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FILED
XRef No. 4935951 Superior Court of California
Sacramento
XRef No. 4065360
Filed Date:
04/09/2025
Case Number:
25FE006452

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

**SHELBY BRIANNE ROBERTSON, AND
ALFEAR NELSON WRIGHT,**

Defendants.

Case No.:
FELONY COMPLAINT
[AG Docket No. SA2025301524 and SA2025301525]

The People of the State of California hereby allege that in the County of Sacramento, State of California, and elsewhere, within the State of California, before the making of this criminal complaint, the above-named defendants, SHELBY BRIANNE ROBERTSON [REDACTED] AND ALFEAR NELSON WRIGHT [REDACTED] committed the following different criminal offenses all connected together in their commission, and being two or more different offenses of the same class of crimes or offenses, under separate counts:

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COUNT 1

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between August 8, 2020 and March 5, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, K.J., was an elder and dependent adult, *to wit, defendants stole \$58,521.89 entrusted to them for victim's board and care home payments.*

COUNT 2

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between August 8, 2020 and March 5, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from C.L. on behalf of K.J. pursuant to an agreement that Defendants and co-conspirators would pay Country Hearts care home for K.J.'s care and rent.

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Overt Act #2

Defendants and co-conspirators retained \$58,521.89 entrusted to them by C.L. on behalf of K.J..

Overt Act #3

Defendants and co-conspirators did not pay Country Hearts care home for K.J.'s care and rent as agreed.

Overt Act #4

Money from K.J. was deposited by Defendants and co-conspirators into various bank accounts for which Alfeair Wright is listed as a Signer.

Overt Act #5

Money from K.J. was deposited by Defendants and co-conspirators into various bank accounts in the name of businesses for which defendants were officers.

COUNT 3

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between February 20, 2024 and February 21, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, K.J., was an elder and dependent adult, *to wit, defendants stole \$35,671.46 from victim's New York Life Insurance Account.*

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COUNT 4

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between February 20, 2024 and February 21, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators signed K.J.'s signature on a Full Surrender for Variable Annuities Form.

Overt Act #2

Defendant Shelby Robertson notarized the Full Surrender for Variable Annuities Form and emailed said document to a Google account associated with Persimmon Placements, Inc..

Overt Act #3

Defendants and co-conspirators submitted the Full Surrender for Variable Annuities Form to New York Life Insurance Co..

Overt Act #4

K.J.'s life insurance annuity in the amount of \$35,671.40 was electronically transferred into a JP Morgan Chase Account (5973) in the name of Defendant Alfear Wright and Persimmon Placements.

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COUNT 5

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between March 4, 2024 and March 5, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, K.J., was an elder and dependent adult, *to wit, defendants stole \$14,531.05 from victim's JP Morgan Chase Brokerage Account.*

COUNT 6

Penal Code Section 182(a)(1)/368(d), a Felony

**Conspiracy to Commit Grand Theft from an Elder or Dependent Adult
2, 3 or 4 years PC 1170(h)**

On or about and between March 4, 2024 and March 5, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators posed as K.J. and telephonically requested that JP Morgan Chase change the mailing address on K.J.'s brokerage account to defendants and co-conspirators home address.

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Overt Act #2

Defendants and co-conspirators telephonically requested that K.J.'s JP Morgan Brokerage Account be liquidated and the check with the funds be mailed to Defendants' and co-conspirators' home address.

Overt Act #3

Money from K.J.'s JP Morgan Brokerage Account, in the amount of \$14,531.05 was deposited into JP Morgan Chase Bank Account (2668), an account held by Defendant Alfeair Wright.

COUNT 7

**Penal Code Section 530.5(a) -a Felony
Unauthorized Use of Personal Identifying Information
- 16 mos., 2, or 3 years PC 1170(h)**

On or about and between February 13, 2024 and February 21, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did willfully and unlawfully obtain personal identifying information of K.J. and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of K.J., *defendants attempted to procure victim's pension through CALPERS.*

COUNT 8

**Penal Code Section 182(a)(1)/530.5(a), a Felony
Conspiracy to Commit Unlawful Use of Personal Information
16 mos., 2 years, or 3 years PC 1170(h)**

On or about and between February 13, 2024 and February 21, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Unlawful Use of Personal Information, in violation of Section

1 530.5(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the
2 objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
3 overt act and acts at and in the County of Sacramento:

4 Overt Act #1

5 After K.J. had been conserved by Butte County conservator, Defendants and Co-
6 Conspirators called CALPERS impersonating K.J. and requested that direct deposit of K.J.'s
7 pension be stopped and instead be paid by check, and mailed to a new address.

