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 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 10 COUNTY OF LOS ANGELES

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

Case No. *BA396115*

13
 14 Plaintiff,

FELONY COMPLAINT
FOR ARREST WARRANT

15 v.

16 **(1) JUAN LUCAS CAMACHO, AKA JUAN**
CAMACHO RAMIREZ
 17 **(DOB: 10/18/1972),**

18 **(2) JOSE PABLO ALMARAZ**
 19 **(DOB: 5/13/1974),**

20 Defendants.

21
 22 THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses Defendants
 23 JUAN LUCAS CAMACHO and JOSE PABLO ALMARAZ of the following crimes, which are
 24 connected to one another in their commission:

25 **COUNT 1**

26 On or about and between March 5, 2012 through April 17, 2012, in the County of Los
 27 Angeles, the crime of CONSPIRACY in violation of Penal Code section 182(a)(1), a Felony, was
 28 committed by Defendants JUAN LUCAS CAMACHO and JOSE PABLO ALMARAZ ; who did

1 willfully and unlawfully conspire together with another person or persons to commit the crimes of
2 Failure to Disclose Origin of a Recording/AV Work, a Felony, and Counterfeit of a Registered
3 Trademark, a Felony, and that pursuant to and for the purposes of carrying out the objectives and
4 purposes of the aforesaid conspiracy, the following Overt Acts were committed:

5 **OVERT ACT - 1**

6 On or about March 5, 2012, in the county of Orange, Defendants JUAN LUCAS
7 CAMACHO and JOSE PABLO ALMARAZ met at a Del Taco located at 213 East Katella
8 Avenue in the city of Anaheim and offered counterfeit CDs for sale.

9 **OVERT ACT - 2**

10 On or about April 17, 2012, in the county of Los Angeles, Defendants JUAN LUCAS
11 CAMACHO and JOSE PABLO ALMARAZ met in a Home Depot parking lot located at 1675
12 Wilshire Boulevard in the city of Los Angeles and produced 4 boxes of counterfeit CDs for sale.

13 **OVERT ACT - 3**

14 On or about April 17, 2012, in the county of Los Angeles, Defendants JUAN LUCAS
15 CAMACHO and JOSE PABLO ALMARAZ sold 800 counterfeit CDs for \$480 in the Home
16 Depot parking lot located at 1675 Wilshire Boulevard in the city of Los Angeles.

17 **COUNT 2**

18 On or about April 17, 2012, in the County of Los Angeles, the crime of FAILURE TO
19 DISCLOSE ORIGIN OF A RECORDING/AV WORK WITH A PRIOR in violation of Penal
20 Code section 653w(a), a Felony, was committed by Defendant JUAN LUCAS CAMACHO, who
21 did unlawfully fail to disclose the origin of a recording and audiovisual work, said Defendant
22 having previously been convicted of a violation of this section on April 23, 2008, in Lancaster
23 Superior Court in Los Angeles County, California.

24 **COUNT 3**

25 On or about April 17, 2012, in the County of Los Angeles, the crime of COUNTERFEIT
26 OF REGISTERED TRADEMARK WITH A PRIOR in violation of Penal Code section
27 350(a)(1), a Felony, was committed by Defendant JUAN LUCAS CAMACHO, who did willfully
28 and unlawfully manufacture, intentionally sell and knowingly possess for sale a counterfeit of a

1 mark registered with the Secretary of State and registered on the Principal Register of the United
2 States Patent and Trademark Office, to wit: Universal Music Group.

3 It is further alleged, pursuant to section 350(b), that the Defendant was previously
4 convicted of a violation of 350(a).

5 **COUNT 4**

6 On or about April 17, 2012, in the County of Los Angeles, the crime of FAILURE TO
7 DISCLOSE ORIGIN OF A RECORDING WORK in violation of Penal Code section 653w(a), a
8 Felony, was committed by Defendant JOSE PABLO ALMARAZ, who did unlawfully fail to
9 disclose the origin of a recording and audiovisual work.

