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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

**EDGARDO ANTONIO GUERRERO (DOB:
4/9/1949); HECTOR HUMBERTO GUERRERO
(DOB: 5/3/1970); and SIDIA MAROLY
LANDAVERDE (DOB: 10/14/1960)**

Defendants.

Case No. BA464427

**SECOND-AMENDED FELONY
COMPLAINT FOR ARREST
WARRANT**

The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants EDGARDO ANTONIO GUERRERO, HECTOR HUMBERTO GUERRERO and SIDIA MAROLY LANDAVERDE of the following crimes, which are separate causes of complaint but connected to one another in their commission:

COUNT 1 - GRAND THEFT

From on or about February 1, 2014, and continuing to on or about July 18, 2015, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 2 - GRAND THEFT

From on or about October 2, 2014, and continuing to on or about October 21, 2015, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO

1 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
2 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED],
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 3 - GRAND THEFT**

4 From on or about February 20, 2014, and continuing to on or about March 24, 2014, in the
5 County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
6 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
violation of Penal Code section 487, subdivision (a), a felony.

7 **COUNT 4 - GRAND THEFT**

8 From on or about August 18, 2011, and continuing to on or about March 19, 2013, in the County
9 of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
10 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED],
in violation of Penal Code section 487, subdivision (a), a felony.

11 It is further alleged that the violation in Count 4 was not discovered until the following
12 dates and in the following manner and that no law enforcement agency chargeable with the
investigation and prosecution of said violation had actual and constructive knowledge of said
violation prior to said date, within the meaning of Penal Code section 803, subdivision (c).

13 On or about September 8, 2015, [REDACTED] discovered that Defendants did not
14 submit pardons to the United States Customs and Immigration Services for her husband [REDACTED]
[REDACTED] as promised and that the petition for his residency had been denied.

15 [REDACTED] did not have actual or constructive knowledge sufficient to cause an inquiry as to whether
16 the Defendants had defrauded her prior to September 8, 2015, because Defendants gave
reasonable reassurances that they were working on the case and concealed their wrongdoing as
17 follows: (1) gave [REDACTED] a letter purportedly from the United States Department of State National
Visa Center dated March 29, 2013, stating that Defendant EDGARDO ANTONIO GUERRERO
18 was registered as an agent for her husband's visa petition; (2) provided ongoing reassurances that
the immigration case was pending; (3) in 2015 advised [REDACTED] that her husband had to go to a clinic
19 in Ciudad Juarez, Mexico, to obtain fingerprints and a physical needed for the petition; (4)
scheduled an interview for a residency petition on September 8, 2015, for [REDACTED] and her husband
at the United States Consulate in Ciudad Juarez.

20 **COUNT 5 - UNLAWFUL PRACTICE OF LAW**

21 On or about November 17, 2017, in the County of Los Angeles, EDGARDO ANTONIO
22 GUERRERO was providing immigration services as a representative of Oficina Guerrero and
held himself out as practicing or entitled to practice law or otherwise practiced law by giving
23 legal advice regarding immigration relief to California Department of Justice Special Agent
Daniel Torres and Los Angeles County Department of Consumer and Business Affairs
Investigator Analu Fernandini, while not an active member of the California State Bar, or
24 otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and
Professions Code section 6126, subdivision (a), a misdemeanor.

25 **COUNT 6 - IMMIGRATION CONSULTANT SERVICES WITHOUT A BOND**

26 On or about November 17, 2017, EDGARDO ANTONIO GUERRERO, did unlawfully fail to
27 file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) prior to
engaging in the business or acting in the capacity of an immigration consultant in providing
services to California Department of Justice Special Agent Daniel Torres and Los Angeles
28 County Department of Business and Consumer Affairs Investigator Analu Fernandini, in

violation of Business and Professions Code section 22443.1, subdivision (a)(1) and 22445, subdivision(b), a misdemeanor.

COUNT 7 – UNLAWFUL PRACTICE OF LAW

On or about January 25, 2018, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO was providing immigration services as a representative of Oficina Guerrero and held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to California Department of Justice Special Agent Sal Rojas and California Department of Justice Special Agent Sonia Ramos, while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a), a misdemeanor.

