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WARRANT ISSUED

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FILED

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12 CENTRAL DISTRICT

14 PEOPLE OF THE STATE OF CALIFORNIA,

15 Plaintiff,

16 v.

17 LUIS MARROQUIN (11/30/46),
18 MARTIN VASQUEZ (4/10/67),
19 KIRSIO CRUZ (6/16/64),

20 Defendants.

No. BA 301253

FELONY COMPLAINT

FOR ARREST WARRANT

21
22 The Attorney General of the State of California accuses the above-named defendants of the
23 following offenses, which are connected to each other in their commission:

24 COUNT 1

25 On or about or between February 15, 2007, and September 18, 2008, in the county of Los
26 Angeles, the crime of CONSPIRACY in violation of PENAL CODE SECTION 182(a)(1), a
27 Felony, was committed by LUIS MARROQUIN, MARTIN VASQUEZ, and KIRSIO CRUZ,
28 who did willfully and unlawfully conspire together with another person or persons to commit the

1 crimes of: UNLAWFUL TAKING OF A VEHICLE, a Felony, in violation of Vehicle Code
2 section 10851(a); GRAND THEFT AUTOMOBILE, a Felony, in violation of Penal Code section
3 487(d)(1); FILING FALSE OR FORGED INSTRUMENT, a Felony, in violation of Penal Code
4 section 115(a); IDENTITY THEFT, a Felony, in violation of Penal Code section 530.5(a);
5 FORGERY-POSSESSION, a Felony, in violation of Penal Code section 475(a); FORGERY OF
6 PUBLIC SEALS, a Felony, in violation of Penal Code section 472; or POSSESSION OF
7 FORGED DRIVER'S LICENSE, a Felony, in violation of Penal Code section 470b; that pursuant
8 to and for the purposes of carrying out the objectives and purposes of the aforesaid conspiracy,
9 the following overt acts were committed:

10 Overt Act 1

11 On or about February 15, 2007, in the county of Los Angeles, Luis Marroquin forged a
12 certificate of repossession releasing the ownership interest of "Capital One Auto Fin" to Gerry
13 Louis Auto Sales for a 2002 BMW 745li, license plate no. 5XGZ213.

14 Overt Act 2

15 On or about March 27, 2007, in the county of Los Angeles, Martin Vasquez sold at auction
16 a 2002 BMW 745li, license plate no. 5XGZ213.

17 Overt Act 3

18 On or about April 9, 2007, in the county of Los Angeles, Martin Vasquez sold at auction a
19 2004 BMW 645i, license plate no. 5YDE613.

20 Overt Act 4

21 On or about April 9, 2007, in the county of Los Angeles, Martin Vasquez sold at auction a
22 2005 BMW 645i, license plate no. 5WOL966.

23 Overt Act 5

24 On or about April 18, 2007, in the county of Los Angeles, Martin Vasquez stamped "Dept.
25 of Motor Vehicles, 3615 S. Hope St., Los Angeles CA 90007" on a Department of Motor
26 Vehicles form REG 343 for a 2006 Toyota Tundra, license plate no. 8F32044.

27 Overt Act 6

1 On or about, July 31, 2007, in the county of Los Angeles, Martin Vasquez sold at auction a
2 2006 Toyota Tundra, license plate no. 8F32044.

3 Overt Act 7

4 On or about September 6, 2007, in the county of Los Angeles, Martin Vasquez sold at
5 auction a 2006 Nissan 350Z, license plate no. 5YAB223.

6 Overt Act 8

7 On or about October 24, 2007, in the county of Los Angeles, Luis Marroquin stamped the
8 fraudulent seal of a notary public in the name of Sandra Duran on a Department of Motor
9 Vehicles form REG 227 for a 2005 Toyota Camry, license plate no. 5PZR414.

10 Overt Act 9

11 On or about December 27, 2007, in the county of Los Angeles, Luis Marroquin stamped the
12 fraudulent seal of a notary public in the name of Yolanda Torres on a Department of Motor
13 Vehicles form REG 227 for a Ford Escape, license plate no. 5ZSE308.

