EDMUND G. BROWN JR., Attorney General
of the State of California
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Attorneys for The People of the State of California

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

| | |
|---|---|
| **THE PEOPLE OF THE STATE OF CALIFORNIA,**<br><br>**Plaintiff,**<br><br>**v.**<br><br>**RAYMOND LEE ALLEN**<br>**(DOBs: 03/26/1959; 03/26/1958),**<br><br>**Defendant.** | **Case No.:**<br><br>**FELONY COMPLAINT FOR ARREST WARRANT**<br><br>**2 Counts**<br><br>**Count 1: P.C. 487(a)**<br>**Count 2: W&I 14107(b)(1)** |

The Undersigned, on information and belief, accuses defendant RAYMOND LEE ALLEN of the following crimes which are connected to one another in their commission:

**COUNT 1**

**[GRAND THEFT]**

From on or about October 12, 2007, to on or about January 15, 2008, in the County of Los Angeles, State of California, defendant RAYMOND LEE ALLEN unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

///

///

## COUNT 2

## [PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about October 12, 2007, to on or about January 15, 2008, in the County of Los Angeles, State of California, defendant RAYMOND LEE ALLEN, with intent to defraud, presented and caused to be presented for allowance and payment, false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to MARY HINKLE (DOB 7/4/41), in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

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

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

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

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

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

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

///

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

This is a continuing request for the above information. If the information becomes available at a future time, the prosecution, by this request, asks that it be immediately disclosed to the prosecution.

**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed at _____, California, May ____, 2009.

Lorena Andrade
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse

Agency: Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI #CA0199409
BMFEA Docket No. LA2009307315

Preliminary Hearing Time Estimate: 3 hours

## ORDER

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

| Defendant | Bail |
|---|---|
| RAYMOND LEE ALLEN | $_____ |

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant: RAYMOND LEE ALLEN

Recommended Bail: $2,500.00

DOB: 03/26/1959; 03/26/1958
CII No.: A04743981
CDL No.: N8217891
SS No.: 558-25-8207

Sex: M Race: Blk Hair: Blk Eyes: Brn Ht: 5' 09" Wt: 200

Residence: 4433 Crenshaw Blvd. #14
Los Angeles, CA 90043
(323) 291-1725

Aliases: None

## HOLDING ORDER

It appearing from the evidence presented at the preliminary hearing that the following offenses charged in this complaint have been committed and that there is sufficient cause to believe that the following defendant is guilty of those offenses,

IT IS ORDERED, pursuant to sections 872 and 875 of the Penal Code, that the following defendant is held to answer in Superior Court to the following offenses:

| Defendant | Count | Charge | Special Allegation |
|---|---|---|---|
| RAYMOND LEE ALLEN | 1 | 487(a) | - |
| RAYMOND LEE ALLEN | 2 | 14107(b)(1) | - |

and is committed to the custody of the Sheriff of Los Angeles County until bail is posted in the sum of:

| Defendant | Bail |
|---|---|
| RAYMOND LEE ALLEN | $_____ |

Arraignment in Superior Court will be in Department _____ on _____ at _____ a.m./p.m.

DATED this _____ day of _____, 2009.

_____
MAGISTRATE

EDMUND G. BROWN JR., Attorney General
SUE MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
STEVEN DAVID SMITH (45969),
Deputy Attorney General
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse
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Telephone: (818) 556-2929
Fax: (818) 556-2939

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**STATE OF CALIFORNIA**

| | |
|---|---|
| **THE PEOPLE OF THE STATE OF CALIFORNIA,**<br>Plaintiff,<br>v.<br>**SHIRLEY ANN BYRD,**<br>Defendant. | **Case No. 9CA 03419**<br>**MISDEMEANOR COMPLAINT**<br>**Voluntary Appearance June 17, 2009**<br>**Count 1: 487(a) P.C.**<br>**Count 2: 14107(b)(1)W&I** |

The undersigned, on information and belief, accuses defendant, **SHIRLEY ANN BYRD,** of the following crimes, which are connected to one another in their commission:

**COUNT 1**

**487(a) Penal Code**

**[GRAND THEFT]**

From on or about December 25, 2007, to on or about March 20, 2008, in the County of Los Angeles, State of California, defendant **SHIRLEY ANN BYRD,** unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a misdemeanor.

