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8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES  
11 CENTRAL DISTRICT  
12

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

15 Plaintiff,

16 **v.**

- 17 **1. RAYMUNDO MONTOYA (08/07/1982)**  
18 **2. SERGIO HERNANDEZ (09/04/1967)**  
19 **3. IGNACIO RAZO (12/28/1972)**  
20 **4. MARVIN REN ARMIRA CHALI**  
**(03/14/1972)**  
21 **5. TOMAS DOMINGUEZ (12/21/1967)**  
22 **6. IRVING DOMINGUEZ FLORES**  
**(10/25/1976)**  
23 **7. MICHAEL DOMINGUEZ (07/26/1998)**  
24 **8. JOB ROBLES-PELAEZ (12/06/1982)**  
25 **9. ZAYDA GARCIA MEJIA (10/26/1988)**

26 Defendants  
27  
28

Case No. BA484132

**AMENDED FELONY COMPLAINT FOR  
ARREST WARRANT AND  
EXTRADITION**

Action Filed: June 17, 2020

1 The undersigned is informed and believes that:

2 **COUNT ONE**

3 On or between April 4, 2019, and June 4, 2020, in the County of Los Angeles, State of  
4 California, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code  
5 section 182(a)(1), a Felony, was committed by RAYMUNDO MONTOYA, SERGIO  
6 HERNANDEZ, IGNACIO RAZO, MARVIN REN ARMIRA CHALI, TOMAS DOMINGUEZ,  
7 IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, JOB ROBLES-PELAEZ, and  
8 ZAYDA GARCIA MEJIA who did unlawfully conspire together and with another person and  
9 persons whose identity is unknown to commit the crimes Grand Theft in violation of Penal Code  
10 section 487(a); and Recycling Fraud in an amount exceeding nine hundred fifty dollars, in  
11 violation of Public Resources Code section 14591(b)(1)(D) and Public Resources Code section  
12 14591(b)(1)(F), felonies; that pursuant to and for the purpose of carrying out the objects and  
13 purposes of aforesaid conspiracy, the said defendants committed the following overt acts at and in  
14 the County of Los Angeles:

15 **OVERT ACTS**

16 **I**

17 On or about March 23, 2020, males unloaded gaylord bags of empty beverage containers  
18 (EBC) from box trucks and repackaged the material into bags at 45 N. 69<sup>th</sup> Ave., Phoenix AZ, a  
19 property under the control of Raymundo Montoya.

20 **II**

21 On or about April 14, 2020, Sergio Hernandez traveled from 45 N. 69<sup>th</sup> Ave., Phoenix AZ  
22 to 13059 Simms Ave., Hawthorne CA, via a circuitous route designed to circumvent inspection  
23 by the California Department of Food and Agriculture (CDFA).

24 **III**

25 On or around April 22, 2020, Sergio Hernandez traveled to 45 N. 69<sup>th</sup> Ave., Phoenix AZ,  
26 and returned to California via a circuitous route designed to circumvent CDFA inspection.

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**IV**

On or around April 23, 2020, Sergio Hernandez traveled to Public Storage located at 8340 Washington Blvd., Pico Rivera CA, where unidentified males unloaded material into storage lockers, and then into vehicles which made deliveries to recycling centers in Los Angeles.

**V**

On or about April 28, 2020, Sergio Hernandez traveled from 45 N. 69<sup>th</sup> Ave., Phoenix AZ to California via a circuitous route designed to circumvent CDFA inspection.

**VI**

On or about April 29, 2020, Sergio Hernandez drove to Public Storage located at 8340 Washington Blvd., Pico Rivera CA, where males unloaded bags of out of state empty beverage containers (OOS/EBC) from his truck and delivered the material to recycling centers in Los Angeles.

**VII**

On or about April 29, 2020, a green freightliner registered to Sergio Hernandez was driven from Arizona to California via a circuitous route designed to circumvent CDFA inspection and was parked near 3103 Glen Helen Pkwy., San Bernardino, CA.

**VIII**

On or about April 30, 2020, Ignacio Razo drove the green freightliner registered to Sergio Hernandez from 3103 Glen Helen Pkwy., San Bernardino CA, to Dollar Self Storage, located at 8717 Pioneer Blvd., Santa Fe Springs CA, where males unloaded OOS/EBC material into storage lockers.

**IX**

On or about April 30, 2020, Irving Dominguez Flores drove a Dodge Sprinter from Dollar Self Storage located at 8717 Pioneer Blvd., Santa Fe Springs CA, and delivered EBC materials to recycling centers throughout Los Angeles.

**X**

On or about May 6, 2020, Irving Dominguez Flores departed Dollar Self Storage located at 8717 Pioneer Blvd., Santa Fe Springs CA, in a Dodge Sprinter filled with plastic bags that he

described as recyclables and delivered them throughout Los Angeles.

## XI

On or about May 8-9, 2020, Ignacio Razo traveled from a recycling center in Arizona to an undocumented lot in the vicinity of 27898 Ethanac Rd., Menifee CA, via a circuitous route designed to circumvent CDFA inspection.

## XII

On or about May 11, 2020, Sergio Hernandez traveled from 3720 W. Clarendon Ave., Phoenix AZ, a property owned by Raymundo Montoya, to California via a circuitous route designed to circumvent CDFA inspection.

## XIII

On or about May 12, 2020, Sergio Hernandez traveled to Public Storage at Pico Rivera CA, where several men unloaded bags filled with OOS/EBC and placed the material into lockers.

## XIV

On or about May 12, 2020, Ignacio Razo drove from a recycling center located at 1590 W. University Dr., Mesa AZ, to an undocumented lot located at 233 W. Jefferson Blvd., Los Angeles CA, via a circuitous route designed to circumvent CDFA inspection.

## XV

On or about May 12, 2010, males unloaded bags into open storage lockers at Public Storage located at 8340 Washington Blvd., Pico Rivera CA.

## XVI

On or about May 12, 2010, Michael Dominguez loaded OOS/EBC from the storage lockers at Public Storage into a white sprinter van registered to Tomas Dominguez, drove to a recycling center at 825 N. Virgil Ave., Los Angeles CA, and unloaded bags of OOS/EBC.

## XVII

On or about May 14, 2020, Tomas Dominguez drove to Public Storage at 8340 Washington Blvd., Pico Rivera CA, and then took OOS/EBCs to LA Recycling Center at 12643 San Fernando Rd., Sylmar CA, and Estrada's Recycling at 15252 Parthenia St., North Hills CA. At Estrada's Recycling, Dominguez transferred OOS/EBCs from the truck bed into another

1 vehicle, after which individuals emptied the bags into super sacks.

2 **XVIII**

3 On or about May 17, 2020, Ignacio Razo drove from EJ Automotive located at 1311 W.  
4 Broadway Rd., Phoenix AZ, to Extra Space Storage at 1705 S. State College Blvd., Anaheim CA,  
5 via a circuitous route designed to circumvent CDFA inspection.

6 **XIX**

7 On or about June 3, 2020, Raymundo Montoya possessed large stacks of black plastic  
8 bags and white super sacks of empty beverage containers at his property located at 3720  
9 Clarendon Ave., Phoenix AZ.

10 **XX**

11 On or about June 3, 2020, Sergio Hernandez parked at 41 E. Broadway Rd., Mesa AZ,  
12 where males loaded OOS/EBC into his trailer. Hernandez then drove to Z&M Recycling Center,  
13 located at 2806 E. Washington Blvd., Los Angeles CA, via a circuitous route designed to  
14 circumvent CDFA inspection.

15 **XXI**

16 On or about June 3, 2020, Sergio Hernandez offered to sell OOS/EBC to Marvin Ren  
17 Armira Chali and transferred this material to him at Z&M Recycling located at 2806 E.  
18 Washington Blvd., Los Angeles CA.

19 **XXII**

20 On or about June 3, 2020, Marvin Ren Armira Chali agreed to buy thousands of pounds of  
21 OOS/EBC from Arizona and accepted this material at Z&M Recycling located at 2806 E.  
22 Washington Blvd., Los Angeles CA.

23 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
24 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime."

