

SECRET

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

- 1) TANEHA BROOKS ([REDACTED])
- 2) SHAWN SMYLES ([REDACTED])
- 3) ISAIAH GOODIE ([REDACTED])
- 4) RAMSES PATRON ([REDACTED])
- 5) JULIAN LIRA ([REDACTED])
- 6) VANESSA WATTANACHINDA-JONES
([REDACTED])
- 7) KENNETH SILVA ([REDACTED])
- 8) ROBERT FORD JR. ([REDACTED])
- 9) RENE CONANT JR. ([REDACTED])
- 10) LENTON ABRAM ([REDACTED])
- 11) CAIN CABRERA ([REDACTED])
- 12) FLOR SANCHEZ ([REDACTED])
- 13) JACQUELINE RIVERA-CASTILLO ([REDACTED])
([REDACTED])

Case No. **25 CJC F00763**

INDICTMENT

- 1 14) SOPHEA KIET ([REDACTED]
- 2 15) ARIEL PHELIX-ESPINOZA ([REDACTED]
- 3 [REDACTED]
- 4 16) CHEZZARAY WHITE ([REDACTED]
- 5 17) TIMOTHY GOULD ([REDACTED]
- 6 18) RAYMOND RAMIREZ ([REDACTED]
- 7 19) EUNICE HUERTA ([REDACTED]
- 8 20) NANCY SOSTRE ([REDACTED]
- 9 21) DIANA JACOBO ([REDACTED]
- 10 22) KENNETH HAYWOOD [REDACTED]
- 11 23) BENJAMIN CANO ([REDACTED]
- 12 24) ROBERT PERKINS ([REDACTED]
- 13 25) ENRIQUE ALVARENGA [REDACTED]
- 14 26) LAFRANCE DAVIS ([REDACTED]
- 15 27) ANGELINA MEDINA [REDACTED]
- 16 28) JESSICA JUAREZ-SERRANO
- 17 ([REDACTED]
- 18 29) SERGIO MAGOS [REDACTED]
- 19 30) RANDY BACA ([REDACTED]

Defendants.

20 TANEHA BROOKS, SHAWN SMYLES, ISAIAH GOODIE, RAMSES PATRON,
21 JULIAN LIRA, VANESSA WATTANACHINDA-JONES, KENNETH SILVA, ROBERT
22 FORD JR., RENE CONANT JR., LENTON ABRAM, CAIN CABRERA, FLOR SANCHEZ,
23 JACQUELINE RIVERA-CASTILLO, SOPHEA KIET, ARIEL PHELIX ESPINOZA,
24 CHEZZARAY WHITE, TIMOTHY GOULD, RAYMOND RAMIREZ, EUNICE HUERTA,
25 NANCY SOSTRE, DIANA JACOBO, KENNETH HAYWOOD, BENJAMIN CANO, ROBERT
26 PERKINS, ENRIQUE ALVARANGA, LAFRANCE DAVIS, ANGELINA MEDINA, JESSICA
27 JUAREZ-SERRANO, SERGIO MAGOS, and RANDY BACA, are hereby accused by the Grand
28

1 Jury of the County of Los Angeles, State of California, by this Indictment, of the following
2 crimes:

3
4 **COUNT 1**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about July 14, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
7 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
8 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by SHAWN SMYLES, ISAAH GOODIE, TANEHA BROOKS, and RAMSES
10 PATRON, who did willfully and unlawfully under circumstances and conditions likely to produce
11 great bodily harm and death, injure, cause, and permit children, JOHN DOE 1, JOHN DOE 2, and
12 JOHN DOE 3, having the care and custody of said children, injure, cause, and permit the person
13 and health of said children to be willfully placed in a situation that his person and health was/were
14 endangered.

15
16 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
17 state prison pursuant to Penal Code section 1170.

18
19 **COUNT 2**

20 **CHILD ABUSE / ENDANGERMENT**

21 On or about July 14, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
22 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
23 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
24 committed by SHAWN SMYLES, JULIAN LIRA, and VANESSA WATTANACHINDA-
25 JONES, who did willfully and unlawfully under circumstances and conditions likely to produce
26 great bodily harm and death, injure, cause, and permit children, JOHN DOE 2, JOHN DOE 4,
27 JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, having the care and custody of said children, injure,

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1 cause, and permit the person and health of said children to be willfully placed in a situation that
2 his person and health was/were endangered.

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4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 3**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about July 14, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
10 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
11 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by JULIAN LIRA, ISAAH GOODIE, and VANESSA WATTANACHINDA-
13 JONES, who did willfully and unlawfully under circumstances and conditions likely to produce
14 great bodily harm and death, injure, cause, and permit children JOHN DOE 26, JOHN DOE 66,
15 JOHN DOE 134, having the care and custody of said children, injure, cause, and permit the
16 person and health of said children to be willfully placed in a situation that his person and health
17 was/were endangered.

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19 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
20 state prison pursuant to Penal Code section 1170.

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22 **COUNT 4**

23 **CHILD ABUSE / ENDANGERMENT**

24 On or about July 17, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
25 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
26 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
27 committed by TANEHA BROOKS, who did willfully and unlawfully under circumstances and
28 conditions likely to produce great bodily harm and death, injure, cause, and permit children

1 JOHN DOE 2, and JOHN DOE 48, having the care and custody of said children, injure, cause,
2 and permit the person and health of said children to be willfully placed in a situation that his
3 person and health was/were endangered.