## COUNT 2

## 14107(b)(1) Welfare and Institutions Code

## [PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about December 25, 2007, to on or about March 20, 2008, in the County of Los Angeles, State of California, defendant **SHIRLEY ANN BYRD,** with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Lilian O, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

## DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed May ____, 2009, at _____, California.

_____
LORENA ANDRADE
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse

Agency: California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse
Law Enforcement Agency No. 7293
ORI No. CA0199409
BMFEA Docket number LB2008101553

**DEFENDANT BIOGRAPHICAL INFORMATION**

**SHIRLEY ANN BYRD**

| | | | |
|---|---|---|---|
| DOB: | May 19, 1961 | SSN: | |
| CII No.: | | CDL No. | N8694983 |
| Sex: | Female | Race: | Black |
| Hair: | Black | Eyes: | Brown |
| Height: | 5' 6" | Weight: | 244 |

Residence: 1923 Lemon Avenue
Long Beach, CA 90806
Business: Unknown

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN MELTON BARTHOLOMEW
Supervising Deputy Attorney General
GARY M. MOGIL, Deputy Attorney General
State Bar No. 134585
BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
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Fax: (818) 556-2939
E-mail: gary.mogil@doj.ca.gov

Attorneys for The People of the State of California

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

| | |
|---|---|
| **THE PEOPLE OF THE STATE OF CALIFORNIA,**<br><br>**Plaintiff,**<br><br>**v.**<br><br>**MELCHIZEDEK COLEMEN aka CURTIS COLEMAN (DOB: 04/04/1982),**<br><br>**Defendant.** | **Case No.:**<br><br>**FELONY COMPLAINT FOR ARREST WARRANT**<br><br>**2 Counts**<br><br>**Count 1: P.C. 487(a)**<br>**Count 2: W&I 14107(b)(1)** |

The Undersigned, on information and belief, accuses defendant MELCHIZEDEK COLEMEN aka CURTIS COLEMAN (hereafter "MELCHIZEDEK COLEMEN") of the following crimes which are connected to one another in their commission:

**COUNT 1**

**[GRAND THEFT]**

From on or about March 1, 2007, to on or about September 15, 2007, in the County of Los Angeles, State of California, defendant MELCHIZEDEK COLEMEN unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

///

## COUNT 2

## [PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about March 1, 2007, to on or about September 15, 2007, in the County of Los Angeles, State of California, defendant MELCHIZEDEK COLEMEN, with intent to defraud, presented and caused to be presented for allowance and payment, false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to FREDDIE SMITH (DOB 7/11/29), in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

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

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

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

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

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

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

///

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

This is a continuing request for the above information. If the information becomes available at a future time, the prosecution, by this request, asks that it be immediately disclosed to the prosecution.

**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed at _____, California, May ____, 2009.

_____
Lorena Andrade
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse

Agency: Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI #CA0199409
BMFEA Docket No. LA2008306740

Preliminary Hearing Time Estimate: 3 hours

**ORDER**

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

| Defendant | Bail |
|---|---|
| MELCHIZEDEK COLEMEN | $_____ |

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant-MELCHIZEDEK COLEMEN

Recommended Bail: $5,000.00

DOB: 04/04/1982
CII No. A21525259
CDL No. B4959665
SS No. 550-71-9916

Sex: M Race: Blk Hair: Blk Eyes: Brn Ht: 6' 0" Wt: 250

Residence: 1915 W. 41st Place
Los Angeles, CA 90062
(323) 293-3523

4301 S. Lasalle Ave.
Los Angeles, CA 90062
(323) 474-7262

Aliases: MELCHIZEDEK COLEMAN
CURTIS COLEMAN

## HOLDING ORDER

It appearing from the evidence presented at the preliminary hearing that the following offenses charged in this complaint have been committed and that there is sufficient cause to believe that the following defendant is guilty of those offenses,

IT IS ORDERED, pursuant to sections 872 and 875 of the Penal Code, that the following defendant is held to answer in Superior Court to the following offenses:

| Defendant | Count | Charge | Special Allegation |
|---|---|---|---|
| MELCHIZEDEK COLEMEN | 1 | 487(a) | - |
| MELCHIZEDEK COLEMEN | 2 | 14107(b)(1) | - |

and is committed to the custody of the Sheriff of Los Angeles County until bail is posted in the sum of:

| Defendant | Bail |
|---|---|
| MELCHIZEDEK COLEMEN | $_____ |

Arraignment in Superior Court will be in Department _____ on _____ at _____ a.m./p.m.

DATED this _____ day of _____, 2009.

