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Filed  
June 29, 2010

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SAN BERNARDINO

13 **PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16  
17 **01 JOHANNES SIMANJUNTAK,**  
18 **02 PEGGY LEE HOSKINS,**  
19 **03 LAURIE DIANE POWELL,**  
20 **04 SEAN MATTHEW ASHTON,**  
21 **05 ANDY PERRY TRICAS,**  
22 **06 ARNON GRAHAM,**  
23 **07 CLAUDIA ZARGOZA,**  
24 **08 ORELIOUS ANTONIO PEEVY,**  
25 **09 MARIBEL VELASQUEZ, and**  
26 **10 DAVID CARMONA,**

Defendants.

Case No.:

FWV1001553

**FELONY COMPLAINT IN SUPPORT  
OF ARREST WARRANTS**

24 The People of the State of California hereby allege that in the County of San Bernardino,  
25 State of California, and before the making or filing of the complaint, the above-mentioned  
26 defendants did commit the following crime(s):

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1 **COUNT 1 – PC 182(a)(1)**

2 **CONSPIRACY**

3 On or about and between January 1, 2006 through June 30, 2009, in the county of San  
4 Bernardino, defendants JOHANNES SIMANJUNTUK, PEGGY LEE HOSKINS, LAURIE  
5 DIANE POWELL, ANDY PERRY TRICAS, ARNON GRAHAM, SEAN MATTHEW  
6 ASHTON, ORELIOUS ANTONIO PEEVY, CLAUDIA ZARAGOZA, MARIBEL  
7 VELAZQUEZ and DAVID CARMONA, did unlawfully conspire together and with another  
8 person and persons whose identity is unknown to commit the crime of Elder and Dependant Adult  
9 Theft, in violation of section 368(d) of the Penal Code, a felony; that pursuant to and for the  
10 purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said  
11 Defendants committed the following overt acts and acts at and in the County of San Bernardino:

12 **OVERT ACT 1**

13 On or about February 23, 2007, PEGY LEE HOSKINS, Payroll Coordinator at Community  
14 Convalescent Hospital of Montclair (CCHM), received check number 2608 in the amount of  
15 Three Thousand Nine Hundred Nineteen Dollars and Fourteen Cents (\$3,919.14) from CCHM's  
16 Patient Trust Account signed by CCHM's Administrator JOHANNES SIMANJUNTUK in  
17 reference to CCHM resident Jessie Odil.

18 **OVERT ACT 2**

19 On or about February 23, 2007, PEGGY LEE HOSIKINS took CCHM check number 2608  
20 to CHASE Bank [formerly Washington Mutual] where she cashed the check.

21 **OVERT ACT 3**

22 On or about March 29, 2007, PEGGY LEE HOSKINS received check number 2625 in the  
23 amount of Four Thousand Nine Hundred Twenty-Two Dollars and Thirty-Six Cents (\$4,922.36)  
24 from CCHM's Patient Trust Account signed by CCHM's Administrator JOHANNES  
25 SIMANJUNTUK in reference to CCHM residents Janice Akin, Ulysses Guillebeau and Phyllis  
26 Johnson.

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**OVERT ACT 4**

On or about March 29, 2007, PEGGY LEE HOSIKINS took CCHM check number 2625 to CHASE Bank [formerly Washington Mutual] where she cashed the check.

**OVERT ACT 5**

On or about April 16, 2007, ORELIOUS ANTONIO PEEVY, a Social Worker at Community Convalescent Hospital of Montcalir (CCHM), received check number 2636 in the amount of Two Thousand Dollars (\$2,000) from CCHM's Patient Trust Account signed by CCHM's Administrator JOHANNES SIMANJUNTUK in reference to resident Clarence Hilliker.

**OVERT ACT 6**

On or about April 16, 2007, ORELIOUS ANTONIO PEEVY took CCHM check number 2636 to Pomona Ranch Market, a liquor store, where he cashed the check.

**OVERT ACT 7**

On or about June 13, 2007, ORELIOUS ANTONIO PEEVY received check number 2662 in the amount of One Thousand Six Hundred Dollars (\$1,600) from CCHM's Patient Trust Account signed by CCHM's Administrator JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 8**

On or about June 13, 2007, ORELIOUS ANTONIO PEEVY took CCHM check number 2662 to Pomona Ranch Market, a liquor store, where he cashed the check.

**OVERT ACT 9**

On or about August 14, 2007, ORELIOUS ANTONIO PEEVY received check number 2691 in the amount of Two Thousand Five Hundred Dollars (\$2,500) from CCHM's Patient Trust Account signed by CCHM's Administrator JOHANNES SIMANJUNTUK in reference to resident Clarence Hilliker.

**OVERT ACT 10**

On or about August 15, 2007, ORELIOUS ANTONIO PEEVY took CCHM check number 2691 to Pomona Ranch Market, a liquor store, where he cashed the check.

