

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

THE PEOPLE OF THE STATE OF CALIFORNIA, <p style="text-align: center;">v.</p> MARIE COLETTE MARTIN, <i>dob</i> [REDACTED]	Plaintiff, Defendant
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CT No. CD296819
DA No. AEZ886

COMPLAINT-FELONY

INFORMATION
Date: _____

COPY

PC296 DNA TEST STATUS SUMMARY

Defendant

MARTIN, MARIE COLETTE

DNA Testing Requirements

DNA sample required upon conviction

CHARGE SUMMARY

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
1	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
2	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
3	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
4	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
5	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
6	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
7	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
8	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
9	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
10	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
11	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
12	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
13	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
14	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
15	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
16	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
17	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
18	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
19	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
20	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
21	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
22	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
23	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
24	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3		
25	BP17550.15(c) MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
26	BP17550.14 MARTIN, MARIE COLETTE	Felony	16-2-3/\$25,000		
27	PC487(a) MARTIN, MARIE COLETTE	Felony	16-2-3	PC186.11(a)(1)	Check Code
	PC1054.3		INFORMAL REQUEST FOR DISCOVERY		

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 29, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF ST. BONAVENTURE STUDENTS -- ATTACHMENT 1 for ST. BONAVENTURE STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

CHARGES (cont'd)

COUNT 2 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between April 4, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF ST. BONAVENTURE STUDENTS -- ATTACHMENT 1 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 3 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 29, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF ST. BONAVENTURE STUDENTS -- ATTACHMENT 1, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 4 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between June 28, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF OUR LADY QUEEN OF ANGELS STUDENTS -- ATTACHMENT 2 for OUR LADY QUEEN OF ANGELS STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 5 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between April 9, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF OUR LADY QUEEN OF ANGELS STUDENTS -- ATTACHMENT 2 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 6 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 28, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF OUR LADY QUEEN OF ANGELS STUDENTS -- ATTACHMENT 2, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 7 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between April 14, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF CHRIST LUTHERAN STUDENTS -- ATTACHMENT 3 for CHRIST LUTHERAN STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 8 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between May 12, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF CHRIST LUTHERAN STUDENTS -- ATTACHMENT 3 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 9 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between April 14, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF CHRIST LUTHERAN STUDENTS -- ATTACHMENT 3, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 10 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between October 21, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF OUR LADY OF GUADALUPE STUDENTS -- ATTACHMENT 4 for OUR LADY OF GUADALUPE STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 11 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between May 13, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF OUR LADY OF GUADALUPE STUDENTS -- ATTACHMENT 4 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 12 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between October 21, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF OUR LADY OF GUADALUPE STUDENTS -- ATTACHMENT 4, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 13 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between May 31, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF OUR LADY OF FATIMA STUDENTS -- ATTACHMENT 5 for OUR LADY OF FATIMA STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

CHARGES (cont'd)

COUNT 14 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between May 19, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OUR LADY OF FATIMA STUDENTS -- ATTACHMENT 5 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 15 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between May 31, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF OUR LADY OF FATIMA STUDENTS -- ATTACHMENT 5, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 16 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between June 18, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF SPRING VIEW MIDDLE SCHOOL STUDENTS-- ATTACHMENT 6 for SPRING VIEW MIDDLE SCHOOL STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 17 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between June 21, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF SPRING VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 6 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 18 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 18, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF SPRING VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 6, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 19 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between May 28, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF MARINE VIEW MIDDLE SCHOOL STUDENTS-- ATTACHMENT 7 for MARINE VIEW MIDDLE SCHOOL STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 20 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between June 21, 2020 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF MARINE VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 7 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 21 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 21, 2020 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF MARINE VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 7, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 22 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between October 6, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF VISTA VIEW MIDDLE SCHOOL STUDENTS-- ATTACHMENT 8 for VISTA VIEW MIDDLE SCHOOL STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

