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8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SACRAMENTO

10  
11 **THE PEOPLE OF THE STATE OF CALIFORNIA,**  
12 Plaintiff,  
13 **v.**  
14 **KATHLEEN MARIE CULHANE,**  
15 **DOB: 1/22/67**  
16 Defendant.

CASE NO.  
**COMPLAINT (FELONY)**  
**Arraignment**  
**DATE:**  
**TIME:**  
**DEPT:**

17  
18 I, the undersigned, say on information and belief, that in the County of Sacramento, State  
19 of California:

20 **COUNT ONE**

21 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
22 commit a FELONY, namely, a violation of Section 118 of the Penal Code, PERJURY BY  
23 DECLARATION in that defendant did unlawfully, under penalty of perjury, declare as true, that  
24 which was known to be false, to wit: a document bearing the signature "Kathleen Culhane" dated  
25 February 7, 2006.

26 **COUNT TWO**

27 For a further and separate cause of action, being a different offense from, but connected  
28 in its commission with the charge set forth in Count One hereof, complainant complains and says:

1 That on or about January 2006, defendant KATHLEEN MARIE CULHANE, did commit  
2 a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED  
3 INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged  
4 instrument to be filed, registered, or recorded in a public office within this state, which instrument,  
5 if genuine, might be filed, registered, or recorded under a law of this state or the United States, to  
6 wit: a document bearing the signature "Patricia Felix" dated January 25, 2006.

7 **COUNT THREE**

8 For a further and separate cause of action, being a different offense from, but connected  
9 in its commission with the charges set forth in Counts One and Two hereof, complainant complains  
10 and says:

11 That on or about January 2006, defendant KATHLEEN MARIE CULHANE, did commit  
12 a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant  
13 did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature  
14 "Patricia Felix" on a document dated January 25, 2006.

15 **COUNT FOUR**

16 For a further and separate cause of action, being a different offense from, but connected  
17 in its commission with the charges set forth in Counts One through Three hereof, complainant  
18 complains and says:

19 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
20 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
21 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
22 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
23 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
24 States, to wit: a document bearing the signature "Anita Bell" dated February 2, 2006.

25 **COUNT FIVE**

26 For a further and separate cause of action, being a different offense from, but connected  
27 in its commission with the charges set forth in Counts One through Four hereof, complainant  
28 complains and says:

1 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
2 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
3 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
4 signature “Anita Bell” on a document dated February 2, 2006.

5 **COUNT SIX**

6 For a further and separate cause of action, being a different offense from, but connected  
7 in its commission with the charges set forth in Counts One through Five hereof, complainant  
8 complains and says:

9 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
10 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
11 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
12 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
13 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
14 States, to wit: a document bearing the signature “John Boucher” dated February 1, 2006.

15 **COUNT SEVEN**

16 For a further and separate cause of action, being a different offense from, but connected  
17 in its commission with the charges set forth in Counts One through Six hereof, complainant  
18 complains and says:

19 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
20 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
21 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
22 signature “John Boucher” on a document dated February 1, 2006.

23 **COUNT EIGHT**

24 For a further and separate cause of action, being a different offense from, but connected  
25 in its commission with the charges set forth in Counts One through Seven hereof, complainant  
26 complains and says:

27 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
28 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR

1 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
2 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
3 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
4 States, to wit: a document bearing the signature “Merilu Devine” dated February 1, 2006.

5 **COUNT NINE**

6 For a further and separate cause of action, being a different offense from, but connected  
7 in its commission with the charges set forth in Counts One through Eight hereof, complainant  
8 complains and says:

9 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
10 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
11 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
12 signature “Merilu Devine” on a document dated February 1, 2006.

13 **COUNT TEN**

14 For a further and separate cause of action, being a different offense from, but connected  
15 in its commission with the charges set forth in Counts One through Nine hereof, complainant  
16 complains and says:

17 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
18 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
19 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
20 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
21 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
22 States, to wit: a document bearing the signature “Sandra Etchinson” dated February 2, 2006.

23 **COUNT ELEVEN**

24 For a further and separate cause of action, being a different offense from, but connected  
25 in its commission with the charges set forth in Counts One through Ten hereof, complainant  
26 complains and says:

27 That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did  
28 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that

defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature "Sandra Etchinson" on a document dated February 2, 2006.

