

AUG 13 2015

Sherri R. Carter, Executive Officer/Clerk  
By Julie Osdale, Deputy

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7 Attorneys for Plaintiff

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9 **SUPERIOR COURT OF LOS ANGELES COUNTY**  
10 **NORTHEAST DISTRICT, STATE OF CALIFORNIA**

11 Case No. GA097020

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 -versus-

15 1. VERDUGO VALLEY SKILLED NURSING &  
WELLNESS CENTRE LLC,

16 2. ALEXIUSE PEARL GARCIA SAN MATEO,

17 3. CONSUELO LACSON POLICARPIO,

18 Defendants.

**FELONY COMPLAINT  
FOR ARREST WARRANT**

3 Counts

P.C. 192(b) (F, 2/3/4, \$10,000)  
(Verdugo Valley only)

P.C. 368(b)(1) (F/M, 2/3/4, \$10,000)  
Spec. Alleg. P.C. 368(b)(3)(A) (+5)  
(San Mateo only)

P.C. 368(b)(1) (F/M, 2/3/4, \$10,000)  
Spec. Alleg. P.C. 368(b)(2)(A) (+3)  
(Policarpio only)

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20 The undersigned, on information and belief, accuses defendants VERDUGO VALLEY  
21 SKILLED NURSING & WELLNESS CENTRE LLC, ALEXIUSE SAN MATEO and  
22 CONSUELO POLICARPIO of the following crimes, which are connected in their commission:

23 **COUNT 1**

24 [INVOLUNTARY MANSLAUGHTER]

25 From on or about April 8, 2014, to on or about August 24, 2014, in the County of Los  
26 Angeles, State of California, defendant VERDUGO VALLEY SKILLED NURSING &  
27 WELLNESS CENTRE LLC, without due caution and circumspection, unlawfully and without  
28 malice caused the death of J.P., in violation of Penal Code section 192, subdivision (b), a felony.

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**COUNT 2**

[DEPENDENT-ADULT ABUSE]

From on or about April 8, 2014, to on or about August 24, 2014, in the County of Los Angeles, State of California, defendant ALEXIUSE SAN MATEO, having the care and custody of J.P., a dependent adult, who she knew was a dependent adult, willfully caused and permitted J.P.'s person and health to be injured, in violation of Penal Code section 368, subdivision (b)(1), a felony.

**SPECIAL ALLEGATION**

[CAUSING DEATH]

In the commission of the offense charged in count 2, defendant ALEXIUSE SAN MATEO proximately caused the death of J.P., within the meaning of Penal Code section 368, subdivision (b)(3)(A).

**COUNT 3**

[DEPENDENT-ADULT ABUSE]

On or about August 24, 2014, in the County of Los Angeles, State of California, defendant CONSUELO POLICARPIO, having the care and custody of J.P., a dependent adult, who she knew was a dependent adult, willfully caused and permitted J.P.'s person and health to be injured, in violation of Penal Code section 368, subdivision (b)(1), a felony.

**SPECIAL ALLEGATION**

[CAUSING GREAT BODILY INJURY]

In the commission of the offense charged in count 3, defendant CONSUELO POLICARPIO caused J.P. to suffer great bodily injury, within the meaning of Penal Code section 368, subdivision (b)(2)(A).

**REQUEST FOR ARREST WARRANTS**

Based on this complaint and the accompanying declaration in support of arrest warrant, I respectfully request that warrants be issued for the arrest of the defendants pursuant to Penal Code section 813 et seq.

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**REQUEST FOR DISCOVERY**

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

**DECLARATION**

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Signed on the 14<sup>TH</sup> day of August, 2015.



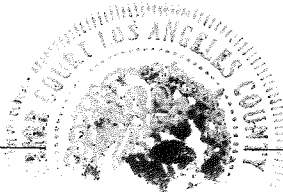
ANTHONY BAUMGART  
Special Agent  
Bureau of Medi-Cal Fraud & Elder Abuse  
California Department of Justice

**ARREST WARRANT ORDER**

IT IS ORDERED that arrest warrants shall issue for the following persons, who are to be admitted to bail in the sum of:

<u>Defendant</u>	<u>Bail</u>
ALEXIUSE SAN MATEO	\$ <u>50,000</u> -
CONSUELO POLICARPIO	\$ <u>50,000</u> -

8/14/15  
Date



Dorothy L. Shubin  
**DOROTHY L. SHUBIN**  
MAGISTRATE

1 Agency: Bureau of Medi-Cal Fraud & Elder Abuse  
2 California Department of Justice  
3 Law Enforcement Agency No. 7293  
4 ORI no. CA199410 Burbank  
5 BMFEA Docket nos.  
6 LA2015100420 (Verdugo Valley)  
7 LA2015104609 (San Mateo)  
8 LA2015104611 (Policarpio)

9 Recommended Bail

10 ALEXIUSE SAN MATEO: \$50,000 (bail schedule)  
11 CONSUELO POLICARPIO: \$50,000 (bail schedule)

12 Preliminary Hearing Time Estimate  
13 1 day

14 Alexiuse Pearl Garcia SAN MATEO

15 DOB: 06/26/1962  
16 CII No. M09631783 CDL No. A7762895  
17 Sex: F Race: Fil Hair: brn Eyes: brn Ht: 5'01" Wt: 120 lbs  
18 Residence: 7320 Balboa Blvd., # 118  
19 Lake Balboa, CA 91406  
20 Aliases: Alex San Mateo  
21 Alexiuse San Mateo  
22 Pearl Aquino Garcia  
23 Pearlita Aquino Garcia  
24 Pearl Garcia  
25 Pearlita Garcia  
26 Pearl San Mateo  
27 Pearlita San Mateo

28 Consuelo Lacson POLICARPIO

DOB: 12/21/1973  
CII No. A28311528 CDL No. F2634732  
Sex: F Race: Fil Hair: blk Eyes: blk Ht: 5'04" Wt: 130 lbs  
Residence: 345 E. Tujunga Ave., # 1  
Burbank, CA 91502  
Aliases: Connie Policarpio  
Consuelo Policarpio

**HOLDING ORDER**

It appearing from the evidence presented at the preliminary hearing that the following offenses charged in this complaint have been committed and that there is sufficient cause to believe that the following defendants are guilty of those offenses,

IT IS ORDERED, pursuant to sections 872 and 875 of the Penal Code, that the following defendants are held to answer in Superior Court to the following offenses:

<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
VERDUGO VALLEY SKILLED NURSING & WELLNESS CENTRE LLC	1	P.C. 192(b)	
ALEXIUSE SAN MATEO	2	P.C. 368(b)(1)	P.C. 368(b)(3)(A)
CONSUELO POLICARPIO	3	P.C. 368(b)(1)	P.C. 368(b)(2)(A)

and are committed to the custody of the Sheriff of Los Angeles County until bail is posted in the sum of:

<u>Defendant</u>	<u>Bail</u>
ALEXIUSE SAN MATEO	\$ _____
CONSUELO POLICARPIO	\$ _____

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

DATED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
MAGISTRATE