

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL**

FILED
Clerk of the Superior Court

CT No. CD302180

JAN 18 2024

By: E. Lopez, Deputy

COMPLAINT-FELONY

THE PEOPLE OF THE STATE OF CALIFORNIA, LAMB FUELS, INC.; GREGORY LAMB, [REDACTED] JEFFREY LISOWSKI, [REDACTED] KEZIN PARABIA, [REDACTED]	Plaintiff, Defendant(s)
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v.

INFORMATION

Date: _____

PC 296 DNA TEST STATUS SUMMARY

Defendant(s)	DNA Testing Requirements
LAMB, GREGORY LISOWSKI, JEFFREY PARABIA, KEZIN	DNA sample required upon conviction DNA sample required upon conviction DNA sample required upon conviction

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	PC 182(a)(1)	Felony	16-2-3		
	LAMB FUELS, INC. LAMB, GREGORY LISOWSKI, JEFFREY PARABIA, KEZIN				
2	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC. LAMB, GREGORY LISOWSKI, JEFFREY PARABIA, KEZIN				
3	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC. LAMB, GREGORY LISOWSKI, JEFFREY PARABIA, KEZIN				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
4	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
5	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
6	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
7	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
8	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
9	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
10	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
11	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
12	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
13	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
14	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
15	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
16	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
17	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
18	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
19	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
20	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
21	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
22	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
23	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
24	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
25	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
26	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
27	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
28	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
29	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
30	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
31	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
32	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
33	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
34	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
35	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
36	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
37	H&S 25189.5(d)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				
38	H&S 25189.5(c)	Felony	16-2-3		
	LAMB FUELS, INC.				
	LAMB, GREGORY				
	LISOWSKI, JEFFREY				
	PARABIA, KEZIN				

The undersigned, certifying upon information and belief, complains that in the Counties of San Diego, Alameda, Butte, Contra Costa, Fresno, Los Angeles, Merced, Monterey, Napa, Orange, Riverside, Sacramento, San Bernardino, San Joaquin, Santa Clara, Shasta, Stanislaus, Tulare, and Yolo, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - CONSPIRACY

On or about and between January 1, 2012, and February 10, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, BUTTE, CONTRA COSTA, FRESNO, LOS ANGELES, MERCED, MONTEREY, NAPA, ORANGE, RIVERSIDE, SACRAMENTO, SAN BERNARDINO, SAN JOAQUIN, SANTA CLARA, SHASTA, STANISLAUS, TULARE, and YOLO, the crime of CONSPIRACY in violation of Penal Code section 182(a)(1), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of TRANSPORTATION OF HAZARDOUS WASTE TO FACILITIES WITHOUT PERMITS OR AT UNAUTHORIZED POINTS, in violation of Section 25189.5(c) of the Health & Safety 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 Counties of San Diego, Los Angeles, Monterey, Yolo, Alameda, and Sacramento:

OVERT ACT 1

On or about July 10, 2012, LAMB shared a press release with his Director of Sales & Marketing that LAMB FUELS, INC. ("LF-INC") had secured a contract with Pick-N-Pull Self-Service Auto Dismantlers ("PNP").

OVERT ACT 2

On or about January 6, 2013, LAMB asked LF-INC staff, including PARABIA, for an update regarding the "alleged waste issue" at the Sims scrapyards in Sacramento, stating that Sims was a "key customer."

OVERT ACT 3

On or about February 12, 2014, PARABIA emailed LAMB that he worked with LF-INC's Director of Operations on drafting fuel quality tier guidelines "so our guys know what to look for in the field."

OVERT ACT 4

On or about August 26, 2014, LAMB drafted an announcement to LF-INC customers that beginning in September 2014, LF-INC would "begin purchasing all customer fuel utilizing our Fuel Quality Grading System;" LAMB stated that it was "necessary to change the way we evaluate, grade and purchase your fuel due to increased government oversight and the pressures of end user markets."

OVERT ACT 5

On or about December 13, 2014, LAMB emailed PNP management terms for the renewal of their contract, including "Fuel Quality Tier Pricing Implementation."

