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10 *Attorneys for People*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES

13
14 **PEOPLE OF THE STATE OF CALIFORNIA,**
15 **Plaintiff,**

16 **v.**

17 **(1) AMIT "EMMIT" MARSHALL**
(DOB: 01/07/1986)

18 **(2) ROBERT WAGGONER**
19 **(DOB: 6/30/1962)**

20 **(3) AARON SOLOMONA**
21 **(DOB: 10/20/1983)**

22 **(4) SANDOR GREENE**
(DOB: 10/2/1956)

23 **(5) IVANOVA ARACELY JIMENEZ**
24 **(DOB: 12/27/1971)**

25 **(6) RANDY ARAMBULA**
(DOB: 4/3/1984)

26 **(7) CAMERON ROSS ATKINS**
27 **(DOB: 3/1/1981)**

28 **(8) RAYMUNDO BARO**
(DOB: 12/31/1984)

Case No. BA

BA464429

**FELONY COMPLAINT FOR ARREST
WARRANT**

FILED
LOS ANGELES SUPERIOR COURT
APR 02 2018

BY 
EXECUTIVE OFFICER/CLERK
Deputy

ORIGINAL

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- (9) YASHIO BELTRAN
(DOB: 9/30/1984)
- (10) JUSTIN BONNANO
(DOB: 5/19/1982)
- (11) JUSTIN DAVIS
(DOB: 10/12/1988)
- (12) CESAR DELGADOSAUCEDO
(DOB: 5/26/1985)
- (13) CARLOS DESANTIAGOMORA
aka "CARLOS MISRAIM MORA"
(DOB: 10/14/1980)
- (14) DERRICK DOMMINGUEZ
(DOB: 11/29/1983)
- (15) DANIEL DONNELL
(DOB: 8/20/1986)
- (16) MOISES ESQUIVEL
(DOB: 08/06/1985)
- (17) KYLE GREEN
(DOB: 1/20/1980)
- (18) MIGUEL GUZMAN
(DOB: 2/24/1989)
- (19) TIMOTHY HATCH
(DOB: 4/9/1982)
- (20) MOISES IRULA
(DOB: 5/15/1987)
- (21) ALEXANDER JUAREZ
(DOB: 6/20/1981)
- (22) SHAWN MANCERA
(DOB: 1/26/1984)
- (23) MICHAEL MCCOY
(DOB: 7/2/1984)
- (24) JOSEPH MIKELAT
(DOB: 8/27/1981)
- (25) ALEX MONTES
(DOB: 2/8/1985)
- (26) DAMON PATTERSON
(DOB: 1/23/1984)

Case No. BA _____

**FELONY COMPLAINT FOR ARREST
WARRANT**

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- (27) LYNN PAULI
(DOB: 12/14/1985)
- (28) JAIRO PAZPENA
(DOB: 10/26/1978)
- (29) CHRISTOPHER PIGATI
(DOB: 4/25/1986)
- (30) CHRISTOPHER SAMORA
(DOB: 2/27/1985)
- (31) NATALIE SANCHEZ
(DOB: 2/22/1985)
- (32) ERNESTO SERRANO
(DOB: 9/26/1988)
- (33) DEEPAK SINGH
(DOB: 8/10/1985)
- (34) RYAN SMITH
(DOB: 9/4/1986)
- (35) JESUS VARGAS,
(DOB: 6/1/1971)
- (36) FERNANDO VELASCO
(DOB: 8/20/1985)
- (37) RICARDO YANEZ
(DOB: 2/18/1986)
- and
- (38) CHARLES YEAGERREIMAN
(DOB: 8/11/1981)

Case No. BA _____

**FELONY COMPLAINT FOR ARREST
WARRANT**

Defendants

The Attorney General of the State of California accuses the above-named defendants of the following offenses:

COUNT 1

It is alleged that on and between September 1, 2011 and April 22, 2015 in the county of Los Angeles, the crime of CONSPIRACY to commit GRAND THEFT, IDENTITY THEFT, FORGERY, MAKING FALSE AND FRAUDULENT CLAIM, and PREPARING FALSE

