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CRIM DIV

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SACRAMENTO
10

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

12 Plaintiff,

13 v.

14
15 **MARIA ELNA FLORA,**

16 Defendant.
17

No. 09F04778

FELONY COMPLAINT

18 The People of the State of California upon oath of the undersigned, upon information and
19 belief complain against the defendant above named for the crimes as follows:
20

21 **COUNT ONE**

22 On or about June 23, 2006, at and in the County of Sacramento, State of California,
23 defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the
24 Penal Code of the State of California, in that said defendant did unlawfully take money and
25 personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property
26 of Irene Eleanor Bradford.
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COUNT TWO

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One hereof: On or about June 23, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Irene Eleanor Bradford, was an elder and dependent adult.

COUNT THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One and Two hereof: On or about July 10, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Irene Eleanor Bradford.

COUNT FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Three hereof: On or about July 10, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Irene Eleanor Bradford, was an elder and dependent adult.

1 **COUNT FIVE**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Counts One through Three hereof: On or about July 10,
4 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
5 commit a felony namely: a violation of Section 459 of the Penal Code of the State of California,
6 First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited
7 dwelling house and trailer coach and inhabited portion of a building occupied by Irene Eleanor
8 Bradford, with the intent to commit larceny and any felony.

9 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
10 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

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12 **COUNT SIX**

13 For a further and separate cause of action, being a different offense from but connected in
14 its commission as the charges set forth in Counts One through Five hereof: On or about January
15 27, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
16 commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
17 California, in that said defendant did unlawfully take money and personal property of a value
18 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Irene Eleanor Bradford.

19
20 **COUNT SEVEN**

21 For a further and separate cause of action, being a different offense from but connected in
22 its commission as the charges set forth in Counts One through Six hereof: On or about January
23 23, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
24 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
25 California, in that said defendant committed theft, embezzlement and identity theft, with respect
26 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
27 and knew and reasonably should have known that said person, Irene Eleanor Bradford, was an
28 elder and dependent adult.

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COUNT EIGHT

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seven hereof: On or about January 23, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Irene Eleanor Bradford, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT NINE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eight hereof: On or about January 5, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

COUNT TEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Nine hereof: On or about January 5, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

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COUNT ELEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Ten hereof: On or about February 4, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

COUNT TWELVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Eleven hereof: On or about February 4, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

COUNT THIRTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Twelve hereof: On or about February 7, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

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COUNT FOURTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Thirteen hereof: On or about February 7, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

COUNT FIFTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fourteen hereof: On or about May 3, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

COUNT SIXTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Fifteen hereof: On or about May 3, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

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COUNT SEVENTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Sixteen hereof: On or about May 31, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

COUNT EIGHTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Seventeen hereof: On or about May 31, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

COUNT NINETEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighteen hereof: On or about June 21, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

1 **COUNT TWENTY**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Nineteen hereof: On or about June
4 21, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
5 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder
9 and dependent adult.
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11 **COUNT TWENTY-ONE**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Twenty hereof: On or about June
14 24, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
15 commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
16 California, in that said defendant did unlawfully take money and personal property of a value
17 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.
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19 **COUNT TWENTY-TWO**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission as the charges set forth in Count One through Twenty-One hereof: On or about
22 June 24, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna
23 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
24 California, in that said defendant committed theft, embezzlement and identity theft, with respect
25 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
26 and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder
27 and dependent adult.
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COUNT TWENTY-THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Twenty-Two hereof: On or about November 17, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

COUNT TWENTY-FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Twenty-Three hereof: On or about November 17, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

COUNT TWENTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Twenty-Four hereof: On or about July 14, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

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COUNT TWENTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Twenty-Five hereof: On or about July 14, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder and dependent adult.

COUNT TWENTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Twenty-Six hereof: On or about July 14, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Vivian Lee Fender, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT TWENTY-EIGHT

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Twenty-Seven hereof: On or about July 17, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

1 **COUNT TWENTY-NINE**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Twenty-Eight hereof: On or about
4 July 17, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
5 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder
9 and dependent adult.

10
11 **COUNT THIRTY**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Twenty-Nine hereof: On or about
14 July 17, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
16 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Vivian
18 Lee Fender, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT THIRTY-ONE**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Thirty hereof: On or about July
25 20, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
26 commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Vivian Lee Fender.

1 **COUNT THIRTY-TWO**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Thirty-One hereof: On or about
4 July 20, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
5 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Vivian Lee Fender, was an elder
9 and dependent adult.