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5 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
6 state prison pursuant to Penal Code section 1170.

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8 **COUNT 5**

9 **CHILD ABUSE / ENDANGERMENT**

10 On or about July 19, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
11 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
12 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
13 committed by KENNETH SILVA, ROBERT FORD JR., and RENE CONANT JR., who did
14 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
15 and death, injure, cause, and permit JOHN DOE 2, JOHN DOE 96, JOHN DOE 4, and JOHN
16 DOE 20, having the care and custody of said children, injure, cause, and permit the person and
17 health of said children to be willfully placed in a situation that his person and health was/were
18 endangered.

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20 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
21 state prison pursuant to Penal Code section 1170.

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23 **COUNT 6**

24 **CHILD ABUSE / ENDANGERMENT**

25 On or about July 26, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
26 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
27 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
28 committed by ARIEL PHELIX-ESPINOZA, who did willfully and unlawfully under

1 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
2 permit children JOHN DOE 136, JOHN DOE 80, JOHN DOE 88, having the care and custody of
3 said children, injure, cause, and permit the person and health of said child to be willfully placed in
4 a situation that his person and health was/were endangered.

5
6 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
7 state prison pursuant to Penal Code section 1170.

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9 **COUNT 7**

10 **CHILD ABUSE / ENDANGERMENT**

11 On or about July 31, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
12 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
13 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
14 committed by TANEHA BROOKS, who did willfully and unlawfully under circumstances and
15 conditions likely to produce great bodily harm and death, injure, cause, and permit children
16 JOHN DOE 38, JOHN DOE 5, JOHN DOE 39, JOHN DOE 20, JOHN DOE 4, JOHN DOE 1,
17 JOHN DOE 40, having the care and custody of said children, injure, cause, and permit the person
18 and health of said children to be willfully placed in a situation that his person and health was/were
19 endangered.

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21 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
22 state prison pursuant to Penal Code section 1170.

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24 **COUNT 8**

25 **CHILD ABUSE / ENDANGERMENT**

26 On or about August 9, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
27 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
28 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was

1 committed by CAIN CABRERA, who did willfully and unlawfully under circumstances and
2 conditions likely to produce great bodily harm and death, injure, cause, and permit children
3 JOHN DOE 3, JOHN DOE 26, JOHN DOE 49, having the care and custody of said children,
4 injure, cause, and permit the person and health of said children to be willfully placed in a situation
5 that his person and health was/were endangered.

6
7 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
8 state prison pursuant to Penal Code section 1170.

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10 **COUNT 9**

11 **CHILD ABUSE / ENDANGERMENT**

12 On or about August 10, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
13 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
14 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
15 committed by FLOR SANCHEZ, LENTON ABRAM, and CAIN CABRERA, who did willfully
16 and unlawfully under circumstances and conditions likely to produce great bodily harm and
17 death, injure, cause, and permit children JOHN DOE 67, JOHN DOE 39, JOHN DOE 2, JOHN
18 DOE 36, JOHN DOE 68, JOHN DOE 4, JOHN DOE 20, JOHN DOE 19, JOHN DOE 38, and
19 JOHN DOE 40, having the care and custody of said children, injure, cause, and permit the person
20 and health of said children to be willfully placed in a situation that his person and health was/were
21 endangered.

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23 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
24 state prison pursuant to Penal Code section 1170.

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COUNT 10

CHILD ABUSE / ENDANGERMENT

On or about August 11, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by SOPHEA KIET, EUNICE HUERTA, LAFRANCE DAVIS, and ARIEL PHELIX-ESPINOZA, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 80, JOHN DOE 81, JOHN DOE 82, having the care and custody of said children, injure, cause, and permit the person and health of said child to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

COUNT 11

CHILD ABUSE / ENDANGERMENT

On or about August 12, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by CHEZZARAY WHITE, RAYMOND RAMIREZ, and EUNICE HUERTA, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 82, JOHN DOE 81, JOHN DOE 86, and JOHN DOE 109, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

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4 **COUNT 12**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about August 12, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
7 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
8 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by NANCY SOSTRE, who did willfully and unlawfully under circumstances and
10 conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 63 and JOHN DOE 115, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

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18 **COUNT 13**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about August 13, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
21 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
22 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by CHEZZARAY WHITE and TIMOTHY GOULD, who did willfully and
24 unlawfully under circumstances and conditions likely to produce great bodily harm and death,
25 injure, cause, and permit children JOHN DOE 86, JOHN DOE 81, JOHN DOE 87, JOHN DOE
26 88 and JOHN DOE 82, having the care and custody of said children, injure, cause, and permit the
27 person and health of said children to be willfully placed in a situation that his person and health
28 was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

