

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF PLACER

--oOo--

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

62-142635  
NO. BI-SA2015-00003  
WARRANT OF ARREST

-VS-

☒ Roseville ☒ Felony  
☐ Tahoe ☐ Misdemeanor

ALEX MORALES III, Defendant.

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY PEACE OFFICER IN THIS STATE:

Declaration upon oath having this day been made before me that the following crime(s) have been committed, and accusing ALEX MORALES III thereof: 68 PC, RECEIVING BRIBES.

You are therefore commanded forthwith to arrest the above-named defendant, and bring said defendant, before any magistrate in this County pursuant to the provisions of Penal Code Sections 821 and 825.

Defendant is to be admitted to bail in the sum of \$ 50,000.

Ordered this 15 day of

Dec. 2014



JUDGE OF SUPERIOR COURT

Garen J. Horst

This warrant be served at any hour of the day or night.

(initials)

WARRANT SERVICE ☒ NCIC ☐ State Only ☐ Local

DESCRIPTION OF DEFENDANT

ALEX MORALES III

DOB:11/23/1960 HT:510 WT:295 SEX:MALE HAIR/EYE :BLK/BRN SOC.  
STATE:CA CII:A07318725 FBI:342284AA8

Vehicle

Year: 2013 Make: Dodge Model: Truck  
Color: Maroon State: CA Lic# DP455JS

Residence Address: 26 Suntrail Circle, Sacramento, CA 95823

Marks Other Info:

1 KAMALA D. HARRIS  
Attorney General of California  
2 PETER WILLIAMS  
Supervising Deputy Attorney General  
3 RICHARD J. CUTLER  
Deputy Attorney General  
4 State Bar No. 146180  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-0027  
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*Attorneys for the People*  
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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 IN AND FOR THE COUNTY OF PLACER

11  
12 **PEOPLE OF THE STATE OF**  
13 **CALIFORNIA,**

Plaintiff,

Case No.

**CRIMINAL COMPLAINT**

14 v.

15  
16 **ALEX MORALES III,**

17  
18 Defendant.

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

21 **INTRODUCTION**

22 At all times relevant, defendant ALEX MORALES III ("Morales") was an employee of the  
23 State of California ("the State") Department of Transportation ("Caltrans") and held the position  
24 of Statewide Americans with Disabilities Act ("ADA") Contract Coordinator. In that position,  
25 Defendant MORALES was responsible for rendering an opinion, voting, and deciding which  
26 companies would be awarded contracts from Caltrans to perform ADA-related work for the State.

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On or about February 7, 2011, in the above-named judicial district, the crime of ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly ask for, receive, and agree upon to receive a bribe, to wit, a 2010 white Ford Expedition, with the understanding and for the purpose of influencing the action of Defendant MORALES upon a matter then pending and that may have been brought before Defendant MORALES in his official capacity as an employee of the State of California, to wit, the Statewide Americans with Disabilities Act (“ADA”) Contract Coordinator for Caltrans.

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On or about July 22, 2013, in the above-named judicial district, the crime of ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$12,000.00, with the understanding and for the purpose of influencing the action of Defendant MORALES upon a matter then pending and that may have been brought before Defendant MORALES in his official capacity as an employee of the State of California, to wit, the Statewide Americans with Disabilities Act (“ADA”) Contract Coordinator for Caltrans.

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On or about July 31, 2013, in the above-named judicial district, the crime of ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$1,500.00, with the understanding and for the purpose of influencing the action of Defendant MORALES upon a matter then pending



1 and that may have been brought before Defendant MORALES in his official capacity as an  
2 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
3 (“ADA”) Contract Coordinator for Caltrans.

4 **COUNT FOUR**

5 **ASKING FOR/RECEIVING A BRIBE**  
6 **(Penal Code section 68; Defendant MORALES)**

7 On or about August 30, 2013, in the above-named judicial district, the crime of ASKING  
8 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
9 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
10 ask for, receive, and agree upon to receive a bribe, to wit, \$5,000.00, with the understanding and  
11 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
12 and that may have been brought before Defendant MORALES in his official capacity as an  
13 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
14 (“ADA”) Contract Coordinator for Caltrans.

15 **COUNT FIVE**

16 **ASKING FOR/RECEIVING A BRIBE**  
17 **(Penal Code section 68; Defendant MORALES)**

18 On or about September 20, 2013, in the above-named judicial district, the crime of  
19 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
20 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
21 knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the  
22 understanding and for the purpose of influencing the action of Defendant MORALES upon a  
23 matter then pending and that may have been brought before Defendant MORALES in his official  
24 capacity as an employee of the State of California, to wit, the Statewide Americans with  
25 Disabilities Act (“ADA”) Contract Coordinator for Caltrans.

