

FILED
Clerk of the Superior Court

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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN DIEGO

10
11 **THE PEOPLE OF THE STATE OF**
12 **CALIFORNIA,**

Plaintiff,

13
14 v.

15 **LATASHIA PATRICE MCKINNEY A/K/A**
16 **LATASHIA PATRICE ROBINSON**

and

17 **LAE'SHAUN JACQUELINE MCKINNEY,**

18
19 Defendants.

Case No. CD307652
AG No. SD2023802198

**FELONY COMPLAINT FOR
ARREST WARRANT AND
EXTRADITION**

20 The Attorney General of the State of California, based on information and belief, accuses
21 the above-named defendants of the following offenses:

22 **SECURITIES FRAUD**

23 **COUNT 1**

24 **[VICTIM [REDACTED] LEWIS]**

25 On or about December 11, 2020, in the county of San Diego, the crime of FRAUD IN THE
26 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
27 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
28 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,

1 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza, to
2 [REDACTED] LEWIS, by means of a written or oral communication which included an
3 untrue statement of a material fact or an omission of a material fact.

4 COUNT 2

5 [VICTIM [REDACTED] WILLIAMS, JR.]

6 On or about January 25, 2021 through February 28, 2022, in the County of San Diego, the
7 crime of FRAUD IN THE OFFER OF A SECURITY, a violation of §§ 25401 and 25540,
8 subdivision (b), of the California Corporations Code, a Felony, was committed by defendants
9 LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and
10 LAE'SHAUN JACQUELINE MCKINNEY, who did willfully and unlawfully offer a security, to
11 wit: the sale of stock in Perfect Pizza, to [REDACTED] WILLIAMS, JR., by means of a written or
12 oral communication which included an untrue statement of a material fact or an omission of a
13 material fact.

14 COUNT 3

15 [VICTIM [REDACTED] GRAHAM]

16 On or about February 1, 2021, in the County of San Diego, the crime of FRAUD IN THE
17 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
18 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
19 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
20 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza, to
21 [REDACTED] GRAHAM by means of a written or oral communication which included an untrue
22 statement of a material fact or an omission of a material fact.

23 COUNT 4

24 [VICTIM [REDACTED] GRAY]

25 On or about December 17, 2020, in the County of San Diego, the crime of FRAUD IN THE
26 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
27 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
28 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY

1 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza, to
2 [REDACTED] GRAY, by means of a written or oral communication which included an
3 untrue statement of a material fact or an omission of a material fact.

4 COUNT 5

5 [VICTIM [REDACTED] BUTLER]

6 On or about May 9, 2021, in the County of San Diego, the crime of FRAUD IN THE
7 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
8 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
9 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
10 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza, to
11 [REDACTED] BUTLER, by means of a written or oral communication which included an
12 untrue statement of a material fact or an omission of a material fact.

13 COUNT 6

14 [VICTIM [REDACTED] LAMAR]

15 On or about May 10, 2021, in the County of San Diego, the crime of FRAUD IN THE
16 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
17 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
18 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
19 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza to
20 [REDACTED] LAMAR, by means of a written or oral communication which
21 included an untrue statement of a material fact or an omission of a material fact.

22 COUNT 7

23 [VICTIM [REDACTED] TAITANO]

24 On or about January 26, 2021, in the County of San Diego, the crime of FRAUD IN THE
25 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
26 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
27 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
28 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza to

1 [REDACTED] TAITANO, by means of a written or oral communication which included
2 an untrue statement of a material fact or an omission of a material fact.

3 **COUNT 8**

4 [VICTIM [REDACTED] PRATT]

5 On or about December 30, 2020, in the County of San Diego, the crime of FRAUD IN THE
6 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
7 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
8 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
9 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza to
10 [REDACTED] PRATT, by means of a written or oral communication which included an
11 untrue statement of a material fact or an omission of a material fact.

12 **COUNT 9**

13 [VICTIMS [REDACTED] CLARKE]

14 On or about December 9, 2020, in the County of San Diego, the crime of FRAUD IN THE
15 OFFER OF A SECURITY, a violation of §§ 25401 and 25540, subdivision (b), of the California
16 Corporations Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY
17 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY,
18 who did willfully and unlawfully offer a security, to wit: the sale of stock in Perfect Pizza to
19 [REDACTED] CLARKE, by means of a written or oral communication which included
20 an untrue statement of a material fact or an omission of a material fact.