14 Overt Act 10

15 On or about January 18, 2008, in the county of Los Angeles, Luis Marroquin drove a 1993
16 Ford Taurus, license plate no. 6CBU247.

17 Overt Act 11

18 On or about January 31, 2008, in the county of Los Angeles, Kirsio Cruz drove a 2007
19 Toyota Sequoia, license plate no. 6BLC145.

20 Overt Act 12

21 On or about, February 22, 2008, in the county of Los Angeles, Luis Marroquin stamped the
22 fraudulent seal of a notary public in the name of Veronica Carrion on a Department of Motor
23 Vehicles form REG 227 for a 2007 Mercedes, license plate number 5VQD136.

24 Overt Act 13

25 On or about March 10, 2008, in the county of Los Angeles, Luis Marroquin drove 2007
26 Ford Escape, license plate no. 5ZSE308, containing fraudulent notary stamps.

27 Overt Act 14

28

1 On or about March 13, 2008, in the county of Los Angeles, Martin Vasquez drove a 2000
2 Ford Expedition, license plate no. REGSRV.

3 Overt Act 15

4 On or about March 26, 2008, in the county of Los Angeles, Corina Macias drove a 2007
5 GMC Yukon, license plate number 5UOS545.

6 Overt Act 16

7 On or about March 26, 2008, in the county of Los Angeles, Mariano Perez drove a 2003
8 Range Rover, license plate no. 5XIG264.

9 Overt Act 17

10 On or about May 30, 2008, in the county of Los Angeles, Martin Vasquez sold a 2006
11 Cadillac STS, license plate no. 5NVT860, to Nellie Munoz.

12 Overt Act 18

13 On or about June 10, 2008, in the county of Los Angeles, Kirsio Cruz received by facsimile
14 a document containing information for a 2005 Ford Mustang, license plate no. 5LDL689.

15 Overt Act 19

16 On September 18, 2008, in the county of Los Angeles, Kirsio Cruz drove a 2007 BMW
17 335i, license plate no. 5XGP999.

18 **COUNT 2**

19 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
20 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
21 MARROQUIN, who with intent to defraud, and knowing the same to be forged, altered or
22 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
23 forged, altered, counterfeit or completed document, to wit:: Certificate of Adjustment-Brake
24 Adjustment.

25 **COUNT 3**

26 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
27 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
28 MARROQUIN, who with intent to defraud, and knowing the same to be forged, altered or

1 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
2 forged, altered, counterfeit or completed document, to wit:: Certificate of Adjustment-Lamp
3 Adjustment.

4 **COUNT 4**

5 On or about March 13, 2008, in the county of Los Angeles, the crime of RECEIVING
6 STOLEN PROPERTY, in violation of PENAL CODE SECTION 496(a), a Felony, was
7 committed by defendant LUIS MARROQUIN, who did willfully and unlawfully receive
8 property, to wit: a Department of Motor Vehicles Form 19, Temporary Operating Permit; that had
9 been stolen or obtained in any manner constituting theft, knowing the property to be so stolen or
10 obtained, or did conceal or withhold property from its owner, knowing the property to be so
11 stolen or obtained.

12 **COUNT 5**

13 On or about March 13, 2008, in the county of Los Angeles, the crime of RECEIVING
14 STOLEN PROPERTY, in violation of PENAL CODE SECTION 496(a), a Felony, was
15 committed by defendant MARTIN VASQUEZ, who did willfully and unlawfully receive
16 property, to wit: Department of Motor Vehicles Form 19, Temporary Operating Permit; that had
17 been stolen or obtained in any manner constituting theft, knowing the property to be so stolen or
18 obtained, or did conceal or withhold property from its owner, knowing the property to be so
19 stolen or obtained.

20 **COUNT 6**

21 On or about March 13, 2008, in the county of Los Angeles, the crime of POSSESSION OF
22 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
23 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
24 or possess a driver's license or identification card of the type enumerated in Penal Code Section
25 470a, to wit: a driver's license in the name of Ilian Assolen, no. N2747314, with the intent that
26 said document be used to facilitate the commission of a forgery.