OVERT ACT 6

On or about March 14, 2015, LAMB emailed LKQ scrapyards management, copying PARABIA, that LF-INC would begin "retraining" its drivers, as well as LKQ/PYP scrapyards staff, "on how to properly sample fuel to ensure any waste or water accumulation does not get out of control."

OVERT ACT 7

On or about April 30, 2015, PARABIA emailed LF-INC management, including LAMB and LISOWSKI, items to compile for PNP, including the tier grading scale, results of which would be shared with PNP on a monthly basis.

OVERT ACT 8

On or about January 18, 2016, PARABIA emailed LF-INC's Director of Sales and Marketing that "i expect you to know our drops locations in EVERY region... by the end of the week, you need to reach out to everyone on this list and introduce yourself... they are the most important part of business!! Without them EVERYTHING STOPS."

OVERT ACT 9

On or about May 10, 2016, LAMB emailed LF-INC staff, including LISOWSKI and PARABIA, that PNP had "agreed

to continue utilizing our services for several years to come.”

OVERT ACT 10

On or about July 31, 2016, LF-INC allowed its Hazardous Waste Transporter Registration to expire.

OVERT ACT 11

On February 18, 2017, LISOWSKI told LF-INC's Operations Manager to add a PNP scrapyards to a driver's route because the scrapyards had full tanks and was unable to drain vehicles.

OVERT ACT 12

On or about July 1, 2017, LF-INC stopped using one fuel grading system for non-PNP customers and adopted its PNP grading system for all LF-INC customers.

OVERT ACT 13

On or about July 18, 2018, LF-INC's Assistant Operations Manager forwarded LISOWSKI a picture of a barrel labeled “HAZARDOUS WASTE” from a LF-INC driver at the PNP-Richmond scrapyards.

OVERT ACT 14

On or about January 15, 2019, PARABIA met with staff from the Department of Toxic Substances Control (DTSC) and told them that LF-INC sells the gasoline that they pick up to wholesalers and fuel blenders. He further stated that he did not know what happens to the gasoline after it is sold.

OVERT ACT 15

On or about March 13, 2019, LF-INC picked up a total of 1,278 gallons of waste fuel from two SA Recycling scrapyards in Los Angeles, California.

OVERT ACT 16

On or about March 13, 2019, LISOWSKI approved the request of LF-INC driver Anthony Rogers to drop waste fuel at Main St. Gas station in Los Angeles, California.

OVERT ACT 17

On or about November 5, 2019, LF-INC picked up approximately 1,264 gallons of waste fuel from two PNP scrapyards locations in Monterey County, California.

OVERT ACT 18

On or about November 5, 2019, LF-INC dropped approximately 1,764 gallons of waste fuel at Norman's Smog & Gas station in Woodland, California.

OVERT ACT 19

On or about November 6, 2019, LF-INC dropped approximately 5,034 gallons of waste fuel at Main St. Gas station in Los Angeles, California and 2,235 gallons of waste fuel at Norman's Smog & Gas station in Woodland, California.

OVERT ACT 20

On or about February 28, 2020, LF-INC dropped approximately 2,084 gallons of waste fuel at Norman's Smog & Gas station in Woodland, California, 2,474 gallons of waste fuel at Grand Petroleum gas station in Hayward, California, and 2,366 gallons of waste fuel at Franklin Gas Mart in Sacramento, California.

OVERT ACT 21

On or about June 1, 2020, LF-INC dropped approximately 4,983 gallons of waste fuel at California Finest Oil gas station in Lemon Grove, California.

OVERT ACT 22

On or about June 3, 2020, LISOWSKI represented to a representative of PNP's parent company that “Lamb Fuels has numerous end users that we sell our product to. Recovered gasoline can be used for industrial, retail and commercial purposes, including re-blending back into feedstock, blends for furnaces, and asphalt plants.”

OVERT ACT 23

On or about October 5, 2020, LF-INC dropped approximately 2,717 gallons of waste fuel at California Finest Oil gas station in Poway, California.

