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FILED
Superior Court of California
County of Placer

JAN 23 2020

Jake Chatters
Executive Officer & Clerk
By: K. Harding, Deputy

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF PLACER

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

14 Plaintiffs,

15 v.

16 **ALEX MORALES III**

17 Defendant.

Case No. 62-144473A

FIRST AMENDED INFORMATION

18 The Attorney General of the State of California by this First Amended Information accuses
19 Defendant ALEX MORALES III of the following criminal offenses:

20 **COUNT ONE**

21 **(Receiving a Bribe)**

22 On or between August 2010 and January 2015, in the County of Placer, Defendant ALEX
23 MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in
24 that he unlawfully and knowingly received from National Americans with Disabilities Act
25 Accrediting and Consulting Inc. ("ADAAC"), a bribe, to wit: use of a white Ford Expedition, with
26 the understanding and for the purpose of influencing the action of the Defendant upon a matter
27 then pending or that may have been brought before the Defendant in his official capacity as the
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1 Statewide Americans with Disabilities Act ("ADA") Coordinator for the California Department
2 of Transportation ("CALTRANS").

3 **COUNT TWO**

4 **(Receiving a Bribe)**

5 On or about October 19, 2010, in the County of Placer, Defendant ALEX MORALES III
6 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
7 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
8 money, with the understanding and for the purpose of influencing the action of the Defendant
9 upon a matter then pending or that may have been brought before the Defendant in his official
10 capacity as the Statewide ADA Coordinator for CALTRANS.

11 **COUNT THREE**

12 **(Receiving a Bribe)**

13 On or about November 10, 2010, in the County of Placer, Defendant ALEX MORALES III
14 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
15 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
16 money, with the understanding and for the purpose of influencing the action of the Defendant
17 upon a matter then pending or that may have been brought before the Defendant in his official
18 capacity as the Statewide ADA Coordinator for CALTRANS.

19 **COUNT FOUR**

20 **(Receiving a Bribe)**

21 On or about December 14, 2010, in the County of Placer, Defendant ALEX MORALES III
22 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
23 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
24 money, with the understanding and for the purpose of influencing the action of the Defendant
25 upon a matter then pending or that may have been brought before the Defendant in his official
26 capacity as the Statewide ADA Coordinator for CALTRANS.

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1 **COUNT FIVE**

2 **(Receiving a Bribe)**

3 On or about January 11, 2011, in the County of Placer, Defendant ALEX MORALES III
4 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
5 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
6 money, with the understanding and for the purpose of influencing the action of the Defendant
7 upon a matter then pending or that may have been brought before the Defendant in his official
8 capacity as the Statewide ADA Coordinator for CALTRANS.

9 **COUNT SIX**

10 **(Receiving a Bribe)**

11 On or about February 22, 2011, in the County of Placer, Defendant ALEX MORALES III
12 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
13 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
14 money, with the understanding and for the purpose of influencing the action of the Defendant
15 upon a matter then pending or that may have been brought before the Defendant in his official
16 capacity as the Statewide ADA Coordinator for CALTRANS.

17 **COUNT SEVEN**

18 **(Receiving a Bribe)**

19 On or about May 17, 2011, in the County of Placer, Defendant ALEX MORALES III
20 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
21 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
22 money, with the understanding and for the purpose of influencing the action of the Defendant
23 upon a matter then pending or that may have been brought before the Defendant in his official
24 capacity as the Statewide ADA Coordinator for CALTRANS.

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COUNT EIGHT

(Receiving a Bribe)

On or about June 13, 2011, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT NINE

(Receiving a Bribe)

On or about November 16, 2011, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT TEN

(Receiving a Bribe)

On or about December 17, 2011, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT ELEVEN

(Receiving a Bribe)

On or about July 20, 2012, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he

1 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
2 money, with the understanding and for the purpose of influencing the action of the Defendant
3 upon a matter then pending or that may have been brought before the Defendant in his official
4 capacity as the Statewide ADA Coordinator for CALTRANS.