21 **FRAUDULENT SECURITIES SCHEME**

22 **COUNT 10**

23 Commencing from approximately December 2020 and continuing until approximately
24 December 2022, in the County of San Diego, defendant LATASHIA PATRICE MCKINNEY
25 A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY did
26 willfully and unlawfully engage in acts, practices and a course of business which operated as a
27 fraud and deceit upon a person or persons in connection with the offer of a security, to wit:

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1 persons who purchased stock in Perfect Pizza, in violation of California Corporations Code
2 §§ 25541 and 25540, subdivision (a), a Felony.

3 **GRAND THEFT – SECURITIES SCHEME**

4 **COUNT 11**

5 Commencing from approximately December 2020 and continuing until approximately
6 December 2022, in the County of San Diego, the crime of GRAND THEFT, a violation of § 487,
7 subdivision (a), of the California Penal Code, a Felony, was committed by defendants
8 LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and
9 LAE'SHAUN JACQUELINE MCKINNEY who unlawfully took property, in the form of money
10 for the sale of stock in Perfect Pizza, of a value in excess of Nine Hundred Fifty Dollars (\$950)
11 from another, to wit: All persons who purchased stock in Perfect Pizza, including the securities
12 fraud victims named in Counts 1 through 9.

13 **FRANCHISE FRAUD**

14 **COUNT 12**

15 **[VICTIM ██████████ DAVILA]**

16 On or about and between January 2020 and December 2021, in the County of San Diego,
17 the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and 31411 of
18 the California Corporations Code, a Felony, was committed by defendants LATASHIA
19 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
20 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
21 written communication which included an untrue statement of material fact or omission of a
22 material fact necessary in order to make the statements made, in light of the circumstances under
23 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to ██████████
24 Davila.

25 **COUNT 13**

26 **[VICTIM ██████████ COLLIER]**

27 On or about December 15, 2020, in the County of San Diego, the crime of FRAUD IN THE
28 OFFER OF A FRANCHISE, a violation of §§ 31201 and 31411 of the California Corporations

1 Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY A/K/A
2 LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY, who did
3 offer or sell a franchise in this state by means of an oral or written communication which included
4 an untrue statement of material fact or omission of a material fact necessary in order to make the
5 statements made, in light of the circumstances under which they were made, not misleading, to
6 wit: Offer or Sale of Perfect Pizza Franchise to [REDACTED] COLLIER.

7 COUNT 14

8 [VICTIM [REDACTED] COLLIER]

9 On or about and between December 15, 2020 and April 22, 2021, in the County of San
10 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
11 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
12 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
13 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
14 written communication which included an untrue statement of material fact or omission of a
15 material fact necessary in order to make the statements made, in light of the circumstances under
16 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to [REDACTED]
17 [REDACTED] COLLIER.

18 COUNT 15

19 [VICTIM [REDACTED] JOHNSON]

20 On or about and between March 12, 2021 and March 17, 2021, in the County of San Diego,
21 the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and 31411 of
22 the California Corporations Code, a Felony, was committed by defendants LATASHIA
23 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
24 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
25 written communication which included an untrue statement of material fact or omission of a
26 material fact necessary in order to make the statements made, in light of the circumstances under
27 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
28 [REDACTED] JOHNSON.

1 COUNT 16

2 [VICTIM ██████████ MALONE]

3 On or about and between December 23, 2020 and January 25, 2021, in the County of San
4 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
5 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
6 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
7 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
8 written communication which included an untrue statement of material fact or omission of a
9 material fact necessary in order to make the statements made, in light of the circumstances under
10 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
11 ██████████ MALONE.

12 COUNT 17

13 [VICTIM ██████████ MALONE]

14 On or about and between December 22, 2022 and July 31, 2021, in the County of San
15 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
16 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
17 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
18 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
19 written communication which included an untrue statement of material fact or omission of a
20 material fact necessary in order to make the statements made, in light of the circumstances under
21 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
22 ██████████ MALONE.