26 **COUNT SIX**

27 **ASKING FOR/RECEIVING A BRIBE**  
28 **(Penal Code section 68; Defendant MORALES)**

On or about September 24, 2013, in the above-named judicial district, the crime of  
ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and



1 knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the  
2 understanding and for the purpose of influencing the action of Defendant MORALES upon a  
3 matter then pending and that may have been brought before Defendant MORALES in his official  
4 capacity as an employee of the State of California, to wit, the Statewide Americans with  
5 Disabilities Act ("ADA") Contract Coordinator for Caltrans.

6 **COUNT SEVEN**

7 **ASKING FOR/RECEIVING A BRIBE**  
8 **(Penal Code section 68; Defendant MORALES)**

9 On or about October 17, 2013, in the above-named judicial district, the crime of ASKING  
10 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
11 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
12 ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the understanding and  
13 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
14 and that may have been brought before Defendant MORALES in his official capacity as an  
15 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
16 ("ADA") Contract Coordinator for Caltrans.

17 **COUNT EIGHT**

18 **ASKING FOR/RECEIVING A BRIBE**  
19 **(Penal Code section 68; Defendant MORALES)**

20 On or about October 29, 2013, in the above-named judicial district, the crime of ASKING  
21 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
22 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
23 ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the understanding and  
24 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
25 and that may have been brought before Defendant MORALES in his official capacity as an  
26 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
27 ("ADA") Contract Coordinator for Caltrans.

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1 **COUNT NINE**

2 **ASKING FOR/RECEIVING A BRIBE**  
3 **(Penal Code section 68; Defendant MORALES)**

4 On or about November 14, 2013, in the above-named judicial district, the crime of  
5 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
6 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
7 knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the  
8 understanding and for the purpose of influencing the action of Defendant MORALES upon a  
9 matter then pending and that may have been brought before Defendant MORALES in his official  
10 capacity as an employee of the State of California, to wit, the Statewide Americans with  
11 Disabilities Act ("ADA") Contract Coordinator for Caltrans.

12 **COUNT TEN**

13 **ASKING FOR/RECEIVING A BRIBE**  
14 **(Penal Code section 68; Defendant MORALES)**

15 On or about November 24, 2013, in the above-named judicial district, the crime of  
16 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
17 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
18 knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the  
19 understanding and for the purpose of influencing the action of Defendant MORALES upon a  
20 matter then pending and that may have been brought before Defendant MORALES in his official  
21 capacity as an employee of the State of California, to wit, the Statewide Americans with  
22 Disabilities Act ("ADA") Contract Coordinator for Caltrans.

23 **COUNT ELEVEN**

24 **ASKING FOR/RECEIVING A BRIBE**  
25 **(Penal Code section 68; Defendant MORALES)**

26 On or about December 17, 2013, in the above-named judicial district, the crime of  
27 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
28 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$3,000.00, with the  
understanding and for the purpose of influencing the action of Defendant MORALES upon a

1 matter then pending and that may have been brought before Defendant MORALES in his official  
2 capacity as an employee of the State of California, to wit, the Statewide Americans with  
3 Disabilities Act ("ADA") Contract Coordinator for Caltrans.

4 **COUNT TWELVE**

5 **ASKING FOR/RECEIVING A BRIBE**  
6 **(Penal Code section 68; Defendant MORALES)**

7 On or about January 30, 2014, in the above-named judicial district, the crime of ASKING  
8 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
9 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
10 ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the understanding and  
11 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
12 and that may have been brought before Defendant MORALES in his official capacity as an  
13 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
14 ("ADA") Contract Coordinator for Caltrans.

15 **COUNT THIRTEEN**

16 **ASKING FOR/RECEIVING A BRIBE**  
17 **(Penal Code section 68; Defendant MORALES)**

18 On or about February 10, 2014, in the above-named judicial district, the crime of ASKING  
19 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
20 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
21 ask for, receive, and agree upon to receive a bribe, to wit, \$2,500.00, with the understanding and  
22 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
23 and that may have been brought before Defendant MORALES in his official capacity as an  
24 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
25 ("ADA") Contract Coordinator for Caltrans.

26 **COUNT FOURTEEN**

27 **ASKING FOR/RECEIVING A BRIBE**  
28 **(Penal Code section 68; Defendant MORALES)**

On or about March 24, 2014, in the above-named judicial district, the crime of ASKING  
FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly



1 ask for, receive, and agree upon to receive a bribe, to wit, \$5,000.00, with the understanding and  
2 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
3 and that may have been brought before Defendant MORALES in his official capacity as an  
4 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
5 (“ADA”) Contract Coordinator for Caltrans.

6 **COUNT FIFTEEN**

7 **ASKING FOR/RECEIVING A BRIBE**  
8 **(Penal Code section 68; Defendant MORALES)**

9 On or about May 31, 2014, in the above-named judicial district, the crime of ASKING  
10 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
11 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
12 ask for, receive, and agree upon to receive a bribe, to wit, \$5,000.00, with the understanding and  
13 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
14 and that may have been brought before Defendant MORALES in his official capacity as an  
15 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
16 (“ADA”) Contract Coordinator for Caltrans.