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11 **COUNT THIRTY-THREE**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Thirty-Two hereof: On or about
14 July 20, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
16 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Vivian
18 Lee Fender, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT THIRTY-FOUR**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Thirty-Three hereof: On or about
25 August 22, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Louise Finn.

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COUNT THIRTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Thirty-Four hereof: On or about August 22, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Louise Finn, was an elder and dependent adult.

COUNT THIRTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Five hereof: On or about August 22, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Louise Finn, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT THIRTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Six hereof: On or about September 11, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a

1 value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Evalyne Edith
2 Fisher.

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4 **COUNT THIRTY-EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Count One through Thirty-Seven hereof: On or about
7 September 11, 2006, at and in the County of Sacramento, State of California, defendant Maria
8 Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the
9 State of California, in that said defendant committed theft, embezzlement and identity theft, with
10 respect to the property of an elder and dependent adult, said property having a value exceeding
11 \$400.00, and knew and reasonably should have known that said person, Evalyne Edith Fisher,
12 was an elder and dependent adult.

13
14 **COUNT THIRTY-NINE**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission as the charges set forth in Counts One through Thirty-Eight hereof: On or about
17 September 11, 2006, at and in the County of Sacramento, State of California, defendant Maria
18 Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State
19 of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
20 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
21 Evalyne Edith Fisher, with the intent to commit larceny and any felony.

22 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
23 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

24
25 **COUNT FORTY**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission as the charges set forth in Counts One through Thirty-Nine hereof: On or about
28 March 15, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna

1 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
2 California, in that said defendant did unlawfully take money and personal property of a value
3 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Theresa Ophilia Lennen.
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5 **COUNT FORTY-ONE**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Count One through Forty hereof: On or about March
8 15, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
9 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
10 California, in that said defendant committed theft, embezzlement and identity theft, with respect
11 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
12 and knew and reasonably should have known that said person, Theresa Ophilia Lennen, was an
13 elder and dependent adult.
14

15 **COUNT FORTY-TWO**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Counts One through Forty-One hereof: On or about
18 March 29, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna
19 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
20 California, in that said defendant did unlawfully take money and personal property of a value
21 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Theresa Ophilia Lennen.
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23 **COUNT FORTY-THREE**

24 For a further and separate cause of action, being a different offense from but connected in
25 its commission as the charges set forth in Count One through Forty-Two hereof: On or about
26 March 29, 2005, at and in the County of Sacramento, State of California, defendant Maria Elna
27 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
28 California, in that said defendant committed theft, embezzlement and identity theft, with respect

1 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
2 and knew and reasonably should have known that said person, Theresa Ophilia Lennen, was an
3 elder and dependent adult.

4
5 **COUNT FORTY-FOUR**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Counts One through Forty-Three hereof: On or about
8 April 1, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
9 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
10 California, in that said defendant did unlawfully take money and personal property of a value
11 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Theresa Ophilia Lennen.

12
13 **COUNT FORTY-FIVE**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission as the charges set forth in Count One through Forty-Four hereof: On or about
16 April 1, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
17 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
18 California, in that said defendant committed theft, embezzlement and identity theft, with respect
19 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
20 and knew and reasonably should have known that said person, Theresa Ophilia Lennen, was an
21 elder and dependent adult.

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23 **COUNT FORTY-SIX**

24 For a further and separate cause of action, being a different offense from but connected in
25 its commission as the charges set forth in Counts One through Forty-Five hereof: On or about
26 April 1, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
27 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
28 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an

1 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
2 Theresa Ophilia Lennen, with the intent to commit larceny and any felony.

3 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
4 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

5
6 **COUNT FORTY-SEVEN**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Forty-Six hereof: On or about
9 May 7, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora
10 did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
11 California, in that said defendant did unlawfully take money and personal property of a value
12 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Patricia Marguerite
13 Letamendi.

14
15 **COUNT FORTY-EIGHT**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Count One through Forty-Seven hereof: On or about
18 May 7, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora
19 did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
20 California, in that said defendant committed theft, embezzlement and identity theft, with respect
21 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
22 and knew and reasonably should have known that said person, Patricia Marguerite Letamendi,
23 was an elder and dependent adult.

24
25 **COUNT FORTY-NINE**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission as the charges set forth in Counts One through Forty-Eight hereof: On or about
28 May 7, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora

1 did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
2 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
3 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
4 Patricia Marguerite Letamendi, with the intent to commit larceny and any felony.

