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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE COUNTY OF SACRAMENTO

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

14 Plaintiffs,

15 **v.**

16 **MICHAEL MATHISON,
17 STEPHANIE CLARK, and
DANNY COMPSON,**

18 Defendants.

Case No.

CRIMINAL COMPLAINT

20 I, the undersigned, say on information and belief, that in the County of Sacramento, State of
21 California:

22 **COUNT ONE**
23 **Conspiracy to Misappropriate Public Funds**
(Penal Code section 182/424; Defendants MATHISON and CLARK)

24 Between in or around June of 2006 through at least May of 2012, in the County of
25 Sacramento, DEFENDANTS MATHISON and CLARK did unlawfully commit the crime of
26 CONSPIRACY in violation of section 424 of the Penal Code in that said defendants did
27 unlawfully conspire together with each other and with others whose identity is unknown, to
28 commit the crime of misappropriation of public funds in violation of section 424 of the Penal

1 Code, a felony; and that pursuant to and for the purposes of carrying out the objectives of the
2 aforesaid conspiracy, the said defendants committed the following overt acts during the alleged
3 time period:

4 **Overt Act 1**

5 Defendants MATHISON and CLARK had CLARK order office supplies for the California
6 Department of Fish & Wildlife (DFW) where CLARK is employed, from companies employing
7 MATHISON, and later MATHISON's own office supply company, at substantially over-inflated
8 prices. To wit, and among other instances, in or around January of 2008, CLARK purchased
9 office supplies from MATHISON at over-inflated prices.

10 **Overt Act 2**

11 In consideration for the orders set forth above in Overt Act 1, MATHISON paid to CLARK
12 over 74 bribes, 3 of which were over \$950.00 pursuant to Penal Code section 67.5(b), totaling
13 over \$23,800.00, all of which CLARK accepted. To wit, and among other instances, in or
14 around March of 2009, MATHISON mailed to CLARK, and CLARK accepted, a money order in
15 the amount of \$1,000.00.

16 **Overt Act 3**

17 In order to facilitate the over-inflated transactions set forth above in Overt Act 1,
18 MATHISON gave to CLARK, and CLARK accepted, competitors' bids forged by MATHISON
19 or at his direction, that were even more over-inflated than MATHISON's own. On occasion,
20 CLARK falsely indicated to DFW that MATHISON's bids did not require a competitor's bid.
21 Forged competitors' bids were then submitted by CLARK, along with MATHISON's (slightly
22 less) over-inflated bid, to DFW, resulting in MATHISON being allowed to complete the
23 transaction. To wit, and among other instances, in December of 2009, MATHISON created, or
24 had others create, and then submitted to CLARK, a forged competitor's bid purporting to be from
25 Clovis Stationary and Office Supplies. In total, Between in or around June of 2006 through at
26 least May of 2012, using a scheme exemplified by Overt Acts 1 through 3, MATHISON was able
27 to conduct over one hundred and fifty transactions with DFW via CLARK, many of which
28 involved items whose prices were over-inflated.

1 **COUNT TWO**
2 **Misappropriation of Public funds**
3 **(Penal Code section 424; Defendants MATHISON and CLARK)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Count One: In or around January of 2008, CLARK, a
6 public employee of DFW, aided and abetted by MATHISON, willfully and knowingly transacted
7 and submitted to DFW invoice number 4504 for office supplies at over-inflated prices, resulting
8 in the misappropriation of public funds from DFW.

9 **COUNT THREE**
10 **Misappropriation of Public Funds**
11 **(Penal Code section 424; Defendants MATHISON and CLARK)**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission with the charges set forth in Counts One and Two: In or around January of 2008,
14 CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and knowingly
15 transacted and submitted to DFW invoice number 4522 for office supplies at over-inflated prices,
16 resulting in the misappropriation of public funds from DFW.

17 **COUNT FOUR**
18 **Misappropriation of Public Funds**
19 **(Penal Code section 424; Defendants MATHISON and CLARK)**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission with the charges set forth in Counts One through Three: In or around January of
22 2008, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
23 knowingly transacted and submitted to DFW invoice number 4653 for office supplies at over-
24 inflated prices, resulting in the misappropriation of public funds from DFW.

