

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
HALL OF JUSTICE

COMPLAINT FOR ARREST WARRANT(S)

RONDA F TAPPER EY467

VIRGILIO AGUINALDO ABAD EY466

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

vs.

RONDA F TAPPER (05/31/1960),
1574 WESSEX LOS ALTOS CA 94024
VIRGILIO AGUINALDO ABAD (08/08/1957),
62 BONVIEW ST SAN FRANCISCO CA 94110

Defendant(s).

C1888684

FELONY COMPLAINT

DA NO: 180410778

CEN

RFT WARR

VAA WARR

(ENDORSED)
FILED
APR 12 2018

Clerk of the Court
Superior Court of CA County of Santa Clara
BY T. UEHMANN DEPUTY

The undersigned is informed and believes that:

COUNT 1

On or about and between May 1, 2011 and April 9, 2018, in the County of Santa Clara, State of California, the crime of UNLAWFUL CLIENT OR PATIENT REFERRAL, in violation of LABOR CODE SECTION 3215, a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did unlawfully offer, deliver, receive and accept a rebate, refund, commission, preference, patronage dividend, discount and other consideration as compensation and inducement for referring patients, clients and customers to, VABAD, Inc., doing business as Career Advancement Solutions and Tapper Inc., doing business as RFT Vocational Services. to wit: Defendant Abad paid Defendant Tapper between \$600 and \$1700 per student referred to Career Advancement Solutions.

COUNT 2

On or about and between November 5, 2015 and February 9, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person Nadine Cleghorn was entitled.

COUNT 3

On or about and between August 1, 2015 and February 27, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from Berkshire-Hathaway Homestate Company (Cypress Ins. Co.).

COUNT 4

On or about and between August 1, 2015 and February 27, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

COUNT 5

On or about and between August 1, 2016 and April 18, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from the County of Santa Clara, a self-insured public agency,.

COUNT 6

On or about and between August 1, 2016 and April 18, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

COUNT 7

On or about and between August 15, 2011 and March 6, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from Insurance Company of the West.

COUNT 8

On or about and between August 15, 2011 and March 6, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

COUNT 9

On or about and between September 1, 2015 and September 18, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from State Compensation Insurance Fund.

COUNT 10

On or about and between September 1, 2015 and September 18, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

COUNT 11

On or about and between September 1, 2015 and July 7, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from Travelers Insurance.

COUNT 12

On or about and between September 1, 2015 and July 7, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

COUNT 13

On or about and between September 1, 2015 and July 7, 2017, in the County of Santa Clara, State of California, the crime of MAKING A FALSE OR FRAUDULENT MATERIAL STATEMENT, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did knowingly make and cause to be made, a false and fraudulent material statement and material representation for the purpose of obtaining and denying compensation from The Zenith.

COUNT 14

On or about and between September 1, 2015 and July 7, 2017, in the County of Santa Clara, State of California, the crime of CONCEALING OR FAILING TO DISCLOSE AN EVENT AFFECTING A RIGHT TO AN INSURANCE BENEFIT, in violation of PENAL CODE SECTION 550(b)(3), a Felony, was committed by RONDA F TAPPER AND VIRGILIO AGUINALDO ABAD who did conceal and knowingly fail to disclose, the occurrence of an event that affected a person's initial and continued right and entitlement to an insurance benefit and payment, and the amount of a benefit and payment to which the person was entitled.

(OTH) The offense(s) charged in Count(s) 1, 7 and 8 above was/were not discovered until on or about 2/28/017 when on 2/28/2017, Investigator Tracy Crates, of Insurance Company of the West, received a tip that Defendant Abad's vocational school was no longer qualified to provide services to injured workers under the Supplemental Job Displacement training voucher program. Prior to 2/28/2017, Tracy Crates, special investigator for Insurance Company of the West had no actual and constructive knowledge of the crimes because, Defendant Abad failed to disclose his school lost its qualifications for SJDB training vouchers after 6/30/2015 and failed to disclose paying Defendant Tapper illegal kickbacks for client referrals while continuing to bill victims in violation of the Labor Code, and, in the exercise of reasonable diligence, the crimes could not have been discovered at an earlier date within the meaning of Penal Code section 803(c).

Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this complaint or information is required to provide buccal swab samples, right thumbprints and a full palm print impression of each hand, and any blood specimens or other biological samples required pursuant to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code section 296, et seq.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant RONDA F TAPPER, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant VIRGILIO AGUINALDO ABAD, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Complainant therefore requests that the defendant(s) be dealt with according to law.

I certify under penalty of perjury that the above is true and correct.

Executed on April 10, 2018, in SANTA CLARA County, California.

Timothy Crowley 4K108
(Timothy Crowley 4K108)
DABOI BI170525141
SOUSA/ D294 / FELONY/ MS

Cash or Bond \$ _____

Date: _____

JUDGE OF THE SUPERIOR COURT

Warrant Received for Service by:

on _____