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**OVERT ACT 11**

On or about October 10, 2007, ORELIOUS ANTONIO PEEVY received check number 2713 the amount of Six Thousand Nine Hundred Dollars (\$6,900) from CCHM's Patient Trust Account signed by CCHM's Administrator JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 12**

On or about October 12, 2007, ORELIOUS ANTONIO PEEVY took CCHM check number 2713 to Pomona Ranch Market, a liquor store, where he cashed the check.

**OVERT ACT 13**

On or about February 20, 2008, CLAUDIA ZARAGOZA, Social Services Designee at CCHM, received check number 2760 in the amount of Three Hundred Twenty Dollars (\$320) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 14**

On or about February 20, 2008, CLAUDIA ZARAGOZA took check number 2760 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

**OVERT ACT 15**

On or about March 13, 2008, CLAUDIA ZARAGOZA received check number 2771 in the amount of Four Hundred Dollars (\$400) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 16**

On or about March 13, 2008, CLAUDIA ZARAGOZA took check number 2771 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

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**OVERT ACT 17**

On or about March 26, 2008, CLAUDIA ZARAGOZA received check number 2778 in the amount of Five Hundred Dollars (\$500) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 18**

On or about March 26, 2008, CLAUDIA ZARAGOZA took check number 2778 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

**OVERT ACT 19**

On or about October 17, 2008, MARIBEL VELAZQUEZ, Director of Staff Development at CCHM, received check number 2876 in the amount of Three Thousand Dollars (\$3,000) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Clarence Hilliker.

**OVERT ACT 20**

On or about October 17, 2008, MARIBEL VELAZQUEZ took check number 2876 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

**OVERT ACT 21**

On or about October 27, 2008, ANDY PERRY TRICAS received check number 2878 in the amount of Three Thousand One Hundred Fifty Dollars (\$3,150) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident William Searcy.

**OVERT ACT 22**

On or about October 27, 2008, ANDY PERRY TRICAS took check number 2878 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

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**OVERT ACT 23**

On or about December 2, 2008, JOHANNES SIMANJUNTUK signed CCHM Patient Trust Account check number 2895 in the amount of Three Thousand Five Hundred Dollars (\$3,500) to DAVID CARMONA, the neighbor and uncle of Holly Esparza, a former CCHM employee.

**OVERT ACT 24**

On or about December 11, 2008, LAURIE DIANE POWELL, a San Bernardino County employee, received check number 2903 in the amount of Three Thousand Two Hundred Dollars (\$3,200) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Shirley Litteral.

**OVERT ACT 25**

On or about December 11, 2008, SEAN MATTHEW ASHTON received check number 2902 in the amount of Three Thousand One Hundred Dollars (\$3,100) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Florence Mead.

**OVERT ACT 26**

On or about December 12, 2008, LAURIE DIANE POWELL took check number 2903 to Arrowhead Credit Union where she cashed it. An employee at Arrowhead Credit Union contacted CCHM and verified it was okay to cash the check.

**OVERT ACT 27**

On or about December 12, 2008, SEAN MATTHEW ASHTON took check number 2902 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with JOHANNES SIMANJUNTUK who verified the check and approved it for cashing.

**OVERT ACT 28**

On or about January 14, 2009, LAURIE DIANE POWELL received CCHM check number 2925 in the amount of Three Thousand Dollars (\$3,000) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Joseph Spano.

**OVERT ACT 29**

On or about January 15, 2009, LAURIE DIANE POWELL took check number 2925 to Arrowhead Credit Union where she cashed it.

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**OVERT ACT 30**

On or about February 10, 2009, LAURIE DIANE POWELL received CCHM check number 2939 in the amount of Four Thousand Eight Hundred Dollars (\$4,800) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Dennis Lewis.

**OVERT ACT 31**

On or about February 11, 2009, LAURIE DIANE POWELL took check number 2939 to Wells Fargo Bank where she cashed it.

**OVERT ACT 32**

On or about March 12, 2009, SEAN MATTHEW ASHTON received check number 2958 in the amount of Five Thousand Six Hundred Sixty-Seven Dollars and Thirty-Eight Cents (\$5,667.38) from CCHM Patient Trust Account signed by JOHANNES SIMANJUNTUK in reference to CCHM resident Lillian Dietz.

**OVERT ACT 33**

On or about March 13, 2009, SEAN MATTHEW ASHTON took check number 2958 to Wells Fargo Bank to cash it. Before it was cashed, the bank teller called CCHM and spoke with PEGGY LEE HOSKINS who verified the check and approved it for cashing.