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4 **COUNT 14**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about August 16, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
7 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
8 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by LENTON ABRAM, who did willfully and unlawfully under circumstances and
10 conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 36 and JOHN DOE 69, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 15**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about August 19, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
21 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
22 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by CHEZZARAY WHITE and EUNICE HUERTA, who did willfully and unlawfully
24 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
25 and permit children JOHN DOE 90 and JOHN DOE 137, having the care and custody of said
26 children, injure, cause, and permit the person and health of said children to be willfully placed in
27 a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 16**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about August 21, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
7 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
8 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ISAIAH GOODIE, who did willfully and unlawfully under circumstances and
10 conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 16 and JOHN DOE 48, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 17**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about August 23, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
21 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
22 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by LENTON ABRAM and JACQUELINE RIVERA-CASTILLO, who did willfully
24 and unlawfully under circumstances and conditions likely to produce great bodily harm and
25 death, injure, cause, and permit children JOHN DOE 70, JOHN DOE 34, JOHN DOE 36, having
26 the care and custody of said children, injure, cause, and permit the person and health of said
27 children to be willfully placed in a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 18**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about August 28, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
7 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
8 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ISAAH GOODIE and NANCY SOSTRE, who did willfully and unlawfully under
10 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
11 permit children JOHN DOE 49 and JOHN DOE 8, having the care and custody of said children,
12 injure, cause, and permit the person and health of said children to be willfully placed in a situation
13 that his person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 19**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about August 29, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
21 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
22 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by SHAWN SMYLES and ISAAH GOODIE, who did willfully and unlawfully
24 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
25 and permit children JOHN DOE 8 and JOHN DOE 9, having the care and custody of said
26 children, injure, cause, and permit the person and health of said children to be willfully placed in
27 a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 20**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about September 8, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ROBERT PERKINS, who did willfully and unlawfully under circumstances and
10 conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 121 and JOHN DOE 122, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 21**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about September 12, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by ISAIAH GOODIE, who did willfully and unlawfully under circumstances and
24 conditions likely to produce great bodily harm and death, injure, cause, and permit children
25 JOHN DOE 10 and JOHN DOE 11, having the care and custody of said children, injure, cause,
26 and permit the person and health of said children to be willfully placed in a situation that his
27 person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 22**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about September 19, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ISAIAH GOODIE and FLOR SANCHEZ, who did willfully and unlawfully under
10 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
11 permit children JOHN DOE 50, JOHN DOE 27, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53,
12 having the care and custody of said children, injure, cause, and permit the person and health of
13 said children to be willfully placed in a situation that his person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 23**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about September 19, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by TANEHA BROOKS, who did willfully and unlawfully under circumstances and
24 conditions likely to produce great bodily harm and death, injure, cause, and permit children
25 JOHN DOE 36 and JOHN DOE 14, having the care and custody of said children, injure, cause,
26 and permit the person and health of said children to be willfully placed in a situation that his
27 person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 24**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about September 21, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by JULIAN LIRA and LENTON ABRAM, who did willfully and unlawfully under
10 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
11 permit children JOHN DOE 5, JOHN DOE 13, JOHN DOE 14, JOHN DOE 19, JOHN DOE 36,
12 having the care and custody of said children, injure, cause, and permit the person and health of
13 said children to be willfully placed in a situation that his person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 25**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about September 22, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by ROBERT PERKINS, who did willfully and unlawfully under circumstances and
24 conditions likely to produce great bodily harm and death, injure, cause, and permit children
25 JOHN DOE 123, JOHN DOE 124, JOHN DOE 125, having the care and custody of said children,
26 injure, cause, and permit the person and health of said children to be willfully placed in a situation
27 that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

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4 **COUNT 26**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about September 22, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ARIEL PHELIX-ESPINOZA who did willfully and unlawfully under
10 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
11 permit children JOHN DOE 83, JOHN DOE 84, JOHN DOE 85, having the care and custody of
12 said children, injure, cause, and permit the person and health of said children to be willfully
13 placed in a situation that his person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 27**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about September 23, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by ROBERT PERKINS and RANDY BACA, who did willfully and unlawfully under
24 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
25 permit children JOHN DOE 126, JOHN DOE 127, JOHN DOE 128, JOHN DOE 129, JOHN
26 DOE 130, and JOHN DOE 138, having the care and custody of said children, injure, cause, and
27 permit the person and health of said children to be willfully placed in a situation that his person
28 and health was/were endangered.

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2 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
3 state prison pursuant to Penal Code section 1170.
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5 **COUNT 28**

6 **CHILD ABUSE / ENDANGERMENT**

7 On or about September 25, 2023, in the County of Los Angeles, the crime of CHILD
8 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
9 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
10 committed by SHAWN SMYLES, TANEHA BROOKS, and DIANA JACOBO, who did
11 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
12 and death, injure, cause, and permit children JOHN DOE 12, JOHN DOE 13, JOHN DOE 14,
13 JOHN DOE 5, JOHN DOE 15, and JOHN DOE 16, having the care and custody of said children,
14 injure, cause, and permit the person and health of said children to be willfully placed in a situation
15 that his person and health was/were endangered.
16

17 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
18 state prison pursuant to Penal Code section 1170.
19

20 **COUNT 29**

21 **CHILD ABUSE / ENDANGERMENT**

22 On or about September 25, 2023, in the County of Los Angeles, the crime of CHILD
23 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
24 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
25 committed by SHAWN SMYLES and TANEHA BROOKS, who did willfully and unlawfully
26 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
27 and permit children JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 12, and JOHN
28 DOE 20, having the care and custody of said children, injure, cause, and permit the person and

1 health of said children to be willfully placed in a situation that his person and health was/were
2 endangered.

