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WARRANT ISSUED

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CENTRAL CRIMINAL
LOS ANGELES SUPERIOR COURT

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12

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

15 Plaintiff,

Case No. 25CJCF02140

**FELONY COMPLAINT FOR ARREST
WARRANT**

16 v.

17 1) ANTHONY LIMAS ([REDACTED])
2) JOHNNY NICKLAS ([REDACTED])
18 3) STEVE RANDY NICKLAS ([REDACTED])

19 Defendants.
20

21 The Attorney General of the State of California accuses the above-named defendants of the
22 following offenses, based on information and belief, which are connected to each other in their
23 commission:

24 **COUNT 1**

25 On and between March 26, 2023 and July 27, 2023, in the counties of Alameda, Los
26 Angeles, Orange, Riverside, San Bernardino, San Mateo, and Santa Clara, the crime of
27 ORGANIZED RETAIL THEFT, a violation of PENAL CODE SECTION 490.4(a), a Felony,
28 was committed by defendants, ANTHONY LIMAS, JOHNNY NICKLAS, and STEVE RANDY

1 NICKLAS, who did unlawfully act in concert with one or more person to steal merchandise from
2 one or more merchant's premises with the intent to sell, exchange, or return the merchandise for
3 value, in which the violations are committed on two or more separate occasions within a twelve
4 month period, in which the aggregate value of the merchandise stolen, received, purchased or
5 possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit: Merchandise from
6 Harbor Freight, Zales, Jared, and Kay.

7 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
8 pursuant to Penal Code section 786.5.

9 **COUNT 2**

10 On or about March 26, 2023, in the County of Los Angeles the crime of GRAND THEFT, a
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant, STEVE
12 RANDY NICKLAS, who did willfully and unlawfully take personal property of another of a
13 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Zales.

14 **COUNT 3**

15 On or about April 2, 2023, in the County of San Bernardino, the crime of GRAND THEFT,
16 a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants,
17 JOHNNY NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take
18 personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit:
19 Merchandise from Kay.

20 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
21 pursuant to Penal Code section 786.5.

22 **COUNT 4**

23 On or about April 2, 2023, in the County of San Bernardino, the crime of
24 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, a violation of
25 PENAL CODE SECTION 530.5(a), a Felony, was committed by defendant, JOHNNY
26 NICKLAS, who did willfully and unlawfully obtain personal identifying information of Luis
27 Alvarez and used that information for an unlawful purpose and to obtain, and attempt to obtain
28

1 credit, goods, services, real property, and medical information without the consent of Luis
2 Alvarez.

3 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
4 pursuant to Penal Code section 786.5.

5 **COUNT 5**

6 On or about April 2, 2023, in the County of San Bernardino, the crime of GRAND THEFT,
7 a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant,
8 JOHNNY NICKLAS, who did willfully and unlawfully take personal property of another of a
9 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Zales.

10 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
11 pursuant to Penal Code section 786.5.

12 **COUNT 6**

13 On or about April 4, 2023, in the County of San Bernardino, the crime of
14 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, a violation of
15 PENAL CODE SECTION 530.5(a), a Felony, was committed by defendant, JOHNNY
16 NICKLAS, who did willfully and unlawfully obtain personal identifying information of Luis
17 Alvarez and used that information for an unlawful purpose and to obtain, and attempt to obtain
18 credit, goods, services, real property, and medical information without the consent of Luis
19 Alvarez.

20 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
21 pursuant to Penal Code section 786.5.

22 **COUNT 7**

23 On or about April 4, 2023, in the County of Riverside, the crime of GRAND THEFT, a
24 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants
25 ANTHONY LIMAS, JOHNNY NICKLAS, and STEVE RANDY NICKLAS, who did willfully
26 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars
27 (\$950), to wit: Merchandise from Kay.
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1 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
2 pursuant to Penal Code section 786.5.

3 **COUNT 8**

4 On or about April 4, 2023, in the County of Riverside, the crime of GRAND THEFT, a
5 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants
6 ANTHONY LIMAS, JOHNNY NICKLAS, and STEVE RANDY NICKLAS, who did willfully
7 and unlawfully take personal property of another of a value exceeding nine hundred fifty dollars
8 (\$950), to wit: Merchandise from Kay.

9 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
10 pursuant to Penal Code section 786.5.

11 **COUNT 9**

12 On or about April 11, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
13 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants,
14 ANTHONY LIMAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take
15 personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit:
16 Merchandise from Kay.

17 **COUNT 10**

18 On or about April 11, 2023, in the County of Los Angeles, the crime of UNAUTHORIZED
19 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
20 SECTION 530.5(a), a Felony, was committed by defendant, JOHNNY NICKLAS, who did
21 willfully and unlawfully obtain personal identifying information of Luis Alvarez and used that
22 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
23 real property, and medical information without the consent of Jose Echeverria.

24 **COUNT 11**

25 On or about April 21, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
26 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
27 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
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1 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
2 from Kay.