**OVERT ACT - 34**

On or about March 20, 2009, JOHANNES SIMANJUNTUK signed CCHM Patient Trust Account check number 2968 in the amount of Nine Thousand One Hundred Dollars (\$9,100) to ARNON GRAHAM, a delivery man for United Parcel Service (UPS).

**OVERT ACT - 35**

On or about March 25, 2009, ARNON GRAHAM went to Bank of America and cashed check number 2968 in the amount of Nine Thousand One Hundred Dollars (\$9,100).

**COUNT 2 - PC 487(a)**

**GRAND THEFT**

On or about and between January 1, 2006 through June 30, 2009, in the county of San Bernardino, defendants JOHANNES SIMANJUNTUK, PEGGY LEE HOSKINS, LAURIE

1 DIANE POWELL, ANDY PERRY TRICAS, ARNON GRAHAM, SEAN MATTHEW  
2 ASHTON, ORELIOUS ANTONIO PEEVY, CLAUDIA ZARAGOZA, MARIBEL  
3 VELAZQUEZ and DAVID CARMONA did unlawfully take money and personal property of a  
4 value exceeding Nine Hundred Fifty Dollars (\$950), to wit, One Hundred Four Thousand Four  
5 Hundred Ninety-Nine Dollars and Forty-One Cents (\$104,499.41), the property of Community  
6 Convalescent Hospital of Montclair.

7 **SPECIAL ALLEGATION - 1**

8 **EXCESSIVE LOSS OVER \$100,000**

9 It is further alleged that the above offense is a theft of over \$100,000, within the meaning of  
10 penal Code section 1203.045(a).

11 **SPECIAL ALLEGATION - 2**

12 **EXCESSIVE LOSS OVER \$65,000**

13 It is further alleged that in the commission of the above offense, the said Defendants, with  
14 the intent to do so, took, damages, and destroyed property of a value exceeding \$65,000, within  
15 the meaning of Penal Code section 12022.6(a)(1).

16 **COUNT 3 – PC 502(c)**

17 **UNAUTHORIZED USE OF COMPUTER SYSTEMS**

18 On or about and between January 1, 2006 through June 30, 2009, in the county of San  
19 Bernardino, defendant LAURIE DIANE POWELL did knowingly and unlawfully violate  
20 subsection (c) of Penal Code section 502 in that Defendant used her San Bernardino County work  
21 computer to fraudulently zero out the patient trust accounts of residents at Community  
22 Convalescent Hospital of Montclair and placed the residents on Medi-Cal at the State's expense,  
23 in a conspiracy with several other individuals working at Community Convalescent Hospital of  
24 Montclair as well as several other individuals outside of the facility.

25 **COUNT 4 – PC 368(d)**

26 **THEFT FROM AN ELDER AND DEPENDANT ADULT**

27 On or about December 12, 2008, in the county of San Bernardino, defendant LAURIE  
28 DIANE POWELL committed theft, embezzlement, forgery, fraud and identity theft with respect



1 to the property and personal identifying information of an elder and dependant adult, said  
2 property, moneys, labor, goods, and services taken and obtained having a value exceeding  
3 \$950.00, and knew and reasonably should have known that said person, Shirley Litteral, was an  
4 elder and dependant adult.

5 **COUNT 5 - PC 487(a)**

6 **GRAND THEFT**

7 On or about December 12, 2008, in the county of San Bernardino, defendant LAURIE  
8 DIANE POWELL did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950), to wit, Three Thousand Two Hundred Dollars (\$3,200), the  
10 property of Shirley Litteral.

11 **COUNT 6 - PC 459**

12 **SECOND DEGREE COMMERCIAL BURGLARY**

13 On or about December 12, 2008, in the county of San Bernardino, defendant LAURIE  
14 DIANE POWELL did unlawfully enter a commercial building being occupied by  
15 ARROWHEAD CREDIT UNION with the intent to commit larceny and any felony.

16 **COUNT 7 - PC 496(a)**

17 **RECEIPT OF STOLEN PROPERTY**

18 On or about December 12, 2008, in the county of San Bernardino, defendant LAURIE  
19 DIANE POWELL, did unlawfully buy and receive stolen property, to wit, Three Thousand Two  
20 Hundred Dollars (\$3,200), the property of Shirley Litteral from her CCHM Patient Trust  
21 Account.

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**COUNT 8 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about January 15, 2009, in the county of San Bernardino, defendant LAURIE DIANE POWELL committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Joseph Spano, was an elder and dependant adult.

**COUNT 9 - PC 487(a)**

**GRAND THEFT**

On or about January 15, 2009, in the county of San Bernardino, defendant LAURIE DIANE POWELL did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand Dollars (\$3,000), the property of Jospeh Spano.

**COUNT 10 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about January 15, 2009, in the county of San Bernardino, defendant LAURIE DIANE POWELL did unlawfully enter a commercial building being occupied by ARROWHEAD CREDIT UNION with the intent to commit larceny and any felony.