COUNT 8 – IMMIGRATION CONSULTANT SERVICES WITHOUT A BOND

On or about January 25, 2018, EDGARDO ANTONIO GUERRERO, did unlawfully fail to file with the Secretary of State a bond of one hundred-thousand dollars (\$100,000) prior to engaging in the business or acting in the capacity of an immigration consultant in providing services to California Department of Justice Special Agent Sal Rojas and California Department of Justice Special Agent Sonia Ramos, in violation of Business and Professions Code section 22443.1, subdivision (a)(1) and 22445, subdivision(b), a misdemeanor.

COUNT 9 – CONSPIRACY (UNLAWFUL PRACTICE OF LAW)

From on or about August 18, 2011, and continuing to on or about March 15, 2018, in the county of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO did unlawfully conspire together to commit a crime in violation of Section 182 subdivision (a)(1) of the Penal Code, a felony to wit: unlawfully advertising as practicing or entitled to practice law, or otherwise practicing law, in violation of Section 6126 (a) of the Business and Profession Code, a misdemeanor, and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, defendants EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO, committed the following overt acts:

OVERT ACT ONE: From on or about August 18, 2011, and continuing to on or about March 15, 2018, HECTOR HUMBERTO GUERRERO was employed by his brother EDGARDO ANTONIO GUERRERO, doing business as Oficina Guerrero, to assist him with providing immigration services, which included giving legal advice regarding immigration relief options, by preparing forms for filing with United States Customs and Immigration Services on behalf of Oficina Guerrero clients.

OVERT ACT TWO: From on or about August 18, 2011, and continuing to on or about March 15, 2018, HECTOR HUMBERTO GUERRERO was employed by his brother EDGARDO ANTONIO GUERRERO, doing business as Oficina Guerrero, to collect payment from clients for services that included legal advice regarding immigration relief options.

OVERT ACT THREE: From on or about August 18, 2011, and continuing to on or about March 15, 2018, HECTOR HUMBERTO GUERRERO was employed by his brother EDGARDO ANTONIO GUERRERO, doing business as Oficina Guerrero, to assist him with providing immigration services, which included giving legal advice regarding immigration relief options, by providing administrative and customer support to clients, including setting up client appointments and responding to client complaints.

1 **OVERT ACT FOUR:** From on or about February 1, 2014, and continuing to July 18,
2 2015, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself
3 out as practicing or entitled to practice law or otherwise practiced law by giving legal
4 advice regarding immigration relief to [REDACTED], while not an active member
of the California State Bar, or otherwise authorized pursuant to statute or court rule to
practice law, in violation of Business and Professions Code section 6126, subdivision (a).

5 **OVERT ACT FIVE:** From on or about October 2, 2014, and continuing to October 21,
6 2015, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself
7 out as practicing or entitled to practice law or otherwise practiced law by giving legal
8 advice regarding immigration relief to [REDACTED] while not an active
member of the California State Bar, or otherwise authorized pursuant to statute or court
rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

9 **OVERT ACT SIX:** From on or about February 20, 2014, and continuing to March 24,
10 2014, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself
11 out as practicing or entitled to practice law or otherwise practiced law by giving legal
advice regarding immigration relief to [REDACTED], while not an active member of
the California State Bar, or otherwise authorized pursuant to statute or court rule to
practice law, in violation of Business and Professions Code section 6126, subdivision (a).

12 **OVERT ACT SEVEN:** From on or about August 18, 2011, and continuing to March 19,
13 2013, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself
14 out as practicing or entitled to practice law or otherwise practiced law by giving legal
15 advice regarding immigration relief to [REDACTED], while not an active
members of the California State Bar, or otherwise authorized pursuant to statute or court
rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

16 **OVERT ACT EIGHT:** From on or about December 11, 2010, and continuing to on or
17 about October 18, 2017, in the County of Los Angeles, EDGARDO ANTONIO
18 GUERRERO held himself out as practicing or entitled to practice law or otherwise
19 practiced law by giving legal advice regarding immigration relief to [REDACTED],
while not an active member of the California State Bar, or otherwise authorized pursuant
to statute or court rule to practice law, in violation of Business and Professions Code
section 6126, subdivision (a).