_____
MAGISTRATE

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
Telephone: (818) 556-2922

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**CENTRAL DISTRICT, STATE OF CALIFORNIA**

| | |
|---|---|
| THE PEOPLE OF THE STATE OF CALIFORNIA,<br>Plaintiff,<br>-versus-<br>**LARRY GEORGE DENMAN SR.,**<br>Defendant. | Case No. _____<br>**FELONY COMPLAINT FOR ARREST WARRANT**<br>2 Counts<br>P.C. 487(a) (F)<br>W&I 14107(b)(1) (M) |

The undersigned, on information and belief, accuses defendant LARRY DENMAN of the following crimes, which are connected to one another in their commission:

**COUNT 1**

[GRAND THEFT]

From on or about March 5, 2007, to on or about April 30, 2007, in the County of Los Angeles, State of California, defendant LARRY DENMAN unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

**COUNT 2**

[PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about March 5, 2007, to on or about April 30, 2007, in the County of Los Angeles, State of California, defendant LARRY DENMAN, with intent to defraud,

presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Lillie Denman, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

**REQUEST FOR ARREST WARRANT**

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

**REQUEST FOR DISCOVERY**

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the _____ day of May, 2009.

_____
LORENA ANDRADE
Senior Management Auditor
Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice

IT IS ORDERED that an arrest warrant shall issue and be held until June 18, 2009 for the following person, who is to be admitted to bail in the sum of:

| Defendant | Bail |
|---|---|
| LARRY DENMAN | $_____ |

_____ Date

_____ MAGISTRATE

Agency:
Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI no. CA0199409
BMFEA Docket no. LB2008306737

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 09/12/1954
CII No. A07657320 CDL No. N0007213 SS No. 552-86-8100
Sex: M Race: B Hair: Blk Eyes: Brn Ht: 5'11" Wt: 220
Residence: 201 S. Matthisen Ave.
Compton, CA 90220
Aliases: Larry Denman

## HOLDING ORDER

It appearing from the evidence presented at the preliminary hearing that the following offenses charged in this complaint have been committed and that there is sufficient cause to believe that the following defendants are guilty of those offenses,

IT IS ORDERED, pursuant to sections 872 and 875 of the Penal Code, that the following defendants are held to answer in Superior Court to the following offenses:

| Defendant | Count | Charge | Special Allegation |
|---|---|---|---|
| LARRY DENMAN | 1 | 487(a) | - |
| " | 2 | 14107(b)(1) | - |

and are committed to the custody of the Sheriff of Los Angeles County until bail is posted in the sum of:

| Defendant | Bail |
|---|---|
| LARRY DENMAN | $_____ |

Arraignment in Superior Court will be in Department _____ on _____ at _____ a.m./p.m.

DATED this ____ day of _____, 20___.

_____
MAGISTRATE

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
MALCOLM VENOLIA, Deputy Attorney General
State Bar No. 130401
303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502
Telephone: (818) 556-2919
Fax: (818) 556-2939

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**CENTRAL DISTRICT, STATE OF CALIFORNIA**

| | |
|---|---|
| PEOPLE OF THE STATE OF CALIFORNIA,<br>Plaintiff,<br>v.<br>**GERALD ROBERT HARRIS**,<br>Defendant. | Case No.:<br>A.G. Case No. RV2008306668<br>**FELONY COMPLAINT FOR ARREST WARRANT**<br>2 Counts<br>B&P 650(a) |

The undersigned complains that in the County of Los Angeles, State of California, and before the making or filing of this complaint, the defendant, **GERALD ROBERT HARRIS**, did commit the following crimes which are connected to one another in their commission:

**COUNT 1**

[GRAND THEFT]

From on or about August 18, 2006, to on or about December 22, 2006 and from on or about February 26 to May 6, 2007, in the County of Los Angeles, State of California, defendant **GERALD ROBERT HARRIS** unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

## COUNT 2

[PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about August 16, 2006, to on or about April 30, 2007, in the County of Los Angeles, State of California, defendant , with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Ruth Milner, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying declaration in support of arrest warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

## DECLARATION

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

Executed this _____ of May, 2009, in Los Angeles, California.