3
4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 30**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about October 6, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
10 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
11 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by ISAIAH GOODIE, who did willfully and unlawfully under circumstances and
13 conditions likely to produce great bodily harm and death, injure, cause, and permit children
14 JOHN DOE 54, JOHN DOE 27, and JOHN DOE 28, having the care and custody of said
15 children, injure, cause, and permit the person and health of said children to be willfully placed in
16 a situation that his person and health was/were endangered.

17
18 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
19 state prison pursuant to Penal Code section 1170.

20
21 **COUNT 31**

22 **CHILD ABUSE / ENDANGERMENT**

23 On or about October 9, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
24 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
25 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
26 committed by SHAWN SMYLES, ISAIAH GOODIE, and NANCY SOSTRE, who did willfully
27 and unlawfully under circumstances and conditions likely to produce great bodily harm and
28 death, injure, cause, and permit children JOHN DOE 21, and JOHN DOE 22, having the care and

1 custody of said children, injure, cause, and permit the person and health of said children to be
2 willfully placed in a situation that his person and health was/were endangered.

3
4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 32**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about October 11, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
10 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
11 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by LENTON ABRAM, who did willfully and unlawfully under circumstances and
13 conditions likely to produce great bodily harm and death, injure, cause, and permit children
14 JOHN DOE 72, JOHN DOE 73, JOHN DOE 36, and JOHN DOE 12, having the care and custody
15 of said children, injure, cause, and permit the person and health of said children to be willfully
16 placed in a situation that his person and health was/were endangered.

17
18 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
19 state prison pursuant to Penal Code section 1170.

20
21 **COUNT 33**

22 **CHILD ABUSE / ENDANGERMENT**

23 On or about October 22, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
24 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
25 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
26 committed by CHEZZARAY WHITE, who did willfully and unlawfully under circumstances and
27 conditions likely to produce great bodily harm and death, injure, cause, and permit children
28 JOHN DOE 89 and JOHN DOE 90, having the care and custody of said children, injure, cause,

1 and permit the person and health of said children to be willfully placed in a situation that his
2 person and health was/were endangered.

3
4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 34**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about October 23, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
10 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
11 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by SHAWN SMYLES, ISAAH GOODIE, and NANCY SOSTRE, who did willfully
13 and unlawfully under circumstances and conditions likely to produce great bodily harm and
14 death, injure, cause, and permit children JOHN DOE 23 and JOHN DOE 24, having the care and
15 custody of said children, injure, cause, and permit the person and health of said children to be
16 willfully placed in a situation that his person and health was/were endangered.

17
18 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
19 state prison pursuant to Penal Code section 1170.

20
21 **COUNT 35**

22 **CHILD ABUSE / ENDANGERMENT**

23 On or about October 27, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
24 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
25 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
26 committed by TANEHA BROOKS, and DIANA JACOBO, who did willfully and unlawfully
27 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
28 and permit children JOHN DOE 7, JOHN DOE 41, and JOHN DOE 14, having the care and

1 custody of said children, injure, cause, and permit the person and health of said children to be
2 willfully placed in a situation that his person and health was/were endangered.

3
4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 36**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about October 29, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
10 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
11 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by SHAWN SMYLES, ISAIAH GOODIE, NANCY SOSTRE and ANGELINA
13 MEDINA, who did willfully and unlawfully under circumstances and conditions likely to produce
14 great bodily harm and death, injure, cause, and permit children JOHN DOE 23, JOHN DOE 25,
15 JOHN DOE 26, JOHN DOE 27, JOHN DOE 21, JOHN DOE 28, and JOHN DOE 29 having the
16 care and custody of said children, injure, cause, and permit the person and health of said children
17 to be willfully placed in a situation that his person and health was/were endangered.

18
19 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
20 state prison pursuant to Penal Code section 1170.

21
22 **COUNT 37**

23 **CHILD ABUSE / ENDANGERMENT**

24 On or about October 31, 2023, in the County of Los Angeles, the crime of CHILD ABUSE
25 UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY
26 INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
27 committed by TANEHA BROOKS and DIANA JACOBO, who did willfully and unlawfully
28 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,

1 and permit children JOHN DOE 42, JOHN DOE 43, and JOHN DOE 41, having the care and
2 custody of said children, injure, cause, and permit the person and health of said children to be
3 willfully placed in a situation that his person and health was/were endangered.
4

5 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
6 state prison pursuant to Penal Code section 1170.
7

8 **COUNT 38**

9 **CHILD ABUSE / ENDANGERMENT**

10 On or about November 1, 2023, in the County of Los Angeles, the crime of CHILD
11 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
12 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
13 committed by LENTON ABRAM, who did willfully and unlawfully under circumstances and
14 conditions likely to produce great bodily harm and death, injure, cause, and permit children
15 JOHN DOE 74 and JOHN DOE 36, having the care and custody of said children, injure, cause,
16 and permit the person and health of said children to be willfully placed in a situation that his
17 person and health was/were endangered.
18

19 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
20 state prison pursuant to Penal Code section 1170.
21

22 **COUNT 39**

23 **CHILD ABUSE / ENDANGERMENT**

24 On or about November 3, 2023, in the County of Los Angeles, the crime of CHILD
25 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
26 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
27 committed by ISAIAH GOODIE, JULIAN LIRA, and ANGELINA MEDINA who did willfully
28 and unlawfully under circumstances and conditions likely to produce great bodily harm and