20 **OVERT ACT NINE:** From on or about July 18, 2013, and continuing to on or about
21 December 19, 2017, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO
22 held himself out as practicing or entitled to practice law or otherwise practiced law by
23 giving legal advice regarding immigration relief to [REDACTED],
[REDACTED], while not an active member of the California State Bar, or otherwise authorized
pursuant to statute or court rule to practice law, in violation of Business and Professions
Code section 6126, subdivision (a).

24 **OVERT ACT TEN:** From on or about July 7, 2014, and continuing to on or about
25 November 14, 2016, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO
26 held himself out as practicing or entitled to practice law or otherwise practiced law by
27 giving legal advice regarding immigration relief to [REDACTED], while not an
active member of the California State Bar, or otherwise authorized pursuant to statute or
court rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

1 **OVERT ACT ELEVEN:** From on or about July 25, 2014, and continuing to on or about
2 October 22, 2016, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO
3 held himself out as practicing or entitled to practice law or otherwise practiced law by
4 giving legal advice regarding immigration relief to [REDACTED], while not an
active member of the California State Bar, or otherwise authorized pursuant to statute or
court rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

5 **OVERT ACT TWELVE:** From on or about February 8, 2015, and continuing to on or
6 about June 10, 2016, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO
7 held himself out as practicing or entitled to practice law or otherwise practiced law by
8 giving legal advice regarding immigration relief to [REDACTED], while not an
active member of the California State Bar, or otherwise authorized pursuant to statute or
court rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

9 **OVERT ACT THIRTEEN:** From on or about August 29, 2015, and continuing to on or
10 about January 20, 2018, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
11 practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or otherwise authorized
12 pursuant to statute or court rule to practice law, in violation of Business and Professions
Code section 6126, subdivision (a).

13 **OVERT ACT FOURTEEN:** From on or about September 30, 2015, and continuing to
14 on or about May 12, 2016, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
15 practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or otherwise
16 authorized pursuant to statute or court rule to practice law, in violation of Business and
Professions Code section 6126, subdivision (a).

17 **OVERT ACT FIFTEEN:** From on or about February 27, 2016, and continuing to on or
18 about March 17, 2017, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
19 practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant
20 to statute or court rule to practice law, in violation of Business and Professions Code
section 6126, subdivision (a).

21 **OVERT ACT SIXTEEN:** From on or about May 30, 2016, and continuing to on or
22 about July 5, 2017, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO
held himself out as practicing or entitled to practice law or otherwise practiced law by
23 giving legal advice regarding immigration relief to [REDACTED], while not an active
member of the California State Bar, or otherwise authorized pursuant to statute or court
24 rule to practice law, in violation of Business and Professions Code section 6126,
subdivision (a).

25 **OVERT ACT SEVENTEEN:** From on or about May 17, 2016, and continuing to on or
26 about January 9, 2018, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
27 practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or otherwise
28 authorized pursuant to statute or court rule to practice law, in violation of Business and
Professions Code section 6126, subdivision (a).

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2 **OVERT ACT EIGHTEEN:** From on or about August 9, 2016, and continuing to on or
3 about February 10, 2017, 2018, in the County of Los Angeles, EDGARDO ANTONIO
4 GUERRERO held himself out as practicing or entitled to practice law or otherwise
5 practiced law by giving legal advice regarding immigration relief to [REDACTED]
6 [REDACTED], while not an active member of the California State Bar, or
7 otherwise authorized pursuant to statute or court rule to practice law, in violation of
8 Business and Professions Code section 6126, subdivision (a).

9
10 **OVERT ACT NINETEEN:** From on or about September 29, 2016, and continuing to on
11 or about January 24, 2018, in the County of Los Angeles, EDGARDO ANTONIO
12 GUERRERO held himself out as practicing or entitled to practice law or otherwise
13 practiced law by giving legal advice regarding immigration relief to [REDACTED]
14 [REDACTED], while not an active member of the California State Bar, or
15 otherwise authorized pursuant to statute or court rule to practice law, in violation of
16 Business and Professions Code section 6126, subdivision (a).

