

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN MELTON BARTHOLOMEW
Supervising Deputy Attorney General
3 GARY M. MOGIL, Deputy Attorney General
State Bar No. 134585
4 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
303 N. Glenoaks Boulevard, Suite 900
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8 Attorneys for The People of the State of California

9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11
12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

Plaintiff,

14
15 **v.**

16 **RAYMOND LEE ALLEN**
(DOB: 03/26/1959; 03/26/1958),

17 **Defendant.**

Case No.:

**FELONY COMPLAINT
FOR ARREST WARRANT**

2 Counts

Count 1: P.C. 487(a)
Count 2: W&I 14107(b)(1)

18
19 The Undersigned, on information and belief, accuses defendant RAYMOND LEE
20 ALLEN of the following crimes which are connected to one another in their commission:

21 **COUNT 1**

22 **[GRAND THEFT]**

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

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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).]

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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:

<u>Defendant</u>	<u>Bail</u>
RAYMOND LEE ALLEN	\$ _____

_____ Date	_____ MAGISTRATE
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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

1 **HOLDING ORDER**

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

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

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
RAYMOND LEE ALLEN	1	487(a)	-
RAYMOND LEE ALLEN	2	14107(b)(1)	-

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

<u>Defendant</u>	<u>Bail</u>
RAYMOND LEE ALLEN	\$ _____

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

16 DATED this _____ day of _____, 2009.

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

7 Attorneys for Plaintiff

8 **SUPERIOR COURT OF LOS ANGELES COUNTY**

9 **STATE OF CALIFORNIA**

10

11 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. 9CA 03419

12 Plaintiff,

**MISDEMEANOR
COMPLAINT**

13 v.

**Voluntary Appearance
June 17, 2009**

14 **SHIRLEY ANN BYRD,**

15 Defendant.

**Count 1: 487(a) P.C.
Count 2: 14107(b)(1)W&I**

16

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

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COUNT 1

22

487(a) Penal Code

23

[GRAND THEFT]

24

25 From on or about December 25, 2007, to on or about March 20, 2008, in the County of
26 Los Angeles, State of California, defendant **SHIRLEY ANN BYRD**, unlawfully took from the
27 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.

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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

1 Agency: California Department of Justice
2 Bureau of Medi-Cal Fraud and Elder Abuse
3 Law Enforcement Agency No. 7293
4 ORI No. CA0199409
5 BMFEA Docket number LB2008101553
6

7 **DEFENDANT BIOGRAPHICAL INFORMATION**

8 **SHIRLEY ANN BYRD**

9 DOB: May 19, 1961 SSN:
10 CII No.: CDL No. N8694983
11 Sex: Female Race: Black
12 Hair: Black Eyes: Brown
13 Height: 5' 6" Weight: 244
14 Residence: 1923 Lemon Avenue
15 Long Beach, CA 90806
16 Business: Unknown
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1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN MELTON BARTHOLOMEW
Supervising Deputy Attorney General
3 GARY M. MOGIL, Deputy Attorney General
State Bar No. 134585
4 BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
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5 Burbank, California 91502-1148
Telephone: (818) 556-2928
6 Fax: (818) 556-2939
E-mail: gary.mogil@doj.ca.gov
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8 Attorneys for The People of the State of California

9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11
12 **THE PEOPLE OF THE STATE OF**
13 **CALIFORNIA,**

14 **Plaintiff,**

15 **v.**

16 **MELCHIZEDEK COLEMEN**
aka CURTIS COLEMAN (DOB: 04/04/1982),

17 **Defendant.**

Case No.:

FELONY COMPLAINT
FOR ARREST WARRANT

2 Counts

Count 1: P.C. 487(a)
Count 2: W&I 14107(b)(1)

18
19 The Undersigned, on information and belief, accuses defendant MELCHIZEDEK
20 COLEMEN aka CURTIS COLEMAN (hereafter "MELCHIZEDEK COLEMEN") of the
21 following crimes which are connected to one another in their commission:

22 **COUNT 1**

23 **[GRAND THEFT]**

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

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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).]