**COUNT TWELVE**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Eleven hereof, complainant complains and says:

That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged instrument to be filed, registered, or recorded in a public office within this state, which instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United States, to wit: a document bearing the signature "Laquita Evans" dated February 2, 2006.

**COUNT THIRTEEN**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twelve hereof, complainant complains and says:

That on or about February 7, 2006, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature "Laquita Evans" on a document dated February 2, 2006.

**COUNT FOURTEEN**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Thirteen hereof, complainant complains and says:

That on or about November 12, 2002, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged instrument to be filed, registered, or recorded in a public office within this state, which

1 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
2 States, to wit: a document bearing the signature “Enrique Aleman” dated November 10, 2002.

3 **COUNT FIFTEEN**

4 For a further and separate cause of action, being a different offense from, but connected  
5 in its commission with the charges set forth in Counts One through Fourteen hereof, complainant  
6 complains and says:

7 That on or about November 12, 2002, defendant KATHLEEN MARIE CULHANE, did  
8 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
9 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
10 signature “Enrique Aleman” on a document dated November 10, 2002.

11 **COUNT SIXTEEN**

12 For a further and separate cause of action, being a different offense from, but connected  
13 in its commission with the charges set forth in Counts One through Fifteen hereof, complainant  
14 complains and says:

15 That on or about November 12, 2002, defendant KATHLEEN MARIE CULHANE, did  
16 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
17 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
18 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
19 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
20 States, to wit: a document bearing the signature “Kathryn Oshel” dated November 11, 2002.

21 **COUNT SEVENTEEN**

22 For a further and separate cause of action, being a different offense from, but connected  
23 in its commission with the charges set forth in Counts One through Sixteen hereof, complainant  
24 complains and says:

25 That on or about November 12, 2002, defendant KATHLEEN MARIE CULHANE, did  
26 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
27 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
28 signature “Kathryn Oshel” on a document dated November 11, 2002.

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**COUNT EIGHTEEN**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Seventeen hereof, complainant complains and says:

That on or about November 30, 2004, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged instrument to be filed, registered, or recorded in a public office within this state, which instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United States, to wit: a document bearing the signature “Kathryn Oshel” dated October 3, 2004.

**COUNT NINETEEN**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Eighteen hereof, complainant complains and says:

That on or about November 30, 2004, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature “Kathryn Oshel” on a document dated October 3, 2004.

**COUNT TWENTY**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Nineteen hereof, complainant complains and says:

That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged instrument to be filed, registered, or recorded in a public office within this state, which instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United States, to wit: a document bearing the signature “Lily Arellano” dated November 11, 2003.

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**COUNT TWENTY-ONE**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty hereof, complainant complains and says:

That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature “Lily Arellano” on a document dated November 11, 2003.

**COUNT TWENTY-TWO**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty-One hereof, complainant complains and says:

That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged instrument to be filed, registered, or recorded in a public office within this state, which instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United States, to wit: a document bearing the signature “JoAnne Glenn” dated December 1, 2003.

**COUNT TWENTY-THREE**

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty-Two hereof, complainant complains and says:

That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature “JoAnne Glenn” on a document dated December 1, 2003.

**COUNT TWENTY-FOUR**

For a further and separate cause of action, being a different offense from, but connected



1 in its commission with the charges set forth in Counts One through Twenty-Three hereof,  
2 complainant complains and says:

3 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
4 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
5 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
6 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
7 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
8 States, to wit: a document bearing the signature "Lynn Price" dated November 26, 2003.

9 **COUNT TWENTY-FIVE**

10 For a further and separate cause of action, being a different offense from, but connected  
11 in its commission with the charges set forth in Counts One through Twenty-Four hereof,  
12 complainant complains and says:

13 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
14 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
15 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
16 signature "Lynn Price" on a document dated November 26, 2003.

17 **COUNT TWENTY-SIX**

18 For a further and separate cause of action, being a different offense from, but connected  
19 in its commission with the charges set forth in Counts One through Twenty-Five hereof, complainant  
20 complains and says:

21 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
22 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
23 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
24 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
25 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
26 States, to wit: a document bearing the signature "Thomas Duncan" dated December 1, 2003.

