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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SACRAMENTO
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13 **THE PEOPLE OF THE STATE OF**
14 **CALIFORNIA,**
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17 **LOVELLA NEBERBA LUCERO (A.K.A.**
18 **LOVELLA VIPINOSA) AND**
19 **RONNIE VIPINOSA NEBERBA,**
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Plaintiff,
v.
Defendants.

Case No. _____

FELONY COMPLAINT

[AG DOCKET Nos.: SA2022304504 and SA2025300733]

20 The People of the State of California hereby allege that in the County of Sacramento, and
21 elsewhere within the State of California, before the making of this criminal complaint, the above-
22 named defendants, LOVELLA NEBERBA LUCERO (a.k.a. LOVELLA VIPINOSA) (DOB [REDACTED])
23 [REDACTED] and RONNIE VIPINOSA NEBERBA (DOB [REDACTED]), committed the following
24 criminal offenses:
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COUNT 1
[Pen. Code § 550(a)(5) – Felony]
False or Fraudulent Claims –2, 3, or 5 years

Beginning on or about January 1, 2020, and continuing through September 30, 2022, defendants, LOVELLA NEBERBA LUCERO and RONNIE VIPINOSA NEBERBA, did aid, abet, solicit and/or conspire with another to knowingly prepare, make or subscribe a writing or writings, with the intent to present and use it, or to allow it to be presented, in support of a false and fraudulent claim or claims, in violation of Penal Code section 550, subdivision (a)(5), a felony.

COUNT 2
[Pen. Code, § 182(a)(1)]
Conspiracy to Commit False or Fraudulent Claims – 2, 3, or 5 years Imprisonment

Beginning on or about January 1, 2020, and continuing through September 30, 2022, defendants, LOVELLA NEBERBA LUCERO and RONNIE VIPINOSA NEBERBA, did unlawfully conspire together to commit the crime of False or Fraudulent Claims, in violation of Penal Code section 182(a)(1), a felony.

OVERT ACTS

The Attorney General of the State of California further charges that pursuant to the above conspiracy, and to carry out the objects thereof, each defendant and co-defendant did, on or about January 1, 2020, and continuing through September 30, 2022, in the county of Sacramento and elsewhere in the State of California, commit various overt acts including, but not limited to, the following:

OVERT ACT #1: Defendant Ronnie Neberba, facility manager for Granite Bay Home, submitted to Alta California Regional Center, via electronic billing, claims for services for resident A. Moon which were not provided, to wit, a 24-hour, one on one, direct service provider.

OVERT ACT #2: Defendant Ronnie Neberba, facility manager for Granite Bay Home, submitted to Alta California Regional Center, via electronic billing, claims for services for resident A. Moon which were not provided, to wit, an additional 8 hours per day registered nurse or licensed vocational nurse.

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SPECIAL ALLEGATION
[Pen. Code, § 186.11(a)(2)]
White Collar Crime Enhancement
Additional 2, 3, or 5 years State Prison

Furthermore, as to counts 1, 2 and 3, the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by, the State of California of more than five hundred thousand dollars (\$500,000), thus subjecting LOVELLA NEBERBA LUCERO to the additional punishment provided for in Penal Code sections 186.11(a)(2).

NOTICE: Pursuant to Penal Code section 1170(h), prison custody time is to be served in state prison if the enhancement pursuant to Penal Code section 186.11 is imposed as part of a sentence for the above offense.

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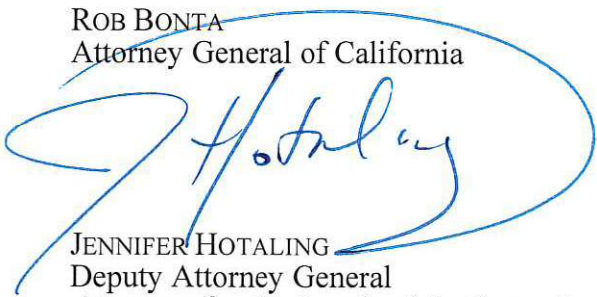
1 Further, attached and incorporated by reference is an Affidavit in Support of Arrest Warrant
2 and Complaint completed by a sworn peace officer from the California Department of Justice which
3 the complainant believes establishes probable cause for the arrest of defendants LOVELLA
4 NEBERBA LUCERO and RONNIE VIPINOSA NEBERBA, for the above listed crimes.
5 Wherefore, A WARRANT OF ARREST IS REQUESTED.
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7 I declare under penalty of perjury, on information and belief, pursuant to the laws of the State
8 of California, that the foregoing is true and correct.
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10 Dated: March 5, 2025

Respectfully Submitted,

ROB BONTA
Attorney General of California



JENNIFER HOTALING
Deputy Attorney General
*Attorneys for the People of the State of
California*

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