5 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
6 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

7
8 **COUNT FIFTY**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through Forty-Nine hereof: On or about
11 May 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
12 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
13 California, in that said defendant did unlawfully take money and personal property of a value
14 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Patricia Marguerite
15 Letamendi.

16
17 **COUNT FIFTY-ONE**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Count One through Fifty hereof: On or about May 21,
20 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
21 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
22 California, in that said defendant committed theft, embezzlement and identity theft, with respect
23 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
24 and knew and reasonably should have known that said person, Patricia Marguerite Letamendi,
25 was an elder and dependent adult.

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COUNT FIFTY-TWO

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-One hereof: On or about May 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Patricia Marguerite Letamendi, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT FIFTY-THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-Two hereof: On or about May 29, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Patricia Marguerite Letamendi.

COUNT FIFTY-FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Fifty-Three hereof: On or about May 29, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00,

1 and knew and reasonably should have known that said person, Patricia Marguerite Letamendi,
2 was an elder and dependent adult.

3
4 **COUNT FIFTY-FIVE**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Fifty-Four hereof: On or about
7 May 29, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
8 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
9 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
10 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
11 Patricia Marguerite Letamendi, with the intent to commit larceny and any felony.

12 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
13 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

14
15 **COUNT FIFTY-SIX**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Counts One through Fifty-Five hereof: On or about
18 May 30, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
19 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
20 California, in that said defendant did unlawfully take money and personal property of a value
21 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Patricia Marguerite
22 Letamendi.

23
24 **COUNT FIFTY-SEVEN**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Count One through Fifty-Six hereof: On or about May
27 30, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
28 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of

1 California, in that said defendant committed theft, embezzlement and identity theft, with respect
2 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
3 and knew and reasonably should have known that said person, Patricia Marguerite Letamendi,
4 was an elder and dependent adult.

5
6 **COUNT FIFTY-EIGHT**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Fifty-Seven hereof: On or about
9 May 30, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
10 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
11 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
12 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
13 Patricia Marguerite Letamendi, with the intent to commit larceny and any felony.

14 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
15 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

16
17 **COUNT FIFTY-NINE**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Fifty-Nine hereof: On or about
20 November 9, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
21 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
22 California, in that said defendant did unlawfully take money and personal property of a value
23 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Rosella Jean Nichols.

24
25 **COUNT SIXTY**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission as the charges set forth in Count One through Fifty-Nine hereof: On or about
28 November 9, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna

1 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
2 California, in that said defendant committed theft, embezzlement and identity theft, with respect
3 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
4 and knew and reasonably should have known that said person, Rosella Jean Nichols, was an elder
5 and dependent adult.

6
7 **COUNT SIXTY-ONE**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Counts One through Sixty hereof: On or about
10 November 9, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
11 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
12 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
13 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
14 Rosella Jean Nichols, with the intent to commit larceny and any felony.

15 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
16 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

17
18 **COUNT SIXTY-TWO**

19 For a further and separate cause of action, being a different offense from but connected in
20 its commission as the charges set forth in Counts One through Sixty-One hereof: On or about
21 November 11, 2006, at and in the County of Sacramento, State of California, defendant Maria
22 Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the
23 State of California, in that said defendant did unlawfully take money and personal property of a
24 value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Rosella Jean
25 Nichols.

1 **COUNT SIXTY-THREE**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Sixty-Two hereof: On or about
4 November 11, 2006, at and in the County of Sacramento, State of California, defendant Maria
5 Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the
6 State of California, in that said defendant committed theft, embezzlement and identity theft, with
7 respect to the property of an elder and dependent adult, said property having a value exceeding
8 \$400.00, and knew and reasonably should have known that said person, Rosella Jean Nichols,
9 was an elder and dependent adult.

10
11 **COUNT SIXTY-FOUR**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Sixty-Three hereof: On or about
14 November 11, 2006, at and in the County of Sacramento, State of California, defendant Maria
15 Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State
16 of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 Rosella Jean Nichols, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT SIXTY-FIVE**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Sixty-Four hereof: On or about
25 February 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Rosella Jean Nichols.

1 **COUNT SIXTY-SIX**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Sixty-Five hereof: On or about
4 February 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
5 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Rosella Jean Nichols, was an elder
9 and dependent adult.

10 **COUNT SIXTY-SEVEN**

11 For a further and separate cause of action, being a different offense from but connected in
12 its commission as the charges set forth in Counts One through Sixty-Six hereof: On or about
13 February 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
14 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
15 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
16 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
17 Rosella Jean Nichols, with the intent to commit larceny and any felony.