1 COUNT 7

2 On or about March 13, 2008, in the county of Los Angeles, the crime of POSSESSION OF
3 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
4 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
5 or possess a driver's license or identification card of the type enumerated in Penal Code Section
6 470a, to wit: driver's license in the name of Kenneth M Webb, no. D2771325, with the intent that
7 said document be used to facilitate the commission of a forgery.

8 COUNT 8

9 On or about March 13, 2008, in the county of Los Angeles, the crime of POSSESSION OF
10 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
11 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
12 or possess a driver's license or identification card of the type enumerated in Penal Code Section
13 470a, to wit: driver's license in the name of Valiere Banos, no. N3663217, with the intent that
14 said document be used to facilitate the commission of a forgery.

15 COUNT 9

16 On or about March 13, 2008, in the county of Los Angeles, the crime of POSSESSION OF
17 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
18 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
19 or possess a driver's license or identification card of the type enumerated in Penal Code Section
20 470a, to wit: driver's license in the name of Yara Perez, no. C5861378, with the intent that said
21 document be used to facilitate the commission of a forgery.

22 COUNT 10

23 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY OF
24 PUBLIC SEAL in violation of PENAL CODE SECTION 472, a Felony, was committed by
25 defendant LUIS MARROQUIN, who did willfully and unlawfully and with the intent to defraud,
26 forge or counterfeit the seal of the State of California for a notary stamp in the name of Sandra
27 Duran, or did falsely make, forge, or counterfeit any impression purporting to be such a seal, or
28 did knowingly possess and willfully conceal such a seal or impression.

1 COUNT 11

2 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY OF
3 PUBLIC SEAL in violation of PENAL CODE SECTION 472, a Felony, was committed by
4 defendant LUIS MARROQUIN, who did willfully and unlawfully and with the intent to defraud,
5 forge or counterfeit the seal of the State of California for a notary stamp in the name of Veronica
6 Carrion, or did falsely make, forge, or counterfeit any impression purporting to be such a seal, or
7 did knowingly possess and willfully conceal such a seal or impression.

8 COUNT 12

9 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY OF
10 PUBLIC SEAL in violation of PENAL CODE SECTION 472, a Felony, was committed by
11 defendant LUIS MARROQUIN, who did willfully and unlawfully and with the intent to defraud,
12 forge or counterfeit the seal of the State of California for a notary stamp in the name of Yolanda
13 Torres, or did falsely make, forge, or counterfeit any impression purporting to be such a seal, or
14 did knowingly possess and willfully conceal such a seal or impression.

15 COUNT 13

16 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
17 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
18 MARROQUIN, who with intent to defraud, and knowing the same to be forged, altered or
19 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
20 forged, altered, counterfeit or completed document, to wit: Western Surety Bonds.

21 COUNT 14

22 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
23 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
24 MARROQUIN, who with intent to defraud, and knowing the same to be forged, altered or
25 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
26 forged, altered, counterfeit or completed document, to wit: Certificate of Adjustment-Brake
27 Adjustment.
28

1 COUNT 15

2 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
3 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
4 MARROQUIN, who with intent to defraud, and knowing the same to be forged, altered or
5 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
6 forged, altered, counterfeit or completed document, to wit: Certificate of Adjustment-Lamp
7 Adjustment.

8 COUNT 16

9 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
10 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by MARTIN
11 VASQUEZ, who with intent to defraud, and knowing the same to be forged, altered or
12 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
13 forged, altered, counterfeit or completed document, to wit: Department of Motor Vehicles Form
14 REG 124, Referral for Inspection, bearing a stamp of the East Los Angeles office of the
15 California Highway Patrol.

16 COUNT 17

17 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY in
18 violation of Penal Code section 470(d), a Felony, was committed by LUIS MARROQUIN, who
19 did, with the intent to defraud, did falsely make, alter, forge and counterfeit, utter, publish, pass
20 and attempt and offer to pass, as true and genuine, a Department of Motor Vehicles Form REG
21 124, Referral for Inspection, bearing a stamp of the East Los Angeles office of the California
22 Highway Patrol, knowing the same to be false, altered, forged and counterfeited.