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1 Arrest Warrant Requested

2 Defendant-MELCHIZEDEK COLEMEN

3 Recommended Bail: \$5,000.00

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

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

9 Residence: 1915 W. 41st Place 4301 S. Lasalle Ave.
Los Angeles, CA 90062 Los Angeles, CA 90062
10 (323) 293-3523 (323) 474-7262

11 Aliases: MELCHIZEDEK COLEMAN
12 CURTIS COLEMAN
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1 HOLDING ORDER

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

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

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
MELCHIZEDEK COLEMEN	1	487(a)	-
MELCHIZEDEK COLEMEN	2	14107(b)(1)	-

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

<u>Defendant</u>	<u>Bail</u>
MELCHIZEDEK COLEMEN	\$ _____

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

16 DATED this _____ day of _____, 2009.

18 _____
19 MAGISTRATE

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
3 DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
4 303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
5 Telephone: (818) 556-2922

6 Attorneys for Plaintiff

7
8 **SUPERIOR COURT OF LOS ANGELES COUNTY**
9 **CENTRAL DISTRICT, STATE OF CALIFORNIA**

10 THE PEOPLE OF THE STATE OF CALIFORNIA,
11 Plaintiff,

12 -versus-

13 **LARRY GEORGE DENMAN SR.,**
14 Defendant.

Case No. _____

**FELONY COMPLAINT
FOR ARREST WARRANT**

2 Counts
P.C. 487(a) (F)
W&I 14107(b)(1) (M)

15
16 The undersigned, on information and belief, accuses defendant LARRY
17 DENMAN of the following crimes, which are connected to one another in their commission:

18 **COUNT 1**

19 [GRAND THEFT]

20 From on or about March 5, 2007, to on or about April 30, 2007, in the County of
21 Los Angeles, State of California, defendant LARRY DENMAN unlawfully took from the State
22 of California property of a value in excess of four hundred dollars (\$400), in violation of section
23 487, subdivision (a), of the Penal Code, a felony.

24 **COUNT 2**

25 [PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

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

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

5 **REQUEST FOR ARREST WARRANT**

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

9 **REQUEST FOR DISCOVERY**

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

13 **DECLARATION**

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

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

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

23 Defendant Bail
24 LARRY DENMAN \$ _____

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26 _____
27 Date MAGISTRATE

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

7 Preliminary Hearing Time Estimate: 30 min.

8 Arrest Warrant Requested

9 Recommended Bail: \$1,000

10 DOB: 09/12/1954

11 CII No. A07657320

12 CDL No. N0007213

13 SS No. 552-86-8100

14 Sex: M Race: B Hair: Blk Eyes: Brn

15 Ht: 5'11" Wt: 220

16 Residence: 201 S. Matthisen Ave.

17 Compton, CA 90220

18 Aliases: Larry Denman

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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:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
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:

<u>Defendant</u>	<u>Bail</u>
LARRY DENMAN	\$ _____

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

DATED this ____ day of _____, 20__.

MAGISTRATE

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
3 MALCOLM VENOLIA, Deputy Attorney General
State Bar No. 130401
4 303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502
5 Telephone: (818) 556-2919
Fax: (818) 556-2939
6

7 Attorneys for Plaintiff
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9 **SUPERIOR COURT OF LOS ANGELES COUNTY**
10 **CENTRAL DISTRICT, STATE OF CALIFORNIA**
11

12 PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

15 **GERALD ROBERT HARRIS,**

16 Defendant.
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Case No.:

A.G. Case No. RV2008306668

**FELONY COMPLAINT FOR
ARREST WARRANT**

2 Counts

B&P 650(a)

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

22 **COUNT 1**

23 [GRAND THEFT]

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

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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:

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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

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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:

GERALD ROBERT HARRIS

(Strike out or add as applicable)

<u>Count</u>	<u>Charge</u>
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

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
3 DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
4 303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
5 Telephone: (818) 556-2922

6 Attorneys for Plaintiff

7
8 **SUPERIOR COURT OF LOS ANGELES COUNTY**
9 **CENTRAL DISTRICT, STATE OF CALIFORNIA**

10 THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No. 9CA03425

11 Plaintiff,

**MISDEMEANOR COMPLAINT
FOR ARREST WARRANT**

12 -versus-

13 NADIA RACHEL HOPPES,

Voluntary Appearance June 17, 2009

14 Defendant.

2 Counts

P.C. 487(a) (M)

W&I 14107(b)(1) (M)

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16
17 The undersigned, on information and belief, accuses defendant NADIA HOPPES
18 of the following crimes, which are connected to one another in their commission:

19 **COUNT 1**

20 [GRAND THEFT]

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

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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:

<u>Defendant</u>	<u>Bail</u>
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

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

7 Attorneys for Plaintiff

8 **SUPERIOR COURT OF LOS ANGELES COUNTY**

9 **STATE OF CALIFORNIA**

10
11 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

12 Plaintiff,

13 v.

14 **LOUWANDA ELEASE HURT,**

15 Defendant.

Case No. 9CA 03418

**MISDEMEANOR
COMPLAINT**

**Voluntary Appearance
June 17, 2009**

**Count 1: 487(a) P.C.
Count 2: 14107(b)(1)W&I**

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

21 **COUNT 1**

22 **487(a) Penal Code**

23 **[GRAND THEFT]**

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

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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

1 Agency: California Department of Justice
2 Bureau of Medi-Cal Fraud and Elder Abuse
3 Law Enforcement Agency No. 7293
4 ORI No. CA0199409
5 BMFEA Docket number LB2009307311
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7 **DEFENDANT BIOGRAPHICAL INFORMATION**

8 **LOUWANDA ELEASE HURT**

9 DOB: February 24, 1969 SSN: 568-49-0492
10 CII No.: A08999468 CDL No. B8573035
11 Sex: Female Race: Black
12 Hair: Black Eyes: Black
13 Height: 5' 4" Weight: 220
14 Residence: 545 South San Pedro Street
15 Los Angeles, CA 90013
16 Business: Unknown
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1 EDMUND G. BROWN JR., Attorney General
SUE MELTON BARTHOLOMEW,
2 Supervising Deputy Attorney General
STEVEN DAVID SMITH (45969),
3 Deputy Attorney General
California Department of Justice
4 Bureau of Medi-Cal Fraud & Elder Abuse
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6 Fax: (818) 556-2939

7 Attorneys for Plaintiff

8 **SUPERIOR COURT OF LOS ANGELES COUNTY**

9 **STATE OF CALIFORNIA**

10
11 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

12 Plaintiff,

13 v.

14 **GWENDOLYN A. JACKSON,**

15 Defendant.

Case No. 9CA 03421

**MISDEMEANOR
COMPLAINT**

**Voluntary Appearance
June 17, 2009**

**Count 1: 487(a) P.C.
Count 2: 14107(b)(1)W&I**

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

21 **COUNT 1**

22 **487(a) Penal Code**

23 **[GRAND THEFT]**

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

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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

1 Agency: California Department of Justice
2 Bureau of Medi-Cal Fraud and Elder Abuse
3 Law Enforcement Agency No. 7293
4 ORI No. CA0199409
5 BMFEA Docket number WC2008306701
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7 **DEFENDANT BIOGRAPHICAL INFORMATION**