1 death, injure, cause, and permit children JOHN DOE 24, JOHN DOE 139, and JOHN DOE 26,
2 having the care and custody of said children, injure, cause, and permit the person and health of
3 said children to be willfully placed in a situation that his person and health was/were endangered.
4

5 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
6 state prison pursuant to Penal Code section 1170.
7

8 **COUNT 40**

9 **CHILD ABUSE / ENDANGERMENT**

10 On or about November 3, 2023, in the County of Los Angeles, the crime of CHILD
11 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
12 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
13 committed by EUNICE HUERTA, who did willfully and unlawfully under circumstances and
14 conditions likely to produce great bodily harm and death, injure, cause, and permit children
15 JOHN DOE 110 and JOHN DOE 111, having the care and custody of said children, injure, cause,
16 and permit the person and health of said children to be willfully placed in a situation that his
17 person and health was/were endangered.
18

19 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
20 state prison pursuant to Penal Code section 1170.
21

22 **COUNT 41**

23 **CHILD ABUSE / ENDANGERMENT**

24 On or about November 9, 2023, in the County of Los Angeles, the crime of CHILD
25 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
26 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
27 committed by BENJAMIN CANO, KENNETH HAYWOOD, LENTON ABRAM, and
28 JACQUELINE RIVERA-CASTILLO, who did willfully and unlawfully under circumstances and

1 conditions likely to produce great bodily harm and death, injure, cause, and permit children
2 JOHN DOE 46, JOHN DOE 14, JOHN DOE 34, JOHN DOE 36, and JOHN DOE 43, having the
3 care and custody of said children, injure, cause, and permit the person and health of said children
4 to be willfully placed in a situation that his person and health was/were endangered.

5
6 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
7 state prison pursuant to Penal Code section 1170.

8
9 **COUNT 42**

10 **CHILD ABUSE / ENDANGERMENT**

11 On or about November 12, 2023, in the County of Los Angeles, the crime of CHILD
12 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
13 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
14 committed by NANCY SOSTRE, who did willfully and unlawfully under circumstances and
15 conditions likely to produce great bodily harm and death, injure, cause, and permit JOHN DOE
16 100, JOHN DOE 116, JOHN DOE 3, and JOHN DOE 117, having the care and custody of said
17 children, injure, cause, and permit the person and health of said child to be willfully placed in a
18 situation that his person and health was/were endangered.

19
20 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
21 state prison pursuant to Penal Code section 1170.

22
23 **COUNT 43**

24 **CHILD ABUSE / ENDANGERMENT**

25 On or about November 14, 2023, in the County of Los Angeles, the crime of CHILD
26 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
27 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
28 committed by TANEHA BROOKS and DIANA JACOBO, who did willfully and unlawfully

1 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
2 and permit children JOHN DOE 36, JOHN DOE 15, JOHN DOE 14, JOHN DOE 24, JOHN
3 DOE 5, JOHN DOE 34, JOHN DOE 44, JOHN DOE 41, JOHN DOE 7, and JOHN DOE 20,
4 having the care and custody of said children, injure, cause, and permit the person and health of
5 said children to be willfully placed in a situation that his person and health was/were endangered.

6
7 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
8 state prison pursuant to Penal Code section 1170.

9
10 **COUNT 44**

11 **CHILD ABUSE / ENDANGERMENT**

12 On or about November 14, 2023, in the County of Los Angeles, the crime of CHILD
13 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
14 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
15 committed by ISAIAH GOODIE and FLOR SANCHEZ, who did willfully and unlawfully under
16 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
17 permit children JOHN DOE 55, JOHN DOE 21, JOHN DOE 56, and JOHN DOE 57, having the
18 care and custody of said children, injure, cause, and permit the person and health of said children
19 to be willfully placed in a situation that his person and health was/were endangered.

20
21 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
22 state prison pursuant to Penal Code section 1170.

23
24 **COUNT 45**

25 **CHILD ABUSE / ENDANGERMENT**

26 On or about November 15, 2023, in the County of Los Angeles, the crime of CHILD
27 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
28 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was

1 committed by CAIN CABRERA and FLOR SANCHEZ, who did willfully and unlawfully under
2 circumstances and conditions likely to produce great bodily harm and death, injure, cause, and
3 permit children JOHN DOE 25, JOHN DOE 26, JOHN DOE 29, JOHN DOE 28, JOHN DOE 21,
4 and JOHN DOE 23, having the care and custody of said children, injure, cause, and permit the
5 person and health of said children to be willfully placed in a situation that his person and health
6 was/were endangered.

7
8 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
9 state prison pursuant to Penal Code section 1170.

10
11 **COUNT 46**

12 **CHILD ABUSE / ENDANGERMENT**

13 On or about November 16, 2023, in the County of Los Angeles, the crime of CHILD
14 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
15 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
16 committed by EUNICE HUERTA, who did willfully and unlawfully under circumstances and
17 conditions likely to produce great bodily harm and death, injure, cause, and permit children
18 JOHN DOE 112 and JOHN DOE 91, having the care and custody of said children, injure, cause,
19 and permit the person and health of said children to be willfully placed in a situation that his
20 person and health was/were endangered.

21
22 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
23 state prison pursuant to Penal Code section 1170.