18 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
19 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

20
21 **COUNT SIXTY-EIGHT**

22 For a further and separate cause of action, being a different offense from but connected in
23 its commission as the charges set forth in Counts One through Sixty-Seven hereof: On or about
24 March 10, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
25 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
26 California, in that said defendant did unlawfully take money and personal property of a value
27 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Rosella Jean Nichols.
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COUNT SIXTY-NINE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Sixty-Eight hereof: On or about March 10, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Rosella Jean Nichols, was an elder and dependent adult.

COUNT SEVENTY

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Sixty-Nine hereof: On or about March 10, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Rosella Jean Nichols, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT SEVENTY-ONE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy hereof: On or about April 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Rosella Jean Nichols.

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COUNT SEVENTY-TWO

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Count One through Seventy-One hereof: On or about
14 April 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
16 California, in that said defendant committed theft, embezzlement and identity theft, with respect
17 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
18 and knew and reasonably should have known that said person, Rosella Jean Nichols, was an elder
19 and dependent adult.

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COUNT SEVENTY-THREE

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Seventy-Two hereof: On or about
25 April 21, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
27 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
28 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
Rosella Jean Nichols, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

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COUNT SEVENTY-FOUR

32 For a further and separate cause of action, being a different offense from but connected in
33 its commission as the charges set forth in Counts One through Seventy-Three hereof: On or
34 about May 17, 2007, at and in the County of Sacramento, State of California, defendant Maria
35 Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the
36 State of California, in that said defendant did unlawfully take money and personal property of a
37 value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Robertie O'Day.

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COUNT SEVENTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Seventy-Four hereof: On or about May 17, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of California, in that said defendant committed theft, embezzlement and identity theft, with respect to the property of an elder and dependent adult, said property having a value exceeding \$400.00, and knew and reasonably should have known that said person, Robertie O'Day, was an elder and dependent adult.

COUNT SEVENTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy-Five hereof: On or about May 17, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by Robertie O'Day, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT SEVENTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy-Six hereof: On or about June 22, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Robertie O'Day.

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COUNT SEVENTY-EIGHT

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Count One through Seventy-Seven hereof: On or about
14 June 22, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
16 California, in that said defendant committed theft, embezzlement and identity theft, with respect
17 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
18 and knew and reasonably should have known that said person, Robertie O'Day, was an elder and
19 dependent adult.

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COUNT SEVENTY-NINE

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Seventy-Eight hereof: On or about
25 June 22, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
27 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
28 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
Robertie O'Day, with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

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COUNT EIGHTY

32 For a further and separate cause of action, being a different offense from but connected in
33 its commission as the charges set forth in Counts One through Seventy-Nine hereof: On or about
34 July 29, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
35 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
36 California, in that said defendant did unlawfully take money and personal property of a value
37 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Robertie O'Day.

1 **COUNT EIGHTY-ONE**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Eighty hereof: On or about July 29,
4 2007, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
5 commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Robertie O'Day, was an elder and
9 dependent adult.

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11 **COUNT EIGHTY-TWO**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Eighty-One hereof: On or about
14 July 29, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
16 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 Robertie O'Day, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT EIGHTY-THREE**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Eighty-Two hereof: On or about
25 August 2, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Robertie O'Day.

1 **COUNT EIGHTY-FOUR**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Eighty-Three hereof: On or about
4 August 2, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
5 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Robertie O'Day, was an elder and
9 dependent adult.

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11 **COUNT EIGHTY-FIVE**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Eighty-Four hereof: On or about
14 August 2, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
16 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 Robertie O'Day, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT EIGHTY-SIX**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Eighty-Five hereof: On or about
25 August 9, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Robertie O'Day.

1 **COUNT EIGHTY-SEVEN**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Eighty-Six hereof: On or about
4 August 9, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
5 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
6 California, in that said defendant committed theft, embezzlement and identity theft, with respect
7 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
8 and knew and reasonably should have known that said person, Robertie O'Day, was an elder and
9 dependent adult.

10
11 **COUNT EIGHTY-EIGHT**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Eighty-Seven hereof: On or about
14 August 9, 2007, at and in the County of Sacramento, State of California, defendant Maria Elna
15 Flora did commit a felony namely: a violation of Section 459 of the Penal Code of the State of
16 California, First Degree Residential Burglary, in that said defendant did unlawfully enter an
17 inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 Robertie O'Day, with the intent to commit larceny and any felony.

19 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
20 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

21
22 **COUNT EIGHTY-NINE**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Eighty-Eight hereof: On or about
25 June 6, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora
26 did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
27 California, in that said defendant did unlawfully take money and personal property of a value
28

1 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Elizabeth Esther
2 Shortridge.

