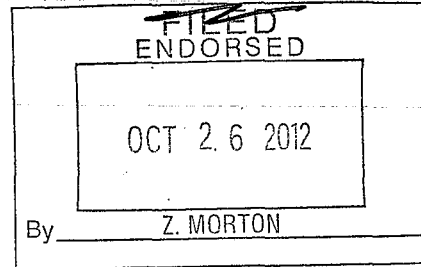


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X-Ref: 4830122, 4830399



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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF SACRAMENTO**

10 12F07020

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

Case No.

13 Plaintiff,

14 v.

**FIRST AMENDED CRIMINAL
COMPLAINT**

15 **LAUREL VELASQUEZ and**
16 **PEDRO IZEHUATL,**

17 Defendant.

18
19 The Attorney General of the State of California, upon oath of the undersigned and based
20 upon information and belief, hereby complains against the defendants LAUREL VELASQUEZ
21 and PEDRO IZEHUATL (hereafter "defendants"), named for the crimes as follows:

22 **COUNT ONE**

23 **(Violation Of Penal Code Section 182 (A)(1), Conspiracy To**
24 **Commit Forgery of a Governmental Identification Card)**

25 On or about and between July 3, 2012 and October 17, 2012 and in the County of
26 Sacramento, State of California, defendants did willfully and unlawfully and in violation of Penal
27 Code Section 182(a)(1), conspire together and with another person and persons whose identities
28 are currently unknown, to commit the crime of forgery of California driver's licenses and other

1 identification cards issued by a governmental agency, in violation of California Penal Code
2 section 470a, and that pursuant to and for the purpose of carrying out the objectives and purposes
3 of the aforesaid conspiracy, the said defendant, along with persons whose identities are currently
4 unknown, committed the following overt acts:

5 Overt Act 1. On July 18, 2012, defendant VELASQUEZ took receipt of photos for
6 illegal governmental identification cards;

7 Overt Act 2. On July 18, 2012, defendant VELASQUEZ returned with the fraudulent
8 governmental identification cards and gave them to the recipient;

9 Overt Act 3. On July 18, 2012, defendant VELASQUEZ took possession of \$200;

10 Overt Act 4. On September 25, 2012, defendant VELASQUEZ took receipt of photos
11 for illegal governmental identification cards;

12 Overt Act 5. On September 25, 2012, defendant VELASQUEZ took receipt of \$100;

13 Overt Act 6. On September 25, 2012, defendant VELASQUEZ took receipt of illegal
14 governmental identification cards from defendant IZEHUATL;

15 Overt Act 7. On September 25, 2012, defendant VELASQUEZ transferred the illegal
16 governmental identification cards to the recipient;

17 Overt Act 8. On September 25, 2012, defendant VELASQUEZ took receipt of \$400;

18 Overt Act 9. On October 17, 2012, took receipt of photos of illegal governmental
19 identification cards;

20 Overt Act 10. On October 17, 2012, defendant VELASQUEZ took receipt of \$100;

21 Overt Act 11. On October 17, 2012, defendant VELASQUEZ took receipt of illegal
22 governmental identification cards from defendant IZEHUATL;

23 Overt Act 12. On October 17, 2012, defendant VELASQUEZ transferred the illegal
24 governmental identification cards to the recipient;

25 Overt Act 13. On October 17, 2012, defendant VELASQUEZ took receipt of \$300.

26 **COUNT TWO**

27 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
28 Identification Card)**

On or about and between July 3, 2012 and October 17, 2012 and in the County of

1 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
2 470a of the Penal Code of the State of California, in that said defendants did willfully and
3 intentionally falsify, forge and counterfeit an United States Social Security Card for a John Chen
4 Woo, with the intent that the card be used to facilitate the commission of the forgery.

5 **COUNT THREE**

6 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
7 Identification Card)**

8 On or about and between July 3, 2012 and October 17, 2012 and in the County of
9 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
10 470a of the Penal Code of the State of California, in that said defendants did willfully and
11 intentionally falsify, forge and counterfeit a Permanent Resident Card (hereafter "Green Card")
12 for a John Chen Woo, with the intent that the card be used to facilitate the commission of the
13 forgery.

