

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  
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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 **FAITH SHELMON,**

16 Defendant.  
17  
18

Case No.:

A.G. Case No. LA2009307307

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

22 **COUNT 1**

23 [GRAND THEFT]

24 From on or about March 16 2007, to on or about July 31, 2007, in the County of Los  
25 Angeles, State of California, defendant **FAITH SHELMON** 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 March 31, 2007, to on or about June 30, 2007, in the County of Los Angeles, State of California, defendant **FAITH SHELMON**, 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 Rickye Diggs, 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

1 admitted to bail in the sum of:

2	<u>Defendant</u>	<u>Bail</u>
3	<b>FAITH SHELMON</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 Lorena Andrade  
 (626) 918-0686

13 Preliminary Hearing time estimate: 1 hour

14 Arrest Warrant Requested

15 **FAITH SHELMON**

16 AKA: Quisenberry, Faith Alexandria  
 17 Orr, Faith Alexandria  
 18 Orr, Faye Alexaendria  
 Orr, Faye A  
 19 Shelmon, Faith Alexandria  
 Quisenberry, Faith Alexandria  
 20 Shelmon, Faith Alexandri Jr.  
 Qusenberry, Faith Alexandri  
 Shelmon, Faith Alexandri

21 Recommended Bail: \$5,000  
 22 DOB: 06/08/1951  
 CII No.A04163911 CDL No. N4522140 SS No. 572-94-4156  
 Sex: F Race: Hair: Bln Eyes: Brn Ht: 5'06" Wt: 135  
 23 Residence: 885 E. 102<sup>nd</sup> St., Apt. 4  
 Los Angeles, CA 90044

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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:

**FAITH SHELMON** (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 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  
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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 **QWA'STOSHA SPRUILLE (dob-02/19/1969),**

16 **Defendant.**

**Case No.: 9CA03423**

**MISDEMEANOR COMPLAINT**

**Voluntary Appearance**  
**June 17, 2009**

**2 Counts**

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

18 The Undersigned, on information and belief, accuses defendant QWA'STOSHA  
19 SPRUILLE of the following crimes, which are connected to one another in their commission:

20 **COUNT 1**

21 **[GRAND THEFT]**

22 From on or about May 21, 2008, to on or about June 30, 2008, in the County of Los  
23 Angeles, State of California, defendant QWA'STOSHA SPRUILLE unlawfully took from the  
24 State of California property of a value in excess of four hundred dollars (\$400), in violation of  
25 section 487, subdivision (a), of the Penal Code, a misdemeanor.

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1 in evidence at the trial." [Penal Code section 1054.3(b).]

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

5 **DECLARATION**

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct. Signed at \_\_\_\_\_, California, May \_\_\_\_, 2009.

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10 \_\_\_\_\_  
11 Lorena Andrade  
12 Senior Management Auditor  
California Department of Justice  
Bureau of Medi-Cal Fraud and Elder Abuse

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14 Agency: Bureau of Medi-Cal Fraud & Elder Abuse  
California Department of Justice  
15 Law Enforcement Agency No. 7293  
ORI #CA0199409  
16 BMFEA Docket No. LB2009307317

17 Preliminary Hearing Time Estimate: 3 hours

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19 **ORDER**

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

22 Defendant Bail  
23 QWA'STOSHA SPRUILLE \$ \_\_\_\_\_

24  
25

26 \_\_\_\_\_  
27 Date MAGISTRATE

28

1 Arrest Warrant Requested

2 Defendant-QWA'STOSHA SPRUILLE

3 Recommended Bail: \$1,000.00

4 DOBs: 02/19/1969; 09/29/1988  
5 CII No. A29706953  
6 CDL No. E1163399  
7 SS No. 616-16-2848

8 Sex: F Race: Blk Hair: Blk Eyes: Brn Ht: 5' 02" Wt: 135

9 Residence: 1527 W. 204<sup>th</sup> St., Apt. 3 621 E. Redondo Beach Blvd.  
10 Torrance, CA 90501 Rancho Dominguez, CA 90220-2524  
11 (310) 533-1019 (310) 323-3166

12 Aliases: None

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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 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:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
QWA'STOSHA SPRUILLE	1	487(a)	-
QWA'STOSHA SPRUILLE	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:

<u>Defendant</u>	<u>Bail</u>
QWA'STOSHA SPRUILLE	\$ _____

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

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. 9CA03426

11 Plaintiff,

**MISDEMEANOR COMPLAINT  
FOR ARREST WARRANT**

12 -versus-

13 PECEY SOK,

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 PECEY SOK of  
18 the following crimes, which are connected to one another in their commission:

19 **COUNT 1**

20 [GRAND THEFT]

21 From on or about October 16, 2007, to on or about December 29, 2007, in the  
22 County of Los Angeles, State of California, defendant PECEY SOK unlawfully took from the  
23 State of California property of a value in excess of four hundred dollars (\$400), in violation of  
24 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 October 16, 2007, to on or about December 29, 2007, in the County of Los Angeles, State of California, defendant PECEY SOK, 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.