**COUNT 11 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about January 15, 2009, in the county of San Bernardino, defendant LAURIE DIANE POWELL, did unlawfully buy and receive stolen property, to wit, Three Thousand Dollars (\$3,200), the property of Joseph Spano from his CCHM Patient Trust Account.

**COUNT 12 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about February 11, 2009, in the county of San Bernardino, defendant LAURIE DIANE POWELL committed theft, embezzlement, forgery, fraud and identity theft with respect

1 to the property and personal identifying information of an elder and dependant adult, said  
2 property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950,  
3 and knew and reasonably should have known that said person, Dennis Lewis, was an elder and  
4 dependant adult.

5 **COUNT 13 - PC 487(a)**

6 **GRAND THEFT**

7 On or about February 11, 2009, in the county of San Bernardino, defendant LAURIE  
8 DIANE POWELL did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950), to wit, Four Thousand Eight Hundred Dollars (\$4,800), the  
10 property of Dennis Lewis.

11 **COUNT 14 - PC 459**

12 **SECOND DEGREE COMMERCIAL BURGLARY**

13 On or about February 11, 2009, in the county of San Bernardino, defendant LAURIE  
14 DIANE POWELL did unlawfully enter a commercial building being occupied by WELLS  
15 FARGO BANK with the intent to commit larceny and any felony.

16 **COUNT 15 - PC 496(a)**

17 **RECEIPT OF STOLEN PROPERTY**

18 On or about February 11, 2009, in the county of San Bernardino, defendant LAURIE  
19 DIANE POWELL, did unlawfully buy and receive stolen property, to wit, Four Thousand Eight  
20 Hundred Dollars (\$4,800), the property of Dennis Lewis from his CCHM Patient Trust Account.

21 **COUNT 16 – PC 368(d)**

22 **THEFT FROM AN ELDER AND DEPENDANT ADULT**

23 On or about February 23, 2007, in the county of San Bernardino, defendant PEGGY LEE  
24 HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the  
25 property and personal identifying information of an elder and dependant adult, said property,  
26 moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew  
27 and reasonably should have known that said person, Jessie Odil, was an elder and dependant  
28 adult.

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**COUNT 17 - PC 487(a)**

**GRAND THEFT**

On or about February 23, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand Nine Hundred Nineteen Dollars and Fourteen Cents (\$3,919.14), the property of Jessie Odil.

**COUNT 18 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about February 23, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

**COUNT 19 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about February 23, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Three Thousand Nine Hundred Nineteen Dollars and Fourteen Cents (\$3,919.14), the property of Jessie Odil from his CCHM Patient Trust Account.

**COUNT 20 - PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about March 29, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of elder and dependant adults, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said persons, Janice Akin, Ulysses Guillebeau, Phyllis Johnson, Mary Pruitt and Velma Stubbs, were elder and dependant adults.

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**COUNT 21 - PC 487(a)**

**GRAND THEFT**

On or about March 29, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Four Thousand Nine Hundred Twenty-Two Dollars and Thirty-Six Cents (\$4,922.36), the property of Janice Akin, Ulysses Guillebeau, Phyllis Johnson, Mary Pruitt and Velma Stubbs.

**COUNT 22 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about March 29, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

**COUNT 23 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about March 29, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Four Thousand Nine Hundred Twenty-Two Dollars and Thirty-Six Cents (\$4,922.36), the property of Janice Akin, Ulysses Guillebeau, Phyllis Johnson, Mary Pruitt and Velma Stubbs from their CCHM Patient Trust Accounts.

**COUNT 24 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about July 25, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adults, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said persons, Dorothy Clarke and Robert Nixon, were elder and dependant adults.

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**COUNT 25 - PC 487(a)**

**GRAND THEFT**

On or about July 25, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Two Thousand Five Hundred Seventy-Nine Dollars (\$2,579), the property of Dorothy Clarke and Robert Nixon.

**COUNT 26 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about July 25, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

**COUNT 27 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about July 25, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Two Thousand Five Hundred Seventy-Nine Dollars (\$2,579), the property of Dorothy Clarke and Robert Nixon from their CCHM Patient Trust Accounts.

**COUNT 28 - PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about October 12, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Bienvenidos Navarro, an elder and dependant adult.

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**COUNT 29 - PC 487(a)**

**GRAND THEFT**

On or about October 12, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Two Thousand Seven Hundred Seventy-Three Dollars and Thirty-Two Cents (\$2,773.32), the property of Bienvenidos Navarro.

**COUNT 30 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about October 12, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

**COUNT 31 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about October 12, 2007, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Two Thousand Seven Hundred Seventy-Three Dollars and Thirty-Two Cents (\$2,773.32), the property of Bienvenidos Navarro from his CCHM Patient Trust Account.

