

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 SUSAN MELTON BARTHOLOMEW,  
Supervising Deputy Attorney General  
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4 303 N. Glenoaks Blvd., Suite 900  
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6

7 Attorneys for Plaintiff  
8

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 **LORRAINE LEE,**  
16 (a.k.a. Lorraine Ann Jackson)

17 Defendant.  
18

Case No.:

A.G. Case No. LB2008306664

**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, **LORRAINE LEE**, did commit the  
21 following crimes which are connected to one another in their commission:

22 **COUNT 1**

23 [GRAND THEFT]

24 From on or about June 1, 2007, to on or about October 18, 2007, in the County of Los  
25 Angeles, State of California, defendant **LORRAINE LEE** unlawfully took from the State of  
26 California property of a value in excess of four hundred dollars (\$400), in violation of section  
27 487, subdivision (a), of the Penal Code, a felony.  
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**COUNT 2**

[PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about 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

1 admitted to bail in the sum of:

2	<u>Defendant</u>	<u>Bail</u>
3		
4	<b>LORRAINE LEE</b>	\$ _____

7	_____	_____
8	Date	MAGISTRATE

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

13 Preliminary Hearing time estimate: 1 hour

14 Arrest Warrant Requested

15 **LORRAINE LEE**

16 Recommended Bail: \$5,000  
 17 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  
 18 Residence: 20 East Ellis Street  
 Long Beach, CA 90805

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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:

**LORRAINE LEE** (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,

11 Plaintiff,

12 -versus-

13 **PATCHES LEE MILLER,**

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 PATCHES  
17 MILLER of the following crimes, which are connected to one another in their commission:

18 **COUNT 1**

19 [GRAND THEFT]

20 From on or about October 5, 2007, to on or about March 22, 2008, in the County  
21 of Los Angeles, State of California, defendant PATCHES MILLER 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 October 5, 2007, to on or about March 22, 2008, in the County  
27 of Los Angeles, State of California, defendant PATCHES MILLER, 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 Barbara Davenport, in violation of section 14107, subdivision (b)(1), of  
4 the 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 \_\_\_\_\_  
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 <u>Defendant</u>	<u>Bail</u>
24 PATCHES MILLER	\$ _____

25  
26 \_\_\_\_\_  
Date

\_\_\_\_\_ MAGISTRATE

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. LB2008306710

6 Preliminary Hearing Time Estimate: 30 min.

7 Arrest Warrant Requested

8 Recommended Bail: \$1,000

9 DOB: 08/28/1970

10 CII No. \_\_\_\_\_ CDL No. A1685412

11 SS No. 545-43-1246

12 Sex: F Race: W Hair: Bln Eyes: Blu

13 Ht: 5'03" Wt: 140

14 Residence: 5847 Cherry Ave.

15 Long Beach, CA 90805

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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>
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:

<u>Defendant</u>	<u>Bail</u>
PATCHES MILLER	\$ _____

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 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. 9CA03424

11 Plaintiff,

**MISDEMEANOR COMPLAINT  
FOR ARREST WARRANT**

12 -versus-

13 PAMELA RENEE NELSON,

Voluntary Appearance June 17, 2009

14 Defendant.

2 Counts

P.C. 487(a) (M)

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

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

19 **COUNT 1**

20 [GRAND THEFT]

21 From on or about December 8, 2007, to on or about January 29, 2008, in the  
22 County of Los Angeles, State of California, defendant PAMELA NELSON 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 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.

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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>
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

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  
5 Burbank, California 91502-1148  
Telephone: (818) 556-2928  
6 Fax: (818) 556-2939  
E-mail: gary.mogil@doj.ca.gov

7 Attorneys for The People of the State of California

8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

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

13 **Plaintiff,**

14 **v.**

15 **ANA BERTHA PINEDA (dob-11/23/1978),**

16 **Defendant.**

**Case No.:**

**FELONY COMPLAINT  
FOR ARREST WARRANT**

**2 Counts**

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

17  
18 The Undersigned, on information and belief, accuses defendant ANA BERTHA PINEDA  
19 of the following crimes, which are connected to one another in their commission:

20 **COUNT 1**

21 **[GRAND THEFT]**

22 From on or about March 10, 2008, to on or about May 31, 2008, in the County of Los  
23 Angeles, State of California, defendant ANA BERTHA PINEDA unlawfully took from the State  
24 of California property of a value in excess of four hundred dollars (\$400), in violation of section  
25 487, subdivision (a), of the Penal Code, a felony.