17
18 **OVERT ACT TWENTY:** From on or about January 19, 2017, and continuing to on or
19 about January 20, 2018, in the County of Los Angeles, EDGARDO ANTONIO
20 GUERRERO held himself out as practicing or entitled to practice law or otherwise
21 practiced law by giving legal advice regarding immigration relief to [REDACTED], while
22 not an active member of the California State Bar, or otherwise authorized pursuant to
23 statute or court rule to practice law, in violation of Business and Professions Code section
24 6126, subdivision (a).

25
26 **OVERT ACT TWENTY-ONE:** From on or about January 20, 2017, and continuing to
27 on or about August 26, 2017, in the County of Los Angeles, EDGARDO ANTONIO
28 GUERRERO held himself out as practicing or entitled to practice law or otherwise
practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State
Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation
of Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-TWO: From on or about February 4, 2017, and continuing to
on or about October 30, 2017, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or otherwise
authorized pursuant to statute or court rule to practice law, in violation of Business and
Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-THREE: From on or about February 24, 2017, and continuing
to on or about March 14, 2017, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
practiced law by giving legal advice regarding immigration relief to [REDACTED], while
not an active member of the California State Bar, or otherwise authorized pursuant to
statute or court rule to practice law, in violation of Business and Professions Code section
6126, subdivision (a).

OVERT ACT TWENTY-FOUR: From on or about March 13, 2017, and continuing to
on or about November 29, 2017, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO held himself out as practicing or entitled to practice law or otherwise
practiced law by giving legal advice regarding immigration relief to [REDACTED]
[REDACTED], while not an active member of the California State Bar, or
otherwise authorized pursuant to statute or court rule to practice law, in violation of

Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-FIVE: From on or about May 1, 2017, and continuing to on or about July 10, 2017, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-SIX: From on or about May 10, 2017, and continuing to on or about December 21, 2017, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-SEVEN: From on or about July 1, 2017, and continuing to on or about March 5, 2018, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-EIGHT: On or about September 9, 2017, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

OVERT ACT TWENTY-NINE: From on or about November 17, 2017, and continuing to on or about February 9, 2018, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

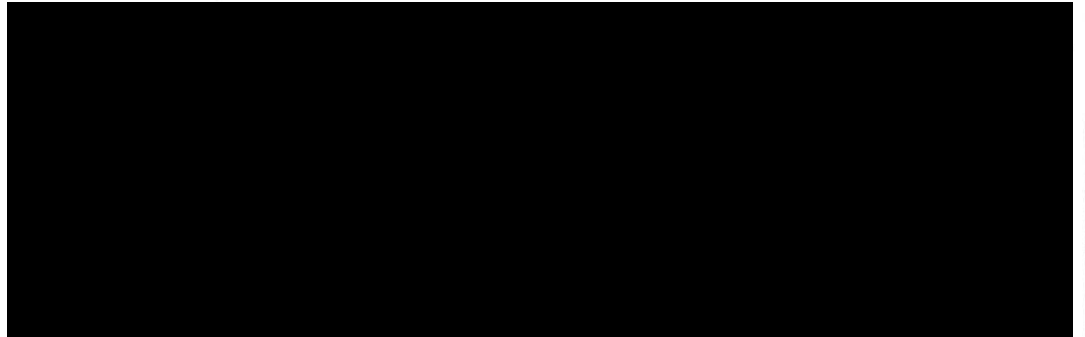
OVERT ACT THIRTY: From on or about March 5, 2018, and continuing to on or about March 15, 2018, in the County of Los Angeles, EDGARDO ANTONIO GUERRERO held himself out as practicing or entitled to practice law or otherwise practiced law by giving legal advice regarding immigration relief to [REDACTED], while not an active member of the California State Bar, or otherwise authorized pursuant to statute or court rule to practice law, in violation of Business and Professions Code section 6126, subdivision (a).

