

1 ROB BONTA
Attorney General of California
2 MIKE FARRELL
Acting Senior Assistant Attorney General
3 BENNIE J. MACKEY, II
Deputy Attorney General
4 State Bar No. 277519
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 510-3822
6 Fax: (415) 703-1699
E-mail: Bennie.Mackey@doj.ca.gov
7 *Attorneys for the People of the State of California*

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SACRAMENTO
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12
13 **THE PEOPLE OF THE STATE OF
CALIFORNIA,**

14 Plaintiff,

15 v.

16
17 **JAWUAN ANTONIO GIBSON**
(XRef: 5258588)

18 Defendant.
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Case No. 19FE007640

**SECOND AMENDED INFORMATION
[FELONY]**

20 The People of the State of California upon oath of the undersigned, upon information and
21 belief, complain against the defendant above named for the crimes as follows:

22 **COUNT 1**

23 **GRAND THEFT BY ACCESS CARD – 484G**

24 On or about and between November 2017 and April 2018 in the County of Los Angeles and,
25 within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did, commit
26 GRAND THEFT BY ACCESS CARD in Violation of Penal Code section 484g, a Felony, in that
27 Defendant with the intent to defraud did, use for the purpose of obtaining money, goods, services,
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1 and something of value, an access card and access card account information that has been altered,
2 obtained, and retained in violation of Penal Code section 484e and 484f, and did use an access card
3 which he knows was forged, expired, and revoked. It is further alleged that the value of all money,
4 goods, services, and other things so obtained exceeded nine hundred fifty dollars (\$950) in a
5 consecutive six-month period.

6 **COUNT 2**

7 **GRAND THEFT BY ACCESS CARD – 484G**

8 On or about and between May 2018 and October 2018 in the County of Los Angeles and,
9 within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did, commit
10 GRAND THEFT BY ACCESS CARD in Violation of Penal Code section 484g, a Felony, in that
11 Defendant with the intent to defraud did, use for the purpose of obtaining money, goods, services,
12 and something of value, an access card and access card account information that has been altered,
13 obtained, and retained in violation of Penal Code section 484e and 484f, and did use an access card
14 which he knows was forged, expired, and revoked. It is further alleged that the value of all money,
15 goods, services, and other things so obtained exceeded nine hundred fifty dollars (\$950) in a
16 consecutive six-month period.

17 **COUNT 3**

18 **GRAND THEFT BY ACCESS CARD – 484G**

19 On or about and between November 2018 and April 2019 in the County of Los Angeles
20 and, within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did,
21 commit GRAND THEFT BY ACCESS CARD in Violation of Penal Code section 484g, a
22 Felony, in that Defendant with the intent to defraud did, use for the purpose of obtaining money,
23 goods, services, and something of value, an access card and access card account information that
24 has been altered, obtained, and retained in violation of Penal Code section 484e and 484f, and did
25 use an access card which he knows was forged, expired, and revoked. It is further alleged that the
26 value of all money, goods, services, and other things so obtained exceeded nine hundred fifty
27 dollars (\$950) in a consecutive six-month period.

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COUNT 4

GRAND THEFT BY ACCESS CARD – 484G

On or about and between May 1, 2019 and May 2, 2019 in the County of Los Angeles and, within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did, commit GRAND THEFT BY ACCESS CARD in Violation of Penal Code section 484g, a Felony, in that Defendant with the intent to defraud did, use for the purpose of obtaining money, goods, services, and something of value, an access card and access card account information that has been altered, obtained, and retained in violation of Penal Code section 484e and 484f, and did use an access card which he knows was forged, expired, and revoked. It is further alleged that the value of all money, goods, services, and other things so obtained exceeded nine hundred fifty dollars (\$950) in a consecutive six-month period.

COUNT 5

POSSESSING ACCESS CARD MAKING EQUIPMENT – 484I(C)

On or about May 2, 2019 in the County of Los Angeles and, within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did, POSSESS ACCESS CARD MAKING EQUIPMENT in Violation of Penal Code section 484i(c), a Felony, in that Defendant with the intent to defraud did unlawfully design, make, possess, and traffic in card making equipment and incomplete access cards with the intent that the equipment and cards be used to make counterfeit access cards.