23 COUNT 18

24 [VICTIMS ██████████ RAMOS]

25 On or about and between April 22, 2021 and September 27, 2021, in the County of San
26 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
27 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
28 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN

1 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
2 written communication which included an untrue statement of material fact or omission of a
3 material fact necessary in order to make the statements made, in light of the circumstances under
4 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
5 [REDACTED] RAMOS.

6 COUNT 19

7 [VICTIM [REDACTED] HENDERSON]

8 On or about and between May 24, 2021 and September 28, 2021, in the County of San
9 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
10 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
11 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
12 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
13 written communication which included an untrue statement of material fact or omission of a
14 material fact necessary in order to make the statements made, in light of the circumstances under
15 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
16 [REDACTED] HENDERSON.

17 COUNT 20

18 [VICTIM [REDACTED] HENDERSON]

19 On or about and between May 26, 2021 and September 28, 2021, in the County of San
20 Diego, the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and
21 31411 of the California Corporations Code, a Felony, was committed by defendants LATASHIA
22 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
23 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
24 written communication which included an untrue statement of material fact or omission of a
25 material fact necessary in order to make the statements made, in light of the circumstances under
26 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to
27 [REDACTED] HENDERSON.

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1 COUNT 21

2 [VICTIMS [REDACTED] ROBINSON]

3 On or about December 3, 2020, in the County of San Diego, the crime of FRAUD IN THE
4 OFFER OF A FRANCHISE, a violation of §§ 31201 and 31411 of the California Corporations
5 Code, a Felony, was committed by defendants LATASHIA PATRICE MCKINNEY A/K/A
6 LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE MCKINNEY, who did
7 offer or sell a franchise in this state by means of an oral or written communication which included
8 an untrue statement of material fact or omission of a material fact necessary in order to make the
9 statements made, in light of the circumstances under which they were made, not misleading, to
10 wit: Offer or Sale of Perfect Pizza Franchise to [REDACTED] ROBINSON.

11 COUNT 22

12 [VICTIM TWIN STAR MOTORS]

13 On or about and between October 1, 2020 and May 3, 2021, in the County of San Diego,
14 the crime of FRAUD IN THE OFFER OF A FRANCHISE, a violation of §§ 31201 and 31411 of
15 the California Corporations Code, a Felony, was committed by defendants LATASHIA
16 PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN
17 JACQUELINE MCKINNEY, who did offer or sell a franchise in this state by means of an oral or
18 written communication which included an untrue statement of material fact or omission of a
19 material fact necessary in order to make the statements made, in light of the circumstances under
20 which they were made, not misleading, to wit: Offer or Sale of Perfect Pizza Franchise to TWIN
21 STAR MOTORS.

22 GRAND THEFT – FRANCHISE FRAUD SCHEME

23 COUNT 23

24 Commencing on or about January 2020 and continuing to on or about December 2022, in
25 the County of San Diego, the crime of GRAND THEFT, a violation of § 487, subdivision (a) of
26 the California Penal Code, a Felony, was committed by defendants LATASHIA PATRICE
27 MCKINNEY A/K/A LATASHIA PATRICE ROBINSON and LAE'SHAUN JACQUELINE
28 MCKINNEY, who unlawfully took property, in the form of money, purportedly for the purpose

1 of purchasing and running a Perfect Pizza franchise, of a value in excess of Nine Hundred Fifty
2 Dollars (\$950) from another, to wit: All persons who paid the defendant(s) money for purposes
3 related to the offer or sale of a Perfect Pizza Franchise, including the franchise fraud Victims
4 named in Counts 12 through 22.

5 **ELDER ABUSE**

6 **COUNT 24**

7 **[VICTIMS [REDACTED] ROBINSON]**

8 On or about December 3, 2020, in the County of San Diego, the crime of ELDER ABUSE,
9 a violation of § 368, subdivision (d), of the California Penal Code, a Felony, was committed by
10 defendant LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON who
11 did willfully and unlawfully obtain money from an elder adult under false pretenses, and knew or
12 reasonably should have known that said persons, [REDACTED] ROBINSON, were
13 elder adults within the meaning of Penal Code § 368, subdivision (d).

14 **COUNT 25**

15 **[VICTIM [REDACTED] GRAY]**

16 On or about December 17, 2020, in the County of San Diego, the crime of ELDER
17 ABUSE, a violation of § 368, subdivision (d), of the California Penal Code, was committed by
18 defendant LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON who
19 did willfully and unlawfully obtain money from an elder adult under false pretenses, and knew or
20 reasonably should have known that said person, [REDACTED] GRAY was an elder
21 adult within the meaning of Penal Code § 368, subdivision (d).