25 **COUNT FIVE**
26 **Misappropriation of Public Funds**
27 **(Penal Code section 424; Defendants MATHISON and CLARK)**

28 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 Four: In or around September of
2008, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
knowingly transacted and submitted to DFW invoice number 9851 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

1 **COUNT SIX**
2 **Misappropriation of Public Funds**
3 **(Penal Code section 424; Defendants MATHISON and CLARK)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Five: In or around December of
6 2008, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
7 knowingly transacted and submitted to DFW invoice number 11401 for office supplies at over-
8 inflated prices, resulting in the misappropriation of public funds from DFW.

9 **COUNT SEVEN**
10 **Misappropriation of Public Funds**
11 **(Penal Code section 424; Defendants MATHISON and CLARK)**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission with the charges set forth in Counts One through Six: In or around February of
14 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
15 knowingly transacted and submitted to DFW invoice number 12108 for office supplies at over-
16 inflated prices, resulting in the misappropriation of public funds from DFW.

17 **COUNT EIGHT**
18 **Misappropriation of Public Funds**
19 **(Penal Code section 424; Defendants MATHISON and CLARK)**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission with the charges set forth in Counts One through Seven: In or around February of
22 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
23 knowingly transacted and submitted to DFW invoice number 12454 for office supplies at over-
24 inflated prices and using a forged competitor's bid, resulting in the misappropriation of public
25 funds from DFW.

26 **COUNT NINE**
27 **Misappropriation of Public Funds**
28 **(Penal Code section 424; Defendants MATHISON and CLARK)**

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 Eight: In or around March of
2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and

1 knowingly transacted and submitted to DFW invoice number 12594 for office supplies at over-
2 inflated prices, resulting in the misappropriation of public funds from DFW.

3 **COUNT TEN**
4 **Misappropriation of Public Funds**
5 **(Penal Code section 424; Defendants MATHISON and CLARK)**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission with the charges set forth in Counts One through Nine: In or around March of
8 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
9 knowingly transacted and submitted to DFW invoice number 12672 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

10 **COUNT ELEVEN**
11 **Misappropriation of Public Funds**
12 **(Penal Code section 424; Defendants MATHISON and CLARK)**

13 For a further and separate cause of action, being a different offense from but connected in
14 its commission with the charges set forth in Counts One through Ten: In or around March of
15 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
16 knowingly transacted and submitted to DFW invoice number 12723 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

17 **COUNT TWELVE**
18 **Misappropriation of Public Funds**
19 **(Penal Code section 424; Defendants MATHISON and CLARK)**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission with the charges set forth in Counts One through Eleven: In or around March of
22 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
23 knowingly transacted and submitted to DFW invoice number 12872 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

24 **COUNT THIRTEEN**
25 **Misappropriation of Public Funds**
26 **(Penal Code section 424; Defendants MATHISON and CLARK)**

27 For a further and separate cause of action, being a different offense from but connected in
28 its commission with the charges set forth in Counts One through Twelve: In or around March of
2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and

1 knowingly transacted and submitted to DFW invoice number 12948 for office supplies at over-
2 inflated prices, resulting in the misappropriation of public funds from DFW.

3 **COUNT FOURTEEN**
4 **Misappropriation of Public Funds**
5 **(Penal Code section 424; Defendants MATHISON and CLARK)**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission with the charges set forth in Counts One through Thirteen: In or around March of
8 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
9 knowingly transacted and submitted to DFW invoice number 12976 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

10 **COUNT FIFTEEN**
11 **Misappropriation of Public Funds**
12 **(Penal Code section 424; Defendants MATHISON and CLARK)**

13 For a further and separate cause of action, being a different offense from but connected in
14 its commission with the charges set forth in Counts One through Fourteen: In or around April of
15 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
16 knowingly transacted and submitted to DFW invoice number 13155 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

17 **COUNT SIXTEEN**
18 **Misappropriation of Public Funds**
19 **(Penal Code section 424; Defendants MATHISON and CLARK)**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission with the charges set forth in Counts One through Fifteen: In or around April of
22 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
23 knowingly transacted and submitted to DFW invoice number 13219 for office supplies at over-
inflated prices, resulting in the misappropriation of public funds from DFW.

24 **COUNT SEVENTEEN**
25 **Misappropriation of Public Funds**
26 **(Penal Code section 424; Defendants MATHISON and CLARK)**

27 For a further and separate cause of action, being a different offense from but connected in
28 its commission with the charges set forth in Counts One through Sixteen: In or around October of
2009, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and

1 knowingly transacted and submitted to DFW invoice number 15451 for office supplies at over-
2 inflated prices and using a forged competitor's bid, resulting in the misappropriation of public
3 funds from DFW.