COUNT 23 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between October 6, 2019 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF VISTA VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 8 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 24 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between October 6, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF VISTA VIEW MIDDLE SCHOOL STUDENTS -- ATTACHMENT 8, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 25 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between April 10, 2019 and May 4, 2020, MARIE COLETTE MARTIN being a seller of travel, did unlawfully encumber the corpus of a trust account containing monies received for travel and transportation services from passengers, as specified in Business and Professions Code section 17550.15, to wit: PARENTS OF CARDEN CONEJO SCHOOL STUDENT -- ATTACHMENT 9 for CARDEN CONEJO SCHOOL STUDENTS EAST COAST TRIP 2020, and further The money received and obtained by defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period., in violation of Business and Professions Code sections 17500.15(c) and 17550.19(b).in violation of BUSINESS AND PROFESSIONS CODE SECTION 17550.15(c).

CHARGES (cont'd)

COUNT 26 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between April 10, 2019 and December 20, 2020, MARIE COLETTE MARTIN, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the money, real, and personal property received and obtained by the defendant for transportation and travel services from any and all persons aggregated exceeded two thousand three hundred fifty dollars (\$2,350) in a consecutive 12-month period, to wit: PARENTS OF CARDEN CONEJO STUDENTS -- ATTACHMENT 9 in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 27 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between April 10, 2019 and December 20, 2020, MARIE COLETTE MARTIN did unlawfully take and steal money and personal property of PARENTS OF CARDEN CONEJO STUDENTS -- ATTACHMENT 9, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

THE FOLLOWING ALLEGATION APPLIES TO ALL OF THE ABOVE CHARGES:

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, MARIE COLETTE MARTIN, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than one hundred thousand dollars (\$100,000) but not more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTION 186.11(a)(1).

NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

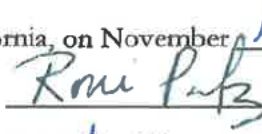
Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.

Sheriff's records indicate that as of the booking date one or more defendants have not yet provided a DNA sample to the DOJ database. Pursuant to Penal Code Section 296(e), the court shall order collection of DNA from the defendant(s) if advised by the prosecuting attorney that a sample is required but has not been provided by the defendant. Pursuant to Penal Code sections 296/296.1, if not already required from a past conviction, any defendants who have not done so will be required to provide a sample upon conviction of this felony offense.

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant MARIE COLETTE MARTIN in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER # CD296819 AEZ886 CONSISTS OF 27 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on November 16, 2022.



DAG Roni Pomerantz for AG Rob Bonta



DDA Gina Darvas for DA Summer Stephan

INFORMATION

SUMMER STEPHAN
District Attorney
County of San Diego
State of California
by:

Date

Deputy District Attorney

ROB BONTA
California Attorney General
by:

Deputy Attorney General

PEOPLE OF THE STATE OF CALIFORNIA v. MARIE COLETTE MARTIN

ATTACHMENT 1 – PARENTS OF ST. BONAVENTURE STUDENTS

TOTAL PAYMENTS: \$167,885.06

<u>SCHOOL & Student Count #</u>	<u>School</u>	<u>Last Name [Consumer Parent/ Granparent]</u>	<u>First Initial [Consumer Parent/ Granparent]</u>	<u>Travel Dates</u>	<u>Amount Paid per Consumer</u>
1.01	SB		M	April 01-09, 2020	\$612.00
1.02	SB		O	April 01-09, 2020	\$3,299.00
1.03	SB		M	April 01-09, 2020	\$3,299.00
1.04	SB		J	April 01-09, 2020	\$3,167.00
1.05	SB		D & M	April 01-09, 2020	\$3,311.00
1.06	SB		E	April 01-09, 2020	\$7,149.00
1.07	SB		C & S	April 01-09, 2020	\$3,167.00
1.08	SB		C & V	April 01-09, 2020	\$7,434.96
1.09	SB		J	April 01-09, 2020	\$3,167.00
1.10	SB		E & MJ	April 01-09, 2020	\$3,299.00
1.11	SB		LA	April 01-09, 2020	\$3,371.00
1.12	SB		E	April 01-09, 2020	\$3,167.00
1.13	SB		M	April 01-09, 2020	\$5,391.70
1.14	SB		M & L	April 01-09, 2020	\$3,167.00