**COUNT 32 - PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about August 29, 2008, in the county of San Bernardino, defendant PEGGY LEE HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of elder and dependant adults, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said persons, Eliza Jackson and Rita Voss, elder and dependant adults.

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**COUNT 33 - PC 487(a)**

**GRAND THEFT**

On or about August 29, 2008, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Two Thousand Seven Hundred Thirty-Nine Dollars and Fifty-Five Cents (\$2,739.55), the property of Eliza Jackson and Rita Voss.

**COUNT 34 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about August 29, 2008, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

**COUNT 35 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about August 29, 2008, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Two Thousand Seven Hundred Thirty-Nine Dollars and Fifty-Five Cents (\$2,739.55), the property of Eliza Jackson and Rita Voss from their CCHM Patient Trust Accounts.

**COUNT 36 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about September 10, 2008, in the county of San Bernardino, defendant PEGGY LEE HOSKINS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Freddie Deeter, an elder and dependant adult.

**COUNT 37 - PC 487(a)**

**GRAND THEFT**

On or about and between September 12, 2008 through January 5, 2009, in the county of San Bernardino, defendant PEGGY LEE HOSKINS did unlawfully take money and personal property



1 of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, One Thousand Dollars (\$1,000),  
2 the property of Freddie Deeter.

3 **COUNT 38 - PC 459**

4 **SECOND DEGREE COMMERCIAL BURGLARY**

5 On or about September 12, 2008, in the county of San Bernardino, defendant PEGGY LEE  
6 HOSKINS did unlawfully enter a commercial building being occupied by CHASE BANK  
7 [formerly WASHINGTON MUTUAL] with the intent to commit larceny and any felony.

8 **COUNT 39 - PC 496(a)**

9 **RECEIPT OF STOLEN PROPERTY**

10 On or about September 12, 2008, in the county of San Bernardino, defendant PEGGY LEE  
11 HOSKINS, did unlawfully buy and receive stolen property, to wit, One Thousand Dollars  
12 (\$1,000), the property of Freddie Deeter from his CCHM Patient Trust Account.

13 **COUNT 40 – PC 504 / 487(a)**

14 **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER**

15 On or about and between July 23, 2007 through June 2, 2009, in the county of San  
16 Bernardino, and while said defendant PEGGY LEE HOSKINS was the Payroll Coordinator at  
17 Community Convalescent Hospital of Montclair, did unlawfully and fraudulently appropriate to a  
18 use and purpose, not in the due and lawful execution of her trust, property which she had in her  
19 possession and under her control by virtue of her trust and did unlawfully secrete said property  
20 with fraudulent intent to appropriate it to such use and purpose contrary to Penal Code section  
21 487(a), and said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit,  
22 Twelve Thousand Eight Hundred Sixty-One Dollars and Eighty-Six Cents (\$12,861.86), the  
23 property of Community Convalescent Hospital of Montclair, Patient Trust Account.

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**COUNT 41 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about and between July 30, 2007 through June 2, 2009, in the county of San Bernardino, defendant PEGGY LEE HOSKINS, did unlawfully buy and receive stolen property, to wit, Twelve Thousand Eight Hundred Sixty-One Dollars and Eighty-Six Cents (\$12,861.86), the property of Community Convalescent Hospital of Montclair, Patient Trust Account.

**COUNT 42 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about December 12, 2008, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Florence Mead, was an elder and dependant adult.

**COUNT 43 - PC 487(a)**

**GRAND THEFT**

On or about December 12, 2008, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand One Hundred Dollars (\$3,100), the property of Florence Mead.

**COUNT 44 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about December 12, 2008, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 45 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about December 12, 2008, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON, did unlawfully buy and receive stolen property, to wit, Three Thousand One Hundred Dollars (\$3,100), the property of Florence Mead in her CCHM Patient Trust Account.

**COUNT 46 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about March 13, 2009, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Lillian Dietz, was an elder and dependant adult.

**COUNT 47 - PC 487(a)**

**GRAND THEFT**

On or about March 13, 2009, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Five Thousand Six Hundred Sixty-Seven Dollars and Thirty-Eight Cents (\$5,667.38), the property of Lillian Dietz.

**COUNT 48 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about March 13, 2009, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 49 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about December 12, 2008, in the county of San Bernardino, defendant SEAN MATTHEW ASHTON, did unlawfully buy and receive stolen property, to wit, Five Thousand Six Hundred Sixty-Seven Dollars and Thirty-Eight Cents (\$5,667.38), the property of Lillian Dietz in her CCHM Patient Trust Account.

**COUNT 50 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about April 23, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Wilma Wilder, was an elder and dependant adult.

**COUNT 51 - PC 487(a)**

**GRAND THEFT**

On or about April 23, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Five Thousand Dollars (\$5,000), the property of Wilma Wilder.