OVERT ACT 24

On or about January 5, 2021, PARABIA asked LISOWSKI to read and edit a draft letter to SA Recycling, which explained that “the market has stabilized enough (knock on wood) for us to begin paying for fuel again.”

OVERT ACT 25

On or about February 3, 2021, PARABIA emailed LISOWSKI and stated that Pull-A-Part’s fuel had been recently averaging “tier 4/5”; PARABIA said that he wanted LISOWSKI to tell Pull-A-Part “how much money they are losing, and introduce to him tier 1 incentive plan like we have done with PNP.”

OVERT ACT 26

On or about February 3, 2021, LF-INC accounting staff informed PARABIA that LF-INC owed PNP \$95,370.85 for January 2021 and LF-INC’s estimated revenue for January 2021 was \$778,274.96.

OVERT ACT 27

On or about February 10, 2021, LISOWSKI told DTSC investigators that he did not renew LF-INC’s hazardous waste transporter registration because LF-INC does not transport hazardous waste.

SOUTHERN CALIFORNIA ROUTE: JANUARY 20-21, 2021

COUNT 2 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about and between January 20-21, 2021, in the COUNTIES of SAN DIEGO and LOS ANGELES, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards iPull-uPull Pomona, SA Recycling – Mid-City, SA Recycling – East Los Angeles, SA Recycling – Montebello, and LKQ-Monrovia.

COUNT 3 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 21, 2021, in the COUNTIES of SAN DIEGO and SAN BERNARDINO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Ontario Fuel gas station in Ontario, California.

COUNT 4 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about January 21, 2021, in the COUNTIES of SAN DIEGO and ORANGE, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards LKQ-Stanton and LKQ-Anaheim.

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COUNT 5 –TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 21, 2021, in the COUNTIES of SAN DIEGO and LOS ANGELES, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Main St. Gas station in Los Angeles, California.

EASTERN CALIFORNIA ROUTE: JANUARY 20-21, 2021

COUNT 6 –TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 20, 2021, in the COUNTIES of SAN DIEGO, FRESNO, and TULARE, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards Westside-Fresno, PNP-Fresno, iPull-uPull Fresno, SA Recycling – Tulare, and Westside-Visalia.

COUNT 7 –TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 21, 2021, in the COUNTIES of SAN DIEGO and SAN JOAQUIN, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Ernie's General Store gas station in Stockton, California.

NORTHERN CALIFORNIA ROUTE: JANUARY 21, 2021

COUNT 8 –TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 21, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, CONTRA COSTA, and SANTA CLARA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Richmond, Sims-Richmond, PNP-Newark, PNP-San Jose, and PNP-Oakland.

COUNT 9 –TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 21, 2021, in the COUNTIES of SAN DIEGO and ALAMEDA, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Grand Petroleum gas station in Oakland, California.

EASTERN CALIFORNIA ROUTE: JANUARY 27-28, 2021

COUNT 10 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 27, 2021, in the COUNTIES of SAN DIEGO and FRESNO, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards Westside-Fresno, PNP-Fresno, iPull-uPull-Fresno, and SA Recycling-Fresno.

COUNT 11 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 28, 2021, in the COUNTIES of SAN DIEGO and YOLO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Norman's Smog & Gas station in Woodland, California.

COUNT 12 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 28, 2021, in the COUNTIES of SAN DIEGO, SACRAMENTO, SAN JOAQUIN, and STANISLAUS, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Modesto, PNP-Stockton, iPull-uPull-Stockton, and PNP-Mather.

COUNT 13 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 28, 2021, in the COUNTIES of SAN DIEGO and SACRAMENTO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Franklin Gas Mart in Sacramento, California.

SOUTHERN CALIFORNIA ROUTE: JANUARY 28, 2021

COUNT 14 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 28, 2021, in the COUNTIES of SAN DIEGO, LOS ANGELES, and ORANGE, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards LKQ-Monrovia, LKQ-Stanton, and LKQ-Anaheim.

