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. **FAITH SHELMON,** Defendant.	Case No.: A.G. Case No. LA2009307307 **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, **FAITH SHELMON**, did commit the following crimes which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

From on or about March 16 2007, to on or about July 31, 2007, in the County of Los Angeles, State of California, defendant **FAITH SHELMON** 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 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

admitted to bail in the sum of:

Defendant	Bail
FAITH SHELMON	$_____

_____ 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

FAITH SHELMON

AKA: Quisenberry, Faith Alexandria
Orr, Faith Alexandria
Orr, Faye Alexaendria
Orr, Faye A
Shelmon, Faith Alexandria
Quisenberry, Faith Alexandria
Shelmon, Faith Alexandri Jr.
Qusenberry, Faith Alexandri
Shelmon, Faith Alexandri

Recommended Bail: $5,000
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
Residence: 885 E. 102nd St., Apt. 4
Los Angeles, CA 90044

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)

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 MELTON BARTHOLOMEW
Supervising Deputy Attorney General
GARY M. MOGIL, Deputy Attorney General
State Bar No. 134585
BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
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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.** **QWA'STOSHA SPRUILLE (dob-02/19/1969),** **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)**

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

COUNT 1

[GRAND THEFT]

From on or about May 21, 2008, to on or about June 30, 2008, in the County of Los Angeles, State of California, defendant QWA'STOSHA SPRUILLE 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.

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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. LB2009307317

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
QWA'STOSHA SPRUILLE	$_____

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant-QWA'STOSHA SPRUILLE

Recommended Bail: $1,000.00

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

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

Residence: 1527 W. 204th St., Apt. 3
Torrance, CA 90501
(310) 533-1019

621 E. Redondo Beach Blvd.
Rancho Dominguez, CA 90220-2524
(310) 323-3166

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
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:

Defendant	Bail
QWA'STOSHA SPRUILLE	$_____

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

DATED this _____ day of _____, 2009.

_____
MAGISTRATE

COUNT 2

[PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about May 21, 2008, to on or about June 30, 2008, in the County of Los Angeles, State of California, defendant QWA'STOSHA SPRUILLE, 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 ROBERT HALL (DOB 11/18/48), 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).]

///

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- **PECEY SOK,** Defendant.	Case No. 9CA03426 **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 PECEY SOK of the following crimes, which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

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 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 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

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
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

EDMUND G. BROWN JR., Attorney General
of the State of California
SUSAN MELTON BARTHOLOMEW
Supervising Deputy Attorney General
GARY M. MOGIL, Deputy Attorney General
State Bar No. 134585
BUREAU OF MEDI-CAL FRAUD & ELDER ABUSE
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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.** **DONNA KAYE TIBBS (dob-02/05/1957) aka DONNA KAYE GATES,** **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 DONNA KAYE TIBBS aka DONNA KAYE GATES (hereafter "DONNA KAYE TIBBS") of the following crimes, which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

From on or about October 17, 2007, to on or about January 15, 2008, in the County of Los Angeles, State of California, defendant DONNA KAYE TIBBS 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.

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COUNT 2

[PRESENTING FALSE MEDI-CAL IHSS CLAIM]

From on or about October 17, 2007, to on or about January 15, 2008, in the County of Los Angeles, State of California, defendant DONNA KAYE TIBBS, 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 KNOWLTON (DOB 8/9/32), 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(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. LA2008306666

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
DONNA KAYE TIBBS	$_____

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant-DONNA KAYE TIBBS

Recommended Bail: $5,000.00

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

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

Residence: 932 W. 52nd St.
Los Angeles, CA 90037-3616
(323) 750-4224

Aliases: Donna Kaye Gates

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
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:

Defendant	Bail
DONNA KAYE TIBBS	$_____

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

DATED this _____ day of _____, 2009.

_____
MAGISTRATE

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

Attorneys for Plaintiff

SUPERIOR COURT OF LOS ANGELES COUNTY

STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. **CHRISTOPHER THOMAS,** 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**

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

COUNT 1

487(a) Penal Code

[GRAND THEFT]

From on or about 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.

COUNT 2

14107(b)(1) Welfare and Institutions Code

[PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

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**, 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 S., 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.

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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.

