

MAR 11 2009

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SONOMA

THE PEOPLE OF THE STATE OF CALIFORNIA,)

Vs.)

#1 - #5 WARRANTS

SCR 556340

FELONY COMPLAINT

KIM LOUISE LEMOINE)

Section 182(a)(1) PC

LAURA RENEE HARKEY)

459 PC (10 cts)

MARY NICOLE HOLSTEIN)

530.5(a) PC (37 cts)

DARIA SIDORKINA)

470a PC (9 cts)

HEIDI LYNN ROTH)

487(a) PC (6 cts)

Defendants)

NOTICE: Conviction for these offenses may require you to provide specimens and samples pursuant to Penal Code Section 296 if you are convicted of a felony offense or have a prior qualifying offense in your criminal background. Willful refusal to provide the specimens and samples is a crime.

THE UNDERSIGNED, being duly sworn, deposes and says, upon information and belief, that the said defendants, **KIM LOUISE LEMOINE and LAURA RENEE HARKEY and MARY NICOLE HOLSTEIN and DARIA SIDORKINA and HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **182(a)(1)** of the PENAL CODE, a **felony**, in that they did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of GRAND THEFT, POSSESSION OF COUNTERFEIT CARD MAKING EQUIPMENT, IDENTITY THEFT, FORGERY, FORGERY OF A CALIFORNIA DRIVER'S LICENSE, FORGERY OF A CHECK, FORGERY OF CALIFORNIA STATE SEAL, in violation of Section 487(a), 484i(c), 530.5(a), 530.5(c), 530.5(d), 470, 470a, and 476 of the PENAL Code, felonies; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of SONOMA and other Counties within the STATE of CALIFORNIA:

OVERT ACTS:

1. The Attorney General of the State of California, by this information, further accuses Kim Lemoine, on or about September 18, 2008, created a counterfeit California Driver's License bearing Laura Harkey's photo and the name of Lauren Broughton, in the county of Sonoma, within the State of California.
2. The Attorney General of the State of California, by this information, further accuses Kim Lemoine, on or about September 18, 2008, created a counterfeit California Driver's License bearing Mary Holstein's photo and the name of Lee Shaugnessy, in the county of Sonoma, within the State of California.

3. The Attorney General of the State of California, by this information, further accuses Kim Lemoine, on or about September 18, 2008, possess the personal identifying information of over fifty individuals, in the county of Sonoma, within the State of California.

COUNT II

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Count I hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **20th day of June, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA, BRANCH #1109 with the intent to commit larceny and any felony.

COUNT III

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-II hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **26th day of June, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA, BRANCH #143 with the intent to commit larceny and any felony.

COUNT IV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-III hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **7th day of August, 2006**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of CATALINA H. APPLEBLUM, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of CATALINA H. APPELBLOM, , and JOHN CHIANG, STATE CONTROLLER.

COUNT V

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-IV hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **31st day of October, 2006**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of KATHERINE A.GRAVES, , and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of KATHERINE A. GRAVES, and JOHN CHIANG, STATE CONTROLLER.

COUNT VI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-V hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **7th day of May, 2007**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT VII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VI hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **5th day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of ANN TORRES, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of ANN TORRES, and JOHN CHIANG, STATE CONTROLLER.

COUNT VIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VII hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **14th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JULIA TASHJIAN KING and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JULIA TASHJIAN KING and JOHN CHIANG, STATE CONTROLLER.

COUNT IX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VIII hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT X

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-IX hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT XI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-X hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of GLENN CHARLES NETTLES, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of GLENN CHARLES NETTLES, and JOHN CHIANG, STATE CONTROLLER.

COUNT XII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XI hereof, complainant further complains and says upon further information and belief, that said defendant, **KIM LOUISE LEMOINE**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit 14 COUNTERFEIT STATE WARRANTS IN THE AMOUNT OF \$19,432.00 (NINETEEN THOUSAND, FOUR HUNDRED AND THIRTY TWO DOLLARS) the property of BANK OF AMERICA.

COUNT XIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **15th day of October, 2007**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **5th day of November, 2007**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA with the intent to commit larceny and any felony.

COUNT XV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **8th day of November, 2007**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **21st day of December, 2007**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA with the intent to commit larceny and any felony.

COUNT XVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVI hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **24th day of December, 2007**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (767 BRYANT ST #209, SAN FRANCISCO, CA) with the intent to commit larceny and any felony.