8 Overt Act #2

9 Defendant Shelby Robertson notarized K.J.'s Special Power of Attorney Form and emailed
10 said form to a Google account in the name of Persimmon Placements.

11 Overt Act #3

12 After K.J. had been conserved by Butte County conservator, Defendants and Co-
13 Conspirators faxed a CALPERS Special Power of Attorney Form containing K.J.'s signature to
14 CALPERS.

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16 **COUNT 9**

17 **Penal Code Section 368(d) -a Felony**

18 **Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)**

19 On or about and between February 1, 2019 and October 31, 2020, the defendants, SHELBY
20 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft,
21 embezzlement, forgery, fraud, and identity theft with respect to the property and personal
22 identifying information of an elder and dependent adult, said property, money, labor, goods, and
23 services taken and obtained having a value exceeding \$950.00, and knew and reasonably should
24 have known that said person, F.E., was an elder and dependent adult, *to wit, defendants stole*
25 *\$48,178.10 entrusted to them for Victim's care home payments.*
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COUNT 10

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between February 1, 2019 and October 31, 2020, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from F.E.'s payee pursuant to an agreement that they would pay F.E.'s care and rent.

Overt Act #2

Defendants and co-conspirators retained \$48,178.10 entrusted to them by F.E.'s payee.

Overt Act #3

Defendants and co-conspirators did not pay F.E.'s care and rent as agreed.

Overt Act #4

Money from F.E. was deposited into a Wells Fargo bank account held by Peppermint Palm Senior Care and for which Defendant Alfeair Wright is the sole signer.

Overt Act #5

Money from F.E. was deposited into a bank account associated with a business for which defendants and co-conspirators were officers.

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COUNT 11

Penal Code Section 487(a)/503 -a Felony

Grand Theft by Embezzlement- 16 mos, 2, years or 3 years PC 1170(h)

On or about and between February 1, 2019 and October 31, 2020, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did fraudulently appropriate property, which had a value exceeding nine hundred and fifty dollars (\$950) and which had been entrusted to him/her by P.E; *to wit, defendants stole \$11,300 entrusted to them for care home payments.*

COUNT 12

Penal Code Section 182(a)(1)/487(a)/503, a Felony

Conspiracy to Commit Grand Theft by Embezzlement

16 mos., 2, years, or 3 years PC 1170(h)

On or about and between February 1, 2019 and October 31, 2020, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft by Embezzlement, in violation of Section 487(a)/503 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from P.E. pursuant to an agreement that they would pay for F.E.'s care and rent.

Overt Act #2

Defendants and co-conspirators retained \$11,300 entrusted to them by P.E on behalf of F.E.

Overt Act #3

Defendants and co-conspirators did not pay F.E.'s care and rent as agreed.

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Overt Act #4

Money collected from P.E. was deposited into bank accounts held by Peppermint Palm Senior Care and for which Defendant Alfeair Wright is the sole signer.

Overt Act #5

Money from P.E. was deposited into bank accounts associated with a business for which defendants and co-conspirators were officers.

COUNT 13

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between March 1, 2019 and November 30, 2019, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, B.O., was an elder and dependent adult, *to wit, defendants stole \$77,010.35 entrusted to them for Victim's care home payments.*

COUNT 14

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between March 1, 2019 and November 30, 2019, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the

1 objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
2 overt act and acts at and in the County of Sacramento:

3 Overt Act #1

4 Defendants and co-conspirators collected money from B.O.'s payee pursuant to an
5 agreement that defendants and co-conspirators would pay for B.O.'s care and rent.

6 Overt Act #2

7 Defendants and co-conspirators retained \$77,010.35 entrusted to them by B.O.'s payee.

8 Overt Act #3

9 Defendants and co-conspirators did not pay B.O.'s care and rent as agreed.

10 Overt Act #4

11 Money from B.O. was deposited into a bank account held by Porus Placements and for
12 which Defendant Alfeair Wright is the sole signer.

13 Overt Act #5

14 Money from B.O. was deposited into a bank account associated with a business for which
15 defendants and co-conspirators were officers.