COUNT 15 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 28, 2021, in the COUNTIES of SAN DIEGO and SAN BERNARDINO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Ontario Fuel gas station in Ontario, California.

NORTHERN CALIFORNIA ROUTE: JANUARY 28, 2021

COUNT 16 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about January 28, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, CONTRA COSTA, and SANTA CLARA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Richmond, Sims-Richmond, PNP-Newark, and PNP-San Jose.

COUNT 17 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about January 28, 2021, in the COUNTIES of SAN DIEGO and ALAMEDA, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Grand Petroleum gas station in Oakland, California.

EASTERN CALIFORNIA ROUTE: FEBRUARY 1-2, 2021

COUNT 18 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about and between February 1-2, 2021, in the COUNTIES of SAN DIEGO and SACRAMENTO, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Rancho Cordova, Sims-Sacramento, Planet Auto – Sacramento, PNP-Mather, and Planet Auto – Rancho Cordova.

COUNT 19 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 2, 2021, in the COUNTIES of SAN DIEGO and SACRAMENTO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Nav Gas & Foods in Rancho Cordova, California.

COUNT 20 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about February 2, 2021, in the COUNTIES of SAN DIEGO, SAN JOAQUIN, STANISLAUS, and MERCED, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Merced, PNP-Modesto, and PNP-Stockton.

COUNT 21 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 2, 2021, in the COUNTIES of SAN DIEGO and SAN JOAQUIN, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Ernie's General Store gas station in Stockton, California.

NORTHERN CALIFORNIA ROUTE: FEBRUARY 2, 2021

COUNT 22 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 2, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, CONTRA COSTA, MONTEREY, NAPA, and SANTA CLARA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-American Canyon, PNP-Newark, PNP-Richmond, PNP-San Jose, PNP-Salinas, and PNP-Moss Landing.

COUNT 23 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 2, 2021, in the COUNTIES of SAN DIEGO and CONTRA COSTA, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Grand Petroleum gas station in Concord, California.

SOUTHERN CALIFORNIA ROUTE: FEBRUARY 2-3, 2021

COUNT 24 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about and between February 2-3, 2021, in the COUNTIES of SAN DIEGO, LOS ANGELES, RIVERSIDE, and SAN BERNARDINO, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards Apple Auto, SA Recycling – Chino, iPull-uPull – Pomona, SA Recycling – Montebello, Cedar Express, SA Recycling – Mid-City, SA Recycling – East LA, and Ecology-Thousand Palms.

COUNT 25 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 3, 2021, in the COUNTIES of SAN DIEGO and LOS ANGELES, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Garo Gas station in Pasadena, California.

SOUTHERN CALIFORNIA ROUTE: FEBRUARY 8-9, 2021

COUNT 26 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 8, 2021, in the COUNTY of SAN DIEGO, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards Ecology-Oceanside, T-Metals, CPH Recycling, and Ecology/PYP-Chula Vista.

COUNT 27 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 8, 2021, in the COUNTY of SAN DIEGO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to California Finest Oil gas station in Poway, California.

COUNT 28 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 9, 2021, in the COUNTIES of SAN DIEGO, SAN BERNARDINO, and LOS ANGELES, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards Apple Auto, iPull-uPull – Pomona, Cedar Express, SA Recycling – Montebello, SA Recycling – Mid-City, and SA Recycling – East LA.

COUNT 29 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 9, 2021, in the COUNTIES of SAN DIEGO and LOS ANGELES, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Garo Gas station in Pasadena, California.

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COUNT 30 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 8, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, and CONTRA COSTA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Richmond, Sims-Richmond, PNP-Oakland, and Planet Auto – Oakland.

COUNT 31 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 8, 2021, in the COUNTIES of SAN DIEGO and ALAMEDA, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Grand Petroleum gas station in Hayward, California.

COUNT 32 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about and between February 8-9, 2021, in the COUNTIES of SAN DIEGO, ALAMEDA, MERCED, SANTA CLARA, SAN JOAQUIN, and STANISLAUS, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Newark, PNP-San Jose, PNP-Merced, PNP-Modesto, and PNP-Stockton.