1 EVIDENCE in violation of Penal Code section 182(a) was committed by Defendants AMIT
2 "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR
3 GREENE, IVANOVA ARACELY JIMENEZ, RANDY ARAMBULA, CAMERON ROSS
4 ATKINS, RAYMUNDO BARO, YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN DAVIS,
5 CESAR DELGADOSAUCEDO, CARLOS DESANTIAGOMORA, DERRICK
6 DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN, MIGUEL
7 GUZMAN, TIMOTHY HATCH, MOISES IRULA, ALEXANDER JUAREZ, SHAWN
8 MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT, ALEX MONTES, DAMON
9 PATTERSON, LYNN PAULI, JAIRO PAZPENA, CHRISTOPHER PIGATI, CHRISTOPHER
10 SAMORA, NATALIE SANCHEZ, ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH,
11 JESUS VARGAS, FERNANDO VELASCO, RICARDO YANEZ and CHARLES
12 YEAGERREIMAN who did willfully and unlawfully conspire together and with another person
13 and persons whose identity is unknown to cheat and defraud the United States Government and
14 the United States Department of Veterans Affairs of property by means which are criminal, and
15 commit the Crimes of GRAND THEFT in violation of PENAL CODE SECTION 487(a),
16 IDENTITY THEFT in violation of PENAL CODE SECTION 530.5(c)(3), FORGERY in
17 violation PENAL CODE SECTIONS 470(b) and 471, FALSE AND FRAUDULENT CLAIMS
18 in violation of PENAL CODE SECTION 550(a)(5) and PREPARING FALSE EVIDENCE in
19 violation of PENAL CODE SECTION 134; and, that pursuant to and for the purpose of carrying
20 out the objectives and purposes of the aforesaid conspiracy, the said Defendants committed the
21 following overt act and acts at and in the County of Los Angeles:

22 **OVERT ACTS**

- 23 1. In or around September 2011, defendant AMIT "EMMIT" MARSHALL, owner,
24 president and director of Alliance School of Trucking (AST) obtained and caused to
25 be obtained approval from the California State Approving Agency for Veterans
26 Education (CSAAVE) for AST to provide non-college degree (NCD) trucking
27 programs to veterans eligible for benefits under the Post-9/11 GI Bill, namely,
28

1 Advanced I Class Tractor Trailer & Safety (160 hours) and Advanced II Class A
2 Tractor Trailer & Safety (240 hours).

- 3 2. Beginning in or around October 2011, AST defendant MARSHALL obtained and
4 caused to be obtained approval by the California CSAAVE to provide certain non-
5 college degree trucking programs to veterans eligible for Post-9/11 GI Bill
6 education benefits.
- 7 3. In or around 2011, defendant MARSHALL submitted and caused to be submitted
8 VA paperwork that designated defendant MARSHALL as a Certifying Official for
9 AST.
- 10 4. In or around 2011, defendant MARSHALL falsely certified to the VA that he would
11 truthfully report the enrollment status of veteran students, certified that he would
12 maintain current knowledge of the VA rules and benefits, and falsely certified that
13 he would truthfully maintain records of veteran students attendance.
- 14 5. On or about July 10, 2012, defendants MARSHALL and ROBERT WAGGONER,
15 director of AST, submitted and caused to be submitted to the VA a Designation of
16 Certifying Officials, Form 22-8794, which added defendant WAGGONER as a
17 Certifying Official for AST.
- 18 6. On or about July 10, 2012, Defendants MARSHALL and WAGGONER falsely
19 certified to VA that they would truthfully report the enrollment status of veteran
20 students, certified that they would maintain current knowledge of the VA rules and
21 benefits, and falsely certified that they would truthfully maintain records of veteran
22 students attendance.
- 23 7. In or around October 2012, defendant MARSHALL obtained and caused to be
24 obtained from CSAAVE approval for AST to provide two additional NCD trucking
25 programs to veterans eligible for benefits under the Post-9/11 GI Bill, namely,
26 Commercial II Class B Tractor Program (144 hours) and Select Driver Development
27 Program (600 hours) so that AST would be authorized to receive tuition and other
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1 payments from the VA for the provision of training and education to veteran
2 students.

3 8. In or around September 2013, defendants MARSHALL and WAGGONER hired
4 defendant AARON SOLOMONA to work at AST.