COUNT 6

ACCESSING AND USING COMPUTER DATA TO COMMIT FRAUD – 502(C)(1)

On or about and between November 2017 and May 2, 2019 in the County of Los Angeles and, within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did unlawfully ACCESS AND USE COMPUTER DATA TO COMMIT FRAUD in Violation of Penal Code section 502(c)(1), a Felony, in that Defendant did, did knowingly access and without permission alter, damage, delete, destroy, and use data, a computer, a computer system, and a computer network, belonging to THE STATE OF CALIFORNIA'S DEPARTMENT OF SOCIAL

SERVICES, to devise and execute a scheme and artifice to defraud, and wrongfully control and obtain money, property, and data belonging to, THE STATE OF CALIFORNIA'S DEPARTMENT OF SOCIAL SERVICES.

COUNT 7

ACCESSING AND USING COMPUTER DATA TO COMMIT FRAUD – 502(C)(1)

On or about and between November 2017 and May 2, 2019 in the County of Los Angeles and, within the meaning of Penal Code section 781 in the County of Sacramento, Defendant did unlawfully ACCESS AND USE COMPUTER DATA TO COMMIT FRAUD in Violation of Penal Code section 502(c)(1), a Felony, in that Defendant did, did knowingly access and without permission alter, damage, delete, destroy, and use data, a computer, a computer system, and a computer network, belonging to Chase Bank and Citibank, to devise and execute a scheme and artifice to defraud, and wrongfully control and obtain money, property, and data belonging to, THE STATE OF CALIFORNIA'S DEPARTMENT OF SOCIAL SERVICES.

COUNT 8

IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)

On or about 7/1/2018 in the County of Los Angeles and, within the meaning of Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of personal identifying information, of another person, to wit: The Personal Identification Number (PIN) and Access Card Number of F. Toa a resident of California, said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

COUNT 9

IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)

On or about 7/3/2018 in the County of Los Angeles and, within the meaning of Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that

1 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
2 personal identifying information, of another person, to wit: The Personal Identification Number
3 (PIN) and Access Card Number of R. Rudder a resident of California, said Defendant having
4 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
5 Court case LACBA41366401.

6 **COUNT 10**

7 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

8 On or about 8/18/2018 4:54 AM in the County of Los Angeles and, within the meaning of
9 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
10 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
11 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
12 possession of personal identifying information, of another person, to wit: The EBT Card Number
13 5077-19##-####-0993 belonging to a resident of Los Angeles, said Defendant having previously
14 been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
15 LACBA41366401.

16 **COUNT 11**

17 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

18 On or about 10/1/2018 in the County of Los Angeles and, within the meaning of Penal
19 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
20 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
21 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
22 personal identifying information, of another person, to wit: The Personal Identification Number
23 (PIN) and Access Card Number of D. Camacho a resident of California, said Defendant having
24 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
25 Court case LACBA41366401.

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1 **COUNT 12**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 10/1/2018 in the County of Los Angeles and, within the meaning of Penal
4 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
5 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
6 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
7 personal identifying information, of another person, to wit: The Personal Identification Number
8 (PIN) and Access Card Number of D. Williams a resident of California, said Defendant having
9 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
10 Court case LACBA41366401.

11 **COUNT 13**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 10/2/2018 in the County of Los Angeles and, within the meaning of Penal
14 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
15 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
16 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
17 personal identifying information, of another person, to wit: The Personal Identification Number
18 (PIN) and Access Card Number of S. Kendle a resident of California, said Defendant having
19 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
20 Court case LACBA41366401.

21 **COUNT 14**

22 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

23 On or about 10/3/2018 in the County of Los Angeles and, within the meaning of Penal
24 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
25 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
26 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
27 personal identifying information, of another person, to wit: The Personal Identification Number
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1 (PIN) and Access Card Number of L. Flores a resident of California, said Defendant having
2 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
3 Court case LACBA41366401.

