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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SISKIYOU

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

Case No.

13 Plaintiff,

**FELONY COMPLAINT**

14 v.

15 **DENISE FAIRHURST,**

(AG Docket No.: SA2009308193)

16 Defendant.  
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19 The People of the State of California hereby allege, upon information and belief, that in the  
20 County of Siskiyou and other counties within the State of California, and before the making or  
21 filing of this complaint, Defendant, DENISE FAIRHURST, did commit the following crimes:

22 **COUNT 1**

23 **Penal Code section 487, subdivision (a) - a Felony**  
**[Grand Theft of Personal Property -16- 2-3, +1,+2, or +3]**

24 On or about January 1, 2004 through December 31, 2007, in the County of Siskiyou, State  
25 of California, and elsewhere, Defendant, DENISE FAIRHURST, did unlawfully take money and  
26 personal property of value exceeding Four Hundred Dollars (\$400), to wit, money, the property of  
27 the State of California, a violation of Penal Code section 487, subdivision (a), a Felony.

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**SPECIAL ALLEGATION**  
**Penal Code section 1203.045, subdivision (a)**  
**[Excessive Loss Over \$100,000 – Presumptive State Prison]**

It is further alleged, as to count one, that the above offense is a theft of over \$100,000, within the meaning of Penal Code section 1203.045, subdivision (a).

**SPECIAL ALLEGATION**  
**Penal Code section 12022.6, subdivision (a)(1)**  
**[Excessive Loss Over \$50,000 - +1 Yr]**

It is further alleged, as to count one, that in the commission of the above offense the said Defendant, with the intent to do so, took, damaged and destroyed property of a value exceeding \$50,000, within the meaning of Penal Code section 12022.6, subdivision (a)(1).

**SPECIAL ALLEGATION**  
**Penal Code section 12022.6, subdivision (a)(2)**  
**[Excessive Loss Over \$150,000 - +2 Yrs]**

It is further alleged, as to count one, that in the commission of the above offense the said Defendant, with the intent to do so, took, damaged and destroyed property of a value exceeding \$150,000, within the meaning of Penal Code section 12022.6, subdivision (a)(2).

**SPECIAL ALLEGATION**  
**Penal Code section 12022.6, subdivision (a)(3)**  
**[Excessive Loss Over \$1,000,000 - +3 Yrs]**

It is further alleged, as to count one, that in the commission of the above offense the said Defendant, with the intent to do so, took, damaged and destroyed property of a value exceeding \$1,000,000, within the meaning of Penal Code section 12022.6, subdivision (a)(3).

**COUNT 2**  
**Welfare and Institutions Code section 14107 – a Felony**  
**[Submitting False Claims - 2-3-5]**

On or about January 1, 2004 through December 31, 2007, in the County of Siskiyou, State of California, and elsewhere, Defendant, DENISE FAIRHURST, did willfully and unlawfully, and with the intent to defraud, present and cause to be presented to the State of California, through its fiscal intermediary, Electronic Data Services, for allowance or payment, false and fraudulent claims for furnishing medical services under the Medi-Cal Program, a violation of section 14107 of the California Welfare and Institutions Code, a Felony.

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I declare under penalty of perjury, on information and belief, pursuant to the laws of the State of California that the foregoing is true and correct, and that this declaration was signed this 1<sup>st</sup> day of October, 2009, at Sacramento, California.

EDMUND G. BROWN JR.  
Attorney General of California



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