COUNT XVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **28th day of December, 2007**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (767 BRYANT ST #12, SAN FRANCISCO CA) with the intent to commit larceny and any felony.

COUNT XIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **23rd day of January, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIX hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **6th day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of ANN TORRES, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of ANN TORRES, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XX hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **8th day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XXII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXI hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **15th day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XXIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **26th day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of CLAIRE YOUNG, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of CLAIRE YOUNG, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **10th day of March, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of VIVIAN REYES, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of VIVIAN REYES, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **6th day of May, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARILYN SUNIA, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARILYN SUNIA, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **23rd day of May, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of RYAN SHAIN, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of RYAN SHAIN, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVI hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **12th day of June, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of NANCY PARIKH, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of NANCY PARIKH, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **3rd day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of COLLEEN MARIE CHAPMAN, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of COLLEEN MARIE CHAPMAN, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **7th day of July, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (501 BRANNON ST, SAN FRANCISCO) with the intent to commit larceny and any felony.

COUNT XXX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIX hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **8th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XXXI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXX hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **14th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of CORINNE WIDICO, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of CORINNE WIDICO, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXXII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXI hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **14th day of July, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (600 CLEMENT ST, SAN FRANCISCO) with the intent to commit larceny and any felony.

COUNT XXXIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **19th day of July, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (1000 4TH ST, SAN RAFAEL) with the intent to commit larceny and any felony.

COUNT XXXIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIII hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **21st day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARRY JEAN WHEELER, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARRY JEAN WHEELER, and JOHN CHIANG, STATE CONTROLLER.

COUNT XXXV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of

Sonoma, State of California, on or about the **25th day of July, 2008**, violate Section **459** of the PENAL CODE, a **felony**, in that she did enter a commercial building occupied by BANK OF AMERICA (7185 HEALDSBURG AVE., SEBASTOPOL) with the intent to commit larceny and any felony.

COUNT XXXVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXV hereof, complainant further complains and says upon further information and belief, that said defendant, **HEIDI LYNN ROTH**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit 168 COUNTERFEIT STATE WARRANTS IN THE AMOUNT OF \$225,700 (TWO HUNDRED TWENTY-FIVE THOUSAND, SEVEN HUNDRED DOLLARS) the property of BANK OF AMERICA.

COUNT XXXVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVI hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **16th day of November, 2007**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XXXVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **21st day of February, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARY K. PIASTA, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARY K. PIASTA and JOHN CHIANG, STATE CONTROLLER.

COUNT XXXIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **4th day of March, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain,

and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XL

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIX hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **13th day of May, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XLI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XL hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **30th day of May, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARY JEAN WHEELER, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARY JEAN WHEELER, and JOHN CHIANG, STATE CONTROLLER.

COUNT XLII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLI hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **25th day of June, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JOHN CHIANG, STATE CONTROLLER.

COUNT XLIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **9th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of AMELIA THERESE SPILGER, and JOHN CHIANG, STATE CONTROLLER and used that information

for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of AMELIA THERESE SPILGER, and JOHN CHIANG, STATE CONTROLLER.

COUNT XLIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **22nd day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARILYN SUNIA, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARILYN SUNIA, and JOHN CHIANG, STATE CONTROLLER.

COUNT XLV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIV hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of ELLIE MARIE McHALE, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of ELLIE MARIE McHALE, and JOHN CHIANG, STATE CONTROLLER.

COUNT XLVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLV hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT XLVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVI hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT XLVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT XLIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT L

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIX hereof, complainant further complains and says upon further information and belief, that said defendant, **LAURA RENEE HARKEY**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit 33 COUNTERFEIT STATE WARRANTS IN THE AMOUNT OF \$54,463.00 (FIFTY-FOUR THOUSAND, FOUR HUNDRED SIXTY-THREE DOLLARS) the property of BANK OF AMERICA.

COUNT LI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-L hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **14th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of COLLEEN MARIE CHAPMAN, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of COLLEEN MARIE CHAPMAN, and JOHN CHIANG, STATE CONTROLLER.

COUNT LII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LI hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **19th day of August, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of EMILY SHERRY WILSON, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of EMILY SHERRY WILSON, and JOHN CHIANG, STATE CONTROLLER.

COUNT LIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LII hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **17th day of September, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of SARAH LEEANNE NICHOLS, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of SARAH LEEANNE NICHOLS, and JOHN CHIANG, STATE CONTROLLER.