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1 **COUNT TWO**

2 On or between April 4, 2019, and June 4, 2020, in the County of Los Angeles, State of  
3 California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal  
4 Code section 487(a), a Felony was committed by RAYMUNDO MONTOYA, SERGIO  
5 HERNANDEZ, IGNACIO RAZO, MARVIN REN ARMIRA CHALI, TOMAS DOMINGUEZ,  
6 IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, and JOB ROBLES-PELAEZ,  
7 who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty  
8 Dollars (\$950), to wit: the property of the State of California.

9 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
10 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime."  
11

12 **COUNT THREE**

13 On or between April 4, 2019, and June 4, 2020, in the County of Los Angeles, State of  
14 California, the crime of UNLAWFUL RECYCLING, in violation of Public Resources Code  
15 section 14591(b)(1)(F), a Felony, was committed by RAYMUNDO MONTOYA, SERGIO  
16 HERNANDEZ, IGNACIO RAZO, TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES,  
17 MICHAEL DOMINGUEZ, and JOB ROBLES-PELAEZ, who with the intent to defraud the State  
18 of California did bring out-of-state containers, rejected containers, or line breakage to the  
19 California marketplace for redemption.

20 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
21 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime."  
22

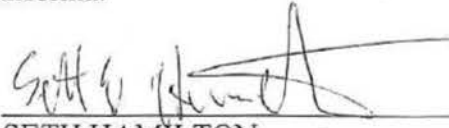
23 **COUNT FOUR**

24 On or between June 3, 2020, and June 4, 2020, in the County of Los Angeles, State of  
25 California, the crime of UNLAWFUL RECYCLING, in violation of Public Resources Code  
26 section 14591(b)(1)(D), a Felony, was committed by MARVIN REN ARMIRA CHALI, who  
27 with the intent to defraud the State of California redeemed out-of-state containers, rejected  
28 containers, line breakage, or containers that have already been redeemed.

1 "NOTICE: Conviction of this offense will require you to provide specimens and samples  
2 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime."

3  
4 **DECLARATION**


5 I declare under the penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct and that this complaint consists of four counts. Executed this  
7 19 day of JUNE, 2020, in Los Angeles, California.

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10 SETH HAMILTON  
11 DECLARANT AND COMPLAINANT

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13 Dated: June 19, 2020

14 Respectfully Submitted,

15 XAVIER BECERRA  
16 Attorney General of California  
17 JAMES G. ROOT  
18 Senior Assistant Attorney General  
19 DIANA L. CALLAGHAN  
20 Supervising Deputy Attorney General

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22 ALIX MCKENNA  
23 Deputy Attorney General  
24 *Attorneys for the People of the*  
25 *State of California*

26 AGENCY: CALIFORNIA BUREAU OF INVESTIGATION AND INTELLIGENCE  
27 PRELIM. TIME EST.: 2 days

28 Pursuant to Penal Code section 1054.5 (b), the People are hereby informally requesting that  
defense counsel provide discovery to the People as required by Penal Code section 1054.

## DECLARATION IN SUPPORT OF ARREST WARRANT AND EXTRADITION

(Made under 2015.5 CCP)

The undersigned hereby declares:

That your declarant is currently employed as a Special Agent for the California Department of Justice Bureau of Investigation. I have been so employed since December 1, 2017. From November 2012 to December 2017, I was employed in a supervisory capacity as a Detective Sergeant with the State of California, Department of Insurance, Fraud Division. Prior to that, I was employed as a Detective with the State of California, Department of Insurance, Fraud Division from September 2005 to November 2012. From May 2003 to September 2005, I was employed by the State of California, Department of Mental Health, as a Police Officer at Metropolitan State Hospital. As part of my employ with the Department of Insurance, I conducted multiple felony criminal investigations. These assignments required tasks including, but not limited to, surveillance, writing and service of search and arrest warrants, and undercover officer assignments. As part of my employ at Metropolitan State Hospital, my assignments entailed, on almost a daily basis, interviews of suspected and admitted persons who were involved in felony and misdemeanor criminal activities. I also performed custody, security, and general law enforcement duties and other related work.

That pursuant to said employment, your declarant has been assigned to investigate allegations that Defendants, RAYMUNDO MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO, MARVIN REN ARMIRA CHALI, TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, JOB ROBLES-PELAEZ, and ZAYDA GARCIA MEJIA did commit the crime(s) as set forth in the attached complaint.

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## FRAUD SCHEME

The California Beverage Container Recycling and Litter Reduction Act requires distributors of beverage containers (such as Anheuser- Busch and Coca-Cola) to make a payment to the California Beverage Container Recycling Fund for each beverage container they sell or offer for sale to retailers and others in California. This cost, commonly referred to as the California Redemption Value (CRV), is then passed along the chain of distribution and is ultimately borne by consumers of beverages at grocery stores, check-out stands, vending machines, and restaurants. California Department of Resources Recycling and Recovery, (CalRecycle) uses the monies in the Recycling Fund to repay the initial redemption payment (the CRV) to eligible claimants who present empty CRV-eligible bottles and cans for redemption at a minimum refund value of ten cents per two containers or five cents per single container in a single transaction. CRV-eligible bottles and cans may be presented for redemption value at any recycling center that is certified by CalRecycle. Those recycling centers that are not certified by CalRecycle are referred to as "non-certified recyclers" and/or "undocumented lots."

Public Resource Code section 14572(d)(2) makes clear that only bottles and aluminum cans sold or offered for sale in California and for which the CRV redemption payment has been made are eligible for redemption under this recycling program. Special Agents from the California Department of Justice have learned through discussion with CalRecycle personnel and others that many people try to collect CRV on non-eligible bottles and cans (usually in the form of crushed glass, aluminum, and plastic) by importing them from other states and Mexico and then redeeming them for CRV. Although this material may bear the "CRV" notation, it does not qualify for CRV redemption unless it was sold or offered for sale in California. That is, even though a can sold in Arizona or Nevada may bear the notation "CRV," it has no redemption value in California unless it was sold or offered for sale in California and the CRV was paid for by the distributor. A violation of these section is punishable as a felony if the money obtained or withheld exceeds nine hundred and fifty dollars (\$950). (Pub. Resources Code, § 14591(b)(2)). It should be noted that some states, such as Nevada and Arizona, as well as Mexico, do not have a recycling program that provides redemption value for bottles and aluminum cans. In fact, some

1 states, and Mexico, have only "scrap" value (which is significantly less than CRV redemption  
2 value) for bottles and aluminum cans.

3 Based on my training and experience, individuals involved in the importation of out-of-  
4 state empty beverage container (OOS/EBC) material collect the material in various ways,  
5 including purchasing it directly from recycling centers in Arizona, Nevada, and Mexico, or  
6 directly from individuals who purchase the material out of state and transport it into California  
7 and re-sell it. Those individuals are able to obtain the EBC material for between \$0.50 and \$0.70  
8 per pound. This value is determined by a nationwide market commodity price that reflects a fair  
9 market value of scrap aluminum and plastic. The containers are then transported to California  
10 and taken to "undocumented lots" and either loaded directly into box trucks for immediate  
11 redemption at "dirty" recycling centers, or are stored within the lot or "dirty" recycling center and  
12 meted out to local recycling centers or processed in small, nondescript loads that are designed to  
13 avoid suspicion.

14 Upon redemption in California, the importing individual receives approximately \$1.63 a  
15 pound for aluminum and \$1.26 a pound for plastic based on the CRV. Due to the fact the EBC  
16 material in question was never sold or offered for sale in California, the state never received the  
17 mandatory CRV payment from the distributor. Therefore, any claim against the CRV fund from  
18 an out of state importer is illegally defrauding the state of funds, a violation of Public Resources  
19 Code (PRC) section 14591(b)(1)(D), redeeming out-of-state containers with the intent to defraud.  
20 Further, the act of importing out of state containers with a fraudulent intent for the purpose of  
21 redemption is also a crime. (Pub. Resources Code, § 14591(b)(1)(F).)