5 9. On and between October 1, 2011 and April 22, 2015, defendants MARSHALL,
6 WAGGONER, and SOLOMONA recruited and caused others to recruit eligible
7 veterans to enroll in the CSAAVE-approved NCD trucking programs at AST.

8 10. On and between September 1, 2013 and April 22, 2015, and with the knowledge and
9 encouragement of defendants MARSHALL and WAGGONER, defendant
10 SOLOMONA told the AST students he recruited that contrary to the requirements
11 of the VA, together they could defraud the VA and the studnets would never
12 actually have to attend classes at AST.

13 11. On and between September 1, 2013 and April 22, 2015, Defendant AARON
14 SOLOMONA told AST students and potential students that AST would lie to the
15 VA and claim that the students attended classes that they never actually attended.

16 12. On and between September 1 2013 and April 22, 2015, Defendant AARON
17 SOLOMONA told AST students that as a consequence of the lies AST and its
18 employees would tell the VA, each student could defraud the VA of between \$2000
19 and \$3000 dollars per month in the payment of BAH as well as payments for books
20 they would never actually have to purchase.

21 13. On and between October 1, 2011 and April 22, 2015, defendants MARSHALL,
22 WAGGONER, and SOLOMONA provided and caused to be provided enrollment
23 paperwork to veterans.

24 14. On and between October 1, 2011 and April 22, 2015, veterans including defendants
25 RANDY ARAMBULA, CAMERON ROSS ATKINS, RAYMUNDO BARO,
26 YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN DAVIS, CESAR
27 DELGADOSAUCEDO, CARLOS DESANTIAGOMORA, DERRICK
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1 DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN,
2 MIGUEL GUZMAN, TIMOTHY HATCH, MOISES IRULA, ALEXANDER
3 JUAREZ, SHAWN MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT,
4 ALEX MONTES, DAMON PATTERSON, LYNN PAULI, JAIRO PAZPENA,
5 CHRISTOPHER PIGATI, CHRISTOPHER SAMORA, NATALIE SANCHEZ,
6 ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH, JESUS VARGAS,
7 FERNANDO VELASCO, RICARDO YANEZ and CHARLES YEAGERREIMAN
8 filled out the enrollment paperwork and provided information to defendants
9 MARSHALL, WAGGONER, and SOLOMONA so that they could fill out
10 enrollment paperwork on behalf of the veterans.

11 15. On and between October 1, 2011 and April 22, 2015, Defendants MARSHALL,
12 WAGGONER and SOLOMONA submitted or caused to be submitted the recruited
13 veterans' enrollment paperwork to the VA.

14 16. On and between September 1, 2011 and April 22, 2015, Defendants MARSHALL,
15 WAGGONER, SANDOR GREENE, and SOLOMONA created and caused to be
16 created fraudulent student files that contained false and misleading information,
17 including false attendance records, false grades, and false certificates of completion
18 for purported students of AST.

19 17. On and between September 1, 2011 and April 22, 2015, Defendants MARSHALL
20 and WAGGONER falsely and fraudulently certified through the completion of VA
21 Forms 22-1999 that one or more of the following defendants had actually attended
22 classes at AST when they had not: ARAMBULA, ATKINS, BARO, BELTRAN,
23 BONNANO, DAVIS, DELGADOSAUCEDO, DESANTIAGOMORA,
24 DOMMINGUEZ, DONNELL, ESQUIVEL, GREEN, GUZMAN, HATCH,
25 IRULA, JUAREZ, MANCERA, MCCOY, MIKELAT, MONTES, PATTERSON,
26 PAULI, PAZPENA, PIGATI, SAMORA, SANCHEZ, SERRANO, SINGH,
27 SMITH, VARGAS, VELASCO, YANEZ and YEAGERREIMAN .
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1 18. On and between September 1, 2011 and April 22, 2015, defendants MARSHALL,
2 WAGGONER, GREENE, and SOLOMONA caused the monies received by AST
3 from the VA as a result of their scheme to defraud the VA and federal government
4 to be deposited in bank accounts held by AST at City National Bank.