17 **COUNT SIXTEEN**

18 **ASKING FOR/RECEIVING A BRIBE**  
19 **(Penal Code section 68; Defendant MORALES)**

20 On or about June 27, 2014, in the above-named judicial district, the crime of ASKING  
21 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
22 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
23 ask for, receive, and agree upon to receive a bribe, to wit, \$5,000.00, with the understanding and  
24 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
25 and that may have been brought before Defendant MORALES in his official capacity as an  
26 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
27 (“ADA”) Contract Coordinator for Caltrans.

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1 **COUNT SEVENTEEN**

2 **ASKING FOR/RECEIVING A BRIBE**  
3 **(Penal Code section 68; Defendant MORALES)**

4 On or about July 17, 2014, in the above-named judicial district, the crime of ASKING  
5 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
6 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
7 ask for, receive, and agree upon to receive a bribe, to wit, \$5,000.00, with the understanding and  
8 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
9 and that may have been brought before Defendant MORALES in his official capacity as an  
10 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
11 ("ADA") Contract Coordinator for Caltrans.

12 **COUNT EIGHTEEN**

13 **ASKING FOR/RECEIVING A BRIBE**  
14 **(Penal Code section 68; Defendant MORALES)**

15 On or about August 22, 2014, in the above-named judicial district, the crime of ASKING  
16 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
17 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
18 ask for, receive, and agree upon to receive a bribe, to wit, \$6,500.00, with the understanding and  
19 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
20 and that may have been brought before Defendant MORALES in his official capacity as an  
21 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
22 ("ADA") Contract Coordinator for Caltrans.

23 **COUNT NINETEEN**

24 **ASKING FOR/RECEIVING A BRIBE**  
25 **(Penal Code section 68; Defendant MORALES)**

26 On or about September 19, 2014, in the above-named judicial district, the crime of  
27 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
28 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$6,500.00, with the  
understanding and for the purpose of influencing the action of Defendant MORALES upon a

1 matter then pending and that may have been brought before Defendant MORALES in his official  
2 capacity as an employee of the State of California, to wit, the Statewide Americans with  
3 Disabilities Act ("ADA") Contract Coordinator for Caltrans.

4 **COUNT TWENTY**

5 **ASKING FOR/RECEIVING A BRIBE**  
6 **(Penal Code section 68; Defendant MORALES)**

7 On or about October 22, 2014, in the above-named judicial district, the crime of ASKING  
8 FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was committed  
9 by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and knowingly  
10 ask for, receive, and agree upon to receive a bribe, to wit, \$6,500.00, with the understanding and  
11 for the purpose of influencing the action of Defendant MORALES upon a matter then pending  
12 and that may have been brought before Defendant MORALES in his official capacity as an  
13 employee of the State of California, to wit, the Statewide Americans with Disabilities Act  
14 ("ADA") Contract Coordinator for Caltrans.

15 **COUNT TWENTY-ONE**

16 **ASKING FOR/RECEIVING A BRIBE**  
17 **(Penal Code section 68; Defendant MORALES)**

18 On or about November 15, 2014, in the above-named judicial district, the crime of  
19 ASKING FOR/RECEIVING A BRIBE, in violation of PENAL CODE Section 68, a felony, was  
20 committed by Defendant ALEX MORALES, in that Defendant MORALES did unlawfully and  
21 knowingly ask for, receive, and agree upon to receive a bribe, to wit, \$6,500.00, with the  
22 understanding and for the purpose of influencing the action of Defendant MORALES upon a  
23 matter then pending and that may have been brought before Defendant MORALES in his official  
24 capacity as an employee of the State of California, to wit, the Statewide Americans with  
25 Disabilities Act ("ADA") Contract Coordinator for Caltrans.  
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**SPECIAL ALLEGATION  
WHITE COLLAR CRIME ENHANCEMENT**

It is further alleged, pursuant to Penal Code Section 186.11(a)(1), that the offenses set forth in Counts One through Forty-Five are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of more than one hundred thousand dollars (\$100,000).

**STATUTE OF LIMITATIONS ALLEGATION  
PURSUANT TO PENAL CODE SECTION 803(c)**

It is further alleged that the offenses described herein were not discovered until around or about in or about January 2015 when the above-noted violations came to the attention of law enforcement and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to the date alleged above, because the defendants concealed the unlawful activities alleged herein, within the meaning of Penal Code section 803(c).

**DECLARATION**

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

Dated: December 10, 2015

KAMALA D. HARRIS  
Attorney General of California



By: RICHARD J. CUTLER  
Deputy Attorney General  
*Attorneys for People*

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