COUNT 33 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 9, 2021, in the COUNTIES of SAN DIEGO and SAN JOAQUIN, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Ernie's General Store gas station in Stockton, California.

COUNT 34 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITY

On or about February 9, 2021, in the COUNTIES of SAN DIEGO and SACRAMENTO, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyard PNP-Mather.

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COUNT 35 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 8, 2021, in the COUNTIES of SAN DIEGO, BUTTE, SACRAMENTO, and SHASTA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-Rancho Cordova, Planet Auto – Rancho Cordova, PNP-Chico, and Planet Auto – Anderson.

COUNT 36 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 9, 2021, in the COUNTIES of SAN DIEGO and YOLO, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Norman's Smog & Gas station in Woodland, California.

COUNT 37 – TREATMENT OF HAZARDOUS WASTE AT UNAUTHORIZED FACILITIES

On or about February 9, 2021, in the COUNTIES of SAN DIEGO, MONTEREY, and NAPA, the crime of TREATMENT OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(d), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly treat hazardous waste at a location not authorized and not permitted for the treatment of hazardous waste pursuant to the Hazardous Waste Control Law, to wit: waste fuel at scrapyards PNP-American Canyon, PNP-Moss Landing, and PNP-Salinas.

COUNT 38 – TRANSPORTATION OF HAZARDOUS WASTE TO UNAUTHORIZED FACILITY

On or about February 9, 2021, in the COUNTIES of SAN DIEGO and CONTRA COSTA, the crime of TRANSPORTATION OF HAZARDOUS WASTE in violation of Health & Safety Code section 25189.5(c), a felony, was committed by LAMB FUELS, INC., GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, who did unlawfully and knowingly transport or cause the transportation of hazardous waste, and who reasonably should have known that he was causing the transportation of hazardous waste, to a location not authorized and not permitted pursuant to the Hazardous Waste Control Law, to wit: waste fuel to Grand Petroleum gas station in Concord, California.

CIRCUMSTANCES IN AGGRAVATION

(CALIFORNIA RULE OF COURT 4.421; PENAL CODE SECTION 1170(B)(2))

It is further alleged as to all charges, that GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, per PENAL CODE SECTION 1170(b)(2) and within the meaning of Rule 4.421 of the California Rules of Court, that there exist circumstances in aggravation including the following factors:

1. The defendant(s) induced others to participate in the commission of the crime or occupied a position of leadership or dominance of other participants in its commission (4.421(a)(4));
2. The manner in which the crime was carried out indicates planning, sophistication, or professionalism (4.421(a)(8));
3. The defendant(s) took advantage of a position of trust or confidence to commit the offense (4.421(a)(11)).

NOTICE: Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

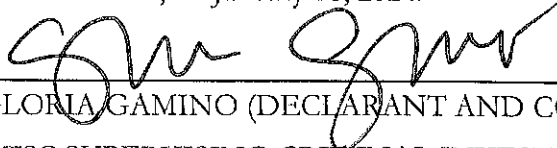
NOTICE: Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant(s). Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

NOTICE: Upon conviction of the offenses charged in Counts 2-38, the Court shall impose a fine of not less than five thousand dollars (\$5,000) nor more than one hundred thousand dollars (\$100,000) for each day of violation, pursuant to Health & Safety Code section 25189.5(e).

Further, attached and incorporated herein are official reports, documents, and/or a declaration of a law enforcement agency, which the undersigned believes establish probable cause for the arrest of the defendant(s), GREGORY LAMB, JEFFREY LISOWSKI, and KEZIN PARABIA, for the above-listed crimes. Wherefore, a warrant of arrest is request for said defendants.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CD302180, CONSISTS OF 38 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on January 18, 2024.



GLORIA GAMINO (DECLARANT AND COMPLAINANT)
DTSC SUPERVISING CRIMINAL INVESTIGATOR #31

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INFORMATION

ROB BONTA
ATTORNEY GENERAL OF CALIFORNIA
by:

Date

MARISA LANDIN
DEPUTY ATTORNEY GENERAL