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2 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
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5 [REDACTED]
6 [REDACTED]
7 *Attorneys for Plaintiff*

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, Central District

10
11 **PEOPLE OF THE STATE OF CALIFORNIA,**
12
13 Plaintiff,
14
15 **v.**
16 **TATYANA YAKOVENKO (aka Tetyana Yakovenko, Tatyana Fox),**
17 **NATALYA ZVEREVA (aka Natasha Zvereva),**
18 **CARLOS VILLANUEVA,**
19 **ALEKSEY LISITSA (aka Alex Lisitsa),**
20 **JODEE A. WALLACE, and**
21 **ROMALIS CONWAY,**
22 Defendants.

Case No.:
(AG Docket No.: LA2009101229)

**FELONY COMPLAINT
IN SUPPORT OF
ARREST WARRANT**

**Count 1 PC 487(a)
Count 2 W&I 14107(b)(1)**

23
24 The People of the State of California hereby allege that in the County of Los Angeles,
25 State of California, and before the making or filing of the complaint, the above-mentioned
26 defendants did commit the following crime(s):

27 **COUNT 1**

[GRAND THEFT]

28 From on or about July 1, 2005, through May 30, 2009, in the County of Los Angeles,

1 State of California, defendants, **TATYANA YAKOVENKO (AKA TETYANA YAKOVENKO,**
2 **TATYANA FOX), NATALYA ZVEREVA (AKA NATASHA ZVEREVA), CARLOS**
3 **VILLANUEVA, ALEKSEY LISITSA (AKA ALEX LISITSA), JODEE A. WALLACE,** and
4 **ROMALIS CONWAY,** unlawfully took from the State of California (Health Care Deposit Fund)
5 property of a value in excess of four hundred dollars (\$400), in violation of section 487 of the
6 Penal Code, a felony.

7 **COUNT 2**

8 **[PRESENTING FALSE MEDI-CAL CLAIMS]**

9 From on or about July 1, 2005, through May 30, 2009, in the County of Los Angeles,
10 State of California, defendants, **TATYANA YAKOVENKO (AKA TETYANA YAKOVENKO,**
11 **TATYANA FOX), NATALYA ZVEREVA (AKA NATASHA ZVEREVA), CARLOS**
12 **VILLANUEVA, ALEKSEY LISITSA (AKA ALEX LISITSA), JODEE A. WALLACE,** and
13 **ROMALIS CONWAY,** with intent to defraud, presented and caused to be presented for
14 allowance and payment a false and fraudulent claim for furnishing services under the Medi-Cal
15 Act in violation of section 14107, subdivision (b)(1) of the Welfare and Institutions Code, a
16 felony.

17 **DECLARATION**

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

20 Executed this _____ of _____, 2010, in Los Angeles, California.

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25 _____
26 PAUL RAMIREZ
27 Special Agent
28 California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse

(LA2009101229)

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IT IS ORDERED that arrest warrants shall issue for the following person, who is to be admitted to bail in the sum of:

Defendant	Bail
TATYANA YAKOVENKO	\$68,338
NATALYA ZVEREVA	\$40,000
CARLOS VILLANUEVA	\$40,000
ALEKSEY LISITSA	\$40,000
JODEE A. WALLACE	\$40,000
ROMALIS CONWAY	\$40,000

_____	_____
Date	Magistrate

Agency: Bureau of Medi-Cal Fraud and Elder Abuse
 California Department of Justice
 Law Enforcement Agency No. 0132
 I/O Paul Ramirez, ID #
████████████████████

Preliminary Hearing time estimate: 1 day

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DESCRIPTION OF DEFENDANTS

TATYANA YAKOVENKO (AKA TETYANA YAKOVENKO, TATYANA FOX)

[REDACTED]

NATALYA ZVEREVA (AKA NATASHA ZVEREVA)

[REDACTED]

CARLOS VILLANUEVA

[REDACTED]

ALEKSEY LISITSA (AKA ALEX LISITSA)

[REDACTED]

JODEE A. WALLACE

[REDACTED]

ROMALIS CONWAY

[REDACTED]

1 **REQUEST FOR DISCOVERY**

2 Pursuant to Penal Code section 1054.5(b), the People request from defendants and defense
3 counsel all materials and information required to be disclosed to the prosecution by the defense
4 under the authority of Penal Code section 1054.3, including the following:

5 1. The names and addresses of persons, other than the defendants, whom the defendants
6 intend to call as witnesses at trial. [Penal Code section 1054.3(a).]
7

8 2. Any relevant written or recorded statements of persons whom the defendants intend
9 to call as witnesses at trial. [Penal Code section 1054.3(a).]

10 3. Any reports of the statements persons whom the defendants intend to call as
11 witnesses at trial. [Penal Code section 1054.3(a).]

12 4. Any reports or statements of experts made in connection with the case. [Penal Code
13 section 1054.3(a).]
14

15 5. Any results of physical or mental examinations, scientific tests, experiments or
16 comparisons which the defendants intend to offer in evidence at the trial. [Penal Code section
17 1054.3(a).]

18 6. The opportunity to view “[a]ny real evidence which the defendants intend to offer in
19 evidence at the trial.” [Penal Code section 1054.3(b).]
20

21 This is a continuing request for the above information. If the information becomes available
22 at a future time, the prosecution, by this request, asks that it be immediately disclosed to the
23 prosecution.
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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

TATYANA YAKOVENKO (Strike out or add as applicable)

Count

1 PC 487(a)

2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT

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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

NATALYA ZVEREVA (Strike out or add as applicable)

Count

- 1 PC 487(a)
- 2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT

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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

CARLOS VILLANUEVA (Strike out or add as applicable)

Count

- 1 PC 487(a)
- 2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT

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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

ALEKSEY LISITSA (Strike out or add as applicable)

Count

1 PC 487(a)

2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT

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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

JODEE WALLACE (Strike out or add as applicable)

Count

- 1 PC 487(a)
- 2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT

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FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. sec. 872

It appearing from the evidence presented at the preliminary hearing that the following offense(s) charged in this Complaint have been committed and that there is sufficient cause to believe the defendant guilty thereof, to wit:

ROMALIS CONWAY (Strike out or add as applicable)

Count

1 PC 487(a)

2 W&I 14107(b)(1)

I order that defendant be held to answer therefor and be admitted to bail in the amount of _____.

Date of arraignment in Superior Court will be _____
in Department _____ at _____ a.m./p.m.

Dated this _____ day of _____, 2010.

JUDGE OF THE SUPERIOR COURT