23 COUNT 18

24 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
25 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by MARTIN
26 VASQUEZ, who with intent to defraud, and knowing the same to be forged, altered or
27 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
28

1 forged, altered, counterfeit or completed document, to wit: Certificate of Adjustment-Brake
2 Adjustment.

3 **COUNT 19**

4 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
5 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by MARTIN
6 VASQUEZ, who with intent to defraud, and knowing the same to be forged, altered or
7 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
8 forged, altered, counterfeit or completed document, to wit: Certificate of Adjustment-Lamp
9 Adjustment.

10 **COUNT 20**

11 On or about March 13, 2008, in the county of Los Angeles, the crime of FORGERY –
12 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by MARTIN
13 VASQUEZ, who with intent to defraud, and knowing the same to be forged, altered or
14 counterfeit, did possess or receive, with intent to pass or facilitate the passage and utterance of a
15 forged, altered, counterfeit or completed document, to wit: Western Surety Bond.

16 **COUNT 21**

17 On or about October 24, 2007, in the county of Los Angeles, the crime of FILING FALSE
18 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
19 committed by LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false
20 and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 bearing a
21 fraudulent "Toyota Mtr Crdt Corp" stamp for 2005 Toyota Camry, license plate number
22 5PZR414; to be filed, registered, and recorded in a public office within this state, which
23 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
24 United States.

25 **COUNT 22**

26 On or about October 24, 2007, in the county of Los Angeles, the crime of IDENTITY
27 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
28 MARROQUIN, who did willfully and unlawfully obtain personal identifying information of

1 Toyota Motor Credit Corporation, and used that information for an unlawful purpose and to
2 obtain, and attempt to obtain credit, goods, services, real property, without the consent of the
3 victim.

4 **COUNT 23**

5 On or about and between February 22, 2008, and March 26, 2008, in the county of Los
6 Angeles, the crime of UNLAWFUL TAKING OF A VEHICLE in violation of Vehicle Code
7 section 10851(a), a Felony, was committed by LUIS MARROQUIN and KIRSIO CRUZ, who
8 did unlawfully drive and take a vehicle, to wit: 2007 Mercedes GL450, license plate number
9 5VQD136, without the consent of and with intent, either permanently or temporarily, to deprive
10 the said owner of title to and possession of said vehicle.

11 **COUNT 24**

12 On or about February 22, 2008, in the county of Los Angeles, the crime of FILING FALSE
13 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
14 committed by LUIS MARROQUIN and KIRSIO CRUZ, who did unlawfully and knowingly
15 procure and offer a false and forged instrument, to wit: a Department of Motor Vehicles Form
16 REG 227 bearing a fraudulent "US Bank" stamp for 2007 Mercedes GL450, license plate number
17 5VQD136, to be filed, registered, and recorded in a public office within this state, which
18 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
19 United States.

20 **COUNT 25**

21 On or about February 22, 2008, in the county of Los Angeles, the crime of IDENTITY
22 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
23 MARROQUIN and KIRSIO CRUZ, who did willfully and unlawfully obtain personal identifying
24 information of U.S. Bank, and used that information for an unlawful purpose and to obtain, and
25 attempt to obtain credit, goods, services, real property, without the consent of the victim.

26 **COUNT 26**

27 On or about May 30, 2008, in the county of Los Angeles, the crime of UNLAWFUL
28 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was

1 committed by LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully drive and
2 take a vehicle, to wit: 2006 Cadillac STS, license plate number 5NVT860, without the consent of
3 the owner, Brooklyn Auto Sales, and with intent, either permanently or temporarily, to deprive
4 the said owner of title to and possession of said vehicle.

5 **COUNT 27**

6 On or about July 11, 2007, in the county of Los Angeles, the crime of FILING FALSE OR
7 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
8 LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully and knowingly procure and
9 offer a false and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 for
10 2006 Cadillac STS, license plate number 5NVT860, to be filed, registered, and recorded in a
11 public office within this state, which instrument, if genuine, might be filed, registered, and
12 recorded under a law of this state or the United States.

13 **COUNT 28**

14 On or about July 11, 2007, in the county of Los Angeles, the crime of IDENTITY THEFT
15 in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS MARROQUIN
16 and MARTIN VASQUEZ, who did willfully and unlawfully obtain personal identifying
17 information of Brooklyn Auto Sales, and used that information for an unlawful purpose and to
18 obtain, and attempt to obtain credit, goods, services, real property, without the consent of the
19 victim.