1.15	SB		B	April 01-09, 2020	\$7,175.20
1.16	SB		S	April 01-09, 2020	\$1,848.00
1.17	SB		M	April 01-09, 2020	\$3,167.00
1.18	SB		E	April 01-09, 2020	\$3,167.00
1.19	SB		KA	April 01-09, 2020	\$3,311.00
1.20	SB		P & M	April 01-09, 2020	\$3,167.00
1.21	SB		K	April 01-09, 2020	\$2,999.10
1.22	SB		D & C	April 01-09, 2020	\$6,863.00
1.23	SB		L & S	April 01-09, 2020	\$3,299.00
1.24	SB		B & J	April 01-09, 2020	\$3,299.00
1.25	SB		W	April 01-09, 2020	\$2,999.50
1.26	SB		R	April 01-09, 2020	\$3,299.00
1.27	SB		S	April 01-09, 2020	\$7,975.00
1.28	SB		R	April 01-09, 2020	\$6,549.00
1.29	SB		M	April 01-09, 2020	\$914.00
1.30	SB		RA	April 01-09, 2020	\$5,600.00
1.31	SB		M	April 01-09, 2020	\$2,099.40
1.32	SB		K	April 01-09, 2020	\$7,149.00
1.33	SB		K	April 01-09, 2020	\$3,119.00
1.34	SB		P & P	April 01-09, 2020	\$6,863.00
1.35	SB		S & D	April 01-09, 2020	\$3,167.00

1.36	SB	[REDACTED]	T	April 01-09, 2020	\$7,435.00
1.37	SB	[REDACTED]	T	April 01-09, 2020	\$3,299.00
1.38	SB	[REDACTED]	D	April 01-09, 2019	\$3,299.00
1.39	SB	[REDACTED]	J	April 01-09, 2020	\$2,373.20
1.40	SB	[REDACTED]	CG	April 01-09, 2020	\$3,299.00
1.41	SB	[REDACTED]	T	April 01-09, 2020	\$7,149.00

PEOPLE OF THE STATE OF CALIFORNIA v. MARIE COLETTE MARTIN

ATTACHMENT 2 – PARENTS OF OUR LADY QUEEN OF ANGELS STUDENTS

TOTAL PAYMENTS: \$ 34,549.20

2.01	OLQA		K	April 26-May 1, 2020	\$2,599.00
2.02	OLQA		M	April 26-May 1, 2020	\$2,611.00
2.03	OLQA		L & M	April 26-May 1, 2020	\$2,596.00
2.04	OLQA		T	April 26-May 1, 2020	\$2,611.00
2.05	OLQA		R	April 26-May 1, 2020	\$2,224.80
2.06	OLQA		B & G	April 26-May 1, 2020	\$2,599.00
2.07	OLQA		P	April 26-May 1, 2020	\$2,599.00
2.08	OLQA		A	April 26-May 1, 2020	\$2,599.00
2.09	OLQA		B	April 26-May 1, 2020	\$4,990.00
2.10	OLQA		M	April 26-May 1, 2020	\$1,434.60
2.11	OLQA		L & T	April 26-May 1, 2020	\$2,594.80
2.12	OLQA		E	April 26-May 1, 2020	\$2,596.00
2.13	OLQA		Q	April 26-May 1, 2020	\$2,495.00

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ATTACHMENT 3 – PARENTS OF CHRIST LUTHERAN