4 **COUNT EIGHTEEN**
5 **Misappropriation of Public Funds**
6 **(Penal Code section 424; Defendants MATHISON and CLARK)**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission with the charges set forth in Counts One through Seventeen: In or around
9 December of 2009, CLARK, a public employee of DFW, aided and abetted by MATHISON,
10 willfully and knowingly transacted and submitted to DFW invoice number 18588 for office
11 supplies at over-inflated prices and using a forged competitor's bid, resulting in the
12 misappropriation of public funds from DFW.

13 **COUNT NINETEEN**
14 **Misappropriation of Public Funds**
15 **(Penal Code section 424; Defendants MATHISON and CLARK)**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission with the charges set forth in Counts One through Eighteen: In or around March of
18 2010, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
19 knowingly transacted and submitted to DFW invoice number 20604 for office supplies at over-
20 inflated prices and using a forged competitor's bid, resulting in the misappropriation of public
21 funds from DFW.

22 **COUNT TWENTY**
23 **Misappropriation of Public Funds**
24 **(Penal Code section 424; Defendants MATHISON and CLARK)**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission with the charges set forth in Counts One through Nineteen: In or around
27 November of 2010, CLARK, a public employee of DFW, aided and abetted by MATHISON,
28 willfully and knowingly transacted and submitted to DFW invoice number 31809 for office
supplies at over-inflated prices and using a forged competitor's bid, resulting in the
misappropriation of public funds from DFW.

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1 **COUNT TWENTY-ONE**
2 **Misappropriation of Public Funds**
3 **(Penal Code section 424; Defendants MATHISON and CLARK)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Twenty: In or around May of
6 2012, CLARK, a public employee of DFW, aided and abetted by MATHISON, willfully and
7 knowingly transacted and submitted to DFW invoice number 12-10168 for office supplies at
8 over-inflated prices, resulting in the misappropriation of public funds from DFW.

9 **COUNT TWENTY-TWO**
10 **Forgery**
11 **(Penal Code section 470(d); Defendant MATHISON)**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission with the charges set forth in Counts One through Twenty-One: MATHISON did,
14 and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and
15 attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies for
16 DFW, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice from
17 Clovis Stationary and Office Supplies submitted to DFW on or around December of 2009,
18 corresponding with invoice number 15451.

19 **COUNT TWENTY-THREE**
20 **Forgery**
21 **(Penal Code section 470(d); Defendant MATHISON)**

22 For a further and separate cause of action, being a different offense from but connected in
23 its commission with the charges set forth in Counts One through Twenty-Two: MATHISON did,
24 and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and
25 attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies for
26 DFW, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice from
27 Clovis Stationary and Office Supplies, submitted to DFW on or around December of 2009,
28 corresponding with invoice number 18588.

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1 **COUNT TWENTY-FOUR**
2 **Forgery**
3 **(Penal Code section 470(d); Defendant MATHISON)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Twenty-Three: MATHISON
6 did, and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass
7 and attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies
8 for DFW, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice
9 from Clovis Stationary and Office Supplies, submitted to DFW on or around March of 2010,
10 corresponding with invoice number 20604.

11 **COUNT TWENTY-FIVE**
12 **Forgery**
13 **(Penal Code section 470(d); Defendant MATHISON)**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission with the charges set forth in Counts One through Twenty-Four: MATHISON did,
16 and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and
17 attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies for
18 DFW, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice from
19 Clovis Stationary and Office Supplies, submitted to DFW on or around December of 2010,
20 corresponding with invoice number 31809.

21 **COUNT TWENTY-SIX**
22 **Giving a Bribe**
23 **(Penal Code section 67.5(b); Defendant MATHISON)**

24 For a further and separate cause of action, being a different offense from but connected in
25 its commission with the charges set forth in Counts One through Twenty-Five: MATHISON gave
26 as a bribe to CLARK or aided and abetted the same, in her capacity as an employee of the State of
27 California, a money order for over \$950.00 on or about March 12, 2009.

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1 **COUNT TWENTY-SEVEN**
2 **Giving a Bribe**
3 **(Penal Code section 67.5(b); Defendant MATHISON)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Twenty-Six: MATHISON gave
6 as a bribe to CLARK or aided and abetted the same, in her capacity as an employee of the State of
7 California, a money order for over \$950.00 on or about March 14, 2009.