**COUNT 52 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about April 28, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 53 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about April 28, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS, did unlawfully buy and receive stolen property, to wit, Five Thousand Dollars (\$5,000), the property of Wilma Wilder in her CCHM Patient Trust Account.

**COUNT 54 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about October 21, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, William Searcy, was an elder and dependant adult.

**COUNT 55 - PC 487(a)**

**GRAND THEFT**

On or about October 21, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand One Hundred Fifty Dollars (\$3,150), the property of William Searcy.

**COUNT 56 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about October 27, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 57 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about October 27, 2008, in the county of San Bernardino, defendant ANDY PERRY TRICAS, did unlawfully buy and receive stolen property, to wit, Three Thousand One Hundred Fifty Dollars (\$3,150), the property of William Searcy in her CCHM Patient Trust Account.

**COUNT 58 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about February 23, 2009, in the county of San Bernardino, defendant ANDY PERRY TRICAS committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Minnie Colbert, was an elder and dependant adult.

**COUNT 59 - PC 487(a)**

**GRAND THEFT**

On or about February 23, 2009, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Seven Thousand Nine Hundred Seventy-Five Dollars (\$7,975), the property of Minnie Colbert.

**COUNT 60 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about February 26, 2009, in the county of San Bernardino, defendant ANDY PERRY TRICAS did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

**COUNT 61 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about February 26, 2009, in the county of San Bernardino, defendant ANDY PERRY TRICAS, did unlawfully buy and receive stolen property, to wit, Seven Thousand Nine Hundred

1 Seventy-Five Dollars (\$7,975), the property of Minnie Colbert in her CCHM Patient Trust  
2 Account.

3 **COUNT 62 – PC 368(d)**

4 **THEFT FROM AN ELDER AND DEPENDANT ADULT**

5 On or about March 20, 2009, in the county of San Bernardino, defendant ARNON  
6 GRAHAM committed theft, embezzlement, forgery, fraud and identity theft with respect to the  
7 property and personal identifying information of an elder and dependant adult, said property,  
8 moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and  
9 knew and reasonably should have known that said persons, Joann Allen, Candida Baltierra, Diane  
10 Williams, Choy Huang, Charlotte Oemig, Melvis Leyva, John, Hill, Elsie Gooden, Arthur  
11 Cannon, Freddie Deeter, James Elbel, Angelita Ochoa, Thelma Davis, Betty Paine, Teresa  
12 Martinez, Lillie Atherly and Diana McBride, were elder and dependant adults.

13 **COUNT 63 - PC 487(a)**

14 **GRAND THEFT**

15 On or about March 20, 2009, in the county of San Bernardino, defendant ARNON  
16 GRAHAM did unlawfully take money and personal property of a value exceeding Nine Hundred  
17 Fifty Dollars (\$950), to wit, Nine Thousand One Hundred Dollars (\$9,100), the property of Joann  
18 Allen, Candida Baltierra, Diane Williams, Choy Huang, Charlotte Oemig, Melvis Leyva, John,  
19 Hill, Elsie Gooden, Arthur Cannon, Freddie Deeter, James Elbel, Angelita Ochoa, Thelma Davis,  
20 Betty Paine, Teresa Martinez, Lillie Atherly and Diana McBride.

21 **COUNT 64 - PC 459**

22 **SECOND DEGREE COMMERCIAL BURGLARY**

23 On or about March 25, 2009, in the county of San Bernardino, defendant ARNON  
24 GRAHAM did unlawfully enter a commercial building being occupied by BANK OF AMERICA  
25 with the intent to commit larceny and any felony.

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**COUNT 65 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about March 25, 2009, in the county of San Bernardino, defendant ARNON GRAHAM, did unlawfully buy and receive stolen property, to wit, Nine Thousand One Hundred Dollars (\$9,100), the property of Joann Allen, Candida Baltierra, Diane Williams, Choy Huang, Charlotte Oemig, Melvis Leyva, John, Hill, Elsie Gooden, Arthur Cannon, Freddie Deeter, James Elbel, Angelita Ochoa, Thelma Davis, Betty Paine, Teresa Martinez, Lillie Atherly and Diana McBridein from their personal Patient Trust Accounts at CCHM.

**COUNT 66 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about December 2, 2008, in the county of San Bernardino, defendant DAVID CARMONA committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Fred Atherly, was an elder and dependant adult.

**COUNT 67 - PC 487(a)**

**GRAND THEFT**

On or about December 2, 2008, in the county of San Bernardino, defendant DAVID CARMONA did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand Five Hundred Dollars (\$3,500), the property of Fred Atherly.