COUNT LIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LIII hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT LV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LIV hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT LVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LV hereof, complainant further complains and says upon further information and belief, that said defendant, **MARY NICOLE HOLSTEIN**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit 5 COUNTERFEIT STATE WARRANTS IN THE AMOUNT OF \$8,600.00 (EIGHT THOUSAND, SIX HUNDRED DOLLARS) the property of BANK OF AMERICA.

COUNT LVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LVI hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **23rd day of June, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of MARILY SUNIA, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of MARILYN SUNIA, and JOHN CHIANG, STATE CONTROLLER.

COUNT LVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LVII hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on and between the **1st day of August, 2006 and the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she was an agent, servant, and employee of BANK OF AMERICA, did unlawfully take from BANK OF AMERICA money and personal property of a value exceeding Four Hundred Dollars (\$400.00).

COUNT LIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **11th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JENNIFER BETH MAJARIAN, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JENNIFER BETH MAJARIAN, and JOHN CHIANG, STATE CONTROLLER.

COUNT LX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LIX hereof, complainant further complains and says upon

further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **11th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of NANCY PARIKH, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of NANCY PARIKH, and JOHN CHIANG, STATE CONTROLLER.

COUNT LXI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LX hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **14th day of July, 2008**, violate Section **530.5(a)** of the PENAL CODE, a **felony**, in that she did willfully and unlawfully obtain personal identifying information of JULIA TASHJIAN KING, and JOHN CHIANG, STATE CONTROLLER and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of JULIA TASHJIAN KING, and JOHN CHIANG, STATE CONTROLLER.

COUNT LXII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LXI hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **18th day of September, 2008**, violate Section **470a** of the PENAL CODE, a **felony**, in that she did unlawfully alter, falsify, forge, duplicate, reproduce and counterfeit a governmental agency driver's license and identification card with the intent that said document be used to facilitate the commission of a forgery.

COUNT LXIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LXII hereof, complainant further complains and says upon further information and belief, that said defendant, **DARIA SIDORKINA**, did, in the County of Sonoma, State of California, on or about the **1st day of August, 2006 through the 20th day of December, 2008**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that she did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit 7 COUNTERFEIT STATE WARRANTS IN THE AMOUNT OF \$12,531.00 (TWELVE THOUSAND, FIVE HUNDRED THIRTY-ONE DOLLARS) the property of BANK OF AMERICA.

It is further alleged as to counts 1 through 63 that in the commission of the above offense(s) the said defendants, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000.00 within the meaning of Penal Code Section 12022.6(a)(2).

It is further alleged as to counts 1 through 63 that the above offense(s) are thefts of over \$100,000.00, within the meaning of Penal Code Section 1203.045(a).

It is further alleged that at the time of the commission of the offenses listed in Counts I and XXXI through XXXV, the defendant, HEIDI LYNN ROTH, was released from custody on bail or Own Recognizance in Yolo County Superior Court Case Number 08-001322 within the meaning of Penal Code Section 12022.1.

It is further alleged as to counts 1 through 63 that the above offenses were committed in part in Sonoma and in part in another jurisdictional territory, and the acts or effects thereof constituting or requisite to the consummation of the offense occur in two or more jurisdictional territories, the jurisdiction of such offense is in any competent court within either jurisdictional territory within the meaning of Penal Code Section 781.

PRIOR PRISON CONVICTION

It is further alleged pursuant to Penal Code section 667.5(b) that the defendant, HEIDI LYNN ROTH,, has suffered the following prior conviction(s):

<u>CASE</u>	<u>CRIME</u>	<u>CONVICTION</u>	<u>COUNTY</u>	<u>STATE</u>	<u>COURT</u>
SC050539	487 PC	6/24/03	SAN MATEO	CALIF.	SUPERIOR

and that a term was served as described in Penal Code section 667.5 for said offense(s), and that the defendant did not remain free of prison custody for, and did commit an offense resulting in a felony conviction during, a period of five years subsequent to the conclusion of said term.

Complainant therefore prays that a warrant issue and that said defendant be dealt with according to law.

DEPUTY ATTORNEY GENERAL

Subscribed and sworn to before me this _____ Day of _____, 20_____

Clerk of the Superior Court

3/10/2009

/mm

OTH 593972

DAR-593972

ECR Offer: N/A