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1 **COUNT 2**

2 **[PRESENTING FALSE MEDI-CAL IHSS CLAIM]**

3 From on or about March 10, 2008, to on or about May 31, 2008, in the County of Los  
4 Angeles, State of California, defendant ANA BERTHA PINEDA, with intent to defraud,  
5 presented and caused to be presented for allowance and payment false and fraudulent claims for  
6 furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home Supportive Services  
7 allegedly provided to MARIA NAVARRO (DOB 2/10/21), in violation of section 14107,  
8 subdivision (b)(1), of the Welfare and Institutions Code, a misdemeanor.

9 **REQUEST FOR ARREST WARRANT**

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

13 **REQUEST FOR DISCOVERY**

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

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

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

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

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

25 5. Any results of physical or mental examinations, scientific tests, experiments or  
26 comparisons which the defendants intend to offer in evidence at the trial. [Penal Code section  
27 1054.3(a).]

28 6. The opportunity to view “[a]ny real evidence which the defendants intend to offer



1 Arrest Warrant Requested

2 Defendant-ANA BERTHA PINEDA

3 Recommended Bail: \$2,000.00

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

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

9 Residence: 10025 Alondra Blvd. #117  
10 Bellflower, CA 90706  
11 (562) 920-0672; (562) 852-9903

12 Aliases: None

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

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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  
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 **ARIANNA PRUDE**  
14 **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)

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

18 **COUNT 1**

19 [GRAND THEFT]

20 From on or about December 31, 2007, to on or about February 15, 2008, in the  
21 County of Los Angeles, State of California, defendant ARIANNA PRUDE unlawfully took from  
22 the State of California property of a value in excess of four hundred dollars (\$400), in violation  
23 of 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 December 31, 2007, to on or about February 15, 2008, in the  
27 County of Los Angeles, State of California, defendant ARIANNA PRUDE, with intent to

1 defraud, presented and caused to be presented for allowance and payment false and fraudulent  
2 claims for furnishing services under the Medi-Cal Act, to wit, time sheets for In-Home  
3 Supportive Services allegedly provided to Willie Taylor, in violation of section 14107,  
4 subdivision (b)(1), of the 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 ARIANNA PRUDE \$ \_\_\_\_\_

25  
26 \_\_\_\_\_  
Date

26 \_\_\_\_\_  
MAGISTRATE

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. WC2008306662

6 Preliminary Hearing Time Estimate: 30 min.

7 Arrest Warrant Requested

8 Recommended Bail: \$1,000

9 DOB: 04/18/1967

10 CII No. A22741540

11 CDL No. A3411256

12 SS No. 550-19-4361

13 Sex: F Race: B Hair: Blk Eyes: Brn

14 Ht: 5'07" Wt: 178

15 Residence: 13715 Cordary Ave, #261

16 Hawthorne, CA 90250

17 Aliases: Arianna Prudeoparadguike

18 Arianna Prudeoparadguike

19 Arianna Prudeoparaoguike

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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>
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:

<u>Defendant</u>	<u>Bail</u>
ARIANNA PRUDE	\$_____

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 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 **BRENDA DENISE ROCHELLE,**

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 BRENDA  
17 ROCHELLE of the following crimes, which are connected to one another in their commission:

18 **COUNT 1**

19 [GRAND THEFT]

20 From on or about February 4, 2007, to on or about April 15, 2007, in the County  
21 of Los Angeles, State of California, defendant BRENDA ROCHELLE 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 February 4, 2007, to on or about April 15, 2007, in the County  
27 of Los Angeles, State of California, defendant BRENDA ROCHELLE, 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 Marcus Bradley, 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 \_\_\_\_\_  
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 <u>Defendant</u>	<u>Bail</u>
24 BRENDA ROCHELLE	\$ _____

25  
26 \_\_\_\_\_  
Date

26 \_\_\_\_\_  
MAGISTRATE

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. LA2008306711

6 Preliminary Hearing Time Estimate: 30 min.

7 Arrest Warrant Requested

8 Recommended Bail: \$1,000

9 DOB: 09/09/1966

10 CII No. A28165997

CDL No. C5813959

SS No. 462-35-7748

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

Ht: 5'03" Wt: 200

12 Residence: 9007 S. Fir Ave.  
13 Los Angeles, CA 90002

14 Aliases: Brenda Rochelle

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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>
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:

<u>Defendant</u>	<u>Bail</u>
BRENDA ROCHELLE	\$ _____

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  
8

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 **ERNEST JAMES ROGERS, JR.,**

16 Defendant.  
17  
18

Case No.:

A.G. Case No. LA2008101556

**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, **ERNEST JAMES ROGERS, JR.**,  
21 did 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 26, 2006, to on or about December 27, 2006, in the County of Los  
25 Angeles, State of California, defendant **ERNEST JAMES ROGERS, JR.** 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 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



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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:

**ERNEST JAMES ROGERS, JR.**

(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