4 **COUNT 15**

5 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

6 On or about 11/1/2018 in the County of Los Angeles and, within the meaning of Penal
7 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
8 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
9 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
10 personal identifying information, of another person, to wit: The Personal Identification Number
11 (PIN) and Access Card Number of A. Clark a resident of California, said Defendant having
12 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
13 Court case LACBA41366401.

14 **COUNT 16**

15 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

16 On or about 11/2/2018 in the County of Los Angeles and, within the meaning of Penal
17 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
18 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
19 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
20 personal identifying information, of another person, to wit: The Personal Identification Number
21 (PIN) and Access Card Number of Z. Rivera a resident of California, said Defendant having
22 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
23 Court case LACBA41366401.

24 **COUNT 17**

25 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

26 On or about 11/2/2018 in the County of Los Angeles and, within the meaning of Penal
27 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
28 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that

1 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
2 personal identifying information, of another person, to wit: The Personal Identification Number
3 (PIN) and Access Card Number of R. O'Donnell a resident of California, said Defendant having
4 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
5 Court case LACBA41366401.

6 **COUNT 18**

7 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

8 On or about 11/2/2018 in the County of Los Angeles and, within the meaning of Penal
9 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
10 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
11 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
12 personal identifying information, of another person, to wit: The Personal Identification Number
13 (PIN) and Access Card Number of P. Romo a resident of California, said Defendant having
14 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
15 Court case LACBA41366401.

16 **COUNT 19**

17 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

18 On or about 11/2/2018 in the County of Los Angeles and, within the meaning of Penal
19 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
20 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
21 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
22 personal identifying information, of another person, to wit: The Personal Identification Number
23 (PIN) and Access Card Number of I. Lomeli a resident of California, said Defendant having
24 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
25 Court case LACBA41366401.

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1 **COUNT 20**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 11/3/2018 in the County of Los Angeles and, within the meaning of Penal
4 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
5 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
6 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
7 personal identifying information, of another person, to wit: The Personal Identification
8 Number (PIN) and Access Card Number of V. Cruz a resident of California, said Defendant
9 having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles
10 Superior Court case LACBA41366401.

11 **COUNT 21**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 11/3/2018 in the County of Los Angeles and, within the meaning of Penal
14 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
15 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
16 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
17 personal identifying information, of another person, to wit: The Personal Identification Number
18 (PIN) and Access Card Number of E. Siregar a resident of California, said Defendant having
19 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
20 Court case LACBA41366401.

21 **COUNT 22**

22 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

23 On or about 11/3/2018 in the County of Los Angeles and, within the meaning of Penal
24 Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
25 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
26 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
27 personal identifying information, of another person, to wit: The Personal Identification Number
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1 (PIN) and Access Card Number of J. Pasillas a resident of California, said Defendant having
2 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
3 Court case LACBA41366401.

4 **COUNT 23**

5 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

6 On or about 1/1/2019 in the County of Los Angeles and, within the meaning of Penal Code
7 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
8 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
9 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
10 personal identifying information, of another person, to wit: The Personal Identification Number
11 (PIN) and Access Card Number of C. Randolph a resident of California, said Defendant having
12 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
13 Court case LACBA41366401.

14 **COUNT 24**

15 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

16 On or about 1/1/2019 in the County of Los Angeles and, within the meaning of Penal Code
17 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
18 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
19 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
20 personal identifying information, of another person, to wit: The Personal Identification Number
21 (PIN) and Access Card Number of J. Arroyo a resident of California, said Defendant having
22 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
23 Court case LACBA41366401.

24 **COUNT 25**

25 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

26 On or about 1/01/2019 5:10 AM in the County of Los Angeles and, within the meaning of
27 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
28 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in

1 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
2 possession of personal identifying information, of another person, to wit: The EBT Card Number
3 5077-19##-####-9232 belonging to a resident of San Bernardino, said Defendant having
4 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
5 Court case LACBA41366401.