22 **IDENTITY THEFT**

23 **COUNT 26**

24 **[VICTIM [REDACTED] DAVILA – LEASE FOR ASTON MARTIN]**

25 On or about July 15, 2020, in the County of San Diego, the crime of UNAUTHORIZED
26 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of § 530.5, subdivision (a),
27 of the California Penal Code, a Felony, was committed by defendant LATASHIA PATRICE
28 MCKINNEY A/K/A LATASHIA PATRICE ROBINSON, who did willfully and unlawfully

1 obtain personal identifying information, as defined in Penal Code § 530.55, subdivision (b), of
2 [REDACTED] DAVILA, and did unlawfully use and attempt to use that information for an unlawful
3 purpose, specifically, for the purpose of obtaining a loan for an automobile purchase, without the
4 consent of [REDACTED] DAVILA.

5 **COUNT 27**

6 **[VICTIM [REDACTED] DAVILA – LOAN FROM LEGEND FUNDING]**

7 On or about April 26, 2021, in the County of San Diego, the crime of UNAUTHORIZED
8 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of § 530.5, subdivision (a),
9 of the California Penal Code, a Felony, was committed by defendant LATASHIA PATRICE
10 MCKINNEY A/K/A LATASHIA PATRICE ROBINSON, who did willfully and unlawfully
11 obtain personal identifying information, as defined in Penal Code § 530.55, subdivision (b), of
12 [REDACTED] DAVILA, and did unlawfully use and attempt to use that information for an unlawful
13 purpose, specifically, for the purpose of obtaining a \$40,000 loan from Legend Funding, without
14 the consent of [REDACTED] DAVILA.

15 **GRAND THEFT – CREDIT RESTORATION**

16 **COUNT 28**

17 **[VICTIM [REDACTED] EDWARDS]**

18 On or about and between April 19, 2022 and September 27, 2022, in the County of San
19 Diego, the crime of GRAND THEFT, a violation of § 487, subdivision (a), of the California
20 Penal Code, a Felony, was committed by defendant LATASHIA PATRICE MCKINNEY A/K/A
21 LATASHIA PATRICE ROBINSON, who unlawfully, and with intent to defraud, took property
22 of a value in excess of Nine Hundred Fifty Dollars (\$950) from another, to wit: money for credit
23 restoration, of a value in excess of Nine Hundred Fifty Dollars (\$950), from [REDACTED] EDWARDS
24 D/B/A DLM ENTERPRISES.

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1 **GRAND THEFT - LOAN FRAUD**

2 **COUNT 29**

3 **[VICTIM SMALL BUSINESS ADMINISTRATION]**

4 On or about August 11, 2020, in the County of San Diego, the crime of GRAND THEFT, a
5 violation of § 487, subdivision (a), of the California Penal Code, a Felony, was committed by
6 defendant LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON,
7 who unlawfully, and with intent to defraud, took property of a value in excess of Nine Hundred
8 Fifty Dollars (\$950) from another, to wit: \$149,900 from the SMALL BUSINESS
9 ADMINISTRATION in the name of Perfect Pizza, Inc.

10 **COUNT 30**

11 **[VICTIM SMALL BUSINESS ADMINISTRATION]**

12 On or about August 4, 2020, in the County of San Diego, the crime of GRAND THEFT, a
13 violation of § 487, subdivision (a), of the California Penal Code, a Felony, was committed by
14 defendant LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE ROBINSON,
15 who unlawfully, and with intent to defraud, took property of a value in excess of Nine Hundred
16 Fifty Dollars (\$950) from another, to wit: \$137,500 from the SMALL BUSINESS
17 ADMINISTRATION in the name of Our Prestigious Corporation.

18 **FIRST SPECIAL ALLEGATION**

19 **[TAKING IN EXCESS OF \$1,000,000 – P.C. § 12022.6]**

20 It is further alleged that the property taken by defendant LATASHIA PATRICE
21 MCKINNEY A/K/A LATASHIA PATRICE ROBINSON in the commission of the felonies
22 charged in Counts One through 30, which property defendant intended to take as part of a
23 common scheme or plan resulted in aggregate loss or property value in excess of One Million
24 Dollars (\$1,000,000) within the meaning of subdivision (a)(3) of § 12022.6 of the California
25 Penal Code. This allegation imposes an additional and consecutive term of punishment of three
26 years.