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1 DEPARTMENT OF JUSTICE INVESTIGATION

2 On April 4, 2019, the California Department of Justice (CA DOJ), Bureau of Investigation  
3 (BI), Riverside Regional Office (RRO), Recycling Fraud Team (RFT) served a search warrant at  
4 Los Amigos Recycling, located at 777 E. 61st St. Los Angeles, CA 90001 and an undocumented  
5 lot located at 1628 Wall St. Los Angeles, CA 90015. During the service of the search warrant at  
6 Los Amigos, truck driver Raul MADRID was arrested and interviewed. MADRID's truck was  
7 searched at the time of the search warrant. The vehicle contained 8,328 pounds of OOS/EBC  
8 material with an estimated CRV of \$12,083.90. MADRID told me the material was from  
9 Arizona, and said he obtained the material from an individual he identified as Raymundo  
10 MONTTOYA. MADRID said MONTTOYA calls him when he is ready for him to deliver a load of  
11 EBC material, and his employees load it into his trailer. MADRID said he drives a route up the  
12 303, the 93, through Kingman, down the 95, and on the 40 to avoid California Department of  
13 Food and Agriculture checkpoints. MADRID said MONTTOYA instructed him to take this route  
14 to avoid detection.

15 During this investigation, electronic surveillance placed MADRID's truck at 45 N 69th  
16 Ave., Phoenix AZ, which corresponds with his description of the location of MONTTOYA's  
17 property. A Google maps search of the property matches the description given by MADRID.  
18 Additionally, a Google street view photograph of the property taken in 2018 shows the lot filled  
19 with black plastic commercial sized trash bags, consistent with the type used to package  
20 OOS/EBC material for the illegal importation into California.

21 Using law enforcement databases, I was able to identify a possible match for MONTTOYA,  
22 Arizona driver's license #D03545267. MADRID's description of MONTTOYA approximately  
23 matches the Arizona driver's license description and photograph of MONTTOYA: 5'05" in height,  
24 170 pound in weight approximately 38 years old (DOB: 08/07/1982). Additionally, a law  
25 enforcement database search of vehicles registered to MONTTOYA show two vehicles registered  
26 to MONTTOYA that match the description given by MADRID: a 2016 Chevrolet Colorado,  
27 Arizona license #BTA8454, and a 2019 Chevrolet Colorado, Arizona license #CJN7630.

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1 On April 10, 2019, RFT arrested Eziquel Dominguez GOMEZ pursuant to another  
2 investigation. GOMEZ was stopped on Interstate 15 southbound from Barstow by the San  
3 Bernardino County Sheriff's Department, who contacted DOJ for assistance. At the time of  
4 arrest, GOMEZ was inside his truck, and was transporting 5,250 lbs. of plastic and 1,895 lbs. of  
5 aluminum, with an estimated CRV value of \$9,823.45. GOMEZ told me that he obtained the  
6 material in Phoenix, AZ. GOMEZ said he was paid \$1,200 to drive his empty semi-truck to  
7 Phoenix, where he meets a Hispanic male he identified by the name of Raymundo MONTOYA.  
8 At MONTOYA's direction, GOMEZ takes an indirect route back into California so he can avoid  
9 the California Department of Food and Agriculture (CDFA) inspection checkpoints. GOMEZ  
10 said this was his third time bringing OOS/EBC into California. On April 11, 2019, I interviewed  
11 GOMEZ at his home and showed him the driver's license photograph of MONTOYA I had  
12 obtained from law enforcement databases. GOMEZ positively identified the man in the  
13 photograph as the MONTOYA who provides him with OOS/EBC material to illegally import into  
14 California from Arizona.

15 On January 16, 2020, RFT arrested Arturo REYES at his home, pursuant to an arrest  
16 warrant issued in connection with another investigation. At the time of arrest, REYES was  
17 interviewed by RFT Special Agents. REYES said he had imported OOS/EBC material at the  
18 direction of his employer, Selvin RODRIGUEZ; REYES said RODRIGUEZ would tell him  
19 where to pick up OOS/EBC's. At the time of his interview, REYES was shown a photograph of  
20 Raymundo MONTOYA. REYES said he met the person in the photograph the very first time he  
21 picked up OOS/EBC's from Arizona.

22 On January 17, 2020, RFT arrested Carlos GRIMALDI, pursuant to an arrest warrant issued  
23 in connection with another investigation. At the time of arrest, GRIMALDI was interviewed by  
24 RFT. GRIMALDI admitted that RODRIGUEZ instructed him on multiple occasions to pick up  
25 OOS/EBC's from Arizona. GRIMALDI described a residential location, located in the area of  
26 69th Ave. and Van Buren St. in Phoenix, AZ, where RODRIGUEZ instructed him to pick up  
27 OOS/EBC's. GRIMALDI's description of the location matches the description of 45 N 69th  
28 Ave. Phoenix, AZ, allegedly used for the collection, packaging and distribution of OOS/EBC's

1 into California by MONTOYA. RFT showed GRIMALDI a map of this location, and  
2 GRIMALDI confirmed that this was the location to which he was referring. GRIMALDI showed  
3 RFT a text message from RODRIGUEZ on his cell phone, in which RODRIGUEZ instructed  
4 GRIMALDI to pick up OOS/EBC's from this location.

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26 \*\*\*\*\*PER EVIDENCE CODE SECTIONS 1040, BEGIN SEALED PORTION OF  
27 ARREST WARRANT\*\*\*\*\*  
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1       \*\*\*\*\*PER EVIDENCE CODE SECTIONS 1040, END SEALED PORTION OF  
2 SEARCH WARRANT\*\*\*\*\*

3       On April 14, 2020, RFT conducted remote surveillance of Sergio HERNANDEZ.  
4 HERNANDEZ traveled to 45 N. 69<sup>th</sup> Ave. in Phoenix, departed the location, and returned to CA  
5 via the following route:

- 6       1. Interstate 10 West
- 7       2. Arizona 101 North
- 8       3. US 60 North
- 9       4. US 93 North
- 10      5. Interstate 40 West
- 11      6. US 93 North
- 12      7. Arizona 68 West
- 13      8. Arizona 95 South
- 14      9. US 40 West.

15       I recognize this route as a circuitous route used to deliberately circumvent a California  
16 Department of Food and Agriculture Inspection Station located in Blythe, Vidal Junction,  
17 Needles, and Mountain Pass. HERNANDEZ arrived at a parking location at 13058 Simms Ave.  
18 Hawthorne, CA 90250 at about 2029 hours. A direct route from 45 N. 69<sup>th</sup> Ave. Phoenix, AZ to  
19 this location is about 375 miles. The above detailed circuitous route is about 516 miles.

20       On April 15, 2020, RFT surveilled HERNANDEZ. HERNANDEZ traveled from a parked  
21 location at 2900 W. Rosecrans Ave. Gardena, CA 90249 to Everest Self Storage, located at 1515  
22 S. State College Blvd. Anaheim, CA 92806. RFT saw a white camper style van, (CA  
23 #7PHW077) arrive at Everest Self Storage and a Hispanic male adult, later identified as Job  
24 ROBLES-Pelaez provided access to the facility. HERNANDEZ pulled his truck and trailer inside  
25 the facility and parked near locker 8024. RFT approached the area on foot and could see the  
26 trailer parked near the vicinity of locker 8024 with the rear doors open and hear a sound  
27 consistent with that of aluminum cans being dumped into plastic bags. At about 2250 hours,  
28 HERNANDEZ departed from the vicinity of Everest Self Storage.

1 On April 16-18, 2020, RFT conducted surveillance of Everest Self Storage and ROBLES.  
2 During the course of the surveillance, ROBLES completed multiple trips between Everest Self  
3 Storage and various recycling centers throughout Orange and Riverside Counties.

4 On April 22, 2020, HERNANDEZ's truck and trailer traveled to 45 N. 69<sup>th</sup> Ave. in  
5 Phoenix, then returned to California via the above-mentioned circuitous route. On April 23,  
6 HERNANDEZ traveled to a Public Storage located at 8340 Washington Blvd. Pico Rivera, CA  
7 90660. RFT saw HERNANDEZ driving his red Freightliner semi-truck, with trailer #4RR9576  
8 attached, arrive at the location being unloaded by several unidentified Hispanic males (UHM's).  
9 RFT saw the following vehicles at the location: a white Dodge Sprinter, CA #8B89381, a white  
10 Dodge Sprinter, CA #33672Y1, and a white Ford box truck, CA #25492P2, parked adjacent to the  
11 lockers. RFT watched as the UHM's unloaded the material into four storage lockers at the  
12 location, then loaded the material into the vans and a box truck. During the surveillance, Sprinter  
13 CA #33672Y1 departed from Public Storage, and traveled to Dollar Self Storage, located at 8717  
14 Pioneer Blvd. Santa Fe Springs, CA. The vehicle drove inside the facility and parked adjacent to  
15 lockers 47-50. RFT could see an unidentified white box truck parked near the lockers, and  
16 several UHM's loading bags of EBC material from the lockers into the van and truck. RFT  
17 followed the vehicles throughout the day and observed as the vans and box truck made deliveries  
18 to multiple recycling centers in Los Angeles County.