_____
LORENA ANDRADE
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse

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

| Defendant | Bail |
| --- | --- |
| **GERALD ROBERT HARRIS** | $_____ |

_____ Date

_____ MAGISTRATE

Agency: Bureau of Medi-Cal Fraud and Elder Abuse
California Department of Justice
Law Enforcement Agency No.7293
I/O Lorena Andrade
(626) 918-0686

Preliminary Hearing time estimate: 1 hour

Arrest Warrant Requested

**GERALD ROBERT HARRIS**

Recommended Bail: $5,000
DOB: 10/15/1957
CII No. M06607555 CDL No. N6418963 SS No. 570-35-5407
Sex: M Race: Unknown Hair: Blk Eyes: Brn Ht: 5'7" Wt: 225
Residence: 2520 W. Florence Ave., Apt. 6
Los Angeles, CA 90043

**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:

**GERALD ROBERT HARRIS**

(Strike out or add as applicable)

| **Count** | **Charge** |
|---|---|
| 1 | PC §487(a) |
| 2 | W&I §14107 |

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 _____, _____.

_____
JUDGE OF THE SUPERIOR COURT

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
Telephone: (818) 556-2922

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**CENTRAL DISTRICT, STATE OF CALIFORNIA**

| | |
|---|---|
| THE PEOPLE OF THE STATE OF CALIFORNIA,<br>Plaintiff,<br>-versus-<br>**NADIA RACHEL HOPPES,**<br>Defendant. | Case No. 9CA03425<br>**MISDEMEANOR COMPLAINT FOR ARREST WARRANT**<br>Voluntary Appearance June 17, 2009<br>2 Counts<br>P.C. 487(a) (M)<br>W&I 14107(b)(1) (M) |

The undersigned, on information and belief, accuses defendant NADIA HOPPES of the following crimes, which are connected to one another in their commission:

**COUNT 1**

[GRAND THEFT]

From on or about September 10, 2006, to on or about May 31, 2007, in the County of Los Angeles, State of California, defendant NADIA HOPPES unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a misdemeanor.

## COUNT 2

[PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about September 10, 2006, to on or about May 31, 2007, in the County of Los Angeles, State of California, defendant NADIA HOPPES, with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Shari Bergeron, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

## DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the _____ day of May, 2009.

_____
LORENA ANDRADE
Senior Management Auditor
Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice

IT IS ORDERED that an arrest warrant shall issue and be held until June 17, 2009 for the following person, who is to be admitted to bail in the sum of:

| Defendant | Bail |
|---|---|
| NADIA HOPPES | $_____ |

_____ Date

_____ MAGISTRATE

Agency: Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI no. CA0199409
BMFEA Docket no. LB2008306739

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 06/26/1961
CII No. _____ CDL No. C3262973 SS No. 578-92-1477
Sex: F Race: H Hair: Brn Eyes: Brn Ht: 5'02" Wt: 115
Residence: 956 Chestnut Ave., #956
Long Beach, CA 90813

EDMUND G. BROWN JR., Attorney General
SUE MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
STEVEN DAVID SMITH (45969),
Deputy Attorney General
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse
303 North Glenoaks Boulevard, Suite 900
Burbank, CA 91502
Telephone: (818) 556-2929
Fax: (818) 556-2939

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**STATE OF CALIFORNIA**

| | |
|---|---|
| **THE PEOPLE OF THE STATE OF CALIFORNIA,**<br>Plaintiff,<br>v.<br>**LOUWANDA ELEASE HURT,**<br>Defendant. | **Case No. 9CA 03418**<br>**MISDEMEANOR COMPLAINT**<br>**Voluntary Appearance June 17, 2009**<br>**Count 1: 487(a) P.C.**<br>**Count 2: 14107(b)(1)W&I** |

The undersigned, on information and belief, accuses defendant, **LOUWANDA ELEASE HURT**, of the following crimes, which are connected to one another in their commission:

**COUNT 1**

**487(a) Penal Code**

**[GRAND THEFT]**

From on or about April 3, 2007, to on or about July 23, 2007, in the County of Los Angeles, State of California, defendant **LOUWANDA ELEASE HURT**, unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a misdemeanor.