20 **COUNT 29**

21 On or about March 26, 2008, in the county of Los Angeles, the crime of UNLAWFUL
22 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
23 committed by LUIS MARROQUIN, who did unlawfully drive and take a vehicle, to wit: 2007
24 GMC Yukon, license plate number 5UOS545, without the consent of the owner, Brooklyn Auto
25 Sales, and with intent, either permanently or temporarily, to deprive the said owner of title to and
26 possession of said vehicle.

1 **COUNT 30**

2 On or about July 11, 2007, in the county of Los Angeles, the crime of FILING FALSE OR
3 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
4 LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false and forged
5 instrument, to wit: a Department of Motor Vehicles Form REG 227 for 2007 GMC Yukon,
6 license plate number 5UOS545, to be filed, registered, and recorded in a public office within this
7 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
8 state or the United States.

9 **COUNT 31**

10 On or about July 11, 2007, in the county of Los Angeles, the crime of IDENTITY THEFT
11 in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS MARROQUIN,
12 who did willfully and unlawfully obtain personal identifying information of Brooklyn Auto Sales,
13 and used that information for an unlawful purpose and to obtain, and attempt to obtain credit,
14 goods, services, real property, without the consent of the victim.

15 **COUNT 32**

16 On or about March 13, 2008, in the county of Los Angeles, the crime of UNLAWFUL
17 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
18 committed by LUIS MARROQUIN, who did unlawfully drive and take a certain vehicle, to wit:
19 2007 Ford Escape, license plate number 5ZSE308, without the consent of the owner, Capital One
20 Auto Finance, and with intent, either permanently or temporarily, to deprive the said owner of
21 title to and possession of said vehicle.

22 **COUNT 33**

23 On or about January 15, 2008, in the county of Los Angeles, the crime of FILING FALSE
24 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
25 committed by LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false
26 and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 for a 2007 Ford
27 Escape, license plate number 5ZSE308, to be filed, registered, and recorded in a public office
28

1 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
2 law of this state or the United States.

3 **COUNT 34**

4 On or about January 15, 2008, in the county of Los Angeles, the crime of IDENTITY
5 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
6 MARROQUIN, who did willfully and unlawfully obtain personal identifying information of
7 Capital One Auto Finance and used that information for an unlawful purpose and to obtain, and
8 attempt to obtain credit, goods, services, real property, without the consent of the victim.

9 **COUNT 35**

10 On or about March 19, 2008, in the county of Los Angeles, the crime of UNLAWFUL
11 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
12 committed by LUIS MARROQUIN, who did unlawfully drive and take a certain vehicle, to wit:
13 a 2007 Toyota Sequoia, license plate number 6BLC145, without the consent of the owner, Toyota
14 Motor Credit Corporation, and with intent, either permanently or temporarily, to deprive the said
15 owner of title to and possession of said vehicle.

16 **COUNT 36**

17 On or about January 17, 2008, in the county of Los Angeles, the crime of FILING
18 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
19 committed by LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false
20 and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 for a 2007 Toyota
21 Sequoia, license plate number 6BLC145, to be filed, registered, and recorded in a public office
22 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
23 law of this state or the United States.

24 **COUNT 37**

25 On or about January 17, 2008, in the county of Los Angeles, the crime of IDENTITY
26 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
27 MARROQUIN, who did willfully and unlawfully obtain personal identifying information of
28 Toyota Motor Credit Corporation and used that information for an unlawful purpose and to

1 obtain, and attempt to obtain credit, goods, services, real property, without the consent of the
2 victim.

3 **COUNT 38**

4 On or about March 24, 2008, in the county of Los Angeles, the crime of UNLAWFUL
5 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
6 committed by LUIS MARROQUIN and KIRSIO CRUZ, who did unlawfully drive and take a
7 certain vehicle, to wit: a 2007 Toyota Sequoia, license plate number 6AGV424, without the
8 consent of the owner, Bank of America NA, and with intent, either permanently or temporarily, to
9 deprive the said owner of title to and possession of said vehicle.