3 **COUNT 12**

4 On or about April 21, 2023, in the County of Los Angeles, the crime of UNAUTHORIZED
5 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
6 SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY NICKLAS and STEVE
7 RANDY NICKLAS, who did willfully and unlawfully obtain personal identifying information of
8 Luis Alvarez and used that information for an unlawful purpose and to obtain, and attempt to
9 obtain credit, goods, services, real property, and medical information without the consent of
10 Daniel Vega.

11 **COUNT 13**

12 On or about April 21, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
13 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
14 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
15 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
16 from Zales.

17 **COUNT 14**

18 On or about April 21, 2023, in the County of Los Angeles, the crime of UNAUTHORIZED
19 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
20 SECTION 530.5(a), a Felony, was committed by defendant, STEVE RANDY NICKLAS, who
21 did willfully and unlawfully obtain personal identifying information of Luis Alvarez and used that
22 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
23 real property, and medical information without the consent of Daniel Vega.

24 **COUNT 15**

25 On or about April 26, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
26 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
27 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
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1 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
2 from Jared.

3 **COUNT 16**

4 On or about April 26, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
5 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
6 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
7 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
8 from Jared.

9 **COUNT 17**

10 On or about May 2, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
11 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
12 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
13 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
14 from Kay.

15 **COUNT 18**

16 On or about May 4, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
17 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
18 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
19 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
20 from Zales.

21 **COUNT 19**

22 On or about May 10, 2023, in the County of Santa Clara, the crime of GRAND THEFT, a
23 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
24 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
25 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
26 from Kay.

27 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
28 pursuant to Penal Code section 786.5.

1 **COUNT 20**

2 On or about May 10, 2023, in the County of Santa Clara, the crime of UNAUTHORIZED
3 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
4 SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY NICKLAS and STEVE
5 RANDY NICKLAS, who did willfully and unlawfully obtain personal identifying information
6 Chris Marroquin and used that information for an unlawful purpose and to obtain, and attempt to
7 obtain credit, goods, services, real property, and medical information without the consent of Chris
8 Marroquin.

9 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
10 pursuant to Penal Code section 786.5.

11 **COUNT 21**

12 On or about May 11, 2023, in the County of Alameda, the crime of GRAND THEFT, a
13 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
14 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
15 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
16 from Kay.

17 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
18 pursuant to Penal Code section 786.5.

19 **COUNT 22**

20 On or about May 11, 2023, in the County of Alameda, the crime of UNAUTHORIZED
21 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
22 SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY NICKLAS and STEVE
23 RANDY NICKLAS, who did willfully and unlawfully obtain personal identifying information
24 Miguel Ramirez and used that information for an unlawful purpose and to obtain, and attempt to
25 obtain credit, goods, services, real property, and medical information without the consent of
26 Miguel Ramirez.

27 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
28 pursuant to Penal Code section 786.5.

1 **COUNT 23**

2 On or about May 11, 2023, in the County of San Mateo, the crime of GRAND THEFT, a
3 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
4 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal
5 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
6 from Zales.

7 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
8 pursuant to Penal Code section 786.5.

9 **COUNT 24**

10 On or about May 11, 2023, in the County of San Mateo, the crime of UNAUTHORIZED
11 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
12 SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY NICKLAS and STEVE
13 RANDY NICKLAS, who did willfully and unlawfully obtain personal identifying information
14 Matthew Raya and used that information for an unlawful purpose and to obtain, and attempt to
15 obtain credit, goods, services, real property, and medical information without the consent of
16 Matthew Raya.

17 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
18 pursuant to Penal Code section 786.5.

19 **COUNT 25**

20 On or about May 13, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
21 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants,
22 ANTHONY LIMAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take
23 personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit:
24 Merchandise from Kay.

25 **COUNT 26**

26 On or about May 13, 2023, in the County of Los Angeles, the crime of UNAUTHORIZED
27 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
28 SECTION 530.5(a), a Felony, was committed by defendants, ANTHONY LIMAS and STEVE

1 RANDY NICKLAS, who did willfully and unlawfully obtain personal identifying information
2 Jose Fajardo and used that information for an unlawful purpose and to obtain, and attempt to
3 obtain credit, goods, services, real property, and medical information without the consent of Jose
4 Fajardo.

5 **COUNT 27**

6 On or about May 22, 2023, in the County of Los Angeles, the crime of GRAND THEFT, a
7 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendant,
8 ANTHONY LIMAS, who did willfully and unlawfully take personal property of another of a
9 value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise from Zales.

10 **COUNT 28**

11 On or about May 22, 2023, in the County of Los Angeles, the crime of UNAUTHORIZED
12 USE OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE
13 SECTION 530.5(a), a Felony, was committed by defendant, ANTHONY LIMAS, who did
14 willfully and unlawfully obtain personal identifying information Jose Fajardo and used that
15 information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services,
16 real property, and medical information without the consent of Jose Fajardo.

17 **COUNT 29**

18 On or about May 23, 2023, in the County of San Bernardino, the crime of GRAND THEFT,
19 a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants,
20 JOHNNY NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take
21 personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit:
22 Merchandise from Jared.

