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10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SACRAMENTO

12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 v.

15 **RICHARD WEAVER,**

16 Defendant.
17

03FO4611

**FIRST AMENDED
COMPLAINT (FELONY)**

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

RICHARD WEAVER,

Defendant.

03FO4611

**FIRST AMENDED
COMPLAINT (FELONY)**

The People of the State of California upon oath of the undersigned, upon information and belief complain against the Defendant **RICHARD WEAVER**, above named for the crime(s) as follows:

COUNT 1

(OFFER FALSE INSTRUMENTS)

In and between May 7, 2001, and May 18, 2001, at and in the County of Sacramento in the State of California, Defendant **RICHARD WEAVER**, did commit a felony namely a violation of SECTION 4463(A) OF THE VEHICLE CODE of the State of California, in that said Defendant did unlawfully and with intent to defraud, falsify a Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine, to wit Bill of Sale and vehicle registration for a 1965 Ford Cobra for Thomas Plevin.

1 **COUNT 2**

2 **(OFFER FALSE INSTRUMENTS)**

3 In and between August 2, 2001, and September 13, 2001, at and in the County of
4 Sacramento in the State of California, Defendant **RICHARD WEAVER**, did commit a felony,
5 namely a violation of SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF
6 CALIFORNIA, in that said Defendant did unlawfully and with the intent to defraud, falsify a
7 Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass,
8 and attempt to pass the same as true and genuine, to wit, Bill of Sale and vehicle registration for a
9 1965 Ford Cobra for Randy Rosenburg.

10 **COUNT 3**

11 **(OFFER FALSE INSTRUMENTS)**

12 In and between August 1, 2000, and December 12, 2000, at and in the County of
13 Sacramento in the State of California, Defendant **RICHARD WEAVER**, did commit a felony,
14 namely a violation of SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF
15 CALIFORNIA, in that said Defendant did unlawfully and with the intent to defraud, falsify a
16 Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass,
17 and attempt to pass the same as true and genuine, to wit, Bill of Sale and vehicle registration for a
18 1965 Ford for Frank Kong.

19 **COUNT 4**

20 **(OFFER FALSE INSTRUMENTS)**

21 In and between January 1, 2001, and March 5, 2001, at and in the County of Sacramento,
22 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
23 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
24 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
25 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
26 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Dennis Gordon.

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1 **COUNT 5**

2 **(OFFER FALSE INSTRUMENTS)**

3 In and between January 1, 2001, and February 15, 2001, at and in the County of
4 Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of
5 SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said
6 Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and
7 registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same
8 as true and genuine, to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Dennis
9 Gordon.

10 **COUNT 6**

11 **(OFFER FALSE INSTRUMENTS)**

12 In and between September 1, 2000, and September 26, 2000, at and in the County of
13 Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of
14 SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said
15 Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and
16 registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same
17 as true and genuine, to wit, Bill of Sale and vehicle registration for a 1967 Ford for Fitzroy
18 Killingsworth.

19 **COUNT 7**

20 **(OFFER FALSE INSTRUMENTS)**

21 In and between May 1, 2001, and July 16, 2001, at and in the County of Sacramento,
22 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
23 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
24 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
25 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
26 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Steven Spears.

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1 **COUNT 8**

2 **(OFFER FALSE INSTRUMENTS)**

3 In and between May 1, 200, and June 28, 2000, at and in the County of Sacramento,
4 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
5 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
6 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
7 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
8 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Bradley Pfeifer.

9 **COUNT 9**

10 **(OFFER FALSE INSTRUMENTS)**

11 In and between August 1, 2001, and April 24, 2001, at and in the County of Sacramento,
12 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
13 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
14 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
15 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
16 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Daniel Nissim.

17 **COUNT 10**

18 **(OFFER FALSE INSTRUMENTS)**

19 In and between September 2000, and December 2000, at and in the County of Sacramento,
20 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
21 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
22 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
23 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
24 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for ROBERT O'Neil.

25 **COUNT 11**

26 **(OFFER FALSE INSTRUMENTS)**

27 In and between September 2000, and December 2000, at and in the County of Sacramento,
28 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)

1 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
2 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
3 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
4 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Patrick Roth.

5 **COUNT 12**

6 **(OFFER FALSE INSTRUMENTS)**

7 In and between May 1, 2001, and July 12, 2001, at and in the County of Sacramento,
8 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
9 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
10 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
11 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
12 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Joseph Kennedy.

13 **COUNT 13**

14 **(OFFER FALSE INSTRUMENTS)**

15 In and between August 1, 2000, and August 7, 2000, at and in the County of Sacramento,
16 Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A)
17 OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did
18 unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to
19 and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine,
20 to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Brian Cano.

21 **COUNT 14**

22 **(OFFER FALSE INSTRUMENTS)**

23 In and between December 1, 2000, and December 16, 2000, at and in the County of
24 Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of
25 SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said
26 Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and
27 registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same
28 as true and genuine, to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for John

MacPherson.

COUNT 15

(OFFER FALSE INSTRUMENTS)

In and between September 1, 2000, and September 20, 2000, at and in the County of Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine, to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Nathan Chesmore.

COUNT 16

(OFFER FALSE INSTRUMENTS)

In and between February 1, 2001, and May 18, 2002, at and in the County of Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine, to wit, Bill of Sale and vehicle registration for a 1966 Ford Cobra for Michael Fagan.

COUNT 17

(OFFER FALSE INSTRUMENTS)

In and between January 1, 2001, and March 18, 2001, at and in the County of Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same as true and genuine, to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Edward Lau.

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1 **COUNT 18**

2 **(OFFER FALSE INSTRUMENTS)**

3 In and between November 1, 2000, and December 31, 2000, at and in the County of
4 Sacramento, Defendant **RICHARD WEAVER**, did commit a felony, namely a violation of
5 SECTION 4463(A) OF THE VEHICLE CODE OF THE STATE OF CALIFORNIA, in that said
6 Defendant did unlawfully and with the intent to defraud, falsify a Certificate of Ownership and
7 registration card to and for a motor vehicle and did utter, publish, pass, and attempt to pass the same
8 as true and genuine, to wit, Bill of Sale and vehicle registration for a 1965 Ford Cobra for Terry
9 Brown.

10 **TOLLING OF STATUTE LIMITATIONS**

11 It is further alleged as to Defendant **RICHARD WEAVER** that the statute of limitations
12 has been extended pursuant to PENAL CODE SECTION 801.5 in that the above violations were
13 continuous and that the earliest completion date of any act of the charged offenses was July 16, 2001.

14 Pursuant to PENAL CODE SECTION 1054.5(B), the People are hereby informally
15 requesting that defense counsel provide discovery to the People as required by PENAL CODE
16 SECTION 1054.3, and pursuant to the provisions of PENAL CODE SECTION 1054.7.

17 I declare upon information and belief and under penalty of perjury that the foregoing is true
18 and correct.

19 Executed at Sacramento County, California, the __ day of June, 2003.

20 Respectfully submitted,

21 **BILL LOCKYER**
Attorney General of the State of California

22 **ROBERT R. ANDERSON**
Chief Assistant Attorney General

23 **MARK O. GEIGER**
Senior Assistant Attorney General

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26 **ROBERT M. MORGESTER**
Deputy Attorney General

27 Attorneys for Plaintiff

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