5 19. On and between September and November of 2014, defendants MARSHALL,
6 WAGGONER, GREENE, and SOLOMONA became aware of an investigation into
7 AST by the VA and decided and agreed among themselves that they should
8 fraudulently forge attendance records of veteran students, including defendants
9 ARAMBULA, ATKINS, BARO, BELTRAN, BONNANO, DAVIS,
10 DELGADOSAUCEDO, DESANTIAGOMORA, DOMMINGUEZ, DONNELL,
11 ESQUIVEL, GREEN, GUZMAN, HATCH, IRULA, JUAREZ, MANCERA,
12 MCCOY, MIKELAT, MONTES, PATTERSON, PAULI, PAZPENA, PIGATI,
13 SAMORA, SANCHEZ, SERRANO, SINGH, SMITH, VARGAS, VELASCO,
14 YANEZ and YEAGERREIMAN.

15 20. On and between September and November of 2014 defendants MARSHALL,
16 WAGGONER, GREENE, and SOLOMONA forged and encouraged each other to
17 forge the signatures of veteran students on attendance records in an attempt to
18 provide fraudulent evidence of attendance to the VA of veteran students, including
19 defendants ARAMBULA, ATKINS, BARO, BELTRAN, BONNANO, DAVIS,
20 DELGADOSAUCEDO, DESANTIAGOMORA, DOMMINGUEZ, DONNELL,
21 ESQUIVEL, GREEN, GUZMAN, HATCH, IRULA, JUAREZ, MANCERA,
22 MCCOY, MIKELAT, MONTES, PATTERSON, PAULI, PAZPENA, PIGATI,
23 SAMORA, SANCHEZ, SERRANO, SINGH, SMITH, VARGAS, VELASCO,
24 YANEZ and YEAGERREIMAN.

25 21. On or about December 12, 2014, defendants MARSHALL, WAGGONER,
26 SANDOR GREENE and SOLOMONA met with cooperating suspect Dustin
27 Blackburn.
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22. On or about December 12, 2014, defendants MARSHALL, WAGGONER, GREENE and SOLOMONA met with cooperating suspect Dustin Blackburn.
23. On or about December 12, 2014, defendants MARSHALL, WAGGONER, GREENE and SOLOMONA confirmed to cooperating suspect Blackburn that they knew Blackburn never attended any classes at AST.
24. On or about December 12, 2014, defendants MARSHALL, WAGGONER, GREENE and SOLOMONA advised cooperating suspect Blackburn how to answer any questions federal investigators may ask regarding his attendance at AST.
25. On or about December 12, 2014, cooperating suspect Blackburn signed trucking class paperwork at defendant SOLOMONA's request indicating that Blackburn had attended classes and taken course work at AST which Blackburn had in truth, never actually attended or taken.
26. On or about December 12, 2014, defendant SOLOMONA advised cooperating suspect Blackburn that Blackburn was not the only AST student claiming to have attended classes and taken course work that in truth they had never actually attended or taken.
27. On or about December 12, 2014, an AST employee took a picture of cooperating suspect Blackburn holding a false certificate of completion bearing defendant MARSHALL's signature to be used as false evidence that cooperating suspect Blackburn had attended and completed classes and coursework that in truth, he had never actually attended or completed.
28. On and between November 1, 2014 and April 22, 2015, defendants MARSHALL, WAGGONER, IVANOVA ARACELY JIMENEZ and SOLOMONA agreed that Defendant AARON SOLOMONA should remove incriminating files from the office space occupied by AST and destroy them by fire.
29. On and between December 8, 2011 and April 22, 2015 and as a direct result of their fraudulent scheme, Defendants MARSHALL, WAGGONER, GREENE, JIMENEZ

1 and SOLOMONA caused the VA to pay AST approximately Two-Million Three-
2 Hundred-Fifty-One-Thousand Six-Hundred Fifty-Eight dollars and nineteen cents
3 (\$2,351,658.19) in tuition and fees and approximately One-Million Nine-Hundred-
4 Fifty-Seven-Thousand Seven-Hundred-Fifteen Dollars and Eighty-Nine cents
5 (\$1,957,715.89) in education benefits directly to veteran students who fraudulently
6 claimed to have attended trucking programs at AST, including defendants
7 ARAMBULA, ATKINS, BARO, BELTRAN, BONNANO, DAVIS,
8 DELGADOSAUCEDO, DESANTIAGOMORA, DOMMINGUEZ, DONNELL,
9 ESQUIVEL, GREEN, GUZMAN, HATCH, IRULA, JUAREZ, MANCERA,
10 MCCOY, MIKELAT, MONTES, PATTERSON, PAULI, PAZPENA, PIGATI,
11 SAMORA, SANCHEZ, SERRANO, SINGH, SMITH, VARGAS, VELASCO,
12 YANEZ and YEAGERREIMAN.

