EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN MELTON BARTHOLOMEW,
Supervising Deputy Attorney General
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State Bar No. 130401
303 N. Glenoaks Blvd., Suite 900
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Attorneys for Plaintiff

SUPERIOR COURT OF LOS ANGELES COUNTY

CENTRAL DISTRICT, STATE OF CALIFORNIA

PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. **LORRAINE LEE,** (a.k.a. Lorraine Ann Jackson) Defendant.	Case No.: A.G. Case No. LB2008306664 **FELONY COMPLAINT FOR ARREST WARRANT** 2 Counts 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, **LORRAINE LEE**, did commit the following crimes which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

From on or about June 1, 2007, to on or about October 18, 2007, in the County of Los Angeles, State of California, defendant **LORRAINE LEE** 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 June 15, 2007, to on or about October 15, 2007, in the County of Los Angeles, State of California, defendant **LORRAINE LEE**, 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 Carolyn Lee, 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.

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

_____
YOLANDA MILLS
Investigative 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
LORRAINE LEE	$_____

_____ Date

_____ MAGISTRATE

Agency: Bureau of Medi-Cal Fraud and Elder Abuse
California Department of Justice
Law Enforcement Agency No.7293
I/OYolanda Mills
(626) 917-6348

Preliminary Hearing time estimate: 1 hour

Arrest Warrant Requested

LORRAINE LEE

Recommended Bail: $5,000
DOB: 06/21/1965
CII No.A08578734 CDL No. C3306460 SS No. 556-41-7958
Sex: F Race: Hair: Brn Eyes: Brn Ht: 5'05" Wt: 216
Residence: 20 East Ellis Street
Long Beach, CA 90805

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:

LORRAINE LEE (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
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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, Plaintiff, -versus- **PATCHES LEE MILLER,** Defendant.	Case No. _____ **FELONY COMPLAINT FOR ARREST WARRANT** 2 Counts P.C. 487(a) (F) W&I 14107(b)(1) (M)

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

COUNT 1

[GRAND THEFT]

From on or about October 5, 2007, to on or about March 22, 2008, in the County of Los Angeles, State of California, defendant PATCHES MILLER 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 October 5, 2007, to on or about March 22, 2008, in the County of Los Angeles, State of California, defendant PATCHES MILLER, 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 Barbara Davenport, 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
PATCHES MILLER	$_____

_____ 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. LB2008306710

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 08/28/1970
CII No. _____ CDL No. A1685412 SS No. 545-43-1246
Sex: F Race: W Hair: Bln Eyes: Blu Ht: 5'03" Wt: 140
Residence: 5847 Cherry Ave.
Long Beach, CA 90805

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
PATCHES MILLER	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
PATCHES MILLER	$_____

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 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, Plaintiff, -versus- **PAMELA RENEE NELSON,** Defendant.	Case No. 9CA03424 **MISDEMEANOR COMPLAINT FOR ARREST WARRANT** Voluntary Appearance June 17, 2009 2 Counts P.C. 487(a) (M) W&I 14107(b)(1) (M)

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

COUNT 1

[GRAND THEFT]

From on or about December 8, 2007, to on or about January 29, 2008, in the County of Los Angeles, State of California, defendant PAMELA NELSON 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 December 8, 2007, to on or about January 29, 2008, in the County of Los Angeles, State of California, defendant PAMELA NELSON, 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 Ethel Robinson, 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
PAMELA NELSON	$_____

_____ 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. LA2008306709

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 10/01/1960
CII No. M91655930 CDL No. N7034727 SS No. 569-21-7574
Sex: F Race: B Hair: Brn Eyes: Brn Ht: 5'04" Wt: 128
Residence: 4207 S. Van Ness Ave.
Los Angeles, CA 90062
Aliases: Pamela Nelson

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
303 N. Glenoaks Boulevard, Suite 900
Burbank, California 91502-1148
Telephone: (818) 556-2928
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

THE PEOPLE OF THE STATE OF CALIFORNIA, **Plaintiff,** **v.** **ANA BERTHA PINEDA (dob-11/23/1978),** **Defendant.**	**Case No.:** **FELONY COMPLAINT FOR ARREST WARRANT** **2 Counts** **Count 1-P.C. 487(a)** **Count 2-W&I 14107(b)(1)**

The Undersigned, on information and belief, accuses defendant ANA BERTHA PINEDA of the following crimes, which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