24
25 **COUNT 47**

26 **CHILD ABUSE / ENDANGERMENT**

27 On or about November 21, 2023, in the County of Los Angeles, the crime of CHILD
28 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT

1 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
2 committed by TANEHA BROOKS and NANCY SOSTRE, who did willfully and unlawfully
3 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
4 and permit JOHN DOE 45, JOHN DOE 41, JOHN DOE 46, and JOHN DOE 24, having the care
5 and custody of said children, injure, cause, and permit the person and health of said child to be
6 willfully placed in a situation that his person and health was/were endangered.

7
8 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
9 state prison pursuant to Penal Code section 1170.

10
11 **COUNT 48**

12 **CHILD ABUSE / ENDANGERMENT**

13 On or about November 21, 2023, in the County of Los Angeles, the crime of CHILD
14 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
15 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
16 committed by ANGELINA MEDINA, ISAIAH GOODIE, and DIANA JACOBO, who did
17 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
18 and death, injure, cause, and permit children JOHN DOE 23, JOHN DOE 56, JOHN DOE 65, and
19 JOHN DOE 61, having the care and custody of said children, injure, cause, and permit the person
20 and health of said children to be willfully placed in a situation that his person and health was/were
21 endangered.

22
23 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
24 state prison pursuant to Penal Code section 1170.

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COUNT 49

CHILD ABUSE / ENDANGERMENT

On or about November 21, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by SOPHEA KIET and LAFRANCE DAVIS, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 106 and JOHN DOE 132, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

COUNT 50

CHILD ABUSE / ENDANGERMENT

On or about November 24, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by JESSICA JUAREZ-SERRANO, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 112 and JOHN DOE 133, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 51

CHILD ABUSE / ENDANGERMENT

On or about December 3, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by TANEHA BROOKS, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 33, JOHN DOE 47, JOHN DOE 24, and JOHN DOE 14, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

COUNT 52

CHILD ABUSE / ENDANGERMENT

On or about December 3, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by ISIAIAH GOODIE, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 58 and JOHN DOE 59, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 53

CHILD ABUSE / ENDANGERMENT

On or about December 3, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by CHEZZARAY WHITE, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 30 and JOHN DOE 91, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

COUNT 54

CHILD ABUSE / ENDANGERMENT

On or about December 6, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by FLOR SANCHEZ and JACQUELINE RIVERA-CASTILLO, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 75, JOHN DOE 42, JOHN DOE 41, JOHN DOE 36, and JOHN DOE 47, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

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COUNT 55

CHILD ABUSE / ENDANGERMENT

On or about December 8, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by ISIAIAH GOODIE and DIANA JACOBO, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 26, JOHN DOE 60, JOHN DOE 61, JOHN DOE 62, JOHN DOE 63, JOHN DOE 64, JOHN DOE 25, JOHN DOE 23, JOHN DOE 65, and JOHN DOE 58, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in state prison pursuant to Penal Code section 1170.

COUNT 56

CHILD ABUSE / ENDANGERMENT

On or about December 9, 2023, in the County of Los Angeles, the crime of CHILD ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was committed by BENJAMIN CANO and CHEZZARAY WHITE, who did willfully and unlawfully under circumstances and conditions likely to produce great bodily harm and death, injure, cause, and permit children JOHN DOE 92, JOHN DOE 93, JOHN DOE 94, JOHN DOE 95, JOHN DOE 96, JOHN DOE 88, and JOHN DOE 97, having the care and custody of said children, injure, cause, and permit the person and health of said children to be willfully placed in a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 57**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about December 10, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by KENNETH HAYWOOD, who did willfully and unlawfully under circumstances
10 and conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 118 and JOHN DOE 119, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 58**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about December 15, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by BENJAMIN CANO, who did willfully and unlawfully under circumstances and
24 conditions likely to produce great bodily harm and death, injure, cause, and permit children
25 JOHN DOE 3, JOHN DOE 120, and JOHN DOE 143 having the care and custody of said
26 children, injure, cause, and permit the person and health of said children to be willfully placed in
27 a situation that his person and health was/were endangered.

1 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
2 state prison pursuant to Penal Code section 1170.

3
4 **COUNT 59**

5 **CHILD ABUSE / ENDANGERMENT**

6 On or about December 17, 2023, in the County of Los Angeles, the crime of CHILD
7 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
8 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
9 committed by ROBERT PERKINS, who did willfully and unlawfully under circumstances and
10 conditions likely to produce great bodily harm and death, injure, cause, and permit children
11 JOHN DOE 131 and JOHN DOE 121, having the care and custody of said children, injure, cause,
12 and permit the person and health of said children to be willfully placed in a situation that his
13 person and health was/were endangered.

14
15 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
16 state prison pursuant to Penal Code section 1170.

17
18 **COUNT 60**

19 **CHILD ABUSE / ENDANGERMENT**

20 On or about December 22, 2023, in the County of Los Angeles, the crime of CHILD
21 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
22 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
23 committed by SHAWN SMYLES, TANEHA BROOKS, and NANCY SOSTRE, who did
24 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
25 and death, injure, cause, and permit children JOHN DOE 15, JOHN DOE 24, JOHN DOE 31,
26 JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 14, JOHN DOE 35, JOHN DOE
27 36, and JOHN DOE 5, having the care and custody of said children, injure, cause, and permit the
28

1 person and health of said children to be willfully placed in a situation that his person and health
2 was/were endangered.