10 It is further alleged that the above offense is a felony pursuant to Penal Code section
11 653w(b)(1) in that the offense involved at least 100 articles of audio recordings and 100 articles
12 of audio visual works.

13 **COUNT 5**

14 On or about April 17, 2012, in the County of Los Angeles, the crime of COUNTERFEIT
15 OF REGISTERED TRADEMARK in violation of Penal Code section 350(a)(2), a Felony, was
16 committed by Defendant JOSE PABLO ALMARAZ, who did willfully and unlawfully
17 manufacture, intentionally sell and knowingly possess for sale a counterfeit of a mark registered
18 with the Secretary of State and registered on the Principal Register of the United States Patent and
19 Trademark Office, to wit: Universal Music Group.

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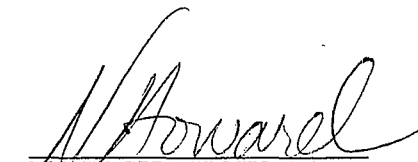
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DECLARATION

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of April, 2012, at Los Angeles, California.


NATASHA HOWARD
Deputy Attorney General
Attorneys for People

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NOTICE TO DEFENDANT AND ATTORNEY

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.

NOTICE TO ATTORNEY

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Special Agent Scot Hunter of the California Department of Justice, I find there is probable cause to believe that the following crimes, and as described in the accompanying felony complaint, have been committed by defendant JUAN LUCAS CAMACHO: Conspiracy in violation of Penal Code § 182(a)(1); Failure to Disclose Origin of a Recording/AV Work with a Prior in violation of PC 653w(a); and Counterfeit of Registered Trademark With a Prior in violation of Penal Code § 350(a)(1).

Therefore, you are commanded to arrest JUAN LUCAS CAMACHO, and to bring said defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

Dated: _____

Time Issued: _____ (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7
8 Proof by declaration under penalty of perjury having been made this day to me by Special
9 Agent Scot Hunter of the California Department of Justice, I find there is probable cause to
10 believe that the following crimes, and as described in the accompanying felony complaint, have
11 been committed by defendant JOSE PABLO ALMARAZ: Conspiracy in violation of Penal Code
12 § 182(a)(1); Failure to Disclose Origin of a Recording Work in violation of PC 653w(a); and
13 Counterfeit of Registered Trademark in violation of Penal Code § 350(a)(2).

14 Therefore, you are commanded to arrest JOSE PABLO ALMARAZ, and to bring said
15 defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and
16 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ _____.

18
19 Dated: _____

20 Time Issued: _____ (am/pm)

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22 _____
23 JUDGE OF THE SUPERIOR COURT
24 State of California, County of Los Angeles
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Defendant	DOB	CII	DMV	Bail Requested
Camacho, Juan Lucas	10/18/1972	A23680378	B3179103	\$
Almaraz, Jose Pablo	5/13/1974	A25105762	B5735826	\$
Investigating Agency	DOJ			
Investigating Officer	Special Agent Scot Hunter			
Phone No.	(619) 645 – 2621			
Prelim Estimate	3 hours			

Order Holding To Answer - Felony Complaint (P.C. § 872)

It appearing to me that the offenses in the complaint have been committed and there is sufficient cause to believe the defendants guilty thereof, I order that the defendants be held to answer for the following:

(Strike out or add as applicable)

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
Juan Lucas Camacho	1	PC 182(a)(1)	16-2-3		
	2	PC 653w(a)	16-2-3		
	3	PC 350(a)(1)	16-2-3		
Jose Pablo Almaraz	1	PC 182(a)(1)	16-2-3		
	4	PC 653w(a)	2-3-5		
	5	PC 350(a)(2)	16-2-3		

1 I ORDER that the defendants named below be held to answer for the above-described
2 offenses and allegations and be admitted to bail in the sum of:

3 Juan Lucas Camacho \$ _____

4 Jose Pablo Almaraz \$ _____

5 And that said defendants be committed to the custody of the Sheriff until such bail is given.
6 The date of Felony arraignment is set for:

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9 _____ in Department _____ at _____ a.m.
10 (Date)

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13 _____
14 Magistrate Date
15 Superior Court of California
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