10 **COUNT 39**

11 On or about January 31, 2008, in the county of Los Angeles, the crime of FILING FALSE
12 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
13 committed by LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false
14 and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 for a 2007 Toyota
15 Sequoia, license plate number 6AGV424, to be filed, registered, and recorded in a public office
16 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
17 law of this state or the United States.

18 **COUNT 40**

19 On or about January 31, 2008, in the county of Los Angeles, the crime of IDENTITY
20 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
21 MARROQUIN, who did willfully and unlawfully obtain personal identifying information of
22 Bank America NA, and used that information for an unlawful purpose and to obtain, and attempt
23 to obtain credit, goods, services, real property, without the consent of the victim.

24 **COUNT 41**

25 On or about March 24, 2008, in the county of Los Angeles, the crime of UNLAWFUL
26 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
27 committed by LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully drive and
28 take a certain vehicle, to wit: a 2007 Toyota Camry, VIN number JTNBE46K873069470, without

1 the consent of the owner and with intent, either permanently or temporarily, to deprive the said
2 owner of title to and possession of said vehicle.

3 **COUNT 42**

4 On or about March 3, 2008, in the county of Los Angeles, the crime of FORGERY –
5 POSSESSION in violation of Penal Code section 475(a), a Felony, was committed by LUIS
6 MARROQUIN and MARTIN VASQUEZ, who with intent to defraud, and knowing the same to
7 be forged, altered or counterfeit, did possess or receive, with intent to pass or facilitate the
8 passage and utterance of a forged, altered, counterfeit or completed document, to wit: Department
9 of Motor Vehicles Form REG 262 for a 2007 Toyota Camry, VIN number
10 JTNBE46K873069470.

11 **COUNT 43**

12 On or about March 26, 2008, in the county of Los Angeles, the crime of UNLAWFUL
13 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
14 committed by LUIS MARROQUIN, who did unlawfully drive and take a certain vehicle, to wit:
15 a 2003 Range Rover, license plate number 5XIG264, without the consent of the owner, Brooklyn
16 Auto Sales, and with intent, either permanently or temporarily, to deprive the said owner of title
17 to and possession of said vehicle.

18 **COUNT 44**

19 On or about March 11, 2007, in the county of Los Angeles, the crime of FILING FALSE
20 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
21 committed by LUIS MARROQUIN, who did unlawfully and knowingly procure and offer a false
22 and forged instrument, to wit: a Department of Motor Vehicles Form REG 227 for a 2003 Range
23 Rover, license plate number 5XIG264, to be filed, registered, and recorded in a public office
24 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
25 law of this state or the United States.

26 **COUNT 45**

27 On or about March 11, 2007, in the county of Los Angeles, the crime of IDENTITY
28 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS

1 MARROQUIN, who did willfully and unlawfully obtain personal identifying information of
2 Brooklyn Auto Sales and used that information for an unlawful purpose and to obtain, and
3 attempt to obtain credit, goods, services, real property, without the consent of the victim.

4 **COUNT 46**

5 On or about April 10, 2007, in the county of Los Angeles, the crime of GRAND THEFT –
6 AUTOMOBILE in violation of Penal Code section 487(d)(1), a Felony, was committed by LUIS
7 MARROQUIN and MARTIN VASQUEZ, who did unlawfully take a an automobile, to wit: a
8 2004 BMW 645i, license plate number 5YDE613, owned by Capital One Auto Finance.

9 **COUNT 47**

10 On or about March 21, 2007, in the county of Los Angeles, the crime of FILING
11 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
12 committed by LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully and
13 knowingly procure and offer a false and forged instrument, to wit: a Department of Motor
14 Vehicles Form REG 227 for a 2004 BMW 645i, license plate number 5YDE613, to be filed,
15 registered, and recorded in a public office within this state, which instrument, if genuine, might be
16 filed, registered, and recorded under a law of this state or the United States.