27 **COUNT TWENTY-SEVEN**

28 For a further and separate cause of action, being a different offense from, but connected

1 in its commission with the charges set forth in Counts One through Twenty-Five hereof, complainant  
2 complains and says:

3 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
4 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
5 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
6 signature "Thomas Duncan" on a document dated December 1, 2003.

7 **COUNT TWENTY-EIGHT**

8 For a further and separate cause of action, being a different offense from, but connected  
9 in its commission with the charges set forth in Counts One through Twenty-Seven hereof,  
10 complainant complains and says:

11 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
12 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
13 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
14 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
15 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
16 States, to wit: a document bearing the signature "Joaquin Chan-Sanchez" dated November 26, 2003.

17 **COUNT TWENTY-NINE**

18 For a further and separate cause of action, being a different offense from, but connected  
19 in its commission with the charges set forth in Counts One through Twenty-Eight hereof,  
20 complainant complains and says:

21 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
22 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
23 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
24 signature "Joaquin Chan-Sanchez" on a document dated November 26, 2003.

25 **COUNT THIRTY**

26 For a further and separate cause of action, being a different offense from, but connected  
27 in its commission with the charges set forth in Counts One through Twenty-Nine hereof,  
28 complainant complains and says:

1 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
2 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
3 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
4 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
5 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
6 States, to wit: a document bearing the signature "Sean Lillywhite" dated December 5, 2003.

7 **COUNT THIRTY-ONE**

8 For a further and separate cause of action, being a different offense from, but connected  
9 in its commission with the charges set forth in Counts One through Thirty hereof, complainant  
10 complains and says:

11 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
12 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
13 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
14 signature "Sean Lillywhite" on a document dated December 5, 2003.

15 **COUNT THIRTY-TWO**

16 For a further and separate cause of action, being a different offense from, but connected  
17 in its commission with the charges set forth in Counts One through Thirty-One hereof, complainant  
18 complains and says:

19 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
20 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
21 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
22 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
23 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
24 States, to wit: a document bearing the signature "David Vacca" dated December 5, 2003.

25 **COUNT THIRTY-THREE**

26 For a further and separate cause of action, being a different offense from, but connected  
27 in its commission with the charges set forth in Counts One through Thirty-Two hereof, complainant  
28 complains and says:

1 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
2 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
3 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
4 signature “David Vacca” on a document dated December 5, 2003.

5 **COUNT THIRTY-FOUR**

6 For a further and separate cause of action, being a different offense from, but connected  
7 in its commission with the charges set forth in Counts One through Thirty-Three hereof, complainant  
8 complains and says:

9 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
10 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR  
11 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
12 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
13 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
14 States, to wit: a document bearing the signature “Aaron Shahrestani” dated December 7, 2003.

15 **COUNT THIRTY-FIVE**

16 For a further and separate cause of action, being a different offense from, but connected  
17 in its commission with the charges set forth in Counts One through Thirty-Four hereof, complainant  
18 complains and says:

19 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
20 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
21 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
22 signature “Aaron Shahrestani” on a document dated December 7, 2003.

23 **COUNT THIRTY-SIX**

24 For a further and separate cause of action, being a different offense from, but connected  
25 in its commission with the charges set forth in Counts One through Thirty-Five hereof, complainant  
26 complains and says:

27 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
28 commit a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR

1 FORGED INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false  
2 and forged instrument to be filed, registered, or recorded in a public office within this state, which  
3 instrument, if genuine, might be filed, registered, or recorded under a law of this state or the United  
4 States, to wit: a document bearing the signature "Paul Soreff" dated August 30, 2003.

5 **COUNT THIRTY-SEVEN**

6 For a further and separate cause of action, being a different offense from, but connected  
7 in its commission with the charges set forth in Counts One through Thirty-Six hereof, complainant  
8 complains and says:

9 That on or about December 8, 2003, defendant KATHLEEN MARIE CULHANE, did  
10 commit a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that  
11 defendant did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the  
12 signature "Paul Soreff" on a document dated August 30, 2003.

