

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 SUSAN E. MELTON BARTHOLOMEW  
Supervising Deputy Attorney General  
3 MELISSA ANNE BIEDERMAN  
Deputy Attorney General  
4 State Bar No.: 231961  
Bureau of Medi-Cal Fraud & Elder Abuse  
5 303 North Glenoaks Boulevard., Suite 900  
Burbank, CA 91502-1148  
6 Telephone: (818) 556-2931  
Fax: (818) 556-2939  
7 E-Mail: melissa.biederman@doj.ca.gov

**LAX RECEIVED**

**JUN 15 2010**

**DEPUTY**

8 Attorneys for Plaintiff

9  
10 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**

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

Case No.:

14 Plaintiff,

**FELONY COMPLAINT**

15 v.

16 **ANTOINETTE THOMAS,**  
17 **[DOB: 7/21/1979]**

[AG Dkt. No.: LA2008100724]

18 Defendant.

19 The People of the State of California hereby allege that in the County of Los Angeles,  
20 State of California, and before the making or filing of the complaint, the above-mentioned  
21 defendant did commit the following crime(s):

22 **COUNT 1**  
23 **GRAND THEFT**

24 On or about December 3 through December 27, 2009, in the County of Los Angeles,  
25 defendant ANTOINETTE THOMAS, did unlawfully take money and personal property of a  
26 value exceeding four-hundred dollars (\$400), the property of RUTH L., a violation of section  
27 487(a) of the Penal Code of the State of California, a felony.

28 ///

1 **COUNT 2**  
2 **THEFT FROM ELDER OR DEPENDENT ADULT BY A CARETAKER**

3 On or about December 3 through December 27, 2009, in the County of Los Angeles,  
4 defendant ANTOINETTE THOMAS, did commit theft, embezzlement, forgery, fraud, or identity  
5 theft with respect to the property and personal identifying information and thereby took or  
6 obtained moneys, labor, goods, services, or real or personal property exceeding nine-hundred and  
7 fifty dollars (\$950) of an elder and dependent adult, and knew and reasonably should have known  
8 that said person, RUTH L., was an elder and dependent person, a violation of section 368(e) of  
9 the Penal Code of the State of California, a felony.

10 **COUNT 3**  
11 **IDENTITY THEFT**

12 On or about December 2 through December 18, 2009, in the County of Los Angeles,  
13 defendant, ANTOINETTE THOMAS, did willingly and unlawfully obtain personal identifying  
14 information of RUTH L., and used that information for an unlawful purpose and to obtain, and  
15 attempt to obtain credit, goods, services, real property, and medical information without the  
16 consent of RUTH L., a violation of section 530.5(a) of the Penal Code of the State of California, a  
17 felony.

18 **COUNT 4**  
19 **FORGERY**

20 On or about December 16, 2009, in the County of Los Angeles, defendant, ANTOINETTE  
21 THOMAS, did, with the intent to defraud, and knowingly without authority to do so, sign the  
22 name of another person, a violation of section 470(a) of the Penal Code of the State of California,  
a felony.

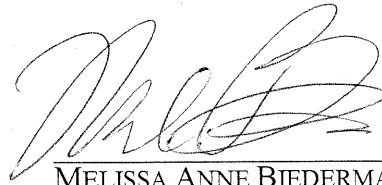
23 **COUNT 5**  
24 **SECOND DEGREE COMMERCIAL BURGLARY**

25 On or about December 17, 2009, in the County of Los Angeles, defendant ANTOINETTE  
26 THOMAS, did unlawfully enter a commercial building occupied by Dream and Rest Mattress  
27 with the intent to commit larceny and any felony, a violation of section 459 of the Penal Code of  
28 the State of California, a felony.

1 Dated: June 8, 2010

Respectfully Submitted,

2 EDMUND G. BROWN JR.  
3 Attorney General of California

4  
5 

6 MELISSA ANNE BIEDERMAN  
7 Deputy Attorney General  
8 Bureau of Medi-Cal Fraud & Elder Abuse  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**REQUEST FOR INFORMAL DISCOVERY**

The People, pursuant to Penal Code section 1054.3, hereby request the following: the names and addresses of any persons, other than the defendant, that he or she intends to call as witnesses at trial, together with any relevant written or recorded statements of those persons, including any reports or statements of experts made in connection with the case, and including the results of physical or mental examinations, scientific tests, experiments, or comparisons which the defendant intends to offer in evidence at trial; any real evidence which the defendant intends to offer at trial.