COUNT 6 – CONSPIRACY (IMMIGRATION CONSULTANTS ACT)

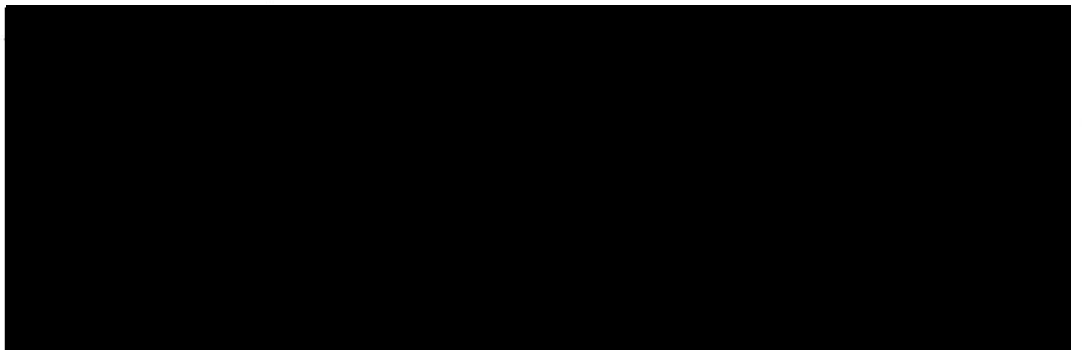
From on or about August 18, 2011, and continuing to March 22, 2018, in the county of Los Angeles, EDGARDO ANTONIO GUERRERO, HECTOR HUMBERTO GUERRERO, and SIDIA MAROLY LANDAVERDE, did unlawfully conspire together to commit a crime in violation of Section 182 subdivision (a)(1) of the Penal Code, a felony, to wit: violate Business

1 and Profession Code sections 22440 et seq. (Immigration Consultants Act) and 22445,
2 subdivision(b), a misdemeanor, and that pursuant to and for the purpose of carrying out the
3 objectives and purposes of the aforesaid conspiracy, defendants EDGARDO ANTONIO
GUERRERO and HECTOR HUMBERTO GUERRERO, committed the following overt acts:

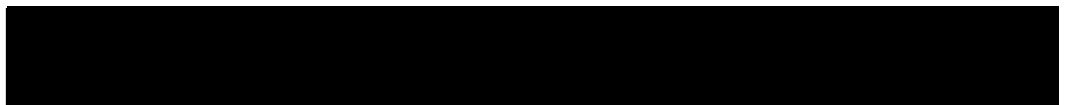
4 **OVERT ACT ONE:** From on or about August 18, 2011, and continuing to on or about
5 March 15, 2018, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
6 GUERRERO, while acting as immigration consultants, did unlawfully fail to provide one
or more of the following persons with a written contract, in violation of Business and
Professions Code section 22442(a):



12 **OVERT ACT TWO:** From on or about August 18, 2011, and continuing to on or about
13 March 15, 2018, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
14 GUERRERO, while acting as immigration consultants, did unlawfully fail to provide one
15 or more of the following persons a typed or computer generated statement of accounting
on the consultant's letterhead for the services rendered and payments made or a translation
of the statement in the victim's native language, in violation of Business and Professions
Code section 22442.1(b):



22 **OVERT ACT THREE:** From on or about August 18, 2011, and continuing to on or
23 about March 15, 2018, EDGARDO ANTONIO GUERRERO and HECTOR
HUMBERTO GUERRERO, while acting as immigration consultants, did unlawfully fail
24 to conspicuously display in Oficina Guerrero a notice at least 12 by 20 inches with
boldface type or print with each character at least one inch in height and width in English
25 and in the victim's native language that contains a statement the consultant is not an
attorney; the services the immigration consultant provides and the current and total fee for
26 each service; the full name, address, and evidence of compliance with applicable bonding
requirements; and the name of each immigration consultant employed at each location, in
violation of Business and Professions Code section 22442.2 (a):