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17 **COUNT 15**

18 **Penal Code Section 368(d) -a Felony**

19 **Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)**

20 On or about and between July 16, 2020 and April 2, 2022, the defendants, SHELBY
21 BRIANNE ROBERTSON, AND ALFEAIR NELSON WRIGHT did unlawfully commit theft,
22 embezzlement, forgery, fraud, and identity theft with respect to the property and personal
23 identifying information of an elder and dependent adult, said property, money, labor, goods, and
24 services taken and obtained having a value exceeding \$950.00, and knew and reasonably should
25 have known that said persons, C.H. and S.H., were an elder and dependent adult, *to wit,*
26 *defendants stole \$51,877.89 entrusted to them for care home payments.*

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COUNT 16

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between July 16, 2020 and April 2, 2022, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from S.H. and C.H. pursuant to an agreement that defendants and co-conspirators would pay Country Hearts care home for S.H.'s care and rent.

Overt Act #2

Defendants and co-conspirators retained \$51,877.89 entrusted to them by S.H. and C.H..

Overt Act #3

Defendants and co-conspirators did not pay for S.H.'s care and rent as agreed.

Overt Act #4

Money from S.H. and C.H. was deposited into bank accounts in the name of various businesses for which Defendants Alfeair Wright and Shelby Robertson are signers.

Overt Act #5

Money from S.H. and C.H. was deposited into bank accounts associated with businesses for which defendants and co-conspirators were officers.

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COUNT 17

Penal Code Section 118(a)-a Felony

Perjury By Declaration - 2, 3, or 4 years PC 1170(h)

On or about and between May 19, 2022 and November 2, 2022, the defendant SHELBY BRIANNE ROBERTSON, did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: that C.H. owed Red Cardinal Management Corporation money for unpaid rent in the amount of \$9,230.00.

COUNT 18

Penal Code Section 115(a)-a Felony

Offering a False or Forged Instrument – 16 mos., 2 years or 3 years State Prison

On or about and between May 19, 2022 and November 2, 2022, the defendant, SHELBY BRIANNE ROBERTSON did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 19

Penal Code Section 186.10(a), a Felony

Money Laundering – 16 mos., 2 years or 3 years PC 1170(h)

On or about and between February 20, 2024 and March 5, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conduct and attempt to conduct a transaction or multiple transactions involving a monetary instrument or instruments of a value exceeding \$25,000 within a 30 day period, through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: embezzlement and financial elder abuse, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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2 **SPECIAL ALLEGATION- PC 186.10(c)(1)(A)**
3 **MONEY LAUNDERING BETWEEN \$50,000 and \$150,000**
4 **(+ 1 years)**

5 It is further alleged as to Count 11, that the value of the transaction(s) exceeded fifty
6 thousand dollars (\$50,000) but was less than one hundred fifty thousand dollars (\$150,000),
7 within the meaning of Penal Code section 186.10(c)(1)(A).
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9 **COUNT 20**
10 **Penal Code Section 182(a)(1)/186.10(a), a Felony**
11 **Conspiracy to Commit Money Laundering**
12 **16 mos., 2 years or 3 years PC 1170(h)**

13 On or about and between February 20, 2024 and March 5, 2024, the defendants, SHELBY
14 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together
15 with LaSonya Robertson and with another person and persons whose identity is unknown, to
16 commit the crime of Money Laundering, in violation of Section 186.10(a) of the Penal Code, a
17 felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the
18 aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the
19 County of Sacramento:

20 **Overt Act #1**

21 On February 22, 2024, K.J.'s life insurance annuity in the amount of \$35,617.40 was
22 electronically transferred into JP Morgan Chase bank account (5973) in the name of Defendant
23 Alfeair Wright and Persimmon Placements.

24 **Overt Act #2**

25 On March 5, 2024, \$14,531.05 from K.J.'s JP Morgan Chase Brokerage Account was
26 deposited into JP Morgan Chase (2668) in the name of Defendant Alfeair Wright.
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COUNT 21

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between April 6, 2018 and November 30, 2022, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, J.T., was an elder and dependent adult, *to wit, defendants stole \$41,105 entrusted to them for victim's board and care home payments.*

COUNT 22

Penal Code Section 182(a)(1)/368(d), a Felony

**Conspiracy to Commit Grand Theft from an Elder or Dependent Adult
2, 3 or 4 years PC 1170(h)**

On or about and between April 6, 2018 and November 30, 2022, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from J.T. and his payee pursuant to an agreement that defendants and co-conspirators would pay for his care and rent.

Overt Act #2

Defendants and co-conspirators retained \$41,105 entrusted to them by J.T. and his payee.

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Overt Act #3

Defendants and co-conspirators did not pay for J.T.'s care and rent as agreed.

