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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SACRAMENTO
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11
12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 Plaintiff,

15 v.

16 **JUSTIN RODINE;**
17 **THOMAS RODINE,**

18 Defendant.

CASE NO.

COMPLAINT (FELONY)

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21 The Attorney General of California, by and through the undersigned Deputy Attorney
22 General, on information and belief, complains and accuses defendants of having committed, in
23 the County of Sacramento, State of California, the crimes of:

24 **COUNT 1**

25 **(PRESENTATION OF FRAUDULENT CLAIM)**

26 In and between January 1, 2007 and December 31, 2009, at and in the County of
27 Sacramento, in the State of California, Defendants JUSTIN RODINE and THOMAS RODINE,
28 did commit a felony namely a violation of SECTION 72 OF THE PENAL CODE of the State of

1 California, in that said Defendants did unlawfully and with intent to defraud, present for
2 allowance and payment a false and fraudulent claim, bill, account, voucher and writing; to wit the
3 presentation of fifty-nine (59) fraudulent invoices for payment to the California Office of the
4 State Controller unclaimed property program.

5 **COUNT 2**

6 **(GRAND THEFT BY EMBEZZLEMENT)**

7 For a further and separate cause of Complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1, complainant further complains and states
9 that on and between January 1, 2007 and December 31, 2007, Defendants JUSTIN RODINE and
10 THOMAS RODINE did commit a felony namely a violation of SECTION 503 OF THE PENAL
11 CODE of the State of California, in that while said Defendants was an agent, servant, and
12 employee of Eleanor [REDACTED], Marion [REDACTED], Janet [REDACTED], Donald [REDACTED], Joanne [REDACTED],
13 and John [REDACTED] did unlawfully take from said person money and personal property of a value
14 exceeding \$400, to wit \$194,555.87.

15 **COUNT 3**

16 **(GRAND THEFT BY EMBEZZLEMENT)**

17 For a further and separate cause of Complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 and 2, complainant further complains and
19 states that on and between January 1, 2008 and December 31, 2008, Defendants JUSTIN
20 RODINE and THOMAS RODINE did commit a felony namely a violation of SECTION 503 OF
21 THE PENAL CODE of the State of California, in that while said Defendants was an agent,
22 servant, and employee of Janet [REDACTED], Sharon [REDACTED], Roy [REDACTED], Patricia [REDACTED] ([REDACTED]
23 Foundation), Eleanor [REDACTED], Ina [REDACTED], Ralph [REDACTED], Roger [REDACTED], Ted [REDACTED],
24 Anne [REDACTED], Dennis [REDACTED], John [REDACTED], Donald [REDACTED], Eugene [REDACTED], [REDACTED] Associates,
25 and Alan [REDACTED], did unlawfully take from said person money and personal property of a value
26 exceeding \$400, to wit \$400,618.27.

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COUNT 4

(GRAND THEFT BY EMBEZZLEMENT)

For a further and separate cause of Complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 3, complainant further complains and states that on and between January 1, 2009 and December 31, 2009, Defendants JUSTIN RODINE and THOMAS RODINE did commit a felony namely a violation of SECTION 503 OF THE PENAL CODE of the State of California, in that while said Defendants was an agent, servant, and employee of Janet [REDACTED], Leslie [REDACTED], James [REDACTED], Beverly [REDACTED], Sharon [REDACTED], Jeannie [REDACTED], Richard [REDACTED], Martin [REDACTED], Addie [REDACTED], Roy [REDACTED], Patricia [REDACTED] ([REDACTED] Foundation), Claire [REDACTED], David [REDACTED], John [REDACTED], Curt [REDACTED], David [REDACTED], Ina [REDACTED], Mary [REDACTED], David [REDACTED], Pamela [REDACTED], Walter [REDACTED], Neil [REDACTED], Dennis [REDACTED], Charles [REDACTED], George [REDACTED], Jack [REDACTED], Linda [REDACTED], William [REDACTED], Alan [REDACTED], Michicyo [REDACTED], Roger [REDACTED], Dan [REDACTED], Cherianne [REDACTED], Deanna [REDACTED], Gregory [REDACTED], Terry [REDACTED], Hilda [REDACTED], Catherine [REDACTED], Barbara [REDACTED], Donald [REDACTED], Michael [REDACTED], Thomas [REDACTED], Bruce [REDACTED], Kitti [REDACTED] and Frank [REDACTED], did unlawfully take from said person money and personal property of a value exceeding \$400, to wit \$1,080,646.99.

ENHANCEMENTS

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1203.045(A) PC SPECIAL ALLEGATION EXCESSIVE LOSS OVER \$100,000

It is further alleged that the offenses set forth in Counts 1 through 4 involve a theft of over \$100,000, within the meaning of Penal Code section 1203.045(a).

12022.6(A)(3) PC SPECIAL ALLEGATION EXCESSIVE LOSS OVER \$1,300,000

It is further alleged that the Defendants JUSTIN RODINE and THOMAS RODINE in the commission of Counts 1 through 4, with the intent to do so, took property of a value exceeding \$1,300,000 within the meaning of Penal Code section 12022.6(a)(3).

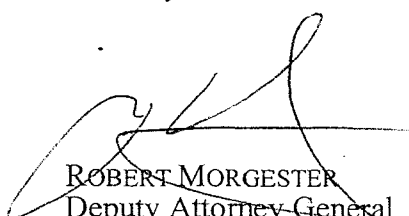
Pursuant to Penal Code section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the people as required by Penal Code section 1054.3.

1 I declare upon information and belief and under penalty of perjury that the foregoing is true
2 and correct.

3 Executed at Sacramento County, California, the 20th day of July, 2010.
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5 Respectfully Submitted,

6 EDMUND G. BROWN JR.
7 Attorney General of California

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10 
11 ROBERT MORGESTER
12 Deputy Attorney General
13 *Attorneys for People of the State of*
14 *California*

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