13 **COUNT 2**

14 It is alleged that on and between December 8, 2011 and April 22, 2015 in the county of Los
15 Angeles, the crime of GRAND THEFT OF PERSONAL PROPERTY in violation of Penal Code
16 section 487(a) was committed by Defendants AMIT "EMMIT" MARSHALL, ROBERT
17 WAGGONER, AARON SOLOMONA, SANDOR GREENE, IVANOVA ARACELY
18 JIMENEZ, RANDY ARAMBULA, CAMERON ROSS ATKINS, RAYMUNDO BARO,
19 YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN DAVIS, CESAR DELGADOSAUCEDO,
20 CARLOS DESANTIAGOMORA, DERRICK DOMMINGUEZ, DANIEL DONNELL, MOISES
21 ESQUIVEL, KYLE GREEN, MIGUEL GUZMAN, TIMOTHY HATCH, MOISES IRULA,
22 ALEXANDER JUAREZ, SHAWN MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT,
23 ALEX MONTES, DAMON PATTERSON, LYNN PAULI, JAIRO PAZPENA, CHRISTOPHER
24 PIGATI, CHRISTOPHER SAMORA, NATALIE SANCHEZ, ERNESTO SERRANO, DEEPAK
25 SINGH, RYAN SMITH, JESUS VARGAS, FERNANDO VELASCO, RICARDO YANEZ and
26 CHARLES YEAGERREIMAN who did willfully and unlawfully steal, take and carry away and
27 fraudulently appropriate by false and fraudulent representation and pretense and defraud the
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1 United States and the the United States Department of Veterans Affairs of personal property of a
2 value exceeding Nine Hundred Fifty Dollars (\$950), to witt, electronic and other bank transfers,
3 checks, United States Currency and other payments in the approximate amount of Four-Million
4 Three-Hundred-Nine-Thousand Three-Hundred Seventy-Four dollars and eight cents
5 (\$4,309,374.08).

6 COUNT 3

7 It is alleged that on and between September 1, 2013 and April 22, 2015 in the county of
8 Los Angeles, the crime of IDENTITY THEFT in violation of PENAL CODE SECTION
9 530.5(c)(3), a Felony, was committed by Defendants AMIT "EMMIT" MARSHALL, ROBERT
10 WAGGONER, AARON SOLOMONA, SANDOR GREENE , and IVANOVA ARACELY
11 JIMENEZ, who did willfully and unlawfully with the intent to defraud, acquired and retained
12 possession of the personal identifying information of ten and more persons, including RANDY
13 ARAMBULA, CAMERON ROSS ATKINS, RAYMUNDO BARO, YASHIO BELTRAN,
14 JUSTIN BONNANO, JUSTIN DAVIS, CESAR SAUCEDO DELGADO, DERRICK
15 DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN, MIGUEL
16 GUZMAN, MOISES IRULA, SHAWN MANCERA, MICHAEL MCCOY, ALEX MONTES,
17 DAMON PATTERSON, JAIRO PAZPENA, CHRISTOPHER PIGATI, CHRISTOPHER
18 SAMORA, ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH, JESUS VARGAS,
19 FERNANDO VELASCO, RICARDO YANEZ and CHARLES YEAGERREIMAN.

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COUNT 4

It is alleged that on and between September 1, 2011 and April 22, 2015 in the county of Los Angeles, the crime of FORGERY in violation of PENAL CODE SECTIONS 470(b) and 471, a Felony, was committed by Defendants AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR GREENE, and IVANOVA ARACELY JIMENEZ, who did willfully and unlawfully with the intent to defraud, counterfeited and forged the handwriting of another and made, forged and altered an entry in a book of records, and an instrument purporting to be a record or return specified in Penal Code section 470.