8 **GWENDOLYN A. JACKSON**

9 DOB: January 4, 1958 SSN: 547-08-1370
10 CII No.: CDL No. N4810477
11 Sex: Female Race: Black
12 Hair: Black Eyes: Brown
13 Height: 5' 7" Weight: 190
14 Residence: 9418 Juniper Street
15 Los Angeles, CA 90002
16 Business: Unknown
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1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 CALIFORNIA DEPARTMENT OF JUSTICE
BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
3 Sue Melton Bartholomew, Supervising Deputy Attorney General
Steven Smith (45969), Deputy Attorney General
4 303 North Glenoaks Boulevard, Suite 900, Burbank, CA 91502
Telephone: (818) 556-2929
5 Fax: (818) 556-2939

6 Attorneys for Plaintiff

7
8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES — CENTRAL DISTRICT**

10
11 **PEOPLE OF THE STATE OF CALIFORNIA,**

Plaintiff,

13 **v.**

14 **RUFUS JACKSON,**

Defendant.

Case No.:

**FELONY COMPLAINT
FOR ARREST WARRANT**

**Count 1: 487(a) Penal Code
Count 2: 14107(b)(1) Wel. & Inst.**

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

21 **COUNT 1**

22 **487(a) Penal Code**

23 **[GRAND THEFT]**

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

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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

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

5 Preliminary hearing time estimate: Two hours

6 Recommended Bail: OR if defendant appears voluntarily
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14 **DEFENDANT BIOGRAPHICAL INFORMATION**

15 RUFUS JACKSON

16 Recommended Bail: OR

17 DOB: February 16, 1975 SSN:
18 CII No. CDL No. A9737661
19 Sex: Male Race: Black
20 Hair: Black Eyes: Brown
21 Height: 5' 3" Weight: 175
22 Home Address (last known): 510 East 61st Street
23 Los Angeles, CA 90003
24 Business Address: Unknown
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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:

<u>Count</u>	<u>Charge</u>
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.

Arrestment in Superior Court will be:

Date: _____

Courtroom: _____

Time: _____ AM / PM

DATED this _____ day of _____, 2009.

MAGISTRATE

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 SUSAN E. MELTON, Supervising Dep. Atty Gen.
Bureau of Medi-Cal Fraud & Elder Abuse
3 DAVID HAXTON, State Bar No. 121702
Deputy Attorney General
4 303 N. Glenoaks Blvd., Suite 900
Burbank, CA 91502-1148
5 Telephone: (818) 556-2922

6 Attorneys for Plaintiff

7
8 **SUPERIOR COURT OF LOS ANGELES COUNTY**
9 **CENTRAL DISTRICT, STATE OF CALIFORNIA**

10 THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No. _____

11 Plaintiff,

**FELONY COMPLAINT
FOR ARREST WARRANT**

12 -versus-

13 **CHRIS DION JONES SR.,**

Defendant.

2 Counts
P.C. 487(a) (F)
W&I 14107(b)(1) (F)

14
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16 The undersigned, on information and belief, accuses defendant CHRIS JONES of
17 the following crimes, which are connected to one another in their commission:

18 **COUNT 1**

19 [GRAND THEFT]

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

24 **COUNT 2**

25 [PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

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

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

5 **REQUEST FOR ARREST WARRANT**

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

9 **REQUEST FOR DISCOVERY**

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

13 **DECLARATION**

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

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

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

23 Defendant Bail
24 CHRIS JONES \$ _____

25
26 _____
Date MAGISTRATE
27

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

6 Preliminary Hearing Time Estimate: 30 min.

7 Arrest Warrant Requested

8 Recommended Bail: \$1,000

9 DOB: 12/14/1966

10 CII No. A07468568

CDL No. A8385595

SS No. 570-37-6089

11 Sex: M Race: B Hair: Blk Eyes: Brn

Ht: 6'00" Wt: 195

12 Residence: 5836 Bonfair Ave.

13 Lakewood, CA 90712

14 Aliases: James Jones

15 Jack Johnson

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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:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
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:

<u>Defendant</u>	<u>Bail</u>
CHRIS JONES	\$ _____

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

DATED this ____ day of _____, 20__.

MAGISTRATE