6 **COUNT 26**

7 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

8 On or about 1/2/2019 in the County of Los Angeles and, within the meaning of Penal Code
9 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
10 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
11 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
12 personal identifying information, of another person, to wit: The Personal Identification Number
13 (PIN) and Access Card Number of C. Granum a resident of California, said Defendant having
14 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
15 Court case LACBA41366401.

16 **COUNT 27**

17 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

18 On or about 1/3/2019 in the County of Los Angeles and, within the meaning of Penal Code
19 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
20 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
21 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
22 personal identifying information, of another person, to wit: The Personal Identification Number
23 (PIN) and Access Card Number of E. Evans a resident of California, said Defendant having
24 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
25 Court case LACBA41366401.

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1 **COUNT 28**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 1/03/2019 3:45 AM in the County of Los Angeles and, within the meaning of
4 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
5 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
6 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
7 possession of personal identifying information, of another person, to wit: The EBT Card Number
8 5077-19##-####-1473 belonging to a resident of Los Angeles, said Defendant having previously
9 been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
10 LACBA41366401.

11 **COUNT 29**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 1/9/2019 in the County of Los Angeles and, within the meaning of Penal Code
14 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
15 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
16 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
17 personal identifying information, of another person, to wit: The Personal Identification Number
18 (PIN) and Access Card Number of D. Ferguson a resident of California, said Defendant having
19 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
20 Court case LACBA41366401.

21 **COUNT 30**

22 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

23 On or about 2/2/2019 in the County of Los Angeles and, within the meaning of Penal Code
24 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
25 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
26 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
27 personal identifying information, of another person, to wit: The Personal Identification Number
28 (PIN) and Access Card Number of S. Alvarado a resident of California, said Defendant having

1 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
2 Court case LACBA41366401.

3 **COUNT 31**

4 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

5 On or about 2/2/2019 in the County of Los Angeles and, within the meaning of Penal Code
6 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
7 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
8 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
9 personal identifying information, of another person, to wit: The Personal Identification Number
10 (PIN) and Access Card Number of H. Cheema a resident of California, said Defendant having
11 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
12 Court case LACBA41366401.

13 **COUNT 32**

14 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

15 On or about 2/3/2019 in the County of Los Angeles and, within the meaning of Penal Code
16 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
17 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
18 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
19 personal identifying information, of another person, to wit: The Personal Identification Number
20 (PIN) and Access Card Number of M. Womack a resident of California, said Defendant having
21 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
22 Court case LACBA41366401.

23 **COUNT 33**

24 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

25 On or about 3/01/2019 1:03 AM in the County of Los Angeles and, within the meaning of
26 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
27 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
28 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain

1 possession of personal identifying information, of another person, to wit: The EBT Card Number
2 5077-19##-####-8472 belonging to a resident of San Diego, said Defendant having previously
3 been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
4 LACBA41366401.

5 **COUNT 34**

6 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

7 On or about 3/01/2019 1:05 AM in the County of Los Angeles and, within the meaning of
8 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
9 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
10 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
11 possession of personal identifying information, of another person, to wit: The Personal
12 Identification Number (PIN) and Access Card Number of C. PREE a resident of Fresno, said
13 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
14 Angeles Superior Court case LACBA41366401.

15 **COUNT 35**

16 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

17 On or about 3/01/2019 1:49 AM in the County of Los Angeles and, within the meaning of
18 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
19 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
20 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
21 possession of personal identifying information, of another person, to wit: The Personal
22 Identification Number (PIN) and Access Card Number of P. CHAN a resident of Fresno, said
23 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
24 Angeles Superior Court case LACBA41366401.

25 **COUNT 36**

26 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

27 On or about 3/01/2019 1:51 AM in the County of Los Angeles and, within the meaning of
28 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit

1 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
2 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
3 possession of personal identifying information, of another person, to wit: The EBT Card Number
4 5077-19##-####-6410 belonging to Los Angeles, said Defendant having previously been
5 convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
6 LACBA41366401.

7 **COUNT 37**

8 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

9 On or about 3/02/2019 2:46 AM in the County of Los Angeles and, within the meaning of
10 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
11 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
12 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
13 possession of personal identifying information, of another person, to wit: The Personal
14 Identification Number (PIN) and Access Card Number of N. PRITCHETT a resident of Kern,
15 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
16 Los Angeles Superior Court case LACBA41366401.