**COUNT 68 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about December 4, 2008, in the county of San Bernardino, defendant DAVID CARMONA did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 69 - PC 496(a)**

**RECEIPT OF STOLEN PROPERTY**

On or about December 4, 2008, in the county of San Bernardino, defendant DAVID CARMONA, did unlawfully buy and receive stolen property, to wit, Three Thousand Five Hundred Dollars (\$3,500), the property of Fred Atherly in his CCHM Patient Trust Account.

**COUNT 70 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about April 16, 2007, in the county of San Bernardino, defendant ORELIOUS PEEVY committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 71 - PC 487(a)**

**GRAND THEFT**

On or about April 16, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Two Thousand Dollars (\$2,000), the property of Clarence Hilliker.

**COUNT 72 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about April 16, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully enter a commercial building being occupied by POMONA RANCH MARKET with the intent to commit larceny and any felony.

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**COUNT 73 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about April 16, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY, did unlawfully buy and receive stolen property, to wit, Two Thousand Dollars (\$2,000), the property of Clarence Hilliker in his CCHM Patient Trust Account.

**COUNT 74 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about June 13, 2007, in the county of San Bernardino, defendant ORELIOUS PEEVY committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 75 - PC 487(a)**

**GRAND THEFT**

On or about June 13, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, One Thousand Six Hundred Dollars (\$1,600), the property of Clarence Hilliker.

**COUNT 76 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about June 13, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully enter a commercial building being occupied by POMONA RANCH MARKET with the intent to commit larceny and any felony.

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**COUNT 77 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about June 13, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY, did unlawfully buy and receive stolen property, to wit, One Thousand Six Hundred Dollars (\$1,600), the property of Clarence Hilliker in his CCHM Patient Trust Account.

**COUNT 78 - PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about August 14, 2007, in the county of San Bernardino, defendant ORELIOUS PEEVY committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 79 - PC 487(a)**

**GRAND THEFT**

On or about August 14, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Two Thousand Five Hundred (\$2,500), the property of Clarence Hilliker.

**COUNT 80 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about August 14, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully enter a commercial building being occupied by POMONA RANCH MARKET with the intent to commit larceny and any felony.

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**COUNT 81 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about August 14, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY, did unlawfully buy and receive stolen property, to wit, Two Thousand Five Hundred Dollars (\$2,500), the property of Clarence Hilliker in his CCHM Patient Trust Account.

**COUNT 82 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about October 10, 2007, in the county of San Bernardino, defendant ORELIOUS PEEVY committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 83 - PC 487(a)**

**GRAND THEFT**

On or about October 10, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Six Thousand Nine Hundred (\$6,900), the property of Clarence Hilliker.

**COUNT 84 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about October 10, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY did unlawfully enter a commercial building being occupied by POMONA RANCH MARKET with the intent to commit larceny and any felony.

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**COUNT 85 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about October 10, 2007, in the county of San Bernardino, defendant ORELIOUS ANTONIO PEEVY, did unlawfully buy and receive stolen property, to wit, Six Thousand Nine Hundred Dollars (\$6,900), the property of Clarence Hilliker in his CCHM Patient Trust Account.

**COUNT 86 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about October 17, 2008, in the county of San Bernardino, defendant MARIBEL VELAZQUEZ committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 87 - PC 487(a)**

**GRAND THEFT**

On or about October 17, 2008, in the county of San Bernardino, defendant MARIBEL VELAZQUEZ did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Three Thousand Dollars (\$3,000), the property of Clarence Hilliker.

**COUNT 88 - PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about October 17, 2008, in the county of San Bernardino, defendant MARIBEL VELAZQUEZ did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

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**COUNT 89 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about October 17, 2008, in the county of San Bernardino, defendant MARIBEL VELAZQUEZ, did unlawfully buy and receive stolen property, to wit, Three Thousand Dollars (\$3,000), the property of Clarence Hilliker in his CCHM Patient Trust Account.

**COUNT 90 – PC 368(d)**

**THEFT FROM AN ELDER AND DEPENDANT ADULT**

On or about and between February 19, 2008 through May 27, 2009, in the county of San Bernardino, defendant CLAUDIA ZARAGOZA committed theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependant adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, Clarence Hilliker, was an elder and dependant adult.

**COUNT 91 - PC 487(a)**

**GRAND THEFT**

On or about and between February 19, 2008 through May 27, 2009, in the county of San Bernardino, defendant CLAUDIA ZARAGOZA did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Nine Thousand Nine Hundred Three Dollars and Thirty-Six Cents (\$9,903.36), the property of Clarence Hilliker.

**COUNT 92- PC 459**

**SECOND DEGREE COMMERCIAL BURGLARY**

On or about March 20, 2009, in the county of San Bernardino, defendant CLAUDIA ZARAGOZA did unlawfully enter a commercial building being occupied by WELLS FARGO BANK with the intent to commit larceny and any felony.

