17 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
18 PENAL CODE §530.5(a)

19 On or between September 24, 2019, and July 7, 2020, at and in the County of Los Angeles,
20 the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
21 §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
22 personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did
23 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
24 of [REDACTED]

25
26 Count 44

27
28 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between October 8, 2019, and June 28, 2021, at and in the County of Los Angeles,
the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
§530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did
unlawfully use and attempt to use that information for an unlawful purpose, without the consent
of [REDACTED]

Count 45

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between December 14, 2020, and July 23, 2021, at and in the County of Los Angeles,
the crime of unauthorized use of personal identifying information, in violation of PENAL CODE
§530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain
personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and
did unlawfully use and attempt to use that information for an unlawful purpose, without the
consent of [REDACTED]

Count 46
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between March 23, 2021, and July 23, 2021, at and in the County of Los Angeles, the crime of unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of [REDACTED]

Count 47
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between November 24, 2020, and December 4, 2020, at and in the County of Los Angeles, the crime of unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of [REDACTED]

Count 48
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between July 11, 2021, and July 23, 2021, at and in the County of Los Angeles, the crime of unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of [REDACTED]

Count 49
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between July 9, 2019, and July 16, 2019, at and in the County of Los Angeles, the crime of unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of [REDACTED]

Count 50
UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION
PENAL CODE §530.5(a)

On or between March 10, 2021, and July 30, 2021, at and in the County of Los Angeles, the crime of unauthorized use of personal identifying information, in violation of PENAL CODE §530.5(a), a felony, was committed by DON AZUL, who did willfully and unlawfully obtain personal identifying information, as defined by PENAL CODE §530.55(b) of [REDACTED] and [REDACTED] and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of [REDACTED] and [REDACTED]

Count 51
FORGERY
PENAL CODE §472

On or between August 1, 2018, and August 9, 2018, at and in the County of Los Angeles, the crime of forgery of a government seal, a felony, in violation of PENAL CODE §472, was committed by DON AZUL, who did willfully and unlawfully forge and counterfeit a government seal and seal of a legally authorized public officer, to wit: California Department of Veterans Affairs Memoranda in the Name of [REDACTED] titled Re: CA CFW Early Enrollment Allotment for AY 2019/2020 Los Angeles County, dated August 9, 2018; California Department of Veterans Affairs Memoranda in the Name of [REDACTED] titled Re: Criteria and Guidelines for Qualifying as a Designated Organization, dated August 9, 2018; California Department of Veterans Affairs Memoranda in the name of [REDACTED] titled Re: California College Promise Grant Extension Program, dated August 1, 2018; and California Department of Veterans Affairs Memoranda in the name of [REDACTED] titled Re: California College Fee Waiver Extension Program, dated August 1, 2018.

Count 52
FALSE PERSONATION
PENAL CODE §529(a)(2)

On or between April 13, 2020, and November 16, 2021, at and in the County of Los Angeles, the crime of false personation, in violation of PENAL CODE §529(a)(2), a felony, was committed by DON AZUL, who did unlawfully and falsely personate [REDACTED] in a private and official capacity and in such assumed character verified, published, acknowledged and proved in the name of another, a written instrument, with intent that the same be recorded, delivered and used as true.

SPECIAL ALLEGATIONS

**PENAL CODE §186.11(a)(3)
WHITE COLLAR CRIME ENHANCEMENT—LOSS OVER \$100,000**

It is further alleged that the crimes committed by defendant DON AZUL in Counts 1-52, are related felonies, a material element of which is fraud. It is further alleged that these related

1 felonies resulted in the taking of more than \$100,000, within the meaning of PENAL CODE
2 §186.11(a)(3).

3 **PENAL CODE § 186.11(a)(2)**
4 **WHITE COLLAR CRIME ENHANCEMENT—LOSS OVER \$500,000**

5 It is further alleged that the crimes committed by defendant DON AZUL in Counts 1-52,
6 are related felonies, a material element of which is fraud. It is further alleged that these related
7 felonies resulted in the taking of more than \$500,000, within the meaning of PENAL CODE
8 § 186.11(a)(2).

9 **PENAL CODE § 1203.045(a)**
10 **PROBATION LIMITATION—LOSS OVER \$100,000**

11 It is further alleged that the crimes committed by defendant DON AZUL in Counts 1-52,
12 resulted in the taking of more than \$100,000, within the meaning of PENAL CODE
13 §1203.045(a).

14 **ADDITIONAL SPECIAL ALLEGATIONS**

15 It is further alleged that the manner in which the crimes committed by DON AZUL in
16 Counts 1-52 were carried out indicates planning, sophistication, or professionalism, within the
17 meaning of California Rules of Court, rule 4.421(a)(8).

18 It is further alleged that the crimes committed by DON AZUL in Counts 1-52 involved a
19 taking of great monetary value within the meaning of California Rules of Court, rule 4.421(a)(9).

20 It is further alleged that as to counts 1-52, defendant DON AZUL took advantage of a
21 position of trust or confidence to commit the offense, within the meaning of California Rules of
22 Court, rule 4.421(a)(11).

23 It is further alleged as to Count 51, that the offenses described in PENAL CODE § 803,
24 subdivision (c), were not discovered until on or around August 14, 2019, when [REDACTED]
25 was made aware of the fraud by defendant Don AZUL.

26 **NOTICE: Conviction of this offense will require the defendant to provide DNA samples and**
27 **print impressions pursuant to PENAL CODE §§ 296 and 296.1. Willful refusal to provide**
28 **the samples and impressions is a crime.**

NOTICE: The People of the State of California intend to present evidence and seek jury
findings regarding all applicable circumstances in aggravation, pursuant to PENAL CODE
§ 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

Further, attached hereto and incorporated herein is a declaration in support of issuance of
arrest warrant by California Department of Justice, Special Agent Supervisor Matthew McCabe,

1 which the undersigned believes establishes probable cause for the arrest of the defendant for the
2 above-listed crimes. Wherefore, a warrant of arrest is requested for the defendant.

3 I declare under penalty of perjury on information and belief that the foregoing is true and
4 correct.

5 Dated: August 7, 2022

Respectfully Submitted.

6 ROB BONTA
7 Attorney General of California

8 

9 RONI DINA POMERANTZ
10 Deputy Attorney General
11 *Attorney for the People of the State of
California*

12 **PURSUANT TO PENAL CODE § 1054.5(b), THE PEOPLE HEREBY INFORMALLY**
13 **REQUEST THAT DEFENDANT'S COUNSEL PROVIDE DISCOVERY TO THE**
14 **PEOPLE AS REQUIRED BY PENAL CODE § 1054.3**