17 **COUNT 38**

18 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

19 On or about 3/03/2019 12:04 AM in the County of Los Angeles and, within the meaning of
20 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
21 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
22 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
23 possession of personal identifying information, of another person, to wit: The EBT Card Number
24 5077-19##-####-4482 belonging to a resident of Kern, said Defendant having previously been
25 convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
26 LACBA41366401.

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1 **COUNT 39**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 3/03/2019 12:05 AM in the County of Los Angeles and, within the meaning of
4 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
5 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
6 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
7 possession of personal identifying information, of another person, to wit: The Personal
8 Identification Number (PIN) and Access Card Number of M. JALILI a resident of Sacramento,
9 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
10 Los Angeles Superior Court case LACBA41366401.

11 **COUNT 40**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 4/01/2019 12:46 AM in the County of Los Angeles and, within the meaning of
14 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
15 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
16 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
17 possession of personal identifying information, of another person, to wit: The EBT Card Number
18 5077-19##-####-5494 belonging to a resident of San Bernardino, said Defendant having
19 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
20 Court case LACBA41366401.

21 **COUNT 41**

22 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

23 On or about 4/01/2019 1:30 AM in the County of Los Angeles and, within the meaning of
24 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
25 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
26 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
27 possession of personal identifying information, of another person, to wit: The Personal
28 Identification Number (PIN) and Access Card Number of J. RIDGWAY a resident of Kern, said

1 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
2 Angeles Superior Court case LACBA41366401.

3 **COUNT 42**

4 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

5 On or about 4/01/2019 2:09 AM in the County of Los Angeles and, within the meaning of
6 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
7 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
8 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
9 possession of personal identifying information, of another person, to wit: The EBT Card Number
10 5077-19##-####-9958 belonging to a resident of Sacramento, said Defendant having previously
11 been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
12 LACBA41366401.

13 **COUNT 43**

14 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

15 On or about 4/2/2019 in the County of Los Angeles and, within the meaning of Penal Code
16 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
17 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
18 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
19 personal identifying information, of another person, to wit: The Personal Identification Number
20 (PIN) and Access Card Number of S. Williams a resident of California, said Defendant having
21 previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior
22 Court case LACBA41366401.

23 **COUNT 44**

24 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

25 On or about 4/03/2019 12:59 AM in the County of Los Angeles and, within the meaning of
26 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
27 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
28 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain

1 possession of personal identifying information, of another person, to wit: The EBT Card Number
2 5077-19##-####-8258 belonging to a resident of Kern, said Defendant having previously been
3 convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles Superior Court case
4 LACBA41366401.

5 **COUNT 45**

6 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

7 On or about 5/2/2019 in the County of Los Angeles and, within the meaning of Penal Code
8 section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit IDENTITY
9 THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in that
10 Defendant did willfully and unlawfully with the intent to defraud acquire and retain possession of
11 personal identifying information, of another person, to wit: The Personal Identification Number
12 (PIN) and Access Card Number of M. Serrato-Ortiz a resident of California, said Defendant
13 having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los Angeles
14 Superior Court case LACBA41366401.

15 **COUNT 46**

16 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

17 On or about 5/02/2019 1:04 AM in the County of Los Angeles and, within the meaning of
18 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
19 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
20 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
21 possession of personal identifying information, of another person, to wit: The Personal
22 Identification Number (PIN) and Access Card Number of A. ALNASSIRY a resident of
23 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
24 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

25 **COUNT 47**

26 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

27 On or about 5/02/2019 1:05 AM in the County of Los Angeles and, within the meaning of
28 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit

1 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
2 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
3 possession of personal identifying information, of another person, to wit: The Personal
4 Identification Number (PIN) and Access Card Number of E. ZAMORA a resident of Sacramento,
5 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
6 Los Angeles Superior Court case LACBA41366401.