**COUNT 93 - PC 496(a)(b)**

**RECEIPT OF STOLEN PROPERTY**

On or about and between February 19, 2008 through May 27, 2009, in the county of San Bernardino, defendant CLAUDIA ZARAGOZA, did unlawfully buy and receive stolen property,

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to wit, Nine Thousand Nine Hundred Three Dollars and Thirty-Six Cents (\$9,903.36), the  
property of Clarence Hilliker from his CCHM Patient Trust Account.

Dated: June 29, 2010

Respectfully Submitted,  
EDMUND G. BROWN JR.  
Attorney General of California



NATASHA FAGEN  
Deputy Attorney General  
*Attorneys for Plaintiff*

1 to wit, Nine Thousand Nine Hundred Three Dollars and Thirty-Six Cents (\$9,903.36), the  
2 property of Clarence Hilliker from his CCHM Patient Trust Account.

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Dated: June 29, 2010

Respectfully Submitted,  
EDMUND G. BROWN JR.  
Attorney General of California



NATASHA FAGEN  
Deputy Attorney General  
*Attorneys for Plaintiff*



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>
JOHANNES SIMANJUNTUK	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
LAURIE DIANE POWELL	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
“ “ “	3	PC 502(c)	
“ “ “	4, 8, 12	PC 368(d)	
“ “ “	5, 9, 13	PC 487(a)	
“ “ “	6, 10, 14	PC 459	
“ “ “	7, 11, 15	PC 496(a)	
PEGGY LEE HOSKINS	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
“ “ “	16, 20, 24, 28, 32, 36	PC 368(d)	
“ “ “	17, 21, 25, 29, 33, 37	PC 487(a)	
“ “ “	18, 22, 26, 30, 34, 38	PC 459	
“ “ “	19, 23, 27, 31, 35, 39	PC 496(a)	
“ “ “	40	PC 504 / 487(a)	
“ “ “	41	PC 496(a)	
SEAN MATTHEW ASHTON	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
“ “ “	42, 46	PC 368(d)	
“ “ “	43, 47	PC 487(a)	

	<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
1	SEAN MATTHEW ASHTON	44, 48	PC 459	
2	“ “ “	45, 49	PC 496(a)	
3	ANDY PERRY TRICAS	1	PC 182	
4	“ “ “	2	PC 487(a)	1, 2
5	“ “ “	50, 54, 58	PC 368(d)	
6	“ “ “	51, 55, 59	PC 487(a)	
7	“ “ “	52, 56, 60	PC 459	
8	“ “ “	53, 57, 61	PC 496(a)	
9	ARNON GRAHAM	1	PC 182	
10	“ “ “	2	PC 487(a)	1, 2
11	“ “ “	62	PC 368(d)	
12	“ “ “	63	PC 487(a)	
13	“ “ “	64	PC 459	
14	“ “ “	65	PC 496(a)	
15	DAVID CARMONA	1	PC 182	
16	“ “ “	2	PC 487(a)	1, 2
17	“ “ “	66	PC 368(d)	
18	“ “ “	67	PC 487(a)	
19	“ “ “	68	PC 459	
20	“ “ “	69	PC 496(a)	
21	ORELIIOUS ANTONIO PEEVY	1	PC 182	
22	“ “ “	2	PC 487(a)	1, 2
23	“ “ “	70, 74, 78, 82	PC 368(d)	
24	“ “ “	71, 75, 79, 83	PC 487(a)	
25	“ “ “	72, 76, 80, 84	PC 459	
26	“ “ “	73, 77, 81, 85	PC 496(a)	
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<u>Defendant</u>	<u>Count</u>	<u>Charge</u>	<u>Special Allegation</u>
MARIBEL VELAZQUEZ	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
“ “ “	86	PC 368(d)	
“ “ “	87	PC 487(a)	
“ “ “	88	PC 459	
“ “ “	89	PC 496(a)	
CLAUDIA ZARAGOZA	1	PC 182	
“ “ “	2	PC 487(a)	1, 2
“ “ “	90	PC 368(d)	
“ “ “	91	PC 487(a)	
“ “ “	92	PC 459	
“ “ “	93	PC 496(a)	

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

<u>Defendant</u>	<u>Bail</u>
JOHANNES SIMANJUNTUK	\$ _____
PEGGY LEE HOSKINS	\$ _____
LAURIE DIANE POWELL	\$ _____
SEAN MATTHEW ASHTON	\$ _____
ANDY PERRY TRICAS	\$ _____
ARNON GRAHAM	\$ _____
CLAUDIA ZARAGOZA	\$ _____
ORELIUS ANTONIO PEEVY	\$ _____
MARIBEL VELAZQUEZ	\$ _____
DAVID CARMONA	\$ _____

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

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2010.

\_\_\_\_\_

MAGISTRATE