## COUNT 2

**14107(b)(1) Welfare and Institutions Code**

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

From on or about April 3, 2007, to on or about July 23, 2007, in the County of Los Angeles, State of California, defendant **LOUWANDA ELEASE HURT**, with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Maria J., in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

## DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed May ____, 2009, at _____, California.

_____
LORENA ANDRADE
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse

Agency: California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse
Law Enforcement Agency No. 7293
ORI No. CA0199409
BMFEA Docket number LB2009307311

## DEFENDANT BIOGRAPHICAL INFORMATION

## LOUWANDA ELEASE HURT

| | |
|---|---|
| DOB: February 24, 1969 | SSN: 568-49-0492 |
| CII No.: A08999468 | CDL No. B8573035 |
| Sex: Female | Race: Black |
| Hair: Black | Eyes: Black |
| Height: 5' 4" | Weight: 220 |

Residence: 545 South San Pedro Street
Los Angeles, CA 90013
Business: Unknown

EDMUND G. BROWN JR., Attorney General
SUE MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
STEVEN DAVID SMITH (45969),
Deputy Attorney General
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse
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Burbank, CA 91502
Telephone: (818) 556-2929
Fax: (818) 556-2939

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**STATE OF CALIFORNIA**

| | |
|---|---|
| **THE PEOPLE OF THE STATE OF CALIFORNIA,**<br>Plaintiff,<br>v.<br>**GWENDOLYN A. JACKSON,**<br>Defendant. | **Case No. 9CA 03421**<br>**MISDEMEANOR COMPLAINT**<br>**Voluntary Appearance June 17, 2009**<br>**Count 1: 487(a) P.C.**<br>**Count 2: 14107(b)(1)W&I** |

The undersigned, on information and belief, accuses defendant, **GWENDOLYN A. JACKSON**, of the following crimes, which are connected to one another in their commission:

**COUNT 1**

**487(a) Penal Code**

**[GRAND THEFT]**

From on or about February 22, 2007, to on or about May 4, 2007, in the County of Los Angeles, State of California, defendant, **GWENDOLYN A. JACKSON**, unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a misdemeanor.

## COUNT 2

## 14107(b)(1) Welfare and Institutions Code

## [PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about February 22, 2007, to on or about May 4, 2007, in the County of Los Angeles, State of California, defendant **GWENDOLYN A. JACKSON**, with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Betty B., in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR ARREST WARRANT

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

## DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed May ____, 2009, at _____, California.

_____
LORENA ANDRADE
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud & Elder Abuse

Agency: California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse
Law Enforcement Agency No. 7293
ORI No. CA0199409
BMFEA Docket number WC2008306701

**DEFENDANT BIOGRAPHICAL INFORMATION**

**GWENDOLYN A. JACKSON**

| | |
|---|---|
| DOB: January 4, 1958 | SSN: 547-08-1370 |
| CII No.: | CDL No. N4810477 |
| Sex: Female | Race: Black |
| Hair: Black | Eyes: Brown |
| Height: 5' 7" | Weight: 190 |

Residence: 9418 Juniper Street
Los Angeles, CA 90002
Business: Unknown

EDMUND G. BROWN JR.
Attorney General of the State of California
CALIFORNIA DEPARTMENT OF JUSTICE
BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
Sue Melton Bartholomew, Supervising Deputy Attorney General
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Telephone: (818) 556-2929
Fax: (818) 556-2939

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES — CENTRAL DISTRICT**

| | |
|---|---|
| **PEOPLE OF THE STATE OF CALIFORNIA,**<br>**Plaintiff,**<br>**v.**<br>**RUFUS JACKSON,**<br>**Defendant.** | **Case No.:**<br><br>**FELONY COMPLAINT FOR ARREST WARRANT**<br><br>**Count 1: 487(a) Penal Code**<br>**Count 2: 14107(b)(1) Wel. & Inst.** |

The undersigned, upon information and belief, accuses defendant RUFUS JACKSON of the following crimes, which are connected to one another in their commission:

**COUNT 1**

**487(a) Penal Code**

**[GRAND THEFT]**

On or about and between October 22, 2007, and August 8, 2008, in the County of Los Angeles, State of California, and elsewhere, defendant RUFUS JACKSON unlawfully took from the State of California's Medi-Cal program money and property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

## COUNT 2

## 14107(b)(1) Welfare and Institutions Code

## [PRESENTING FALSE MEDI-CAL CLAIMS]

On or about and between October 22, 2007, and August 8, 2008, in the County of Los Angeles, State of California, and elsewhere, defendant RUFUS JACKSON with intent to defraud, presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services and merchandise under the Medi-Cal Act, to wit, time sheets for In Home Supportive Services allegedly provided to Joe D., in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

## REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information which disclosure is required by Penal Code section 1054.3.

## DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed at _____, California, on May 21, 2009.

_____
Lorena Andrade
Senior Management Auditor
California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse

Agency: California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse
Law Enforcement Agency No. 7393
BMFEA Docket number LA2009307309

Preliminary hearing time estimate: Two hours

Recommended Bail: OR if defendant appears voluntarily

**DEFENDANT BIOGRAPHICAL INFORMATION**

RUFUS JACKSON

Recommended Bail: OR

| | | | |
|---|---|---|---|
| DOB: | February 16, 1975 | SSN: | |
| CII No. | | CDL No. | A9737661 |
| Sex: | Male | Race: | Black |
| Hair: | Black | Eyes: | Brown |
| Height: | 5' 3" | Weight: | 175 |

Home Address (last known): 510 East 61st Street
Los Angeles, CA 90003

Business Address: Unknown

## HOLDING ORDER

It appearing to me that the offense(s) in the within complaint mentioned have been committed, and that there is sufficient cause to believe that the within named RUFUS JACKSON is guilty, I order that he be held to answer for the same, as follows:

| Count | Charge |
|---|---|
| 1 | Section 487(a) Penal Code |
| 2 | Section 14107, subdivision (b)(1), Welfare & Institutions Code |

and that he be admitted to bail in the sum of _____ dollars, and is committed to the sheriff of the County of Los Angeles until he gives such bail.

Arraignment in Superior Court will be:

Date: _____

Courtroom: _____

Time: _____AM / PM

DATED this _____ day of _____, 2009.

_____
MAGISTRATE

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
Telephone: (818) 556-2922

Attorneys for Plaintiff

**SUPERIOR COURT OF LOS ANGELES COUNTY**

**CENTRAL DISTRICT, STATE OF CALIFORNIA**

| | |
|---|---|
| THE PEOPLE OF THE STATE OF CALIFORNIA,<br>Plaintiff,<br>-versus-<br>**CHRIS DION JONES SR.,**<br>Defendant. | Case No. _____<br>**FELONY COMPLAINT FOR ARREST WARRANT**<br>2 Counts<br>P.C. 487(a) (F)<br>W&I 14107(b)(1) (F) |

The undersigned, on information and belief, accuses defendant CHRIS JONES of the following crimes, which are connected to one another in their commission:

**COUNT 1**

[GRAND THEFT]

From on or about June 12, 2007, to on or about September 30, 2007, in the County of Los Angeles, State of California, defendant CHRIS JONES unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a felony.

**COUNT 2**

[PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about June 12, 2007, to on or about September 30, 2007, in the County of Los Angeles, State of California, defendant CHRIS JONES, with intent to defraud,

presented and caused to be presented for allowance and payment false and fraudulent claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services allegedly provided to Beverly Jones, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a felony.

**REQUEST FOR ARREST WARRANT**

Based on this complaint and the accompanying Declaration in Support of Arrest Warrant, I respectfully request that a warrant be issued for the arrest of the defendant pursuant to Penal Code section 813 et seq.

**REQUEST FOR DISCOVERY**

Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

**DECLARATION**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on the _____ day of May, 2009.

_____
LORENA ANDRADE
Senior Management Auditor
Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice

IT IS ORDERED that an arrest warrant shall issue and be held until June 18, 2009 for the following person, who is to be admitted to bail in the sum of:

| Defendant | Bail |
|---|---|
| CHRIS JONES | $_____ |

_____ Date

_____ MAGISTRATE

Agency: Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI no. CA0199409
BMFEA Docket no. LB2008306665

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 12/14/1966
CII No. A07468568 CDL No. A8385595 SS No. 570-37-6089
Sex: M Race: B Hair: Blk Eyes: Brn Ht: 6'00" Wt: 195
Residence: 5836 Bonfair Ave.
Lakewood, CA 90712
Aliases: James Jones
Jack Johnson

## HOLDING ORDER

It appearing from the evidence presented at the preliminary hearing that the following offenses charged in this complaint have been committed and that there is sufficient cause to believe that the following defendants are guilty of those offenses,

IT IS ORDERED, pursuant to sections 872 and 875 of the Penal Code, that the following defendants are held to answer in Superior Court to the following offenses:

| Defendant | Count | Charge | Special Allegation |
|---|---|---|---|
| CHRIS JONES | 1 | 487(a) | - |
| " | 2 | 14107(b)(1) | - |

and are committed to the custody of the Sheriff of Los Angeles County until bail is posted in the sum of:

| Defendant | Bail |
|---|---|
| CHRIS JONES | $_____ |

Arraignment in Superior Court will be in Department _____ on _____ at _____ a.m./p.m.

DATED this ____ day of _____, 20___.

_____
MAGISTRATE