\_\_\_\_\_  
YOLANDA MILLS  
Investigative 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>
PECEY SOK	\$ _____

_____	_____
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. LB2008306684

Arrest Warrant Requested  
Recommended Bail: \$1,000  
DOB: 11/03/1983  
CII No. A24205662      CDL No. D2246809      SS No. 458-65-2468  
Sex: M    Race: Cam    Hair: Blk    Eyes: Brn    Ht: 5'06"    Wt: 110  
Residence: 2240½ Elm Ave.  
Long Beach, CA 90806  
Aliases: Tecey Sok

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 **DONNA KAYE TIBBS (dob-02/05/1957)**  
16 **aka DONNA KAYE GATES,**

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 The Undersigned, on information and belief, accuses defendant DONNA KAYE TIBBS  
19 aka DONNA KAYE GATES (hereafter "DONNA KAYE TIBBS") of the following crimes,  
20 which are connected to one another in their commission:

21 **COUNT 1**

22 **[GRAND THEFT]**

23 From on or about October 17, 2007, to on or about January 15, 2008, in the County of  
24 Los Angeles, State of California, defendant DONNA KAYE TIBBS 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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1 **COUNT 2**

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

3 From on or about October 17, 2007, to on or about January 15, 2008, in the County of  
4 Los Angeles, State of California, defendant DONNA KAYE TIBBS, 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 BARBARA KNOWLTON (DOB 8/9/32), in violation of section 14107,  
8 subdivision (b)(1), of the Welfare and Institutions Code, a felony.

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 in evidence at the trial.” [Penal Code section 1054.3(b).]

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

5 **DECLARATION**

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct. Signed at \_\_\_\_\_, California, May \_\_\_\_, 2009.

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10 \_\_\_\_\_  
11 Lorena Andrade  
12 Senior Management Auditor  
California Department of Justice  
Bureau of Medi-Cal Fraud and Elder Abuse

13 Agency: Bureau of Medi-Cal Fraud & Elder Abuse  
14 California Department of Justice  
15 Law Enforcement Agency No. 7293  
ORI #CA0199409  
16 BMFEA Docket No. LA2008306666

17 Preliminary Hearing Time Estimate: 3 hours

18  
19 **ORDER**

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

22 Defendant Bail  
23 DONNA KAYE TIBBS \$ \_\_\_\_\_

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26 \_\_\_\_\_  
27 Date

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

1 Arrest Warrant Requested

2 Defendant-DONNA KAYE TIBBS

3 Recommended Bail: \$5,000.00

4 DOB: 02/05/1957  
5 CII No. A12395856  
6 CDL No. N4274301; N4274381  
7 SS No. 556-96-4370

8 Sex: F Race: Blk Hair: Brn Eyes: Brn Ht: 5' 10" Wt: 150

9 Residence: 932 W. 52<sup>nd</sup> St.  
10 Los Angeles, CA 90037-3616  
11 (323) 750-4224

12 Aliases: Donna Kaye Gates

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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 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:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
DONNA KAYE TIBBS	1	487(a)	-
DONNA KAYE TIBBS	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:

<u>Defendant</u>	<u>Bail</u>
DONNA KAYE TIBBS	\$ _____

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

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
MAGISTRATE

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 **CHRISTOPHER THOMAS,**

15 Defendant.

Case No. 9CA 03420

**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 **CHRISTOPHER THOMAS**, 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]**

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From on or about March 22, 2007, to on or about June 12, 2007, in the County of Los Angeles, State of California, defendant, **CHRISTOPHER THOMAS**, 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.





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 **DIANE LYNN TRUJILLO,**

15 Defendant.

**Case No. 9CA 03422**

**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 **DIANE LYNN TRUJILLO**, 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 December 17, 2006, to on or about May 18, 2007, in the County of Los  
25 Angeles, State of California, defendant, **DIANE LYNN TRUJILLO**, unlawfully took from the  
26 State of California property of a value in excess of four hundred dollars (\$400), in violation of  
27 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 17, 2006, to on or about May 18, 2007, in the County of Los Angeles, State of California, defendant **DIANE LYNN TRUJILLO**, 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 Elsie T., 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 LA2008101551  
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7 **DEFENDANT BIOGRAPHICAL INFORMATION**

8 **DIANE LYNN TRUJILLO**

9 DOB: February 6, 1964 SSN: 549-15-7087  
10 CII No.: A06758328 CDL No. C2218536  
11 Sex: Female Race: Hispanic  
12 Hair: Brown Eyes: Brown  
13 Height: 5' 0" Weight: 198  
14 Residence: 14104 Van Nuys Blvd., #111  
15 Arleta, CA 91331  
16 Business: Unknown  
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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,

Case No. \_\_\_\_\_

11 Plaintiff,

**FELONY COMPLAINT  
FOR ARREST WARRANT**

12 -versus-

13 **RICHARD F. VILLEGAS,**

Defendant.