19 On April 23, 2020, RFT initiated a surveillance of the Public Storage and observed the  
20 following vehicles parked near the lockers: a white Dodge van, CA #25537P2, a white Dodge  
21 Sprinter van, CA #8B89381, and a white Dodge Sprinter van, CA #33672Y1. Several UHM's  
22 were unloading bags of OOS/EBC material from the locker into the vans. RFT followed the  
23 vehicles throughout the day as they delivered material to recycling centers throughout Los  
24 Angeles County. At one delivery, RFT saw Dodge van CA #25537P2 deliver to Kay-Met  
25 Recycling, located at 19014 E. San Jose Ave. Rowland Heights, CA. At the location, the Dodge  
26 van stopped and pulled adjacent to a White Sprinter CA #69964B2 and its occupant conversed  
27 with the driver of the Sprinter.

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1 April 28, 2020, HERNANDEZ arrived at 45 N. 69<sup>th</sup> Ave. Phoenix, AZ. At about 1116  
2 hours, HERNANDEZ departed from 45 N. 69<sup>th</sup> Ave. and traveled from Arizona to California  
3 along the above-mentioned circuitous route used to circumvent CDFA Inspection Stations. On  
4 April 29, 2020, RFT initiated a surveillance at the Public Storage. Upon arrival, RFT saw  
5 HERNANDEZ's parked inside. RFT watched as UHM's unloaded bags of OOS/EBC material  
6 from his truck. HERNANDEZ departed Public Storage, and RFT followed the UHM's as they  
7 delivered bags of OOS/EBC material to recycling centers in Los Angeles County.

8 On April 29, 2020, RFT observed as HERNANDEZ's green Freightliner, #WP75903  
9 traveled from Arizona to California along the above-mentioned circuitous route used to  
10 circumvent CDFA Inspection Stations. On April 30, 2020, at about 0035 hours, the trailer  
11 stopped and parked along the road near the vicinity of 3103 Glen Helen Pkwy. San Bernardino,  
12 CA. The direct route from 2833 W. Lincoln St. Phoenix, AZ to 3103 Glen Helen Pkwy. San  
13 Bernardino, CA is about 330 miles. The above detailed circuitous route is about 455 miles.

14 On April 30, 2020, RFT initiated a surveillance of the green Freightliner. At about 0710  
15 hours, it traveled from its parking location along the freeway. RFT contacted the California  
16 Highway Patrol and CHP officers were able to initiate a traffic stop and identify the driver of the  
17 vehicle as Ignacio RAZO. After being released by CHP, RAZO continued along the freeway,  
18 arriving at Dollar Self Storage, located at 8717 Pioneer Blvd. Santa Fe Springs, CA at about 0820  
19 hours. I saw RAZO drive the truck and trailer into the Dollar Self Storage, where UHM's  
20 unloaded bags of OOS/EBC material into lockers 47-50. Also at the location were Sprinter CA  
21 #33672Y1, and Sprinter CA #69964B2. RFT followed Sprinter #69964B2 as it delivered EBC  
22 material to recycling centers throughout Los Angeles County. Simultaneously, RFT conducted  
23 surveillance of the Pico Rivera Public Storage. RFT saw Sprinter #8B89381 driven by a UHM  
24 arrive at the location, park near lockers C031-C035, open the lockers, and begin unloading bags  
25 of EBC from the lockers into the vehicle. Box truck #25492P2 also arrived and was loaded with  
26 EBC material from the lockers. RFT followed both vehicles as they delivered bags of EBC  
27 material to recycling centers throughout Los Angeles County.  
28

1 On May 4, 2020, I observed HERNANDEZ's vehicle, and saw it was parked at 45 N. 69<sup>th</sup>  
2 Ave. On May 5, 2020, at about 0637 hours, HERNANDEZ departed from 69<sup>th</sup> Ave. and traveled  
3 to the Flying J truck stop located at 6700 W. Latham St. Phoenix, AZ. HERNANDEZ remained  
4 at the Flying J until May 6, 2020, at about 0732 hours, when he returned to 69<sup>th</sup> Ave. At about  
5 0915 hours, HERNANDEZ departed from 69<sup>th</sup> Ave. and traveled back to CA along the circuitous  
6 route. On May 7, 2020, HERNANDEZ traveled to the Pico Rivera Public Storage.

7 On May 6, 2020, RFT, conducted a physical surveillance at Dollar Self Storage located at  
8 8717 Pioneer Blvd, Santa Fe Springs, CA 90670. Upon arrival at about 0906 hours, I saw a white  
9 Dodge Sprinter van and a white Isuzu box truck parked inside the facility near the vicinity of  
10 lockers 47-50. I could see a gold semi-truck (CA #WP60100) with an attached 53' trailer (CA  
11 #4MS9849) parked near the entrance gate to the facility. I ran the license plates for both the truck  
12 and trailer through law enforcement and CA DOJ databases and saw the truck was suspected of  
13 illegally importing OOS/EBC material from Arizona to California on previous occasions. The  
14 truck and trailer entered the facility and parked near lockers 47-50, where I could see and hear  
15 several UHM's unloading bags of OOS/EBC material. At about 1120 hours, the truck and trailer  
16 departed the facility. I contacted CHP, who initiated a traffic stop and identified the driver as  
17 Ricardo LOPEZ. I ran LOPEZ's name through DOJ databases and learned that he is suspected of  
18 illegally transporting OOS/EBC to California from Arizona, as investigated in another case.

19 At about 1231 hours, I saw Sprinter CA #69964B2 depart from Dollar Self Storage. I  
20 contacted CHP, who initiated a traffic stop of the Sprinter and identified the driver as Irving  
21 DOMINGUEZ FLORES. According to CHP, DOMINGUEZ FLORES' vehicle was filled top to  
22 bottom, front to back with black plastic trash bags, which DOMINGUEZ FLORES described as  
23 "recyclables." DOMINGUEZ FLORES told the CHP officer that the vehicle belonged to his  
24 father-in-law. I ran DOMINGUEZ FLORES's California driver's license number through law  
25 enforcement databases and obtained his California DMV photo. I recognized the DMV photo as  
26 the same person I saw driving the Sprinter #69964B2 on April 30, 2020. RFT followed  
27 DOMINGUEZ FLORES throughout the day as he delivered OOS/EBC material to recycling  
28 centers throughout Los Angeles County.



1 May 8, 2020, at about 1058 hours, I observed HERNANDEZ's truck in the vicinity of 728  
2 E. Buckeye Rd. Phoenix, AZ. I conducted a Google maps check of this address and saw that it  
3 was a recycling center. At about 1916 hours, HERNANDEZ was observed in the vicinity of 4228  
4 W. Indian School Rd. Phoenix, AZ. I recognize this address as a known recycling center in  
5 Phoenix. HERNANDEZ departed from Indian School Rd. at about 2016 hours, and traveled back  
6 to CA, taking the circuitous route. Also observed on May 8, 2020, RAZO was near the vicinity  
7 of 1213 W. Broadway Rd., Phoenix, AZ. A Google maps search of the location showed a  
8 recycling center in that area. At about 1318 hours, RAZO departed from the Broadway recycling  
9 center, and traveled from AZ to CA, taking the circuitous route. On May 9, 2020, at about 1416  
10 hours, RAZO arrived in the vicinity of 27898 Ethanac Rd. in Menifee, CA. I conducted a Google  
11 maps search of the area and saw the location was an undocumented lot. I know, from my training  
12 and experience, that undocumented lots are often used by individuals for receiving, packaging  
13 and distributing OOS/EBC material to recycling centers.