COUNT 5

It is alleged that on and between September 1, 2013 and April 22, 2015 in the county of Los Angeles, the crime of FALSE AND FRAUDULENT CLAIMS in violation of PENAL CODE SECTION 550(a)(5) a Felony, was committed by Defendants AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR GREENE, IVANOVA ARACELY JIMENEZ, RANDY ARAMBULA, CAMERON ROSS ATKINS, RAYMUNDO BARO, YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN DAVIS, CESAR DELGADOSAUCEDO, CARLOS DESANTIAGOMORA, DERRICK DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN, MIGUEL GUZMAN, TIMOTHY HATCH, MOISES IRULA, ALEXANDER JUAREZ, SHAWN MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT, ALEX MONTES, DAMON PATTERSON, LYNN PAULI, JAIRO PAZPENA, CHRISTOPHER PIGATI, CHRISTOPHER SAMORA, NATALIE SANCHEZ, ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH, JESUS VARGAS, FERNANDO VELASCO, RICARDO YANEZ and CHARLES YEAGERREIMAN who did willfully and unlawfully aid, abet, solicit, and conspire with another person and persons to knowingly prepare, make, and subscribe a writing, with the intent to present and use it, and to allow it to be presented, in support of a false and fraudulent claim.

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COUNT 6

It is alleged that on and between September 1, 2013 and April 22, 2015 in the county of Los Angeles, the crime of PREPARING FALSE EVIDENCE in violation of PENAL CODE SECTION 134 a Felony, was committed by Defendants AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR GREENE, and IVANOVA ARACELY JIMENEZ, who did willfully and unlawfully prepare a false and antedated book, paper, record, instrument in writing, and other matter and thing, with the intent to produce it, and allow it to be produced for a fraudulent and deceitful purpose as genuine and true upon a trial, proceeding, and inquiry authorized by law.

CALIFORNIA CONTROL OF PROFITS OF ORGANIZED CRIME ACT

(Penal Code Section 186)

It is further alleged pursuant to PENAL CODE SECTION 186 that as to COUNTS(S) 1, 2, 3, 4, 5 and 6, Defendants AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR GREENE, and IVANOVA ARACELY JIMENEZ engaged in CRIMINAL PROFITEERING ACTIVITY by committing and attempting to commit acts for financial gain and advantage which may be charged as a crime under PENAL CODE SECTIONS 470 (FORGERY), 487 and 487(a) (GRAND THEFT), 550 (FRAUDULENT CLAIM), and 530.5 (THEFT OF PERSONAL IDENTIFICATION).

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT

(Penal Code Section 186.11(a)(2))

It is further alleged pursuant to PENAL CODE SECTION 186.11 that as to COUNT(S) 1, 2, 3, 4, 5 and 6, Defendants AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA, SANDOR GREENE, and IVANOVA ARACELY JIMENEZ committed two or more related felonies, a material element of which is fraud and embezzlement which involve a pattern of related felony conduct that involves the taking of and results in the loss by another

1 entity of more than Five-Hundred-Thousand Dollars (\$500,000.00).
2

3 **TOLLING OF THE STATUTE OF LIMITATIONS**

4 **PC 803(c)**

5 It is further alleged as to COUNT(S) 2, 3, 4, 5, and 6 an offense and offenses described in
6 Penal Code section 803(c), that the above violation(s) was and were not discovered any earlier
7 than June 5, 2014, and that no victim of said violation(s), and no law enforcement agency
8 chargeable with the investigation and prosecution had actual or constructive knowledge of said
9 violation(s) prior to said date.
10


11 **FACTUAL BASIS**

12 On or about June 5, 2014, a United States Department of Veterans Affairs (VA) employee
13 assigned to the VA Education Service in Washington, D.C., forwarded an anonymous complaint
14 form obtained via the Department of Defense Postsecondary Education Complaint System to the
15 United States Department of Veterans Affairs Office of Inspector General (VA OIG) Criminal
16 Investigations Division (CID) headquarters office in Washington, D.C. wherein the anonymous
17 complainant alleged a trucking school known as the Alliance School of Trucking was engaged in
18 fraud. On about June 11, 2014, the VA OIG CID headquarters office provided the information
19 contained in the anonymous complaint form to an agent assigned to the VA OIG CID office in
20 Los Angeles, California.. The VA did not provide the information contained in the anonymous
21 complaint form to any law enforcement other than the VA OIG and the VA OIG is the primary
22 law enforcement agency responsible for investigating felony criminal acts committed against the
23 VA.