23 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
24 pursuant to Penal Code section 786.5.

25 **COUNT 30**

26 On or about May 23, 2023, in the County of San Bernardino, the crime of
27 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, a violation of
28 PENAL CODE SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY

1 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully obtain personal
2 identifying information Cesar Lopez and used that information for an unlawful purpose and to
3 obtain, and attempt to obtain credit, goods, services, real property, and medical information
4 without the consent of Cesar Lopez.

5 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
6 pursuant to Penal Code section 786.5.

7 **COUNT 31**

8 On or about July 24, 2023 in the County of San Bernardino, the crime of GRAND THEFT,
9 a violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants,
10 JOHNNY NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take
11 personal property of another of a value exceeding nine hundred fifty dollars (\$950), to wit:
12 Merchandise from Harbor Freight.

13 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
14 pursuant to Penal Code section 786.5.

15 **COUNT 32**

16 On or about July 24, 2023, in the County of San Bernardino, the crime of
17 UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION, a violation of
18 PENAL CODE SECTION 530.5(a), a Felony, was committed by defendants, JOHNNY
19 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully obtain personal
20 identifying information Joseph Villa and used that information for an unlawful purpose and to
21 obtain, and attempt to obtain credit, goods, services, real property, and medical information
22 without the consent of Joseph Villa.

23 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
24 pursuant to Penal Code section 786.5.

25 **COUNT 33**

26 On or about July 27, 2023 in the County of Orange, the crime of GRAND THEFT, a
27 violation of PENAL CODE SECTION 487(a), a Felony, was committed by defendants, JOHNNY
28 NICKLAS and STEVE RANDY NICKLAS, who did willfully and unlawfully take personal

1 property of another of a value exceeding nine hundred fifty dollars (\$950), to wit: Merchandise
2 from Harbor Freight.

3 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
4 pursuant to Penal Code section 786.5.

5 **COUNT 34**

6 On or about July 27, 2023, in the County of Orange, the crime of UNAUTHORIZED USE
7 OF PERSONAL IDENTIFYING INFORMATION, a violation of PENAL CODE SECTION
8 530.5(a), a Felony, was committed by defendants, JOHNNY NICKLAS and STEVE RANDY
9 NICKLAS, who did willfully and unlawfully obtain personal identifying information Charles
10 Gonzalez and used that information for an unlawful purpose and to obtain, and attempt to obtain
11 credit, goods, services, real property, and medical information without the consent of Charles
12 Gonzalez.

13 **NOTE:** Jurisdiction for this offense exists in this court when brought by the Attorney General
14 pursuant to Penal Code section 786.5.

15
16 **SPECIAL ALLEGATION 1**

17 As to Counts 1 through 34, it is further alleged that in the commission of the above
18 offenses, the said defendants, JOHNNY NICKLAS and STEVE RANDY NICKLAS, took
19 property of a value exceeding one hundred thousand dollars (\$100,000) within the meaning of
20 PENAL CODE SECTION 1203.045.

21 **SPECIAL ALLEGATION 2**

22 **AGGRAVATING FACTORS AS TO ANTHONY LIMAS**

23 As to Counts 1 and 5, it is further alleged that the People will seek findings from the jury on
24 factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

25 Pursuant to **California Rules of Court, Rule 4.421(a):**

26 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or
professionalism;

27 (a)(9) The crimes involved an attempted or actual taking or damage of great monetary
value; and

28 (a)(10) The crimes involved a large quantity of ~~contraband~~.

1 **SPECIAL ALLEGATION 3**

2 **AGGRAVATING FACTORS AS TO JOHNNY NICKLAS**

3 As to Counts 1 through 5, it is further alleged that the People will seek findings from the
4 jury on factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

5 Pursuant to **California Rules of Court, Rule 4.421(a)**:

6 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication,
or professionalism;

7 (a)(9) The crimes involved an attempted or actual taking or damage of great monetary
value; and

8 (a)(10) The crimes involved a large quantity of contraband.

9 **SPECIAL ALLEGATION 4**

10 **AGGRAVATING FACTORS AS TO STEVE RANDY NICKLAS**

11 As to Counts 1 and 5, it is further alleged that the People will seek findings from the jury on
12 factors of aggravation pursuant to **California Rules of Court, Rule 4.421** that:

13 Pursuant to **California Rules of Court, Rule 4.421(a)**:

14 (a)(8) The manner in which the crimes was carried out indicates planning, sophistication, or
professionalism;

15 (a)(9) The crimes involved an attempted or actual taking or damage of great monetary
value; and

16 (a)(10) The crimes involved a large quantity of contraband.

17
18 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
19 AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 34 COUNTS.

20 Executed at Los Angeles, County of Los Angeles, on April 18, 2025.

21 Dated: April 18, 2025

22 By: 

23 ASHLEY LEE
24 Deputy Attorney General

25 For: ROB BONTA
26 Attorney General of California