14 On May 11, 2020, RFT conducted surveillance of HERNANDEZ and observed that he was  
15 parked near the vicinity of 3720 W. Clarendon Ave. Phoenix, AZ. HERNANDEZ departed from  
16 the location and returned to CA via the circuitous route, and parked in Hawthorne, CA. On May  
17 12, 2020, RFT monitored HERNANDEZ and saw that he had traveled to the Pico Rivera Public  
18 Storage facility. RFT initiated a physical surveillance of the location and saw HERNANDEZ's  
19 truck, with attached trailer #4RR9576, parked inside. Several UHM's were seen unloading bags  
20 filled with OOS/EBC material and placing the bags into lockers. I could see HERNANDEZ  
21 sitting inside his parked truck. Parked adjacent to the lockers were Sprinter CA #69964B2,  
22 Sprinter CA #8B89381, and the white box truck, CA #25492P2. RFT conducted surveillance and  
23 followed several delivery vehicles as they traveled to recycling centers in the Los Angeles area.  
24 During the course of the surveillance, CHP conducted a traffic stop of Sprinter #8B89381, and  
25 identified the driver as MICHAEL Dominguez. MICHAEL stated that the vehicle belonged to  
26 his father, and he was delivering "recycling."

27 On May 12, 2020, RFT monitored RAZO's target vehicle, and observed it was parked for  
28 several hours near 1580 W. University Dr. Mesa, AZ. A Google maps search of this location



1 identified it as a recycling center. On May 13, 2020, RAZO returned to CA via the circuitous  
2 route, and delivered his material to an undocumented lot located at 233 W. Jefferson Blvd. Los  
3 Angeles, CA.

4 On May 14, 2020, RFT monitored HERNANDEZ and observed that his vehicle had  
5 stopped at the recycling center at 4228 Indian School Rd. in Phoenix, and MONTTOYA's location  
6 at 3720 W. Clarendon. At 0700 hours, RFT initiated a physical surveillance of the Pico Rivera  
7 Public Storage. Parked adjacent to storage locker C031-035 was a white semi-truck, CA  
8 #WP70135 (registered owner: Eloy Ricardo/MR DK Trucking, 629 Harmsworth Ave. La Puente,  
9 CA 91744), with an attached 53' trailer, CA #4JW5249 (registered owner Juan Rivera, CA/DBA  
10 Riveras Trucking, 5747 S. Victoria Ave. Los Angeles, CA 90043). I saw multiple HMAs  
11 unloading bags of OOS/EBC's from the trailer, into a box truck #25492P2. At about 0900 hours,  
12 two previously observed HMA's entered box truck #25492P2 and departed from Public Storage.  
13 I requested assistance from CHP for a traffic stop to identify the drivers of the box truck. At  
14 about 0908 hours, CHP Officers conducted a traffic stop of the box truck for a traffic violation.  
15 The driver was identified by his California Driver's License as Tomas DOMINGUEZ.  
16 DOMINGUEZ's son, Carlos, was in the passenger seat. DOMINGUEZ told officers he was  
17 delivering "recycling." DOMINGUEZ was sent on his way at the conclusion of the traffic stop.

18 At about 0955 hours, I saw DOMINGUEZ arrive at LA Recycling Center, located at 12643  
19 San Fernando Rd. Sylmar, CA. CARLOS Domínguez exited the box truck and open the rear box  
20 truck doors. An HMA, appearing to be a recycling center employee, removed approximately five  
21 bags of suspected OOS/EBCs from the truck. At about 1002 hours, DOMINGUEZ drove away  
22 from the location and traveled to Estrada's Recycling, located at 15252 Parthenia St. North Hills,  
23 CA. The box truck backed up to a parked GMC box truck, bearing California license plate  
24 #85131S2. Tomas DOMINGUEZ and CARLOS began transferring bags of OOS/EBC's from  
25 their box truck, into the GMC box truck at the recycling center. I then saw HMAs, appearing to  
26 be recycling center employees, empty bags from the GMC box truck into super sacks.

27 RFT also conducted a physical surveillance of the Jefferson Blvd. lot. RFT saw vehicles  
28 parked inside with the logo All Recycling on them. RFT contacted CalRecycle, and learned that

1 All Recycling is a registered recycling center owned by Norma RANGEL, and has three listed  
2 locations: 5872 S. Central Ave. Los Angeles, CA 90001; 1856 E. 65<sup>th</sup> St. Los Angeles, CA  
3 90001; and 4074 Broadway Pl. Los Angeles, CA 90037. The lot on Jefferson Blvd. is not a  
4 registered location with CalRecycle. Sitting outside the lot inside a parked red Nissan Murano  
5 CA #8EZG082 was Zayda Garcia MEJIA; MEJIA is the sister of Norma RANGEL. MEJIA  
6 previously applied to receive a license with CalRecycle.

7 On May 16, 2020, RFT monitored RAZO's vehicle and observed it in the vicinity of EJ  
8 Automotive, located at 1311 W. Broadway Rd. Phoenix, AZ. A Google street view of this  
9 location indicates that there is a recycling center adjacent to the business. RAZO returned to  
10 California via the circuitous route, and arrived at Extra Space Storage, located at 1705 S. State  
11 College Blvd. Anaheim, CA on May 17, 2020. This storage facility is approximately one block  
12 away from Everest Self-Storage, where ROBLES was observed storing imported OOS/EBC's,  
13 then subsequently delivering them to recycling centers in Los Angeles, Orange, and Riverside  
14 counties.

15 On May 17, 2020, RFT conducted a physical surveillance of Extra Space Storage. During  
16 the surveillance, I saw a white Dodge van, CA #7LXR609, park beside storage locker 94,  
17 Building "B." A DMV showed ROBLES as the registered owner. RFT also saw ROBLES  
18 loading bags of EBC material from the locker into the van. RFT followed ROBLES as he  
19 traveled throughout Los Angeles and Orange counties.

20 On May 19, 2020, I monitored HERNANDEZ and saw he was in the vicinity of  
21 MONTOYA's Clarendon lot. He traveled back to California via the circuitous route and arrived  
22 at a business at 8160 Salt Lake Ave. Cudahy, CA. I traveled to the location and saw  
23 HERNANDEZ's truck and trailer parked at the business.

24 On May 20, 2020, HERNANDEZ returned to Phoenix, and traveled to the Indian School  
25 Rd. recycling center. He returned to California via the circuitous route, and traveled to the  
26 location at 8160 Salt Lake Ave. Cudahy, CA. On May 20, RAZO traveled to MONTOYA's  
27 Clarendon lot and the recycling center at Indian School Rd. He returned to California on May 21,  
28 2020 and traveled to the vicinity of 2427 E. 51<sup>st</sup> St. Los Angeles.

1 On May 21, 2020, RFT conducted surveillance of 233 W. Jefferson Blvd, Los Angeles CA.  
2 RFT saw a semi-truck, CA #WP51253 arrive on the lot. When the vehicle departed, RFT could  
3 see black bags of suspected OOS/EBCs alongside a stack of baled EBCs. During this time,  
4 Zayda Garcia MEJIA was sitting in front of the driver's seat of a Nissan Murano. Three box  
5 trucks with "All Recycling" written on the doors were parked in the area. RFT also saw an All  
6 Recycling roll-off truck depart the Jefferson lot and deliver suspected OOS/EBCs to Basic Fibers  
7 located 6019 S Manhattan Pl. Los Angeles, CA 90047. Basic Fibres is the processor used by All  
8 Recycling.

9 After the roll-off departed the Jefferson lot, Garcia Mejia exited the Nissan Murano and  
10 entered the facility via a pedestrian gate, using keys on her person. Through the pedestrian gate,  
11 RFT saw a stack of plastic EBC bales approximately two stories high. The bales could be seen  
12 over the gate. The type of bales seen at this location consisted of cancelled material and are thus  
13 ineligible for redemption.

14 According to CalRecycle, All Recycling is not a certified processor, and does not have  
15 permission to cancel material; based on this information, there is no reason for them to be in  
16 possession of canceled material in bale form. I know, based on my training and experience, that  
17 canceled material is often transported to illegal recycling centers and storage yards, and broken  
18 down, bagged, and illegally redeemed for CRV.

19 On May 27-28, 2020, RFT conducted surveillance at the Jefferson Blvd. lot and the  
20 aforementioned All Recycling locations. On May 27, 2020, I could see inside the Jefferson lot,  
21 and saw bales of canceled plastic and aluminum EBC material stacked inside.