7 **COUNT 48**

8 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

9 On or about 5/02/2019 1:06 AM in the County of Los Angeles and, within the meaning of
10 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
11 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
12 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
13 possession of personal identifying information, of another person, to wit: The Personal
14 Identification Number (PIN) and Access Card Number of M. ALEMAN a resident of Fresno, said
15 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
16 Angeles Superior Court case LACBA41366401.

17 **COUNT 49**

18 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

19 On or about 5/02/2019 1:06 AM in the County of Los Angeles and, within the meaning of
20 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
21 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
22 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
23 possession of personal identifying information, of another person, to wit: The Personal
24 Identification Number (PIN) and Access Card Number of S. MATEAKI a resident of
25 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
26 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

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1 **COUNT 50**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 5/02/2019 1:08 AM in the County of Los Angeles and, within the meaning of
4 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
5 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
6 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
7 possession of personal identifying information, of another person, to wit: The Personal
8 Identification Number (PIN) and Access Card Number of H. BETANCOURT a resident of
9 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
10 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

11 **COUNT 51**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 5/02/2019 1:09 AM in the County of Los Angeles and, within the meaning of
14 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
15 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
16 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
17 possession of personal identifying information, of another person, to wit: The Personal
18 Identification Number (PIN) and Access Card Number of A. CORNELL a resident of El Dorado,
19 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
20 Los Angeles Superior Court case LACBA41366401.

21 **COUNT 52**

22 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

23 On or about 5/02/2019 1:49 AM in the County of Los Angeles and, within the meaning of
24 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
25 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
26 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
27 possession of personal identifying information, of another person, to wit: The Personal
28 Identification Number (PIN) and Access Card Number of L. MALLORY a resident of Fresno,

1 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
2 Los Angeles Superior Court case LACBA41366401.

3 **COUNT 53**

4 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

5 On or about 5/02/2019 1:50 AM in the County of Los Angeles and, within the meaning of
6 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
7 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
8 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
9 possession of personal identifying information, of another person, to wit: The Personal
10 Identification Number (PIN) and Access Card Number of R. LOPEZ a resident of Madera, said
11 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
12 Angeles Superior Court case LACBA41366401.

13 **COUNT 54**

14 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

15 On or about 5/02/2019 1:50 AM in the County of Los Angeles and, within the meaning of
16 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
17 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
18 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
19 possession of personal identifying information, of another person, to wit: The Personal
20 Identification Number (PIN) and Access Card Number of L. GOMEZ a resident of Sacramento,
21 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
22 Los Angeles Superior Court case LACBA41366401.

23 **COUNT 55**

24 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

25 On or about 5/02/2019 1:51 AM in the County of Los Angeles and, within the meaning of
26 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
27 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
28 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain

1 possession of personal identifying information, of another person, to wit: The Personal
2 Identification Number (PIN) and Access Card Number of N. RAMIREZ a resident of
3 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
4 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

5 **COUNT 56**

6 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

7 On or about 5/02/2019 1:52 AM in the County of Los Angeles and, within the meaning of
8 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
9 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
10 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
11 possession of personal identifying information, of another person, to wit: The Personal
12 Identification Number (PIN) and Access Card Number of F. YOUNG a resident of Sacramento,
13 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
14 Los Angeles Superior Court case LACBA41366401.

15 **COUNT 57**

16 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

17 On or about 5/02/2019 1:53 AM in the County of Los Angeles and, within the meaning of
18 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
19 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
20 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
21 possession of personal identifying information, of another person, to wit: The Personal
22 Identification Number (PIN) and Access Card Number of M. JIMENEZ a resident of Fresno, said
23 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
24 Angeles Superior Court case LACBA41366401.

25 **COUNT 58**

26 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

27 On or about 5/02/2019 1:54 AM in the County of Los Angeles and, within the meaning of
28 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit

1 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
2 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
3 possession of personal identifying information, of another person, to wit: The Personal
4 Identification Number (PIN) and Access Card Number of L. WINSTON a resident of
5 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
6 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

7 **COUNT 59**

8 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

9 On or about 5/02/2019 1:55 AM in the County of Los Angeles and, within the meaning of
10 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
11 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
12 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
13 possession of personal identifying information, of another person, to wit: The Personal
14 Identification Number (PIN) and Access Card Number of L. TURNER a resident of Sacramento,
15 said Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in
16 Los Angeles Superior Court case LACBA41366401.