Overt Act #4

Money collected from J.T. and his payee was deposited into bank accounts in the name of Peppermint Palm Senior Care for which Defendant Alfeair Wright was the signer.

Overt Act #5

Money from J.T. and his payee. was deposited into bank accounts associated with businesses for which defendants and co-conspirators were officers.

COUNT 23

Penal Code Section 530.5(a) -a Felony

Unauthorized Use of Personal Identifying Information

- 16 mos., 2, or 3 years PC 1170(h)

On or about and between December 1, 2022 and March 9, 2023, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did willfully and unlawfully obtain personal identifying information of J.T. and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of J.T., to wit, *defendants attempted to obtain money by depositing multiple checks drawn on J.T.'s closed checking account.*

COUNT 24

Penal Code Section 182(a)(1)/530.5(a), a Felony

Conspiracy to Commit Unlawful Use of Personal Information

16 mos., 2 years, or 3 years PC 1170(h)

On or about and between December 1, 2022 and March 9, 2023, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Unlawful Use of Personal Information, in violation of Section 530.5(a) of

1 the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and
2 purposes of the aforesaid conspiracy, the said defendants committed the following overt act and
3 acts at and in the County of Sacramento:

4 Overt Act #1

5 Defendants and co-conspirators attempted to use J.T.'s bank account information to
6 withdraw money from his bank account.

7 Overt Act #2

8 Multiple checks were deposited into bank accounts associated with Defendants Alfe
9 Wright and Shelby Robertson.

10 Overt Act #3

11 Multiple checks were deposited into bank accounts associated with businesses for which
12 defendants and co-conspirators were officers.

13
14 **COUNT 25**

15 **Penal Code Section 368(d) -a Felony**

16 **Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)**

17 On or about and between February 1, 2021 and March 1, 2021, the defendants, SHELBY
18 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft,
19 embezzlement, forgery, fraud, and identity theft with respect to the property and personal
20 identifying information of an elder and dependent adult, said property, money, labor, goods, and
21 services taken and obtained having a value exceeding \$950.00, and knew and reasonably should
22 have known that said person, M.H., was an elder and dependent adult, *to wit, defendants stole*
23 *money entrusted to them for victim's care home payments.*

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COUNT 26

Penal Code Section 182(a)(1)/368(d), a Felony

Conspiracy to Commit Grand Theft from an Elder or Dependent Adult

2, 3 or 4 years PC 1170(h)

On or about and between February 1, 2021 and March 1, 2021, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together with LaSonya Robertson and with another person and persons whose identity is unknown, to commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Sacramento:

Overt Act #1

Defendants and co-conspirators collected money from M.H. and his payee pursuant to an agreement that defendants and co-conspirators would pay for his care and rent.

Overt Act #2

Defendants and co-conspirators retained money entrusted to them by J.T. and his payee.

Overt Act #3

Defendants and co-conspirators did not pay for M.H.'s care and rent as agreed.

COUNT 27

Penal Code Section 368(d) -a Felony

Grand Theft from an Elder or Dependent Adult - 2, 3, or 4 years PC 1170(h)

On or about and between January 3, 2024 and June 30, 2024, the defendants, SHELBY BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, money, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should

1 have known that said person, C.L. was an elder and dependent adult, *to wit, defendants stole*
2 *\$17,788.01 entrusted to them for attorney fees and reserving a care home spot for K.J.*

3
4 **COUNT 28**

5 **Penal Code Section 182(a)(1)/368(d), a Felony**

6 **Conspiracy to Commit Grand Theft from an Elder or Dependent Adult**

7 **2, 3 or 4 years PC 1170(h)**

8 On or about and between January 3, 2024 and June 30, 2024, the defendants, SHELBY
9 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT did unlawfully conspire together
10 with LaSonya Robertson and with another person and persons whose identity is unknown, to
11 commit the crime of Grand Theft from an Elder and Dependent Adult, in violation of Section
12 368(d) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the
13 objectives and purposes of the aforesaid conspiracy, the said defendants committed the following
14 overt act and acts at and in the County of Sacramento:

15 **Overt Act #1**

16 Defendants and co-conspirators collected money from C.L. to pay for “attorney’s fees” for
17 the representation of C.L. by Sophie Markham related to elder abuse charges in Butte County.

18 **Overt Act #2**

19 Defendants and co-conspirators collected money from C.L. to reserve a spot in a care home
20 for K.J. after the conservatorship would end.