22 On June 3, 2020, RFT conducted a physical surveillance with locations in Phoenix, AZ,  
23 discovered during the course of this investigation to be affiliated with MONTROYA. RFT traveled  
24 to a recycling center located at the approximate address of 41 E. Broadway Rd. Mesa, AZ 85353.  
25 Upon arrival at the location, RFT saw HERNANDEZ's red Freightliner California license  
26 #XP30991, with an attached trailer, California license #4JP2083 parked at the location. RFT  
27 could see several UHM's loading large, black and clear plastic commercial sized plastic bags  
28 filled with EBC material into the trailer. I continued to remotely monitor HERNANDEZ's

1 vehicle. At about 1113 hours, HERNANDEZ departed the location and traveled to California  
2 from Arizona via the circuitous route. HERNANDEZ arrived at Z&M Recycling Center, located  
3 at 2806 E. Washington Blvd. Los Angeles, CA 90023 at about 2148 hours. A direct route from  
4 41 E. Broadway Rd. Mesa, AZ 85353 to 2806 E. Washington Blvd. Los Angeles, CA 90023 is  
5 about 386 miles. The above detailed circuitous route is about 525 miles. HERNANDEZ  
6 remained parked at the location until about 2353 hours, after which he departed and parked his  
7 vehicle near the vicinity of 12900 Crenshaw Blvd. Gardena, CA 90249 at 0049 hours on June 4,  
8 2020.

9 On June 4, 2020, RFT traveled to the locations visited by HERNANDEZ. Upon arrival  
10 near the vicinity of 12900 Crenshaw Blvd., RFT could see parked on the street HERNANDEZ's  
11 truck with the same attached trailer as was observed at 41 E. Broadway Rd. in Mesa, AZ. The  
12 rear doors to the trailer were open and the interior of the trailer was empty. RFT traveled to Z&M  
13 Recycling. The facility was open for business and RFT could see inside the facility. There were  
14 several Gaylord bags inside the facility filled with EBC material. Inside a refuse dumpster onsite,  
15 RFT could see a large clear commercial size plastic bag that appeared filled with similar empty,  
16 discarded commercial sized bags. I know, based on my training and experience, that illegal  
17 OOS/EBC material is often dumped from the bags used to transport the material from out of state  
18 into various storage containers, in this instance Gaylord bags, where it is co-mingled with legally  
19 purchased material, before being transported to a processor.

20 RFT contacted CalRecycle to report the observations. CalRecycle checked internal  
21 databases and observed a large amount (in excess of 1,000 pounds) of plastic EBC material was  
22 delivered for processing from Z&M Recycling that morning. Based on Z&M's processing  
23 history, the amount of material was considerably higher than a normal amount of material they  
24 would submit for processing. CalRecycle auditors responded to the location for a regulatory site  
25 inspection and met with the onsite employee Marvin Rene Armira CHALI. CHALI escorted  
26 CalRecycle auditors through the facility; CalRecycle auditors inspected the gaylord bags at the  
27 location; the bags were filled with aluminum EBC material, which bore the logo of the Arizona  
28 Cardinals Football team. One indicator of OOS/EBC material, based on my training and



1 experience, is packaging, logos, and paraphernalia for sports teams and commercial business  
2 located from an out of state geographic area.

3 Parked at Z&M Recycling was a white box truck, CA #63402A2 (registered owner: Zoila  
4 MEJIA, or Z/M Recycling Center, 12117 Washington Pl. Los Angeles, CA 90066). The truck  
5 was filled with black plastic commercial sized bags consistent with those used to transport  
6 OOS/EBC material. Based on the volume illegal OOS/EBC material present, CalRecycle  
7 requested law enforcement assistance from CA DOJ. RFT Special Agents responded to the site  
8 and secured the location, pending approval of a search warrant. CHALI consented to an  
9 interview, and told RFT agents the following:

10 CHALI said Z&M Recycling is owned by his wife, but he is the person responsible for  
11 operating the recycling center on a daily basis. He stated that he and his wife are the only two  
12 people with keys to open and close the business. Sometimes he hires various friends or homeless  
13 individuals to help him at the recycling center. When asked to explain the large amount of EBC  
14 material currently inside his recycling center, CHALI said he received a telephone call on June 3,  
15 2020, from an unfamiliar number (310-350-0557). The person on the phone was an unknown  
16 male, who offered to sell him 3,000 lbs. of plastic OOS/EBC's and 5,000 lbs. of aluminum  
17 OOS/EBC's. The unidentified person offered to sell the OOS/EBC's to CHALI at rates of  
18 \$.80/pound of plastic and \$1.45/pound of aluminum. The unknown male explained to CHALI he  
19 would have to pay him \$1,500 cash upon delivery of the OOS/EBC's, to cover the cost of  
20 transporting them from out of state. The unidentified male further explained the cost of the  
21 material could be paid at a later date, once CHALI had redeemed the OOS/EBC's and made the  
22 money back.

23 CHALI explained that the unknown male must have found his telephone number by  
24 conducting an internet search of his recycling center. CHALI said he initially told the unknown  
25 male that he was unsure if he wanted to receive the OOS/EBC's. CHALI explained that he has  
26 been caught committing recycling fraud in the past, and that he knew the unknown male was  
27 offering him OOS/EBC's from outside California. Because he was afraid of getting in trouble for  
28 purchasing OOS/EBC's, he told the unknown male he would think about it and call him later.



1 CHALI said he eventually called the number back and told the unknown male that he wanted to  
2 purchase the OOS/EBC's from him. CHALI showed RFT Special Agents a text messages in his  
3 cell phone, which he received from the unknown male (310-350-0557). In the message, the  
4 unknown male asks CHALI what time he can make the delivery. The unknown male also  
5 explains that he cannot cancel his load because he will be charged \$500. The messages concludes  
6 with the unknown male explaining that he is in San Bernardino, CA.

7 CHALI said that later that evening, at about 2100 hours, a red semi-truck arrived at Z&M  
8 Recycling. The semi-truck was pulling an attached white trailer, which was filled with both super  
9 sacks and black trash bags containing OOS/EBC's. CHALI, along with friends he hired for the  
10 night, unloaded the entire contents of the trailer into the recycling center. CHALI said he did not  
11 recognize the semi-truck driver and had never seen him before. He described him as a HMA.  
12 RFT showed CHALI a DMV photograph of HERNANDEZ; CHALI identified HERANDEZ as  
13 the person he was communicating with by telephone and the person who delivered the  
14 OOS/EBC's in the semi-truck.

15 CHALI granted RFT permission to read his text messages to identify any additional  
16 conversations about OOS/EBC importation, RFT Agents reviewed the text messages, and saw a  
17 text message conversation with a telephone number 424-251-1045; CHALI told RFT Agents he  
18 knew this person by the nickname "Catracho". He explained Catracho is a person who will  
19 sometimes sell him large quantities of OOS/EBC's in a cargo vehicle, like a van or box truck.

20 CHALI admitted that all of the EBC material currently inside his recycling center, with the  
21 exception of the non-CRV eligible plastic and glass, was OOS/EBC's he purchased from  
22 HERNANDEZ. The recyclables stored inside the box truck (#63402A2) were also OOS/EBC's  
23 purchased from HERNANDEZ. CHALI said it was his intention to redeem the OOS/EBC's he  
24 purchased from HERNANDEZ for CRV and that he knew doing so would be illegal.

25 On June 4, 2020, I authored a search warrant for Z&M Recycling. The search warrant was  
26 signed by The Honorable Efrain M. Acevedo, Judge of the Los Angeles Superior Court. RFT  
27 served the search warrant at Z&M Recycling at about 1545 hours. CalRecycle and RFT  
28 performed a search of the onsite office structure. I saw that inside the structure was a desk and

1 file cabinets. On top of the desk were stacks of recycling receipts. RFT seized all receipts  
2 corresponding with the months of March, April, May, and June as evidence. At about 1730  
3 hours, Corridor Recycling finished collecting the OOS/EBC's. On June 10, 2020, Corridor  
4 Recycling reported to CalRecycle and RFT the value of the processed the material: 6,733 pounds  
5 of aluminum, with an estimated CRV of \$11,042.12, and 3,524 pounds of plastic, with an  
6 estimated CRV of \$4,510.72. The estimated total potential loss to the CRV from this individual  
7 trip is \$15,552.84.

8 From April 6, 2020 to June 5, 2020, Sergio HERNANDEZ has made 16 trips illegally  
9 delivering OOS/EBC material from Arizona to California. Of those, 10 originated from lots  
10 owned or operated by Raymundo MONTOYA, either in whole or a mixed load. Ignacio RAZO  
11 been continuously tracked since April 29, 2020. He has made 10 trips illegally delivering  
12 OOS/EBC material from Arizona to California. Four of those trips originated from lots owned or  
13 operated by Raymundo MONTOYA. Using the dollar values and weights based on the material  
14 seized from Z&M Recycling, it is estimated Raymundo MONTOYA and his co-conspirators have  
15 illegally obtained approximately \$217,739.76 of public money from the CRV fund, since April 6,  
16 2020.