8 **COUNT TWENTY-EIGHT**
9 **Giving a Bribe**
10 **(Penal Code section 67.5(b); Defendant MATHISON)**

11 For a further and separate cause of action, being a different offense from but connected in
12 its commission with the charges set forth in Counts One through Twenty-Seven: MATHISON
13 gave as a bribe to CLARK, or aided and abetted the same, in her capacity as an employee of the
14 State of California, a money order for over \$950.00 on or about March 23, 2010.

15 **COUNT TWENTY-NINE**
16 **Giving a Bribe**
17 **(Penal Code section 67.5(b); Defendant MATHISON)**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission with the charges set forth in Counts One through Twenty-Eight: MATHISON
20 paid for as a bribe to CLARK, or aided and abetted the same, in her capacity as an employee of
21 the State of California, a vacation to Disneyland in an amount of over \$950.00 in or about August
22 of 2010.

23 **COUNT THIRTY**
24 **Accepting a Bribe**
25 **(Penal Code section 68; Defendant CLARK)**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission with the charges set forth in Counts One through Twenty-Nine: CLARK
28 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
money order in the amount of approximately \$600.00 on or around March 5, 2009, for the
purpose of influencing the action of CLARK and upon an agreement and understanding that the
action of CLARK upon a matter then pending before her in her official capacity, a Business

1 Service Assistant for DFW, should be influenced thereby, CLARK being an employee of the
2 State of California.

3 **COUNT THIRTY-ONE**
4 **Accepting a Bribe**
5 **(Penal Code section 68; Defendant CLARK)**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission with the charges set forth in Counts One through Thirty: CLARK unlawfully and
8 knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money order in
9 the amount of approximately \$1,000.00 on or around March 12, 2009, for the purpose of
10 influencing the action of CLARK and upon an agreement and understanding that the action of
11 CLARK upon a matter then pending before her in her official capacity, a Business Service
12 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
13 California.

14 **COUNT THIRTY-TWO**
15 **Accepting a Bribe**
16 **(Penal Code section 68; Defendant CLARK)**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission with the charges set forth in Counts One through Thirty-One: CLARK unlawfully
19 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
20 order in the amount of approximately \$400.00 on or around March 26, 2009, for the purpose of
21 influencing the action of CLARK and upon an agreement and understanding that the action of
22 CLARK upon a matter then pending before her in her official capacity, a Business Service
23 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
24 California.

25 **COUNT THIRTY-THREE**
26 **Accepting a Bribe**
27 **(Penal Code section 68; Defendant CLARK)**

28 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 Thirty-Two: CLARK unlawfully
and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
order in the amount of approximately \$400.00 on or around April 29, 2009, for the purpose of

1 influencing the action of CLARK and upon an agreement and understanding that the action of
2 CLARK upon a matter then pending before her in her official capacity, a Business Service
3 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
4 California.

5 **COUNT THIRTY-FOUR**
6 **Accepting a Bribe**
7 **(Penal Code section 68; Defendant CLARK)**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission with the charges set forth in Counts One through Thirty-Three: CLARK
10 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
11 money order in the amount of approximately \$1,000.00 on or around May 15, 2009, for the
12 purpose of influencing the action of CLARK and upon an agreement and understanding that the
13 action of CLARK upon a matter then pending before her in her official capacity, a Business
14 Service Assistant for DFW, should be influenced thereby, CLARK being an employee of the
15 State of California.

16 **COUNT THIRTY-FIVE**
17 **Accepting a Bribe**
18 **(Penal Code section 68; Defendant CLARK)**

19 For a further and separate cause of action, being a different offense from but connected in
20 its commission with the charges set forth in Counts One through Thirty-Four: CLARK unlawfully
21 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
22 order in the amount of approximately \$400.00 on or around October 20, 2009, for the purpose of
23 influencing the action of CLARK and upon an agreement and understanding that the action of
24 CLARK upon a matter then pending before her in her official capacity, a Business Service
25 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
26 California.

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1 **COUNT THIRTY-SIX**
2 **Accepting a Bribe**
3 **(Penal Code section 68; Defendant CLARK)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Thirty-Five: CLARK unlawfully
6 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
7 order in the amount of approximately \$450.00 on or around December 17, 2009, for the purpose
8 of influencing the action of CLARK and upon an agreement and understanding that the action of
9 CLARK upon a matter then pending before her in her official capacity, a Business Service
10 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
11 California.