5 **COUNT TWELVE**

6 **(Receiving a Bribe)**

7 On or about September 21, 2012, in the County of Placer, Defendant ALEX MORALES III
8 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
9 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
10 money, with the understanding and for the purpose of influencing the action of the Defendant
11 upon a matter then pending or that may have been brought before the Defendant in his official
12 capacity as the Statewide ADA Coordinator for CALTRANS.

13 **COUNT THIRTEEN**

14 **(Receiving a Bribe)**

15 On or about July 22, 2013, in the County of Placer, Defendant ALEX MORALES III
16 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
17 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
18 money, with the understanding and for the purpose of influencing the action of the Defendant
19 upon a matter then pending or that may have been brought before the Defendant in his official
20 capacity as the Statewide ADA Coordinator for CALTRANS.

21 **COUNT FOURTEEN**

22 **(Receiving a Bribe)**

23 On or about May 31, 2014, in the County of Placer, Defendant ALEX MORALES III
24 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
25 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
26 money, with the understanding and for the purpose of influencing the action of the Defendant
27 upon a matter then pending or that may have been brought before the Defendant in his official
28 capacity as the Statewide ADA Coordinator for CALTRANS.

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COUNT FIFTEEN
(Receiving a Bribe)

On or about June 27, 2014, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT SIXTEEN
(Receiving a Bribe)

On or about July 17, 2014, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT SEVENTEEN
(Receiving a Bribe)

On or about August 22, 2014, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit: money, with the understanding and for the purpose of influencing the action of the Defendant upon a matter then pending or that may have been brought before the Defendant in his official capacity as the Statewide ADA Coordinator for CALTRANS.

COUNT EIGHTEEN
(Receiving a Bribe)

On or about September 19, 2014, in the County of Placer, Defendant ALEX MORALES III committed the crime of receiving a bribe in violation of Penal Code section 68 in that he

1 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
2 money, with the understanding and for the purpose of influencing the action of the Defendant
3 upon a matter then pending or that may have been brought before the Defendant in his official
4 capacity as the Statewide ADA Coordinator for CALTRANS.

5 **COUNT NINETEEN**

6 **(Receiving a Bribe)**

7 On or about October 22, 2014, in the County of Placer, Defendant ALEX MORALES III
8 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
9 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
10 money, with the understanding and for the purpose of influencing the action of the Defendant
11 upon a matter then pending or that may have been brought before the Defendant in his official
12 capacity as the Statewide ADA Coordinator for CALTRANS.

13 **COUNT TWENTY**

14 **(Receiving a Bribe)**

15 On or about November 15, 2014, in the County of Placer, Defendant ALEX MORALES III
16 committed the crime of receiving a bribe in violation of Penal Code section 68 in that he
17 unlawfully and knowingly asked, agreed to receive, or received from ADAAC, a bribe, to wit:
18 money, with the understanding and for the purpose of influencing the action of the Defendant
19 upon a matter then pending or that may have been brought before the Defendant in his official
20 capacity as the Statewide ADA Coordinator for CALTRANS.

21 **STATUTE OF LIMITATIONS ALLEGATION**

22 **PURSUANT TO PENAL CODE SECTION 803(c)**

23 It is further alleged that the offenses described herein were not discovered until around or
24 about in or about December 2014 when the above-noted violations came to the attention of law
25 enforcement and that no victim of said violation and no law enforcement agency chargeable with
26 the investigation and prosecution of said violation had actual and constructive knowledge of said
27 violation prior to the date alleged above, because the defendants concealed the unlawful activities
28 alleged herein, within the meaning of Penal Code section 803(c).

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DECLARATION

I verify under information and belief, pursuant to Penal Code section 806, that the forgoing is true and correct.

Dated: January 23, 2020

Respectfully Submitted,

XAVIER BECERRA
Attorney General of California
JAMES ROOT
Senior Assistant Attorney General
BRETT J. MORRIS
Supervising Deputy Attorney General



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Deputy Attorney General
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