## 17 CONCLUSION

18 Based on my training and experience, individuals involved in the importation of OOS/EBC  
19 material collect the material in various ways, including purchasing the material directly from  
20 recycling centers in Arizona, Nevada, or Mexico. The individuals are able to obtain the EBC  
21 material for between 50¢ and 70¢ per pound. This value is determined by a nationwide market  
22 commodity price that reflects a fair market value for scrap aluminum. The containers are then  
23 transported to California, taken to "undocumented lots," and either loaded directly into box trucks  
24 for immediate redemption at "dirty" recycling centers or are stored within the lot and later meted  
25 out to local recycling centers in small, nondescript loads designed to avoid suspicion. Upon  
26 redemption in California, the importing individual receives \$1.63 per pound for aluminum and  
27 \$1.26 a pound for plastic based on the California Redemption Value (CRV). Due to the fact that  
28 the EBC material in question was never sold or offered for sale in CA, the state never received the

1 mandatory CRV payment from the distributor. Therefore, any claim against the CRV fund from  
2 an out of state importer is illegally defrauding the state of funds. If more than nine hundred and  
3 fifty dollars are illegally obtained in this manner, the act constitutes grand theft, in violation of  
4 Penal Code section 487, and unlawful recycling, a felony in violation of PRC § 14591(b)(1)(D).  
5 Further, the act of bringing in OOS/EBC with fraudulent intent for the purpose of redeeming this  
6 material constitutes a violation of PRC § 14591(b)(1)(F): Brings Out-of-State Containers,  
7 Rejected Containers, or Line Breakage to the Marketplace for Redemption.

8 It is your affiant's opinion based on my training and experience that Raymundo  
9 MONTOYA is illegally importing OOS/EBC material from lots located at 45 N. 69<sup>th</sup> Ave.  
10 Phoenix, AZ, and 3720 W. Clarendon Ave. Phoenix, AZ. Semi-trucks/trailers registered to  
11 Sergio HERNANDEZ, and used by Sergio HERNANDEZ and Ignacio RAZO have been  
12 observed delivering OOS/EBC material to Dollar Self Storage, Santa Fe Springs, CA, Everest  
13 Self Storage, Anaheim, CA, Public Storage, Pico Rivera, CA, and 233 W. Jefferson Blvd. Los  
14 Angeles, CA. The OOS/EBC material is broken down by an organized collection of criminal  
15 groups, including multiple unidentified individuals, and the following identified persons: Job  
16 ROBLES-Pelaez, Irving DOMINGUEZ FLORES, MICHAEL Dominguez, Tomas  
17 DOMINGUEZ, and Marvin Rene Armira CHALI. The broken-down material is then transported  
18 by a box truck and cargo vans to recycling centers within Los Angeles, Orange, and Riverside  
19 Counties in an attempt to commit fraud against the CRV fund.

20 Based on the above investigation, I have probable cause to believe that RAYMUNDO  
21 MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO, MARVIN REN ARMIRA CHALI,  
22 TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, JOB  
23 ROBLES-PELAEZ, and ZAYDA GARCIA MEJIA committed the crime of conspiracy, a felony  
24 in violation of Penal Code section 182(a)(1), in that they conspired to commit grand theft, in  
25 violation of Penal Code section 487(a), and recycling fraud in an amount exceeding nine hundred  
26 and fifty dollars, in violation of Public Resources Code sections 14591(b)(1)(D) and  
27 14591(b)(1)(F), felonies. Therefore, I respectfully request that this court issue a felony warrant  
28 for arrest and extradition for RAYMUNDO MONTOYA, SERGIO HERNANDEZ, IGNACIO

1 RAZO, MARVIN REN ARMIRA CHALI, TOMAS DOMINGUEZ, IRVING DOMINGUEZ  
2 FLORES, MICHAEL DOMINGUEZ, JOB ROBLES-PELAEZ, and ZAYDA GARCIA MEJIA  
3 for a violation of a violation of Penal Code section 182(a)(1).

4 Based on the above investigation, I also have probable cause to believe that RAYMUNDO  
5 MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO, MARVIN REN ARMIRA CHALI,  
6 TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, and  
7 JOB ROBLES-PELAEZ committed the crime of grand theft, a felony in violation of Penal Code  
8 section 487 (a). Therefore, I respectfully request that this court issue a felony warrant for arrest  
9 and extradition for RAYMUNDO MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO,  
10 MARVIN REN ARMIRA CHALI, TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES,  
11 MICHAEL DOMINGUEZ, JOB ROBLES-PELAEZ for a violation of Penal Code section 487  
12 (a).

13 Based on the above investigation, I have probable cause to believe that RAYMUNDO  
14 MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO, TOMAS DOMINGUEZ, IRVING  
15 DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, and JOB ROBLES-PELAEZ committed  
16 the crime of unlawful recycling, a felony in violation of Public Resources Code section  
17 14591(b)(1)(F). Therefore, I respectfully request that this Court issue a felony warrant for arrest  
18 and extradition for RAYMUNDO MONTOYA, SERGIO HERNANDEZ, IGNACIO RAZO,  
19 TOMAS DOMINGUEZ, IRVING DOMINGUEZ FLORES, MICHAEL DOMINGUEZ, JOB  
20 ROBLES-PELAEZ for a violation of PRC 14591(b)(1)(F).

21 Based on the above investigation, I have probable cause to believe that MARVIN REN  
22 ARMIRA CHALI committed the crime of unlawful recycling, a felony in violation of Public  
23 Resources Code section 14591(b)(1)(D). Therefore, I respectfully request that this Court issue a  
24 felony warrant for arrest and extradition for MARVIN REN ARMIRA CHALI for a violation of  
25 PRC 14591(b)(1)(D).

26 WHEREFORE, your declarant prays that warrants issue for the arrest and extradition of the  
27 herein above-named defendants and that said defendants be dealt with according to law.

28 ///

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct. Executed on the  
19 day of June 2020, in Los Angeles, California.

By: Seth E. Hamilton

SETH HAMILTON, Special Agent  
California Department of Justice

Executed on the 19 day of June, 2020, in LOS ANGELES, California.

Seth E. Hamilton  
SETH HAMILTON



1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant RAYMUNDO MONTOYA: Conspiracy in  
11 violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code section 487 (a),  
12 Unlawful Recycling, in violation of Public Resources Code section 14591 (b)(1)(F).

13 Therefore, you are commanded to arrest RAYMUNDO MONTOYA, and to bring said  
14 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
15 848 of the California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_.

17 Dated: \_\_\_\_\_

18 Time Issued: \_\_\_\_\_ (am/pm)

19  
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21 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant SERGIO HERNANDEZ: Conspiracy in  
11 violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code section 487 (a),  
12 Unlawful Recycling, in violation of Public Resources Code section 14591 (b)(1)(F).

13 Therefore, you are commanded to arrest SERGIO HERNANDEZ, and to bring said  
14 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
15 848 of the California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_.

17 Dated: \_\_\_\_\_

18 Time Issued: \_\_\_\_\_ (am/pm)

19  
20  
21 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant IGNACIO RAZO: Conspiracy in violation  
11 of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code section 487 (a),  
12 Unlawful Recycling, in violation of Public Resources Code section 14591 (b)(1)(F).

13 Therefore, you are commanded to arrest IGNACIO RAZO, and to bring said defendant  
14 before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the  
15 California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_

17 Dated: \_\_\_\_\_

18 Time Issued: \_\_\_\_\_ (am/pm)

19  
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21 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant MARVIN REN ARMIRA CHALI  
11 Conspiracy in violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code  
12 section 487 (a), Unlawful Recycling, in violation of Public Resources Code section 14591  
13 (b)(1)(D).

14 Therefore, you are commanded to arrest MARVIN REN ARMIRA CHALI, and to bring  
15 said defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,  
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_

18 Dated: \_\_\_\_\_

19 Time Issued: \_\_\_\_\_ (am/pm)

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21  
22 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant TOMAS DOMINGUEZ: Conspiracy in  
11 violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code section 487 (a),  
12 Unlawful Recycling, in violation of Public Resources Code section 14591 (b)(1)(F).