12 **COUNT THIRTY-SEVEN**
13 **Accepting a Bribe**
14 **(Penal Code section 68; Defendant CLARK)**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission with the charges set forth in Counts One through Thirty-Six: CLARK unlawfully
17 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
18 order in the amount of approximately \$1,000.00 on or around March 23, 2010, for the purpose of
19 influencing the action of CLARK and upon an agreement and understanding that the action of
20 CLARK upon a matter then pending before her in her official capacity, a Business Service
21 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
22 California.

23 **COUNT THIRTY-EIGHT**
24 **Accepting a Bribe**
25 **(Penal Code section 68; Defendant CLARK)**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission with the charges set forth in Counts One through Thirty-Seven: CLARK
28 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
money order in the amount of approximately \$500.00 on or around December 14, 2010, for the
purpose of influencing the action of CLARK and upon an agreement and understanding that the

1 action of CLARK upon a matter then pending before her in her official capacity, a Business
2 Service Assistant for DFW, should be influenced thereby, CLARK being an employee of the
3 State of California.

4 **COUNT THIRTY-NINE**
5 **Accepting a Bribe**
6 **(Penal Code section 68; Defendant CLARK)**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission with the charges set forth in Counts One through Thirty-Eight: CLARK
9 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
10 money order in the amount of approximately \$400.00 on or around April 6, 2011, for the purpose
11 of influencing the action of CLARK and upon an agreement and understanding that the action of
12 CLARK upon a matter then pending before her in her official capacity, a Business Service
13 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
14 California.

15 **COUNT FORTY**
16 **Accepting a Bribe**
17 **(Penal Code section 68; Defendant CLARK)**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission with the charges set forth in Counts One through Thirty-Nine: CLARK
20 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
21 money order in the amount of approximately \$800.00 on or around May 5, 2011, for the purpose
22 of influencing the action of CLARK and upon an agreement and understanding that the action of
23 CLARK upon a matter then pending before her in her official capacity, a Business Service
24 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
25 California.

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1 **COUNT FORTY-ONE**
2 **Accepting a Bribe**
3 **(Penal Code section 68; Defendant CLARK)**

4 For a further and separate cause of action, being a different offense from but connected in
5 its commission with the charges set forth in Counts One through Forty: CLARK unlawfully and
6 knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money order in
7 the amount of approximately \$500.00 on or around July 13, 2011, for the purpose of influencing
8 the action of CLARK and upon an agreement and understanding that the action of CLARK upon
9 a matter then pending before her in her official capacity, a Business Service Assistant for DFW,
10 should be influenced thereby, CLARK being an employee of the State of California.

11 **COUNT FORTY-TWO**
12 **Accepting a Bribe**
13 **(Penal Code section 68; Defendant CLARK)**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission with the charges set forth in Counts One through Forty-One: CLARK unlawfully
16 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
17 order in the amount of approximately \$400.00 on or around August 5, 2011, for the purpose of
18 influencing the action of CLARK and upon an agreement and understanding that the action of
19 CLARK upon a matter then pending before her in her official capacity, a Business Service
20 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
21 California.

22 **COUNT FORTY-THREE**
23 **Accepting a Bribe**
24 **(Penal Code section 68; Defendant CLARK)**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission with the charges set forth in Counts One through Forty-Two: CLARK unlawfully
27 and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a money
28 order in the amount of approximately \$450.00 on or around September 26, 2011, for the purpose
of influencing the action of CLARK and upon an agreement and understanding that the action of
CLARK upon a matter then pending before her in her official capacity, a Business Service

1 Assistant for DFW, should be influenced thereby, CLARK being an employee of the State of
2 California.

3 **COUNT FORTY-FOUR**
4 **Accepting a Bribe**
5 **(Penal Code section 68; Defendant CLARK)**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission with the charges set forth in Counts One through Forty-Three: CLARK
8 unlawfully and knowingly agreed to receive, and did receive, from MATHISON, a bribe, to wit, a
9 paid vacation to Disneyland in or around August of 2010, for the purpose of influencing the
10 action of CLARK and upon an agreement and understanding that the action of CLARK upon a
11 matter then pending before her in her official capacity, a Business Service Assistant, should be
12 influenced thereby for DFW, CLARK being an employee of the State of California.