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6 **OVERT ACT FOUR:** From on or about August 18, 2011, and continuing to on or about
7 March 15, 2018, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
8 GUERRERO, did unlawfully fail to file with the Secretary of State a bond of one hundred
9 thousand dollars (\$100,000) prior to engaging in the business or acting in the capacity of
10 an immigration consultant with one or more of the following individuals, in violation of
11 Business and Professions Code section 22443.1(a)(1):
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15 **OVERT ACT FIVE:** From on or about January 1, 2015, and continuing to on or about
16 March 22, 2018, SIDIA MAROLY LANDAVERDE as the sole signatory, opened and
17 maintained a personal bank account ending in -4984 at Wells Fargo Bank that she knew,
18 or reasonably should have known, was used, or caused to be used, by EDGARDO
19 ANTONIO GUERRERO for the deposit and withdrawal of funds illegally obtained for
20 immigration services provided by EDGARDO ANTONIO GUERRERO.


21 **OVERT ACT SIX:** From on or about January 1, 2015, and continuing to on or about
22 March 22, 2018, SIDIA MAROLY LANDAVERDE as the sole signatory, opened and
23 maintained a personal bank account ending in -1073 at Wells Fargo Bank that she knew,
24 or reasonably should have known, was used, or caused to be used, by EDGARDO
25 ANTONIO GUERRERO for the deposit and withdrawal of funds illegally obtained for
26 immigration services provided by EDGARDO ANTONIO GUERRERO.

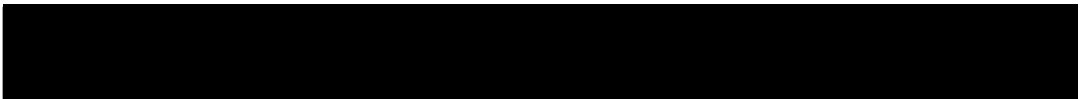
27 **OVERT ACT SEVEN:** From on or about January 1, 2015, and continuing to on or about
28 March 22, 2018, SIDIA MAROLY LANDAVERDE as a joint signatory with an
uncharged co-conspirator, opened and maintained a personal bank account ending in -
2188 at Chase Bank that she knew, or reasonably should have known, was used, or caused
to be used, by EDGARDO ANTONIO GUERRERO for the deposit and withdrawal of
funds illegally obtained for immigration services provided by EDGARDO ANTONIO
GUERRERO.

OVERT ACT EIGHT: From on or about January 1, 2015, and continuing to on or about
March 22, 2018, SIDIA MAROLY LANDAVERDE maintained multiple banks accounts

1 for the deposit and withdrawal of funds illegally obtained for immigration services
2 provided by EDGARDO ANTONIO GUERRERO and knew or reasonably should have
3 known that he was not bonded as an Immigration Consultant by the California Secretary
of State to provide these services.

4 **OVERT ACT NINE:** From on or about January 1, 2015, and continuing to on or about
5 March 22, 2018, SIDIA MAROLY LANDAVERDE, used, or caused to be used, her
6 personal bank accounts, including accounts ending in -1073 and -4984 at Wells Fargo
7 Bank, for electronic withdrawals in excess of \$265,000 payable to the United States
Citizenship and Immigration Services for application fees that EDGARDO ANTONIO
GUERRERO illegally obtained from applicants, including one or more the following
individuals:

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11 **OVERT ACT TEN:** From on or about January 1, 2015, and continuing to on or about
12 March 22, 2018, SIDIA MAROLY LANDAVERDE, used, or caused to be used, her
13 personal bank accounts, including accounts ending in -1073 and -4984 at Wells Fargo
14 Bank, for electronic withdrawals in excess of \$265,000 payable to the United States
15 Citizenship and Immigration Services for application fees. More than \$220,000 of the
16 electronic withdrawals were reversed as unpaid such that SIDIA MAROLY
LANDAVERDE knew or reasonably should have known that EDGARDO ANTONIO
GUERRERO was falsely representing to applicants, including one or more the following
individuals, that their fees had been paid:

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19 **OVERT ACT ELEVEN:** From on or about January 1, 2015, and continuing to on or
20 about March 22, 2018, SIDIA MAROLY LANDAVERDE, commingled funds illegally
21 obtained for immigration services provided by EDGARDO ANTONIO GUERRERO,
doing business as Oficina Guerrero, for her personal gain and benefit, including payment
of personal expenses.