_____
YOLANDA MILLS
Investigative Auditor
Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice

Agency: Bureau of Medi-Cal Fraud & Elder Abuse
California Department of Justice
Law Enforcement Agency No. 7293
ORI No. CA0199409
BMFEA Docket No. LB2008306746

DEFENDANT BIOGRAPHICAL INFORMATION

CHRISTOPHER THOMAS

DOB: May 9, 1984	SSN:
CII No.:	CDL No. D3623039
Sex: Male	Race: Black
Hair: Black	Eyes: Brown
Height: 5' 10"	Weight: 190

Residence: 1901 East 64th Street
Long Beach, CA 90805
Business: Unknown

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

Attorneys for Plaintiff

SUPERIOR COURT OF LOS ANGELES COUNTY

STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. **DIANE LYNN TRUJILLO,** 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**

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

COUNT 1

487(a) Penal Code

[GRAND THEFT]

From on or about December 17, 2006, to on or about May 18, 2007, in the County of Los Angeles, State of California, defendant, **DIANE LYNN TRUJILLO**, unlawfully took from the State of California property of a value in excess of four hundred dollars ($400), in violation of section 487, subdivision (a), of the Penal Code, a misdemeanor.

COUNT 2

14107(b)(1) Welfare and Institutions Code

[PRESENTING FALSE MEDI-CAL IHSS CLAIMS]

From on or about December 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

Agency: California Department of Justice
Bureau of Medi-Cal Fraud and Elder Abuse
Law Enforcement Agency No. 7293
ORI No. CA0199409
BMFEA Docket number LA2008101551

DEFENDANT BIOGRAPHICAL INFORMATION

DIANE LYNN TRUJILLO

DOB: February 6, 1964	SSN: 549-15-7087
CII No.: A06758328	CDL No. C2218536
Sex: Female	Race: Hispanic
Hair: Brown	Eyes: Brown
Height: 5' 0"	Weight: 198

Residence: 14104 Van Nuys Blvd., #111
Arleta, CA 91331
Business: Unknown

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- **RICHARD F. VILLEGAS,** Defendant.	Case No. _____ **FELONY COMPLAINT FOR ARREST WARRANT** 2 Counts P.C. 487(a) (F) W&I 14107(b)(1) (F)

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

COUNT 1

[GRAND THEFT]

From on or about September 19, 2007, to on or about February 29, 2008, in the County of Los Angeles, State of California, defendant RICHARD VILLEGAS 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 September 19, 2007, to on or about February 29, 2008, in the County of Los Angeles, State of California, defendant RICHARD VILLEGAS, 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 defendant by Rodolfo Villegas, in violation of section 14107, subdivision (b)(1), of the Welfare and Institutions Code, a felony.

REQUEST FOR ARREST WARRANT

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

REQUEST FOR DISCOVERY

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

DECLARATION

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

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

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

Defendant	Bail
RICHARD VILLEGAS	$_____

_____ 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. LB2008306667

Preliminary Hearing Time Estimate: 30 min.

Arrest Warrant Requested
Recommended Bail: $1,000
DOB: 05/24/1970
CII No. A11096351 CDL No. A5211340 SS No. 554-45-8651
Sex: M Race: H Hair: Blk Eyes: Brn Ht: 5'08" Wt: 195
Residence: 8041 Orange St.
Downey, CA 90242
Aliases: Joseph Villegas

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
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:

Defendant	Bail
RICHARD VILLEGAS	$_____

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
GARY M. MOGIL, Deputy Attorney General
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Attorneys for The People of the State of California

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA, **Plaintiff,** **v.** **RODERICK EDWARD WOODS (dob-06/20/1960),** **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 RODERICK EDWARD WOODS of the following crimes, which are connected to one another in their commission:

COUNT 1

[GRAND THEFT]

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 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.

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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

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. LB2008306745

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
RODERICK EDWARD WOODS	$_____

_____ Date

_____ MAGISTRATE

Arrest Warrant Requested

Defendant-RODERICK EDWARD WOODS

Recommended Bail: $2,000.00

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

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

Residence: 356 W. 11th St.
San Pedro, CA 90731
(310) 514-3446

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
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:

Defendant	Bail
RODERICK EDWARD WOODS	$_____

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

DATED this _____ day of _____, 2009.

_____
MAGISTRATE