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1 CIRCUMSTANCES IN AGGRAVATION

2 It is further alleged with respect to each count in the Complaint that:

- 3 • The manner in which the crime was carried out indicates planning, sophistication or
4 professionalism within the meaning of California Rules of Court, Rule 4.421,
5 subdivision (a)(8); AND
- 6 • The crime involved an attempted or actual taking of great monetary value within the
7 meaning of California Rules of Court, Rule 4.421, subdivision (a)(9); AND
- 8 • In the commission of the charged crimes, the defendant took advantage of a position of
9 trust or confidence within the meaning of California Rules of Court, Rule 4.421,
10 subdivision (a)(11); AND
- 11 • Defendant LATASHIA PATRICE MCKINNEY A/K/A LATASHIA PATRICE
12 ROBINSON has served a prior term in prison or county jail under subdivision (h) of
13 § 1170 of the California Penal Code, within the meaning of California Rules of Court,
14 Rule 4.421, subdivision (b)(3).

15 It is further alleged with respect to LATASHIA PATRICE MCKINNEY A/K/A
16 LATASHIA ROBINSON, that the defendant has suffered the following prior conviction:

17 <u>Case No.</u>	<u>Charge Code</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
18 09CR1209H	18 USC 1962(D)	06/01/2010	San Diego	CA	USDC

19
20 TOLLING OF THE STATUTE OF LIMITATIONS

21 **Statute of Limitations – Discovery Within Four Years (Penal Code §§ 801.5, 803, subd. (c))**

22 It is further alleged, as to all counts and offenses subject to subdivision (c) of § 803 of the
23 California Penal Code, that the above violations were not discovered until the earliest date of
24 November 13, 2021. It was at that time that [REDACTED] DAVILA discovered defendant
25 LATASHIA PATRICE MCKINNEY A/K/A LATASHIA ROBINSON had unlawfully leased an
26 Aston Martin and secured a loan for it under his name without his knowledge. This alerted
27 [REDACTED] DAVILA to the fact that he was being defrauded.

28

1 On or about December 23, 2021, Mr. Davila made a complaint to the San Diego Police
2 Department and San Diego District Attorney's Office. Thereafter, the case was transferred to the
3 Office of the Attorney General (OAG) where Investigators [REDACTED]
4 uncovered a larger fraud scheme involving dozens of other victims. The case was transferred to
5 the OAG in July 2023.

6 When Investigators [REDACTED] began interviewing individuals, it was clear that
7 the individuals were previously unaware that they were victims of fraud perpetrated by the
8 defendants – the interviews alerted them to that fact. These victims were previously lulled, as
9 was [REDACTED] DAVILA, into believing that the defendants were running legitimate businesses.
10 Hence, the earliest date of discovery as to victims other than [REDACTED] DAVILA, was after the
11 OAG began investigating in July 2023.

12 REQUEST FOR DISCOVERY

13 Pursuant to subdivision (b) of § 1054.5 of the California Penal Code, the People informally
14 request defense counsel provide discovery to the People as required by § 1054.3.

15 NOTICE TO ATTORNEY

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

22 **NOTICE: Conviction of one or more of these offenses will require the defendant to provide**
23 **a DNA sample and print impressions pursuant to §§ 296 and 296.1 of the California Penal**
24 **Code. Willful refusal to provide the samples and impressions is a crime.**

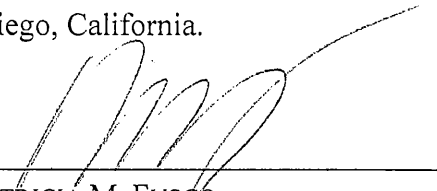
25
26 **NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in**
27 **the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.**
28

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

4 DECLARATION

5 I declare under the penalty of perjury under the laws of the State of the California that the
6 foregoing is true and correct and that this complaint consists of 30 counts.

7 Executed this 14th day of May, 2025, in San Diego, California.

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9 
10 PATRICIA M. FUSCO
11 Declarant and Complainant
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