22 **OVERT ACT TWELVE:** On or about March 22, 2018, while EDGARDO ANTONIO
23 GUERRERO was in custody following his arrest for charges alleged in this complaint,
24 SIDIA MAROLY LANDAVERDE, deposited into her bank account ending in -2188 at
25 Chase Bank check number #150 for \$500 drawn on an account held by Osvaldo Ulloa that
was endorsed to her and payable to EDGARDO ANTONIO GUERRERO for immigration
services he had provided.

26 **COUNT 7 - GRAND THEFT**

27 From on or about December 11, 2010, and continuing to on or about October 18, 2017, in the
28 County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a

1 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
2 violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 8 - GRAND THEFT**

4 From on or about July 18, 2013, and continuing to on or about December 19, 2017, in the County
5 of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
6 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
7 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
8 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

9 **COUNT 9 - GRAND THEFT**

10 From on or about July 7, 2014, and continuing to on or about November 14, 2016, in the County
11 of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
12 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
13 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
14 in violation of Penal Code section 487, subdivision (a), a felony.

15 **COUNT 10 - GRAND THEFT**

16 From on or about July 25, 2014, and continuing to on or about October 22, 2016, in the County of
17 Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
18 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
19 of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in violation of
20 Penal Code section 487, subdivision (a), a felony.

21 **COUNT 11 - GRAND THEFT**

22 From on or about February 8, 2015, and continuing to on or about June 10, 2016, in the County of
23 Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
24 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
25 of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in violation of
26 Penal Code section 487, subdivision (a), a felony.

27 **COUNT 12 - GRAND THEFT**

28 From on or about August 29, 2015, and continuing to on or about January 20, 2018, in the County
of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 13 - GRAND THEFT

From on or about September 3, 2015, and continuing to on or about May 12, 2016, in the County
of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

COUNT 14 - GRAND THEFT

From on or about February 27, 2016, and continuing to on or about March 17, 2017, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a

1 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED] in
2 violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 15 - GRAND THEFT**

4 From on or about May 3, 2016, and continuing to on or about July 5, 2017, in the County of Los
5 Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
6 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
7 of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in violation of Penal
8 Code section 487, subdivision (a), a felony.

9 **COUNT 16 - GRAND THEFT**

10 From on or about May 17, 2016, and continuing to on or about January 9, 2018, in the County of
11 Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
12 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
13 of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
14 violation of Penal Code section 487, subdivision (a), a felony.

15 **COUNT 17 - GRAND THEFT**

16 From on or about August 9, 2016, and continuing to on or about February, 10, 2017, in the
17 County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
18 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
19 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
20 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

21 **COUNT 18 - GRAND THEFT**

22 From on or about September 29, 2016, and continuing to on or about January 24, 2018, in the
23 County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
24 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
25 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
26 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

27 **COUNT 19 - GRAND THEFT**

28 From on or about January 19, 2017, and continuing to on or about January 20, 2017, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
violation of Penal Code section 487, subdivision (a), a felony.

COUNT 20 - GRAND THEFT

From on or about January 20, 2017, and continuing to on or about August 26, 2017, in the County
of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
[REDACTED], in violation of Penal Code section 487, subdivision (a), a
felony.

COUNT 21 - GRAND THEFT

From on or about February 4, 2017, and continuing to on or about October 30, 2017, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO

1 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
2 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 22 - GRAND THEFT**

4 From on or about February 24, 2017, and continuing to on or about March 14, 2017, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
5 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in violation
6 of Penal Code section 487, subdivision (a), a felony.

7 **COUNT 23 - GRAND THEFT**

8 From on or about March 13, 2017, and continuing to on or about November 29, 2017, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
9 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
10 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

11 **COUNT 24 - GRAND THEFT**

12 From on or about May 1, 2017, and continuing to on or about July 10, 2017, in the County of Los
Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
13 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED] in violation of Penal Code
14 section 487, subdivision (a), a felony.