3
4 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
5 state prison pursuant to Penal Code section 1170.

6
7 **COUNT 61**

8 **CHILD ABUSE / ENDANGERMENT**

9 On or about December 23, 2023, in the County of Los Angeles, the crime of CHILD
10 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
11 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
12 committed by ISAIAH GOODIE and ANGELINA MEDINA, who did willfully and unlawfully
13 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
14 and permit children JOHN DOE 23 and JOHN DOE 62, having the care and custody of said
15 children, injure, cause, and permit the person and health of said children to be willfully placed in
16 a situation that his person and health was/were endangered.

17
18 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
19 state prison pursuant to Penal Code section 1170.

20
21 **COUNT 62**

22 **CHILD ABUSE / ENDANGERMENT**

23 On or about December 25, 2023, in the County of Los Angeles, the crime of CHILD
24 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
25 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
26 committed by BENJAMIN CANO and CHEZZARAY WHITE, who did willfully and unlawfully
27 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
28 and permit children JOHN DOE 100, JOHN DOE 101, JOHN DOE 102, JOHN DOE 142, JOHN

1 DOE 103, and JOHN DOE 104, having the care and custody of said children, injure, cause, and
2 permit the person and health of said children to be willfully placed in a situation that his person
3 and health was/were endangered.

4
5 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
6 state prison pursuant to Penal Code section 1170.

7
8 **COUNT 63**

9 **CHILD ABUSE / ENDANGERMENT**

10 On or about December 25, 2023, in the County of Los Angeles, the crime of CHILD
11 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
12 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
13 committed by CHEZZARAY WHITE, who did willfully and unlawfully under circumstances and
14 conditions likely to produce great bodily harm and death, injure, cause, and permit children
15 JOHN DOE 98 and JOHN DOE 99, having the care and custody of said children, injure, cause,
16 and permit the person and health of said children to be willfully placed in a situation that his
17 person and health was/were endangered.

18
19 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
20 state prison pursuant to Penal Code section 1170.

21
22 **COUNT 64**

23 **CHILD ABUSE / ENDANGERMENT**

24 On or about December 26, 2023, in the County of Los Angeles, the crime of CHILD
25 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
26 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
27 committed by SHAWN SMYLES, TANEHA BROOKS, and NANCY SOSTRE, who did
28 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm

1 and death, injure, cause, and permit children JOHN DOE 23, JOHN DOE 34, JOHN DOE 24,
2 JOHN DOE 31, JOHN DOE 36, JOHN DOE 5, and JOHN DOE 37, having the care and custody
3 of said children, injure, cause, and permit the person and health of said children to be willfully
4 placed in a situation that his person and health was/were endangered.

5
6 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
7 state prison pursuant to Penal Code section 1170.

8
9 **COUNT 65**

10 **CHILD ABUSE / ENDANGERMENT**

11 On or about December 28, 2023, in the County of Los Angeles, the crime of CHILD
12 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
13 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
14 committed by EUNICE HUERTA, SERGIO MAGOS, and ENRIQUE ALVARENGA, who did
15 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
16 and death, injure, cause, and permit children JOHN DOE 113 and JOHN DOE 114, having the
17 care and custody of said children, injure, cause, and permit the person and health of said children
18 to be willfully placed in a situation that his person and health was/were endangered.

19
20 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
21 state prison pursuant to Penal Code section 1170.

22
23 **COUNT 66**

24 **CHILD ABUSE / ENDANGERMENT**

25 On or about December 29, 2023, in the County of Los Angeles, the crime of CHILD
26 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
27 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
28 committed by CHEZZARAY WHITE and JESSICA JUAREZ-SERRANO, who did willfully and

1 unlawfully under circumstances and conditions likely to produce great bodily harm and death,
2 injure, cause, and permit children JOHN DOE 105, JOHN DOE 113, and JOHN DOE 107,
3 having the care and custody of said children, injure, cause, and permit the person and health of
4 said children to be willfully placed in a situation that his person and health was/were endangered.
5

6 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
7 state prison pursuant to Penal Code section 1170.
8

9 **COUNT 67**

10 **CHILD ABUSE / ENDANGERMENT**

11 On or about December 30, 2023, in the County of Los Angeles, the crime of CHILD
12 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
13 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
14 committed by CHEZZARAY WHITE and JESSICA JUAREZ-SERRANO, who did willfully and
15 unlawfully under circumstances and conditions likely to produce great bodily harm and death,
16 injure, cause, and permit children JOHN DOE 108 and JOHN DOE 105, having the care and
17 custody of said children, injure, cause, and permit the person and health of said children to be
18 willfully placed in a situation that his person and health was/were endangered.
19

20 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
21 state prison pursuant to Penal Code section 1170.
22

23 **COUNT 68**

24 **CHILD ABUSE / ENDANGERMENT**

25 On or about December 31, 2023, in the County of Los Angeles, the crime of CHILD
26 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
27 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
28 committed by TANEHA BROOKS, ISIAHA GOODIE, and NANCY SOSTRE, who did

1 willfully and unlawfully under circumstances and conditions likely to produce great bodily harm
2 and death, injure, cause, and permit children JOHN DOE 23, JOHN DOE 24, JOHN DOE 41, and
3 JOHN DOE 14, having the care and custody of said children, injure, cause, and permit the person
4 and health of said children to be willfully placed in a situation that his person and health was/were
5 endangered.