13 **COUNT THIRTY-EIGHT**

14 For a further and separate cause of action, being a different offense from, but connected  
15 in its commission with the charges set forth in Counts One through Thirty-Seven hereof,  
16 complainant complains and says:

17 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
18 a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED  
19 INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged  
20 instrument to be filed, registered, or recorded in a public office within this state, which instrument,  
21 if genuine, might be filed, registered, or recorded under a law of this state or the United States, to  
22 wit: a document bearing the signature "Bert Courtney" dated April 15, 2005.

23 **COUNT THIRTY-NINE**

24 For a further and separate cause of action, being a different offense from, but connected  
25 in its commission with the charges set forth in Counts One through Thirty-Eight hereof, complainant  
26 complains and says:

27 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
28 a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant

1 did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature  
2 “Bert Courtney” on a document dated April 15, 2005.

3 **COUNT FORTY**

4 For a further and separate cause of action, being a different offense from, but connected  
5 in its commission with the charges set forth in Counts One through Thirty-Nine hereof, complainant  
6 complains and says:

7 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
8 a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED  
9 INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged  
10 instrument to be filed, registered, or recorded in a public office within this state, which instrument,  
11 if genuine, might be filed, registered, or recorded under a law of this state or the United States, to  
12 wit: a document bearing the signature “John Romanak” dated May 13, 2005.

13 **COUNT FORTY-ONE**

14 For a further and separate cause of action, being a different offense from, but connected  
15 in its commission with the charges set forth in Counts One through Forty hereof, complainant  
16 complains and says:

17 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
18 a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant  
19 did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature  
20 “John Romanak” on a document dated May 13, 2005.

21 **COUNT FORTY-TWO**

22 For a further and separate cause of action, being a different offense from, but connected  
23 in its commission with the charges set forth in Counts One through Forty-One hereof, complainant  
24 complains and says:

25 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
26 a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED  
27 INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged  
28 instrument to be filed, registered, or recorded in a public office within this state, which instrument,

1 if genuine, might be filed, registered, or recorded under a law of this state or the United States, to  
2 wit: a document bearing the signature “Larry Coffman” dated May 21, 2005.

3 **COUNT FORTY-THREE**

4 For a further and separate cause of action, being a different offense from, but connected  
5 in its commission with the charges set forth in Counts One through Forty-Two hereof, complainant  
6 complains and says:

7 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
8 a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant  
9 did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature  
10 “Larry Coffman” on a document dated May 21, 2005.

11 **COUNT FORTY-FOUR**

12 For a further and separate cause of action, being a different offense from, but connected  
13 in its commission with the charges set forth in Counts One through Forty-Three hereof, complainant  
14 complains and says:

15 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
16 a FELONY, namely, a violation of Section 115(a) of the Penal Code, FILE A FALSE OR FORGED  
17 INSTRUMENT in that defendant did unlawfully and knowingly procure or offer a false and forged  
18 instrument to be filed, registered, or recorded in a public office within this state, which instrument,  
19 if genuine, might be filed, registered, or recorded under a law of this state or the United States, to  
20 wit: a document bearing the signature “Michael Matsuda” dated May 30, 2005.

21 **COUNT FORTY-FIVE**

22 For a further and separate cause of action, being a different offense from, but connected  
23 in its commission with the charges set forth in Counts One through Forty-Five hereof, complainant  
24 complains and says:

25 That on or about June 1, 2005, defendant KATHLEEN MARIE CULHANE, did commit  
26 a FELONY, namely, a violation of Section 470(b) of the Penal Code, FORGERY, in that defendant  
27 did, with the intent to defraud, counterfeit or forge the handwriting of another to wit: the signature  
28 “Michael Matsuda” on a document dated May 30, 2005.

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It is further alleged that, (3) the "discovery" date of the time-charged offenses was no earlier than January of 2006. On or about January of 2006, the Office of the Attorney General of the State of California received, in conjunction with the filing of a clemency petition for condemned California inmate Michael Morales, a copy of the declaration, purportedly signed by Felix, which declaration forms the basis for counts Two and Three. The declaration was offered in support of the claim of clemency.

Before that time, complainant had no actual or constructive knowledge that Culhane had engaged in criminal conduct. Felix's revelations triggered a criminal investigation which resulted in the filing of the instant charges.

Executed this 14th day of February, 2007, at Sacramento, California.

## DISCOVERY REQUEST

Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby requested that all materials and information as set forth in Penal Code section 1054.3(a) and (b) be provided to the People.