14 **COUNT FOUR**

15 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
16 Identification Card)**

17 On or about and between July 3, 2012 and October 17, 2012 and in the County of
18 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
19 470a of the Penal Code of the State of California, in that said defendants did willfully and
20 intentionally falsify, forge and counterfeit a California Driver's license for a John Chen Woo,
21 with the intent that the card be used to facilitate the commission of the forgery.

22 **COUNT FIVE**

23 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
24 Identification Card)**

25 On or about and between July 3, 2012 and October 17, 2012 and in the County of
26 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
27 470a of the Penal Code of the State of California, in that said defendants did willfully and
28 intentionally falsify, forge and counterfeit a California Driver's license for an Ang Lee, with the
intent that the card be used to facilitate the commission of the forgery.

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COUNT SIX

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 17, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section 470a of the Penal Code of the State of California, in that said defendants did willfully and intentionally falsify, forge and counterfeit a Green Card for Ang Lee, with the intent that the card be used to facilitate the commission of the forgery.

COUNT SEVEN

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 17, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section 470a of the Penal Code of the State of California, in that said defendants did willfully and intentionally falsify, forge and counterfeit a California driver's license for a Nikolai Baskov, with the intent that the card be used to facilitate the commission of the forgery.

COUNT EIGHT

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 17, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section 470a of the Penal Code of the State of California, in that said defendants did willfully and intentionally falsify, forge and counterfeit a Green Card for a Nikolai Baskov, with the intent that the card be used to facilitate the commission of the forgery.

COUNT NINE

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 17, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section

1 470a of the Penal Code of the State of California, in that said defendants did willfully and
2 intentionally falsify, forge and counterfeit a Green Card for a Anwar Sadat, with the intent that
3 the card be used to facilitate the commission of the forgery.

4 **COUNT TEN**

5 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
6 Identification Card)**

7 On or about and between July 3, 2012 and October 17, 2012 and in the County of
8 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
9 470a of the Penal Code of the State of California, in that said defendants did willfully and
10 intentionally falsify, forge and counterfeit a Green Card for a Ramzy Akrum, with the intent that
11 the card be used to facilitate the commission of the forgery.

12 **COUNT ELEVEN**

13 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
14 Identification Card)**

15 On or about and between July 3, 2012 and October 17, 2012 and in the County of
16 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
17 470a of the Penal Code of the State of California, in that said defendants did willfully and
18 intentionally falsify, forge and counterfeit a Green Card for a Muhammad Ali, with the intent that
19 the card be used to facilitate the commission of the forgery.

20 **COUNT TWELVE**

21 **(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental
22 Identification Card)**

23 On or about and between July 3, 2012 and October 17, 2012 and in the County of
24 Sacramento, State of California, defendants did commit a felony namely: a violation of Section
25 470a of the Penal Code of the State of California, in that said defendants did willfully and
26 intentionally falsify, forge and counterfeit a Green Card for a Rahib Humkar, with the intent that
27 the card be used to facilitate the commission of the forgery.

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COUNT THIRTEEN

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 25, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section 470a of the Penal Code of the State of California, in that said defendants did willfully and intentionally falsify, forge and counterfeit a Green Card for a Ali Gangnam, with the intent that the card be used to facilitate the commission of the forgery.

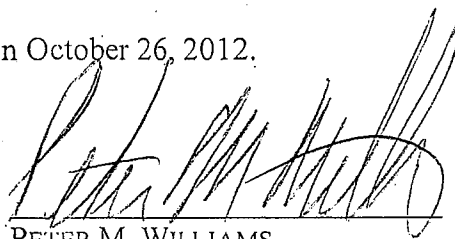
COUNT FOURTEEN

(Violation of Penal Code Section 470a Forgery or Counterfeiting of a Governmental Identification Card)

On or about and between July 3, 2012 and October 25, 2012 and in the County of Sacramento, State of California, defendants did commit a felony namely: a violation of Section 470a of the Penal Code of the State of California, in that said defendants did willfully and intentionally falsify, forge and counterfeit a Green Card for a Raaz Puutin, with the intent that the card be used to facilitate the commission of the forgery.

I declare upon information and belief and under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento County, California, on October 26, 2012.



PETER M. WILLIAMS
Deputy Attorney General