13 Therefore, you are commanded to arrest TOMAS DOMINGUEZ, and to bring said  
14 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
15 848 of the California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_

17 Dated: \_\_\_\_\_

18 Time Issued: \_\_\_\_\_ (am/pm)

19  
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21 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant IRVING DOMINGUEZ FLORES:

11 Conspiracy in violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code  
12 section 487 (a), Unlawful Recycling, in violation of Public Resources Code section 14591  
13 (b)(1)(F).

14 Therefore, you are commanded to arrest IRVING DOMINGUEZ FLORES, and to bring  
15 said defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826,  
16 and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_.

18 Dated: \_\_\_\_\_

19 Time Issued: \_\_\_\_\_ (am/pm)

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21  
22 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant MICHAEL DOMINGUEZ: Conspiracy in  
11 violation of Penal Code section 182(a)(1), Grand Theft in violation of Penal Code section 487 (a),  
12 Unlawful Recycling, in violation of Public Resources Code section 14591 (b)(1)(F).

13 Therefore, you are commanded to arrest MICHAEL DOMINGUEZ, and to bring said  
14 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
15 848 of the California Penal Code.

16 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_.

17 Dated: \_\_\_\_\_

18 Time Issued: \_\_\_\_\_ (am/pm)

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21 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3  
4 WARRANT OF ARREST AND EXTRADITION

5  
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by Special  
8 Agent Seth Hamilton of the California Department of Justice, Bureau of Investigation, and as  
9 described in the accompanying felony complaint, I find there is probable cause to believe that the  
10 following crimes have been committed by defendant ZAYDA GARCIA MEJIA: Conspiracy in  
11 violation of Penal Code section 182(a)(1).

12 Therefore, you are commanded to arrest ZAYDA GARCIA MEJIA, and to bring said  
13 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and  
14 848 of the California Penal Code.

15 Defendant is to be admitted to bail in the sum of \$ \_\_\_\_\_.

16 Dated: \_\_\_\_\_

17 Time Issued: \_\_\_\_\_ (am/pm)

18  
19  
20 JUDGE OF THE SUPERIOR COURT  
State of California, County of Los Angeles  
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**ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient evidence to believe that the following defendant guilty thereof, to wit:

DEFENDANT: **RAYMUNDO MONTOYA**

Count No.	Charge	Range	Special Alleg.	Alleg. Effect
1	PC 182(a)(1)	16/2/3 State Prison		
2	PC 487(a)	16/2/3 State Prison		
3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

**RAYMUNDO MONTOYA** \$ \_\_\_\_\_

And that said defendant be committed to the custody of the Sheriff until such bail is given.  
The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

\_\_\_\_\_  
Date



**ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient evidence to believe that the following defendant guilty thereof, to wit:

DEFENDANT: **SERGIO HERNANDEZ**

<u>Count No.</u>	<u>Charge</u>	<u>Range</u>	<u>Special Alleg.</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16/2/3 State Prison		
2	PC 487(a)	16/2/3 State Prison		
3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

**SERGIO HERNANDEZ** \$ \_\_\_\_\_

And that said defendant be committed to the custody of the Sheriff until such bail is given.  
The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

\_\_\_\_\_  
Date

**ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient evidence to believe that the following defendant guilty thereof, to wit:

DEFENDANT: **IGNACIO RAZO**

Count No.	Charge	Range	Special Alleg.	Alleg. Effect
1	PC 182(a)(1)	16/2/3 State Prison		
2	PC 487(a)	16/2/3 State Prison		
3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

**IGNACIO RAZO** \$ \_\_\_\_\_

And that said defendant be committed to the custody of the Sheriff until such bail is given.  
The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

\_\_\_\_\_  
Date

**ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient evidence to believe that the following defendant guilty thereof, to wit:

DEFENDANT: **MARVIN REN ARMIRA CHALI**

<u>Count No.</u>	<u>Charge</u>	<u>Range</u>	<u>Special Alleg.</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16/2/3 State Prison		
2	PC 487(a)	16/2/3 State Prison		
4	PRC 14591(b)(1)(D)	16/2/3 State Prison		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

**MARVIN REN ARMIRA CHALI** \$ \_\_\_\_\_

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

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DEFENDANT: TOMAS DOMINGUEZ

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

Magistrate \_\_\_\_\_ Date \_\_\_\_\_  
Superior Court of California

1                    **ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

2                    It appearing to me from the evidence presented that the following offense(s) has/have been  
3 committed and that there is sufficient evidence to believe that the following defendant guilty  
4 thereof, to wit:

5 DEFENDANT: **IRVING DOMINGUEZ FLORES**

6	Count			Special	
7	<u>No.</u>	<u>Charge</u>	<u>Range</u>	<u>Alleg.</u>	<u>Alleg. Effect</u>
8	1	PC 182(a)(1)	16/2/3 State Prison		
9	2	PC 487 (a)	16/2/3 State Prison		
10	3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

11                    I ORDER that the defendant named below be held to answer for the above-described  
12 offenses and allegations and be admitted to bail in the sum of:

13                    **IRVING DOMINGUEZ FLORES**                    \$ \_\_\_\_\_

14                    And that said defendant be committed to the custody of the Sheriff until such bail is given.  
15 The date of Felony arraignment is set for:

16                    \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
17 (Date)

18                    \_\_\_\_\_  
19 Magistrate                    Date  
20 Superior Court of California  
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1                   **ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

2           It appearing to me from the evidence presented that the following offense(s) has/have been  
3 committed and that there is sufficient evidence to believe that the following defendant guilty  
4 thereof, to wit:

5 DEFENDANT: **MICHAEL DOMINGUEZ**

6	Count			Special	
7	<u>No.</u>	<u>Charge</u>	<u>Range</u>	<u>Alleg.</u>	<u>Alleg. Effect</u>
8	1	PC 182(a)(1)	16/2/3 State Prison		
9	2	PC 487 (a)	16/2/3 State Prison		
10	3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

11 I ORDER that the defendant named below be held to answer for the above-described  
12 offenses and allegations and be admitted to bail in the sum of:

13                   **MICHAEL DOMINGUEZ**                   \$ \_\_\_\_\_

14           And that said defendant be committed to the custody of the Sheriff until such bail is given.

15 The date of Felony arraignment is set for:

16                   \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
17 (Date)

18                   \_\_\_\_\_  
19 Magistrate  
20 Superior Court of California  
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\_\_\_\_\_  
Date

**ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient evidence to believe that the following defendant guilty thereof, to wit:

**DEFENDANT: JOB ROBLES-PELAEZ**

<u>Count No.</u>	<u>Charge</u>	<u>Range</u>	<u>Special Alleg.</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16/2/3 State Prison		
2	PC 487 (a)	16/2/3 State Prison		
3	PRC 14591(b)(1)(F)	16/2/3 State Prison		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

**JOB ROBLES-PELAEZ** \$ \_\_\_\_\_

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

\_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
(Date)

\_\_\_\_\_  
Magistrate  
Superior Court of California

\_\_\_\_\_  
Date

1                    **ORDER HOLDING TO ANSWER – FELONY COMPLAINT (P.C. § 872)**

2                    It appearing to me from the evidence presented that the following offense(s) has/have been  
3 committed and that there is sufficient evidence to believe that the following defendant guilty  
4 thereof, to wit:

5 DEFENDANT: **ZAYDA GARCIA MEJIA**

6	Count			Special	
7	<u>No.</u>	<u>Charge</u>	<u>Range</u>	<u>Alleg.</u>	<u>Alleg. Effect</u>
8	1	PC 182(a)(1)	16/2/3 State Prison		

9  
10                    I ORDER that the defendant named below be held to answer for the above-described  
11 offenses and allegations and be admitted to bail in the sum of:

12                    **ZAYDA GARCIA MEJIA**                    \$ \_\_\_\_\_

13                    And that said defendant be committed to the custody of the Sheriff until such bail is given.  
14 The date of Felony arraignment is set for:

15                    \_\_\_\_\_ in Department \_\_\_\_\_ at \_\_\_\_\_ a.m.  
16                    (Date)

17                    \_\_\_\_\_  
18                    Magistrate                    Date  
19                    Superior Court of California