TOTAL PAYMENTS: \$ 39,319.95

3.01	CL		D & D	May 09-15, 2020	\$512.90
3.02	CL		P	May 09-15, 2020	\$2,448.00
3.03	CL		L	May 09-15, 2020	\$2,448.00
3.04	CL		C	May 09-15, 2020	\$2,448.00
3.05	CL		D	May 09-15, 2020	\$2,448.00
3.06	CL		F	May 09-15, 2020	\$4,958.53
3.07	CL		PE	May 09-15, 2020	\$2,550.00
3.08	CL		D	May 09-15 2020	\$2,440.00
3.09	CL		J & H	May 09-15, 2020	\$2,202.09
3.10	CL		T	May 09-15, 2020	\$1,932.76
3.11	CL		J & J	May 09-15, 2020	\$2,448.00
3.12	CL		G	May 09-15, 2020	\$2,610.00
3.13	CL		W	May 09-15, 2020	\$2,350.14
3.14	CL		I	May 09-15, 2020	\$5,075.53
3.15	CL		C	May 09-15, 2020	\$2,448.00

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ATTACHMENT 4 – PARENTS OF OUR LADY OF GUADALUPE

TOTAL PAYMENTS: \$ 23,146.53

4.01	OLG		Rosa	May 10-15, 2020	\$2,599.00
4.02	OLG		MG	May 10-15, 2020	\$2,059.20
4.03	OLG		SJ	May 10-15, 2020	\$2,598.97
4.04	OLG		M	May 10-15, 2020	\$1,520.00
4.05	OLG		A & T	May 10-15, 2020	\$2,598.96
4.06	OLG		RL [grandparent]	May 10-15, 2020	\$2,499.00
4.07	OLG		J	May 10-15, 2020	\$2,399.00
4.08	OLG		R	May 10-15, 2020	\$2,499.00
4.09	OLG		G	May 10-15, 2020	\$1,800.00
4.10	OLG		E	May 10-15, 2020	\$2,573.40

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ATTACHMENT 5 – PARENTS OF OUR LADY OF FATIMA

TOTAL PAYMENTS: \$ 29,220.08

5.01	OLF		G	May 16-21, 2020	\$2,364.10
5.02	OLF		J	May 16-21, 2020	\$2,598.96
5.03	OLF		T	May 16-21, 2020	\$2,618.60
5.04	OLF		T	April 27-29, 2020	\$519.00
5.05	OLF		C	May 16-21, 2020	\$2,598.96
5.06	OLF		L	May 16-21, 2020	\$2,599.00
5.07	OLF		T	May 16-21, 2020	\$2,499.00
5.08	OLF		C	May 16-21, 2020	\$2,599.00
5.09	OLF		C	April 27-29, 2020	\$515.00
5.10	OLF		L	May 16-21, 2020	\$2,598.96
5.11	OLF		A	May 16-21, 2020	\$1,600.00
5.12	OLF		A & T	May 16-21, 2020	\$1,481.50
5.13	OLF		C	May 16-21, 2020	\$2,499.00
5.14	OLF		T	May 16-21, 2020	\$2,129.00

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ATTACHMENT 6 – PARENTS OF SPRING VIEW MIDDLE SCHOOL

TOTAL PAYMENTS: \$ 66,481.35

6.01	SVM		M	June 19-24, 2020	\$2,495.00
6.02	SVM		A	June 19-24, 2020	\$2,113.75
6.03	SVM		J	June 19-24, 2020	\$4,718.20
6.04	SVM		JP	June 19-24, 2020	\$2,495.00
6.05	SVM		TL	June 19-24, 2020	\$2,453.50
6.06	SVM		M	June 19-24, 2020	\$1,913.75
6.07	SVM		P	June 19-24, 2020	\$2,359.10
6.08	SVM		M	June 19-24, 2020	\$2,184.00
6.09	SVM		J	June 19-24, 2020	\$2,598.10
6.10	SVM		ML	June 19-24, 2020	\$2,608.60
6.11	SVM		MC	June 19-24, 2020	\$2,495.00
6.12	SVM		B	June 19-24, 2020	\$1,990.30
6.13	SVM		S	June 19-24, 2020	\$2,599.00
6.14	SVM		T & K	June 19-24, 2020	\$2,495.00
6.15	SVM		J & AM	June 19-24, 2020	\$2,495.00
6.16	SVM		O	June 19-24, 2020	\$2,256.50
6.17	SVM		A	June 19-24, 2020	\$1,913.75
6.18	SVM		N	June 19-24, 2020	\$1,248.00