6
7 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
8 state prison pursuant to Penal Code section 1170.

9
10 **COUNT 69**

11 **CHILD ABUSE / ENDANGERMENT**

12 On or about December 31, 2023, in the County of Los Angeles, the crime of CHILD
13 ABUSE UNDER CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT
14 BODILY INJURY OR DEATH, in violation of PENAL CODE SECTION 273a(a), a felony, was
15 committed by ISAAH GOODIE and ANGELINA MEDINA, who did willfully and unlawfully
16 under circumstances and conditions likely to produce great bodily harm and death, injure, cause,
17 and permit children JOHN DOE 26 and JOHN DOE 61, having the care and custody of said
18 children, injure, cause, and permit the person and health of said children to be willfully placed in
19 a situation that his person and health was/were endangered.

20
21 NOTICE: Upon a felony conviction of the above offense, prison custody time is to be served in
22 state prison pursuant to Penal Code section 1170.

23
24 **COUNT 70**

25 **CONSPIRACY TO A COMMIT CRIME**

26 On or between July 1, 2023, and December 31, 2023, in the County of Los Angeles, State
27 of California, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code
28 section 182(a)(1), a Felony, was committed by SHAWN SMYLES, NANCY SOSTRE, and

1 TANEHA BROOKS who did unlawfully conspire together and with another person and persons
2 whose identity is unknown to commit the crimes of CHILD ABUSE UNDER
3 CIRCUMSTANCES OR CONDITIONS LIKELY TO CAUSE GREAT BODILY INJURY OR
4 DEATH, in violation of PENAL CODE SECTION 273a(a), a felony; that pursuant to and for the
5 purpose of carrying out the objects and purposes of aforesaid conspiracy, the said defendants
6 committed the following overt acts in the County of Los Angeles County:

7
8 **OVERT ACTS**

9 **I**

10 On or about July 14, 2023, SHAWN SMYLES and TANEHA BROOKS allowed youths to
11 fight each other in the Unit L side dayroom.

12 **II**

13 On or about September 25, 2023, SHAWN SMYLES and TANEHA BROOKS allowed
14 youths to fight each other in the Unit L side dayroom.

15 **III**

16 On or about December 26, 2023, SHAWN SMYLES and TANEHA BROOKS allowed
17 youths to fight each other in the Unit L side dayroom.

18 **IV**

19 On or about December 22, 2023, SHAWN SMYLES and TANEHA BROOKS told new
20 Detention Service Officers on duty that youth fights were going to occur in Unit L before any
21 fights between youths occurred.

22 **V**

23 On or about December 22, 2023, SHAWN SMYLES and TANEHA BROOKS told new
24 Detention Service Officers that they were not to say anything, write down anything, and just
25 watch when youth fights occurred on that day in Unit L.
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VI

On or about December 22, 2023, SHAWN SMYLES, NANCY SOSTRE, and TANEHA BROOKS allowed nine one-on-one youth fights to occur in Unit L.

VII

On or about December 22, 2023, SHAWN SMYLES, NANCY SOSTRE, and TANEHA BROOKS allowed youth JOHN DOE 31 to fight eight one-on-one fights causing JOHN DOE 31 to sustain a broken nose during the fights.

VIII

On or about December 22, 2023, SHAWN SMYLES told the youths after the Unit L fights occurred, to refuse treatment when they went to medical to get treated by nurses.

IX

Between December 22, 2023 and December 31, 2023, SHAWN SMYLES gave a briefing to the new Detention Service Officers that the nine youth fights that occurred on December 22, 2023 in Unit L were how they operated and controlled the youths and the unit.

COUNT 71

BATTERY

On or about October 9, 2023, in the County of Los Angeles, the crime of BATTERY, in violation of Penal Code section 242, a misdemeanor, was committed by SHAWN SMYLES, who did willfully and unlawfully use force and violence upon the person of JOHN DOE 21.


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SPECIAL ALLEGATION
CIRCUMSTANCES IN AGGRAVATION

It is further alleged as to Counts 1 - 71, and as to TANEHA BROOKS, SHAWN SMYLES, ISAAH GOODIE, RAMSES PATRON, JULIAN LIRA, VANESSA WATTANACHINDA-JONES, KENNETH SILVA, ROBERT FORD JR., RENE CONANT JR., LENTON ABRAM, CAIN CABRERA, FLOR SANCHEZ, JACQUELINE RIVERA-CASTILLO, SOPHEA KIET, ARIEL PHELIX ESPINOZA, CHEZZARAY WHITE, TIMOTHY GOULD, RAYMOND RAMIREZ, EUNICE HUERTA, NANCY SOSTRE, DIANA JACOBO, KENNETH HAYWOOD, BENJAMIN CANO, ROBERT PERKINS, ENRIQUE ALVARENGA, LAFRANCE DAVIS, ANGELINA MEDINA, JESSICA JUAREZ-SERRANO, SERGIO MAGOS, and RANDY BACA, under Penal Code section 1170(b)(2) and within the meaning of California Rule of Court 4.421(a), that there exists circumstances in aggravation including the following factors:

- (1) The victim was particularly vulnerable; and
- (2) The defendant took advantage of a position of trust or confidence to commit the offense.

A TRUE BILL



Foreperson of the Grand Jury

Dated: 2/13/25