17 **COUNT 48**

18 On or about March 21, 2007, in the county of Los Angeles, the crime of IDENTITY
19 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
20 MARROQUIN and MARTIN VASQUEZ, who did willfully and unlawfully obtain personal
21 identifying information of Capital One Auto Finance and used that information for an unlawful
22 purpose and to obtain, and attempt to obtain credit, goods, services, real property, without the
23 consent of the victim.

24 **COUNT 49**

25 On or about March 21, 2007, in the county of Los Angeles, the crime of POSSESSION OF
26 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
27 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
28 or possess a driver's license or identification card of the type enumerated in Penal Code Section

1 470a, to wit: driver's license in the name of Ronen Bashushan, with the intent that said document
2 be used to facilitate the commission of a forgery.

3 **COUNT 50**

4 On or about April 10, 2007, in the county of Los Angeles, the crime of GRAND THEFT –
5 AUTOMOBILE in violation of Penal Code section 487(d)(1), a Felony, was committed by LUIS
6 MARROQUIN and MARTIN VASQUEZ, who did unlawfully take an automobile, to wit:, a
7 2005 BMW 645i, license plate number 5WOL966, owned by Capital One Auto Finance.

8 **COUNT 51**

9 On or about March 5, 2007, in the county of Los Angeles, the crime of FILING
10 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
11 committed by LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully and
12 knowingly procure and offer a false and forged instrument, to wit: a Department of Motor
13 Vehicles Form REG 227 for a 2005 BMW 645i, license plate number 5WOL966, to be filed,
14 registered, and recorded in a public office within this state, which instrument, if genuine, might be
15 filed, registered, and recorded under a law of this state or the United States.

16 **COUNT 52**

17 On or about March 5, 2007, in the county of Los Angeles, the crime of IDENTITY THEFT
18 in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS MARROQUIN
19 and MARTIN VASQUEZ, who did willfully and unlawfully obtain personal identifying
20 information of Capital One Auto Finance and used that information for an unlawful purpose and
21 to obtain, and attempt to obtain credit, goods, services, real property, without the consent of the
22 victim.

23 **COUNT 53**

24 On or about March 5, 2007, in the county of Los Angeles, the crime of POSSESSION OF
25 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
26 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
27 or possess a driver's license or identification card of the type enumerated in Penal Code Section
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1 470a, to wit: driver's license in the name of Melvin Jones, with the intent that said document be
2 used to facilitate the commission of a forgery.

3 **COUNT 54**

4 On or about March 27, 2007, in the county of Los Angeles, the crime of GRAND THEFT –
5 AUTOMOBILE in violation of Penal Code section 487(d)(1), a Felony, was committed by LUIS
6 MARROQUIN and MARTIN VASQUEZ, who did unlawfully take an automobile, to wit:, a
7 2002 BMW 745i, license plate number 5XGZ213, owned by Capital One Auto Finance.

8 **COUNT 55**

9 On or about February 15, 2007, in the county of Los Angeles, the crime of FILING
10 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
11 committed by LUIS MARROQUIN and MARTIN VASQUEZ, who did unlawfully and
12 knowingly procure and offer a false and forged instrument, to wit: a Certificate of Repossession
13 for a 2002 BMW 745i, license plate number 5XGZ213, to be filed, registered, and recorded in a
14 public office within this state, which instrument, if genuine, might be filed, registered, and
15 recorded under a law of this state or the United States.

16 **COUNT 56**

17 On or about February 22, 2007, in the county of Los Angeles, the crime of IDENTITY
18 THEFT in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS
19 MARROQUIN and MARTIN VASQUEZ, who did willfully and unlawfully obtain personal
20 identifying information of Capital One Auto Finance and used that information for an unlawful
21 purpose and to obtain, and attempt to obtain credit, goods, services, real property, without the
22 consent of the victim.

23 **COUNT 57**

24 On or about February 22, 2007, in the county of Los Angeles, the crime of POSSESSION
25 OF FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
26 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
27 or possess a driver's license or identification card of the type enumerated in Penal Code Section
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1 470a, to wit: driver's license in the name of Arend Staines, with the intent that said document be
2 used to facilitate the commission of a forgery.