15 **COUNT 25 - GRAND THEFT**

16 From on or about May 10, 2017, and continuing to on or about December 21, 2017, in the County
of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
17 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
18 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

19 **COUNT 26 - GRAND THEFT**

20 From on or about July 1, 2017, and continuing to on or about March 5, 2018, in the County of
Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
21 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED] in violation of
22 Penal Code section 487, subdivision (a), a felony.

23 **COUNT 27 - GRAND THEFT**

24 On or about September 9, 2017, in the County of Los Angeles, EDGARDO ANTONIO
GUERRERO and HECTOR HUMBERTO GUERRERO, unlawfully took property, to wit:
25 money for immigration consulting services, of a value in excess of nine hundred-fifty dollars
(\$950) from another, to wit: [REDACTED], in violation of Penal Code section 487,
26 subdivision (a), a felony.

27 **COUNT 28 - GRAND THEFT**

28 From on or about November 17, 2017, and continuing to on or about February 9, 2018, in the
County of Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO

1 GUERRERO, unlawfully took property, to wit: money for immigration consulting services, of a
2 value in excess of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED], in
violation of Penal Code section 487, subdivision (a), a felony.

3 **COUNT 29 - GRAND THEFT**

4 From on or about March 5, 2018, and continuing to on or about March 15, 2018, in the County of
Los Angeles, EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO GUERRERO,
5 unlawfully took property, to wit: money for immigration consulting services, of a value in excess
of nine hundred-fifty dollars (\$950) from another, to wit: [REDACTED]
6 [REDACTED], in violation of Penal Code section 487, subdivision (a), a felony.

7 **COUNT 30 - TAX EVASION**

8 On about April 15, 2018, Defendants EDGARDO ANTONIO GUERRERO and SIDIA
MAROLY LANDAVERDE willfully and unlawfully failed to file a personal income tax return
9 with the intent to evade tax imposed by Revenue Tax code section 17041 for tax year 2017, in
violation of Revenue and Taxation Code section 19706, a felony.

10 **COUNT 31 - TAX EVASION**

11 On about April 15, 2017, Defendants EDGARDO ANTONIO GUERRERO and SIDIA
MAROLY LANDAVERDE willfully and unlawfully failed to file a personal income tax return
12 with the intent to evade tax imposed by Revenue Tax code section 17041 for tax year 2016, in
violation of Revenue and Taxation Code section 19706, a felony.

13 **COUNT 32 - TAX EVASION**

14 On about April 15, 2016, Defendants EDGARDO ANTONIO GUERRERO and SIDIA
MAROLY LANDAVERDE willfully and unlawfully failed to file a personal income tax return
15 with the intent to evade tax imposed by Revenue Tax code section 17041 for tax year 2015, in
violation of Revenue and Taxation Code section 19706, a felony.

16 **FIRST SPECIAL ALLEGATION – AGGRAVATED WHITE-COLLAR CRIME**

17 It is further alleged that EDGARDO ANTONIO GUERRERO and HECTOR HUMBERTO
committed two or more related felonies, to wit: Counts One through Four and Counts Seven
18 through Twenty-Nine, a material element of which is fraud, involving a pattern of related felony
conduct and the taking of more than \$100,000, within the meaning of Penal Code section 186.11,
19 subdivision (a)(3).

20 Further, attached hereto and incorporated herein is a Declaration Made Pursuant to Section
21 2015.5 C.C.P. in Support of and Issuance of an Arrest Warrant by California Department of
Justice, Special Agent Craig Black, which the undersigned believes establishes probable cause for
22 the arrest of defendant Sidia Maroly Landeverde for the above-listed crimes. Wherefore, a
warrant of arrest is requested for said defendant.

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DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: August 14, 2018

XAVIER BECERRA
Attorney General of the State of California

By: 
for ANGELA K. ROSENAU
Deputy Attorney General
Attorneys for the People

DISCOVERY

PLEASE NOTE: Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

NOTICE TO ATTORNEY

Any material accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and showing of good cause."