6.19	SVM		K	June 19-24, 2020	\$2,256.50
6.20	SVM		J	June 19-24, 2020	\$1,913.75
6.21	SVM		K	June 19-24, 2020	\$2,495.00
6.22	SVM		YL	June 19-24, 2020	\$599.00
6.23	SVM		JD	June 19-24, 2020	\$1,988.75
6.24	SVM		L	June 19-24, 2020	\$2,495.00
6.25	SVM		CL [grandparent] & J [parent]	June 19-24, 2020	\$2,495.00
6.26	SVM		J	June 19-24, 2020	\$2,495.00
6.27	SVM		M	June 19-24, 2020	\$2,359.10
6.28	SVM		BT	June 19-24, 2020	\$2,359.20
6.29	SVM		A	June 19-24, 2020	\$1,593.50

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ATTACHMENT 7 – PARENTS OF MARINE VIEW MIDDLE SCHOOL

TOTAL PAYMENTS: \$ 28,505.90

7.01	MVM		L	June 19-25, 2020	\$2,618.20
7.02	MVM		S	June 19-25, 2020	\$2,618.20
7.03	MVM		S	June 19-25, 2020	\$2,664.00
7.04	MVM		RG	June 19-25, 2020	\$2,664.00
7.05	MVM		A	June 19-25, 2020	\$2,618.20
7.06	MVM		S	June 19-25, 2020	\$2,517.50
7.07	MVM		S	June 19-25, 2020	\$2,775.00
7.08	MVM		B & D	June 19-25, 2020	\$1,745.00
7.09	MVM		A	June 19-25, 2020	\$2,775.00
7.10	MVM		J	June 19-25, 2020	\$2,517.50
7.11	MVM		R	June 19-25, 2020	\$2,517.50
7.12	MVM		T	June 19-25, 2020	\$475.80

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ATTACHMENT 8 – PARENTS OF VISTA VIEW MIDDLE SCHOOL

TOTAL PAYMENTS: \$ 5,321.00

8.01	VVM	[REDACTED]	J	June 19-25, 2020	\$2,715.00
8.02	VVM	[REDACTED]	M	June 19-25, 2020	\$2,606.00

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ATTACHMENT 9 – PARENTS OF CARDEN CORNEJO SCHOOL

TOTAL PAYMENTS: \$ 22,287.88

9.01	CC		R	March 12-13, 2020	\$1,414.40
9.02	CC		K	March 12-13, 2020	\$1,580.80
9.03	CC		A & L	March 12-13, 2020	\$694.20
9.04	CC		B	March 12-13, 2020	\$1,520.00
9.05	CC		J & J	March 12-13, 2020	\$1,580.80
9.06	CC		D	March 12-13, 2020	\$832.64
9.07	CC		N & A	March 12-13, 2020	\$764.40
9.08	CC		K & R	March 12-13, 2020	\$1,580.80
9.09	CC		B & S	March 12-13, 2020	\$1,100.00
9.10	CC		C & J	March 12-13, 2020	\$1,520.00
9.11	CC		D & L	March 12-13, 2020	\$1,414.40
9.12	CC		C & J	March 12-13, 2020	\$1,581.44
9.13	CC		J & X	March 12-13, 2020	\$208.00

9.15	CC		I & M	March 12-13, 2020	\$1,520.00
9.16	CC		L & T	March 12-13, 2020	\$1,520.00
9.17	CC		R & P	March 12-13, 2020	\$416.00
9.18	CC		IT	March 12-13, 2020	\$735.00
9.19	CC		E & J	March 12-13, 2020	\$1,520.00
9.20	CC		B	March 12-13, 2020	\$785.00