1 2 3 4 5 6 7	EDMUND G. BROWN JR. Attorney General of California ROBERT MORGESTER Deputy Attorney General State Bar No. 142236 1300 I Street, Suite 125 P.O. Box 944255 Sacramento, CA 94244-2550 Telephone: (916) 445-9330 Fax: (916) 322-2368 E-mail: Robert.Morgester@doj.ca.gov Attorneys for People of the State of California	
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9	COUNTY OF SACRAMENTO	
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12	PEOPLE OF THE STATE OF Case No.	
13	CALIFORNIA,	
14	Plaintiff, COMPLAINT [FELONY]	
15	v.	
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17	GEORGE SAMUEL BRONK,	
18	Defendant.	
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20	The People of the State of California upon oath of the undersigned, upon information and	
21	belief complain against the Defendant GEORGE SAMUEL BRONK, above named for the	
22	crime(s) as follows:	
23	COUNT 1	
24	(COMPUTER ACCESS AND FRAUD)	
25	On and about April 18, 2010, at and in the County of Sacramento in the State of California,	
26	Defendant GEORGE SAMUEL BRONK, did commit a felony namely a violation of section	
27	502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully	
28	knowingly access and without permission alter, damage, delete, destroy, and otherwise use any	
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COMPLAINT [FELONY]

data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com and facebook accounts of Ali Alechnowicz

COUNT 2

(FALSE PERSONATION)

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, complainant further complains and states that on and about April 18, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Ali Alechnowicz in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 3

(COMPUTER ACCESS AND FRAUD)

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 and 2, complainant further complains and states that on and about June 13, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com and facebook accounts of Lillian Moore.

COUNT 4

(FALSE PERSONATION)

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 about June 13, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Lillian Moore in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 5

(COMPUTER ACCESS AND FRAUD)

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 4, complainant further complains and states that on and about June 23, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com, @gmail.com and facebook accounts of Katie Amaral.

COUNT 6

(FALSE PERSONATION)

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 5, complainant further complains and states that on and about June 23, 2010, at and in the County of Sacramento in the State of

California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Katie Amaral in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 7

(COMPUTER ACCESS AND FRAUD)

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 6, complainant further complains and states that on and about September 2, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com and facebook accounts of Stephanie Slevin.

COUNT 8

(FALSE PERSONATION)

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 7, complainant further complains and states that on and about September 2, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Stephanie Slevin in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event,

become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

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COUNT 9

(COMPUTER ACCESS AND FRAUD)

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 8, complainant further complains and states that on and about July 4, 2010, at and in the County of Sacramento in the State of California, Defendant GEORGE SAMUEL BRONK, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com and facebook accounts of Lindsie Ferreira.

COUNT 10

(FALSE PERSONATION)

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 9, complainant further complains and states that on and about July 4, 2010, at and in the County of Sacramento in the State of California, Defendant GEORGE SAMUEL BRONK, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Lindsie Ferreira in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 11

(COMPUTER ACCESS AND FRAUD)

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 10, complainant further complains and states that in and between February 15, 2010 and March 15, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com and facebook accounts of Laura Kutzler.

COUNT 12

(FALSE PERSONATION).

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 11, complainant further complains and states that in and between February 15, 2010 and March 15, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Laura Kutzler in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 13

(COMPUTER ACCESS AND FRAUD)

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 12, complainant further

complains and states that in and between June 1, 2010 and June 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com and facebook accounts of Daniel Piscak.

COUNT 14

(FALSE PERSONATION)

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 13, complainant further complains and states that in and between June 1, 2010 and June 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Daniel Piscak in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 15

(COMPUTER ACCESS AND FRAUD)

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 14, complainant further complains and states that in and between September 27, 2009 and April 7, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter,

damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com and facebook accounts of Lauren Rackley.

COUNT 16

(FALSE PERSONATION)

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 15, complainant further complains and states that in and between September 27, 2009 and April 7, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Lauren Rackley in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 17

(COMPUTER ACCESS AND FRAUD)

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 16, complainant further complains and states that on and about December 2, 2009, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com, @yahoo.com and facebook accounts of Lauren Joyce.

COUNT 18

(FALSE PERSONATION)

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 17, complainant further complains and states that on and about December 2, 2009, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Lauren Joyce in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 19

(COMPUTER ACCESS AND FRAUD)

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 18, complainant further complains and states that in and between March 1, 2010 and April 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com, and facebook accounts of Olivia Chrzanowski.

COUNT 20

(FALSE PERSONATION)

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 19, complainant further

complains and states that in and between March 1, 2010 and April 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Olivia Chrzanowski in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 21

(COMPUTER ACCESS AND FRAUD)

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 20, complainant further complains and states that in and between August 14, 2010 and August 18, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @hotmail.com, and facebook accounts of Kylie Birkict.

COUNT 22

(FALSE PERSONATION)

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 21, complainant further complains and states that in and between August 14, 2010 and August 18, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Kylie Birkict in a private and official

capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 23

(COMPUTER ACCESS AND FRAUD)

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 22, complainant further complains and states that in and between April 12, 2010 and April 14, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com, and facebook accounts of Melanie Conway.

COUNT 24

(FALSE PERSONATION)

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 23, complainant further complains and states that in and between April 12, 2010 and April 14, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Melanie Conway in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 25

(COMPUTER ACCESS AND FRAUD)

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 24, complainant further complains and states that in and between May 1, 2010 and May 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @yahoo.com, and facebook accounts of Lauren Merino.

COUNT 26

(FALSE PERSONATION)

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 25, complainant further complains and states that in and between May 1, 2010 and May 30, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Lauren Merino in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 27

(COMPUTER ACCESS AND FRAUD)

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 26, complainant further

complains and states that in and between July 22, 2010 and July 25, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 502 (C)(1) of the Penal Code of the State of California, in that said Defendant did unlawfully knowingly access and without permission alter, damage, delete, destroy, and otherwise use any data from a computer, computer system, or computer network, in order to devise and execute any scheme and artifice to defraud, deceive, and extort and wrongfully control and obtain money property and data, to wit, the @gmail.com account of Nora Campbell.

COUNT 28

(FALSE PERSONATION)

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 27, complainant further complains and states that in and between July 22, 2010 and July 25, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 529 of the Penal Code of the State of California, in that said Defendant did unlawfully and falsely personate Nora Campbell in a private and official capacity and in such assumed character did an act whereby, if done by the person falsely personated, he/she might, in any event, become liable to a suit or prosecution, and to pay a sum of money, and to incur a charge forfeiture and penalty, and whereby any benefit might accrue to the defendant, and to another.

COUNT 29

(EXTORTION)

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 28, complainant further complains and states that on and about June 5, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 520 of the Penal Code of the State of California, in that said Defendant

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extorted money and other property from Jane Doe by means of force and threat such as is mentioned in Section 519.

COUNT 30

(POSSESSION OR CONTROL OF CHILD PORNOGRAPHY)

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 29, complainant further complains and states that on and about September 24, 2010, at and in the County of Sacramento in the State of California, Defendant **GEORGE SAMUEL BRONK**, did commit a felony namely a violation of section 311.11 (A) of the Penal Code of the State of California, in that said Defendant did unlawfully and knowingly possess and control matter depicting a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code Section 311.4(d).

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, and pursuant to the provisions of Penal Code section 1054.7.

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

Executed at Sacramento County, California, the and day of October, 2010.

Respectfully Submitted,

EDMUND G. BROWN JR. Attorney General of California

ROBERT MORGESTER
Deputy Attorney General

Attorneys for People of the State of California

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