3 **COUNT 58**

4 On or about July 31, 2007, in the county of Los Angeles, the crime of GRAND THEFT –
5 AUTOMOBILE in violation of Penal Code section 487(d)(1), a Felony, was committed by LUIS
6 MARROQUIN and MARTIN VASQUEZ, who did unlawfully take an automobile, to wit: a
7 2006 Toyota Tundra, license plate number 8F32044, owned by Capital One Auto Finance.

8 **COUNT 59**

9 On or about and between April 12, 2007, and April 18, 2007, in the county of Los
10 Angeles, the crime of FILING FALSE OR FORGED INSTRUMENT in violation of Penal Code
11 section 115(a), a Felony, was committed by LUIS MARROQUIN and MARTIN VASQUEZ,
12 who did unlawfully and knowingly procure and offer a false and forged instrument, to wit:
13 Department of Motor Vehicles form REG 262 or form REG 343 or Western Surety Bond for a
14 2006 Toyota Tundra, license plate number 8F32044, to be filed, registered, and recorded in a
15 public office within this state, which instrument, if genuine, might be filed, registered, and
16 recorded under a law of this state or the United States.

17 **COUNT 60**

18 On or about April 18, 2007, in the county of Los Angeles, the crime of IDENTITY THEFT
19 in violation of Penal Code section 530.5(a), a Felony, was committed by LUIS MARROQUIN
20 and MARTIN VASQUEZ, who did willfully and unlawfully obtain personal identifying
21 information of the Department of Motor Vehicles and used that information for an unlawful
22 purpose and to obtain, and attempt to obtain credit, goods, services, real property, without the
23 consent of the victim.

24 **COUNT 61**

25 On or about April 12, 2007, in the county of Los Angeles, the crime of POSSESSION OF
26 FORGED DRIVER'S LICENSE in violation of Penal Code section 470b, a Felony, was
27 committed by MARTIN VASQUEZ, who did unlawfully display, cause or permit to be displayed
28 or possess a driver's license or identification card of the type enumerated in Penal Code Section

1 470a, to wit: driver's license in the name of Javier Gonzalez, with the intent that said document
2 be used to facilitate the commission of a forgery.

3 **COUNT 62**

4 On or about September 6, 2007, in the county of Los Angeles, the crime of GRAND
5 THEFT – AUTOMOBILE in violation of Penal Code section 487(d)(1), a Felony, was committed
6 by MARTIN VASQUEZ, who did unlawfully take an automobile, to wit: a 2006 Nissan 350Z,
7 license plate number 5YAB223, owned by Nissan Motor Acceptance.

8 **COUNT 63**

9 On or about and between August 17, 2007, in the county of Los Angeles, the crime of
10 FILING FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a
11 Felony, was committed by MARTIN VASQUEZ, who did unlawfully and knowingly procure and
12 offer a false and forged instrument, to wit: Department of Motor Vehicles form REG 227 for a
13 2006 Nissan 350Z, license plate number 5YAB223, to be filed, registered, and recorded in a
14 public office within this state, which instrument, if genuine, might be filed, registered, and
15 recorded under a law of this state or the United States.

16 **COUNT 64**

17 On or about September 18, 2008, in the county of Los Angeles, the crime of UNLAWFUL
18 TAKING OF A VEHICLE in violation of Vehicle Code section 10851(a), a Felony, was
19 committed by LUIS MARROQUIN and KIRSIO CRUZ, who did unlawfully drive and take a
20 certain vehicle, to wit: a 2007 BMW 335i, license plate number 5XGP999, without the consent of
21 the owner, Chase Bank, and with intent, either permanently or temporarily, to deprive the said
22 owner of title to and possession of said vehicle.

1 All of the foregoing is contrary to the form, force, and effect of the above-named statutes,
2 and is against the peace and dignity of the People of the State of California.

3 Attached hereto and incorporate by reference is a declaration in support of arrest warrant
4 and complaint with accompanying official reports and documents of a law enforcement agency.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd
6 day of February, 2011, at Los Angeles, California.

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By: 
JAMES G. ROOT
Supervising Deputy Attorney General

PLEASE NOTE: Pursuant to Penal Code section 1054.5(b), the People of the State of
California hereby informally request that defense counsel provide discovery to the People as
required by Penal Code section 1054.3.