13 **COUNT FORTY-FIVE**
14 **Conspiracy to Misappropriate Public Funds**
15 **(Penal Code section 182/424; Defendants MATHISON and COMPSON)**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission with the charges set forth in Counts One through Forty-Four: Between in or
18 around October 2010 through at least April of 2012, in the County of Sacramento and elsewhere,
19 DEFENDANTS MATHISON and COMPSON did unlawfully commit the crime of
20 CONSPIRACY in violation of section 424 of the Penal Code in that said defendants did
21 unlawfully conspire together with each other and with others whose identity is unknown, to
22 commit the crime of misappropriation of public funds in violation of section 424 of the Penal
23 Code, a felony; and that pursuant to and for the purposes of carrying out the objectives of the
24 aforesaid conspiracy, the said defendants committed the following overt acts during the alleged
25 time period:

26 **Overt Act 1**

27 Defendants MATHISON and COMPSON had COMPSON order office supplies for the
28 California Department of Transportation (CalTrans) where COMPSON is employed, from
companies employing MATHISON, and later MATHISON's own office supply company, at

1 substantially over-inflated prices. To wit, and among other instances, on or around October of
2 2010, COMPSON purchased office supplies from MATHISON at over-inflated prices.

3 **Overt Act 2**

4 In consideration for the order set forth above in Overt Act 1, and for other over-inflated
5 orders, MATHISON paid to COMPSON numerous bribes, all of which COMPSON accepted.

6 **Overt Act 3**

7 In order to facilitate the over-inflated transaction set forth above in Overt Act 1, and for
8 other over-inflated orders, MATHISON gave to COMPSON, and COMPSON accepted,
9 competitors' bids forged by MATHISON or at his direction, that were even more over-inflated
10 than MATHISON's own. Forged competitor's bids were then submitted by COMPSON, along
11 with MATHISON's (slightly less) over-inflated bid, to CalTrans, resulting in MATHISON being
12 allowed to complete the transaction. To wit, and among other instances, on or around October of
13 2010, MATHISON gave to COMPSON, and COMPSON submitted to CalTrans, a fake
14 competitor's bid.

15 **COUNT FORTY-SIX**
16 **Misappropriation of Public Funds**
(Penal Code section 424; Defendants MATHISON and COMPSON)

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission with the charges set forth in Counts One through Forty-Five: In or around
19 October of 2010, COMPSON, a public employee of CalTrans, aided and abetted by MATHISON,
20 willfully and knowingly transacted and submitted to CalTrans invoice number 26211 for office
21 supplies at over-inflated prices and using a forged competitor's bid, resulting in the
22 misappropriation of public funds from CalTrans.

23 **COUNT FORTY-SEVEN**
24 **Misappropriation of Public Funds**
(Penal Code section 424; Defendants MATHISON and COMPSON)

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission with the charges set forth in Counts One through Forty-Six: In or around April of
27 2012, COMPSON, a public employee of CalTrans, aided and abetted by MATHISON, willfully
28 and knowingly transacted and submitted to CalTrans a purchase order for office supplies at over-

1 inflated prices and using a forged competitors' bids, resulting in the misappropriation of public
2 funds from CalTrans.

3 **COUNT FORTY-EIGHT**
4 **Forgery**
5 **(Penal Code section 470(d); Defendant MATHISON)**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission with the charges set forth in Counts One through Forty-Seven: MATHISON did,
8 and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and
9 attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies for
10 CalTrans, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice
11 from Clovis Stationary and Office Supplies, submitted to CalTrans in or around October of 2010.

12 **COUNT FORTY-NINE**
13 **Forgery**
14 **(Penal Code section 470(d); Defendant MATHISON)**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission with the charges set forth in Counts One through Forty-Eight: MATHISON did,
17 and with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and
18 attempt to offer to pass, as true and genuine, a competitor's bid with respect to office supplies for
19 CalTrans, knowing the same to be false, altered, forged and counterfeited, to wit, a fake invoice
20 from Clovis Stationary and Office Supplies and a fake invoice from Digital Dolphin Supplies,
21 submitted to Caltrans in or around April of 2012.

22 **COUNT FIFTY**
23 **Giving a Bribe**
24 **(Penal Code section 67.5(b); Defendant MATHISON)**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission with the charges set forth in Counts One through Forty-Nine: Between October of
27 2010 and April of 2012, MATHISON paid at least one bribe to COMPSON, or aided and abetted
28 the same, in COMPSON's capacity as an employee of the State of California, to wit, a Digital
Print Operator II, in an amount of money over \$950.00.

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