21 **Overt Act #3**

22 Defendants and co-conspirators retained C.L.’s money entrusted to them for payment of
23 attorneys fees and reserving a spot in a care home.

24 **Overt Act #4**

25 Defendants and co-conspirators impersonated an attorney named Sophie Markham in order
26 to continue to extract money from C.L.

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1 **SPECIAL ALLEGATION – PC 186.11(a)**

2 **AGGRAVATED WHITE COLLAR CRIME-LOSS OVER \$100,000**

3 Furthermore, with regard to Counts 1 through 28 the offenses alleged are related felonies, a
4 material element of which is fraud and embezzlement, which involved a pattern of related felony
5 conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss
6 by Victims of, more than one hundred thousand dollars (\$100,000), thus subjecting, SHELBY
7 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT to the additional punishment
8 provided for in Penal Code section 186.11(a)(1).

9 NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to
10 Penal Code section 186.11 is imposed as part of the sentence for the above offense, within the
11 meaning of Penal Code section 1170(h)(3).

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14 **SPECIAL ALLEGATION – PC 1203.1(l)(2)**

15 **MINIMUM PROBATION TERM FOR FELONY PC 487(b)(3), PC 503 and PC 532a**
16 **WITH PROPERTY VALUE EXCEEDING \$25,000**

17 It is further alleged as to Count 1, that the value of property taken by defendants SHELBY
18 BRIANNE ROBERTSON, AND ALFEAR NELSON WRIGHT, exceeds twenty five thousand
19 dollars (\$25,000) and as a result, the probation term for the above offense(s) is not limited to a
20 two (2) year term under Penal Code section 1203.1(a), within the meaning of Penal Code section
21 1203.1(l)(2).

22
23 **SPECIAL ALLEGATION—STATUTE OF LIMITATIONS**
24 **FOR PC 803(C) OFFENSES**

25 It is further alleged as to Counts 1 through 28 that the above offense(s) are described in
26 Penal Code section 803(c) and prosecution was commenced within four years after the discovery
27 of the commission of the offense(s) and within four years after the completion of the offense(s),
28 within the meaning of Penal Code section 801.5.

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2 **SPECIAL ALLEGATION – TOLLING OF STATUTE OF LIMITATIONS**
3 **Penal Code Sections 801.5 and 803(c)**

4 It is further alleged as to Counts 9 through 14 and 25 through 26:

- 5 1. The offenses are felonies which have a material element of fraud and breach of fiduciary
6 obligation;
- 7 2. The offenses were not discovered until April 16, 2021;
- 8 3. No victim of the offenses and no law enforcement agencies chargeable with the
9 investigation and prosecution of the offenses had actual or constructive knowledge of the
10 offenses prior to April 16, 2021, when it was discovered;
- 11 4. The offenses were discovered on April 16, 2021, when the Department of Social Services
12 sent a Report of Suspected Dependent Adult/Elder Abuse (SOC341) to the Department of
13 Justice, Division of Medi-Cal Fraud and Elder Abuse, a law enforcement agency that
14 subsequently opened an investigation into claims of elder financial abuse.
- 15 5. The offenses could not have been discovered earlier with reasonable diligence because
16 several of the victims have dementia and/or memory problems and the defendants hid
17 their fraudulent behavior, to continue perpetrating their crimes.
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21 **ALLEGATION OF CIRCUMSTANCES IN AGGRAVATION**

22 It is further alleged pursuant to California Penal Code section 1170(b)(2) as to the above
23 felony offenses and allegations that the following circumstances in aggravation as defined in
24 California Rules of Court section 4.421 apply and may justify the imposition of the upper term of
25 imprisonment:

- 26 – (a)(3) The victims were particularly vulnerable;
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- 1 – (a)(8) The manner in which the crime was carried out indicates planning, sophistication,
- 2 or professionalism;
- 3 – (a)(9) The crime involved an attempted or actual taking or damage of great monetary
- 4 value;
- 5 – (a)(11) The defendant took advantage of a position of trust or confidence to commit the
- 6 offense;
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10 I declare under penalty of perjury that the foregoing is true and correct. Executed
11 on April 8th, at Sacramento, Sacramento County, California.

12 Dated: April 8, 2025

Respectfully Submitted,

13 ROB BONTA
14 Attorney General of California

15 

16 AMY BELLAH
17 Deputy Attorney General
18 *Attorneys for The People of the State of*
19 *California*

20 

21 JENNIFER HOTALING
22 Deputy Attorney General
23 *Attorneys for The People of the State of*
24 *California*