From on or about March 10, 2008, to on or about May 31, 2008, in the County of Los Angeles, State of California, defendant ANA BERTHA PINEDA 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 10, 2008, to on or about May 31, 2008, in the County of Los Angeles, State of California, defendant ANA BERTHA PINEDA, 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 NAVARRO (DOB 2/10/21), 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. LB2009307385

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
ANA BERTHA PINEDA	$_____

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant-ANA BERTHA PINEDA

Recommended Bail: $2,000.00

DOB: 11/23/1978
CII No.
CDL No. B4594425
SS No. 558-25-8207

Sex: F Race: Hisp. Hair: Brn Eyes: Grn Ht: 5' 02" Wt: 170

Residence: 10025 Alondra Blvd. #117
Bellflower, CA 90706
(562) 920-0672; (562) 852-9903

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
ANA BERTHA PINEDA	1	487(a)	-
ANA BERTHA PINEDA	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
ANA BERTHA PINEDA	$_____

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, Plaintiff, -versus- **ARIANNA PRUDE** **a.k.a. Arianna Prude Oparadguike,** Defendant.	Case No. _____ **FELONY COMPLAINT FOR ARREST WARRANT** 2 Counts P.C. 487(a) (F) W&I 14107(b)(1) (M)

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

COUNT 1

[GRAND THEFT]

From on or about December 31, 2007, to on or about February 15, 2008, in the County of Los Angeles, State of California, defendant ARIANNA PRUDE 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 December 31, 2007, to on or about February 15, 2008, in the County of Los Angeles, State of California, defendant ARIANNA PRUDE, 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 Willie Taylor, 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
ARIANNA PRUDE	$_____

_____ 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. WC2008306662

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 04/18/1967
CII No. A22741540 CDL No. A3411256 SS No. 550-19-4361
Sex: F Race: B Hair: Blk Eyes: Brn Ht: 5'07" Wt: 178
Residence: 13715 Cordary Ave, #261
Hawthorne, CA 90250
Aliases: Arianna Prudeoparadguike
Arianna Prudeoparaguike
Arianna Prudeoparaoguike

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
ARIANNA PRUDE	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
ARIANNA PRUDE	$_____

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 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, Plaintiff,	Case No. _____
-versus-	**FELONY COMPLAINT FOR ARREST WARRANT**
BRENDA DENISE ROCHELLE, Defendant.	2 Counts P.C. 487(a) (F) W&I 14107(b)(1) (M)

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

COUNT 1

[GRAND THEFT]

From on or about February 4, 2007, to on or about April 15, 2007, in the County of Los Angeles, State of California, defendant BRENDA ROCHELLE 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 February 4, 2007, to on or about April 15, 2007, in the County of Los Angeles, State of California, defendant BRENDA ROCHELLE, 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 Marcus Bradley, 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
BRENDA ROCHELLE	$_____

_____ 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. LA2008306711

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 09/09/1966
CII No. A28165997 CDL No. C5813959 SS No. 462-35-7748
Sex: F Race: B Hair: Blk Eyes: Brn Ht: 5'03" Wt: 200
Residence: 9007 S. Fir Ave.
Los Angeles, CA 90002
Aliases: Brenda Rochelle

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
BRENDA ROCHELLE	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
BRENDA ROCHELLE	$_____

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, Plaintiff, v. **ERNEST JAMES ROGERS, JR.**, Defendant.	Case No.: A.G. Case No. LA2008101556 **FELONY COMPLAINT FOR ARREST WARRANT** 2 Counts 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, **ERNEST JAMES ROGERS, JR.**, did commit the following crimes which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

From on or about August 26, 2006, to on or about December 27, 2006, in the County of Los Angeles, State of California, defendant **ERNEST JAMES ROGERS, JR.** 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 31, 2006, to on or about December 31, 2006, in the County of Los Angeles, State of California, defendant **ERNEST JAMES ROGERS, JR.**, 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 Leslie Harris, 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
ERNEST JAMES ROGERS, JR.	$_____

_____ 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

ERNEST JAMES ROGERS, JR.

AKA: Rogers, Ernest James
Rogers, Ernesto James
Rogers, Ernest

Recommended Bail: $5,000
DOB: 10/07/1955
CII No.A04111141 CDL No. N5008580 SS No. 562-08-9072
Sex: M Race: Hair: Blk Eyes: Brn Ht: 5'10" Wt: 201
Residence: 1020 W. 51st St.
Los Angeles, CA 90037

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:

ERNEST JAMES ROGERS, JR.

(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