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

14  
15  
16 The undersigned, on information and belief, accuses defendant RICHARD  
17 VILLEGAS of the following crimes, which are connected to one another in their commission:

18 **COUNT 1**

19 [GRAND THEFT]

20 From on or about September 19, 2007, to on or about February 29, 2008, in the  
21 County of Los Angeles, State of California, defendant RICHARD VILLEGAS unlawfully took  
22 from the State of California property of a value in excess of four hundred dollars (\$400), in  
23 violation 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 September 19, 2007, to on or about February 29, 2008, in the  
27 County of Los Angeles, State of California, defendant RICHARD VILLEGAS, 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 defendant by Rodolfo Villegas, in violation of section  
4 14107, subdivision (b)(1), of the 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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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 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>
RICHARD VILLEGAS	\$ _____

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_____	_____
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. LB2008306667

6 Preliminary Hearing Time Estimate: 30 min.

7 Arrest Warrant Requested

8 Recommended Bail: \$1,000

9 DOB: 05/24/1970

10 CII No. A11096351

11 CDL No. A5211340

12 SS No. 554-45-8651

13 Sex: M Race: H Hair: Blk Eyes: Brn

14 Ht: 5'08" Wt: 195

15 Residence: 8041 Orange St.

16 Downey, CA 90242

17 Aliases: Joseph Villegas

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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>
RICHARD VILLEGAS	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>
RICHARD VILLEGAS	\$ _____

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 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 CALIFORNIA,**

13 **Plaintiff,**

14 **v.**

15 **RODERICK EDWARD WOODS**  
16 **(dob-06/20/1960),**

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 The Undersigned, on information and belief, accuses defendant RODERICK EDWARD  
19 WOODS of the following crimes, which are connected to one another in their commission:

20 **COUNT 1**

21 **[GRAND THEFT]**

22 From on or about February 1, 2008, to on or about April 15, 2008, in the County of Los  
23 Angeles, State of California, defendant RODERICK EDWARD WOODS unlawfully took from  
24 the State of California property of a value in excess of four hundred dollars (\$400), in violation  
25 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 February 1, 2008, to on or about April 15, 2008, in the County of Los Angeles, State of California, defendant RODERICK EDWARD WOODS, 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 DARLENE MOON (DOB 11/11/56), 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

1 in evidence at the trial." [Penal Code section 1054.3(b).]

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

5 **DECLARATION**

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct. Signed at \_\_\_\_\_, California, May \_\_\_\_, 2009.

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11 \_\_\_\_\_  
12 Lorena Andrade  
13 Senior Management Auditor  
14 California Department of Justice  
15 Bureau of Medi-Cal Fraud and Elder Abuse

13 Agency: Bureau of Medi-Cal Fraud & Elder Abuse  
14 California Department of Justice  
15 Law Enforcement Agency No. 7293  
16 ORI #CA0199409  
17 BMFEA Docket No. LB2008306745

18 Preliminary Hearing Time Estimate: 3 hours

19 **ORDER**

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

22 Defendant Bail  
23 RODERICK EDWARD WOODS \$ \_\_\_\_\_

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26 \_\_\_\_\_  
27 Date

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

1 Arrest Warrant Requested

2 Defendant-RODERICK EDWARD WOODS

3 Recommended Bail: \$2,000.00

4 DOB: 06/20/1960  
5 CII No. A05876120  
6 CDL Nos. C0337728; D8418594  
7 SS No. 547-11-7460

8 Sex: M Race: Blk Hair: Blk Eyes: Brn Ht: 6' 03" Wt: 170

9 Residence: 356 W. 11<sup>th</sup> St.  
10 San Pedro, CA 90731  
11 (310) 514-3446

12 Aliases: None

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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 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:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
RODERICK EDWARD WOODS	1	487(a)	-
RODERICK EDWARD WOODS	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:

<u>Defendant</u>	<u>Bail</u>
RODERICK EDWARD WOODS	\$ _____

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

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
MAGISTRATE