3
4 **COUNT NINETY**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Count One through Eighty-Nine hereof: On or about
7 June 6, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora
8 did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
9 California, in that said defendant committed theft, embezzlement and identity theft, with respect
10 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,
11 and knew and reasonably should have known that said person, Elizabeth Esther Shortridge, was
12 an elder and dependent adult.

13
14 **COUNT NINETY-ONE**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission as the charges set forth in Counts One through Ninety hereof: On or about April
17 11, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna Flora did
18 commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of
19 California, in that said defendant did unlawfully take money and personal property of a value
20 exceeding Four Hundred Dollars (\$400), to wit, money, the property of Mary Alice Stoffel.

21
22 **COUNT NINETY-TWO**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Count One through Ninety-One hereof: On or about
25 April 11, 2006, at and in the County of Sacramento, State of California, defendant Maria Elna
26 Flora did commit a felony namely: a violation of Section 368(d) of the Penal Code of the State of
27 California, in that said defendant committed theft, embezzlement and identity theft, with respect
28 to the property of an elder and dependent adult, said property having a value exceeding \$400.00,

1 and knew and reasonably should have known that said person, Mary Alice Stoffel, was an elder
2 and dependent adult.

3
4 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

5 It is further alleged as to Counts One through Four, Six, Seven, Nine through Twenty-Six,
6 Twenty-Eight, Twenty-Nine, Thirty-One, Thirty-Two, Thirty-Four, Thirty-Five, Thirty-Seven,
7 Thirty-Eight, Forty through Forty-Five, Forty-Seven, Forty-Eight, Fifty, fifty-One, Fifty-Three,
8 fifty-Four, Fifty-Six, fifty-Seven, Fifty-Nine, Sixty, Sixty-Two, Sixty-Three, Sixty-Five, Sixty-
9 Six, Sixty-Eight, Sixty-Nine, Seventy-One, Seventy-Two, Seventy-Four, Seventy-Five, Seventy-
10 Seven, Seventy-Eight, Eighty, Eighty-One, Eighty-Three, Eighty-Four, Eighty-Six, Eighty-Seven,
11 Eighty-Nine through Ninety Two, that in the commission of the above offenses the said
12 defendant, Maria Elna Flora, with the intent to do so, took, damaged and destroyed property of a
13 value exceeding \$200,000, within the meaning of Penal Code Sections 12022.6(a)(2) and
14 1203.045.

15
16 **SPECIAL ALLEGATION – WHITE COLLAR CRIME ENHANCEMENT**

17 It is further alleged, pursuant to Penal Code 186.11(a), that the offenses set forth in Counts
18 One through Four, Six, Seven, Nine through Twenty-Six, Twenty-Eight, Twenty-Nine, Thirty-
19 One, Thirty-Two, Thirty-Four, Thirty-Five, Thirty-Seven, Thirty-Eight, Forty through Forty-Five,
20 Forty-Seven, Forty-Eight, Fifty, fifty-One, Fifty-Three, fifty-Four, Fifty-Six, fifty-Seven, Fifty-
21 Nine, Sixty, Sixty-Two, Sixty-Three, Sixty-Five, Sixty-Six, Sixty-Eight, Sixty-Nine, Seventy-
22 One, Seventy-Two, Seventy-Four, Seventy-Five, Seventy-Seven, Seventy-Eight, Eighty, Eighty-
23 One, Eighty-Three, Eighty-Four, Eighty-Six, Eighty-Seven, Eighty-Nine through Ninety Two are
24 related felonies, a material element of which is fraud and embezzlement, which involve a pattern
25 of related felony conduct, and the pattern of related felony conduct involves the taking of more
26 than one hundred thousand dollars (\$100,000).

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STATUTE OF LIMITATIONS ALLEGATIONS

It is further alleged that the above violations as charged in Counts Nine through Eighteen were not discovered until on or about July 2006, by Vivian Lee Fender, by a chance discovery when defendant Maria Elna Flora ceased making interest payments, 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 said date because of active concealment, within the meaning of Penal Code Section 803(c).

It is further alleged that the above violations as charged in Counts Forty through Forty-Four were not discovered until on or about April 2007, by Theresa Ophilia Lenne, by a chance discovery when defendant Maria Elna Flora ceased making interest payments, 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 said date because of active concealment, within the meaning of Penal Code Section 803(c).

Dated: June 17, 2009



RONALD D. SMETANA
Senior Assistant Attorney General
Attorney General's Office
State of California

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