17 **COUNT 60**

18 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

19 On or about 5/02/2019 1:56 AM in the County of Los Angeles and, within the meaning of
20 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
21 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
22 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
23 possession of personal identifying information, of another person, to wit: The Personal
24 Identification Number (PIN) and Access Card Number of S. THIPPHAVONG a resident of
25 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
26 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

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1 **COUNT 61**

2 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

3 On or about 5/02/2019 1:57 AM in the County of Los Angeles and, within the meaning of
4 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
5 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
6 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
7 possession of personal identifying information, of another person, to wit: The Personal
8 Identification Number (PIN) and Access Card Number of A. AVILA a resident of Madera, said
9 Defendant having previously been convicted of Penal Code Section 530.5 to wit: 8/25/14 in Los
10 Angeles Superior Court case LACBA41366401.

11 **COUNT 62**

12 **IDENTITY THEFT WITH A PRIOR – 530.5(C)(2)**

13 On or about 5/02/2019 1:58 AM in the County of Los Angeles and, within the meaning of
14 Penal Code section 781 and 786(b)(1) in the County of Sacramento, Defendant did, commit
15 IDENTITY THEFT WITH A PRIOR in Violation of Penal Code section 530.5(c)(2), a Felony, in
16 that Defendant did willfully and unlawfully with the intent to defraud acquire and retain
17 possession of personal identifying information, of another person, to wit: The Personal
18 Identification Number (PIN) and Access Card Number of M. SERRATO a resident of
19 Sacramento, said Defendant having previously been convicted of Penal Code Section 530.5 to
20 wit: 8/25/14 in Los Angeles Superior Court case LACBA41366401.

21 **SPECIAL ALLEGATION 186.11(A)(2)**

22 **AGGRAVATED WHITE COLLAR CRIME- LOSS GREATER THAN \$500,000**

23 Furthermore, as to count one through fifteen, the offenses alleged are related felonies, a
24 material element of which is fraud and embezzlement, which involved a pattern of related felony
25 conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss
26 by California CalWork's recipients and the STATE OF CALIFORNIA of, more than five hundred
27 thousand dollars (\$500,000), thus subjecting Defendant to the additional punishment provided for
28 in Penal Code sections 186.11(a)(2).

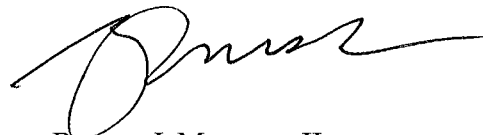
1 **SPEC ALLEGE-STATUS ALLEGATION/PC1170(H)(3)**

2 It is further alleged as to counts one through three that special allegation PC186.11 requires
3 prison custody time to be served in state prison pursuant to PC1170(h)(3).

4 Dated: June 23, 2021

Respectfully Submitted,

5 ROB BONTA
6 Attorney General of California

7 

8 BENNIE J. MACKEY, II
9 Deputy Attorney General
10 *Attorneys for the People of the State of*
11 *California*

12 SA2019101919

13 Second Amended Information - (BJM) formatted - updated dates and xref.docx

DECLARATION OF SERVICE BY OVERNIGHT COURIER

Case Name: **People v. Jawuan Gibson**

Case No.: **19FE007640**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550.

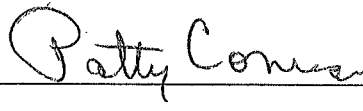
On June 25, 2021, I served the attached **SECOND AMENDED INFORMATION [FELONY]** by placing a true copy thereof enclosed in a sealed envelope with the **FEDEX**, addressed as follows:

Alexander C. Asterlin
Law Office of Alexander Asterlin
901 H Street, Suite 400
Sacramento, CA 95814

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on June 25, 2021, at Sacramento, California.

Patty Conway

Declarant



Signature