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

26 Attached hereto and incorporated by reference is a declaration in support of arrest warrant
27 and complaint with accompanying official reports and documents of a law enforcement agency.
28

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this XX
2 Day of XXX 2018, at Los Alamitos, California.

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6 By: 
7 Anthony Colannino
8 Special Deputy Attorney General

9 **NOTICE TO DEFENDANT AND ATTORNEY**

10 Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby
11 informally request that defense counsel provide discovery to the People as required by Penal
12 Code section 1054.3.

13
14 **NOTICE TO ATTORNEY**

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

FILED
LOS ANGELES SUPERIOR COURT
APR 02 2018
EXECUTIVE OFFICER/CLERK
Deputy

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

DECLARATION IN SUPPORT OF ARREST WARRANT
CRIMINAL CASE NUMBER BA464429

AGENCY: United States Department of Veterans Affairs, Office of the Inspector General	NUMBER OF PAGES ATTACHED:
CHARGES: CONSPIRACY (Penal Code section 182(a)), PREPARING FALSE EVIDENCE (Penal Code section 134), GRAND THEFT (PC487(a)), and IDENTITY THEFT (PC 530.5(c)(3) FORGERY (Penal Code section 470), FALSE AND FRAUDULENT CLAIMS (Penal Code section 550(a)(5), and PREPARING FALSE EVIDENCE (Penal Code section 134).	

1. I, the undersigned, apply for the issuance of an arrest warrant for the defendants named in the attached complaint.
2. I am employed as a law enforcement officer by the agency identified above, and I have been assigned to investigate allegations that the defendant committed the offenses listed above.
3. As part of my assignment, I and other law enforcement personnel have prepared reports containing factual information and statements from victims, witnesses, and other persons concerning the commission of the offenses alleged in the complaint filed in this case.
4. I have reviewed each of the reports. I am informed and believe, and based on my information and belief, allege the facts stated in the reports are true, except for those facts that are set forth as my own observations, which I know to be true based on my personal knowledge.

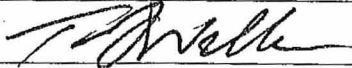
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5. True copies of the reports, the originals of which are official law enforcement agency records, are attached to, and incorporated by reference into, this declaration.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Date: 4/2/18	Special Agent Thomas Walker	Signature: 
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1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF LOS ANGELES

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4 WARRANT OF ARREST
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6 The People of the State of California to any peace officer of said State:
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8 Proof by declaration under penalty of perjury having been made this day to me, I find there
9 is probable cause to believe that the following crimes, as described in the accompanying felony
10 complaint, have been committed by following Defendants:

11 (Strike out or add as applicable)

12 AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA,
13 SANDOR GREENE, IVANOVA ARACELY JIMENEZ, RANDY ARAMBULA, CAMERON
14 ROSS ATKINS, RAYMUNDO BARO, YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN
15 DAVIS, CESAR DELGADOSAUCEDO, CARLOS DESANTIAGOMORA, DERRICK
16 DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN, MIGUEL
17 GUZMAN, TIMOTHY HATCH, MOISES IRULA, ALEXANDER JUAREZ, SHAWN
18 MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT, ALEX MONTES, DAMON
19 PATTERSON, LYNN PAULI, JAIRO PAZPENA, CHRISTOPHER PIGATI, CHRISTOPHER
20 SAMORA, NATALIE SANCHEZ, ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH,
21 JESUS VARGAS, FERNANDO VELASCO, RICARDO YANEZ and CHARLES
22 YEAGERREIMAN as to the crimes of CONSPIRACY in violation of Penal Code §182(a),
23 GRAND THEFT in violation of Penal Code §487(a) and FALSE AND FRAUDULENT
24 CLAIMS in violation of Penal Code §550(a)(5).

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Therefore, you are commanded to arrest:

AMIT "EMMIT" MARSHALL, ROBERT WAGGONER, AARON SOLOMONA,
SANDOR GREENE, IVANOVA ARACELY JIMENEZ, RANDY ARAMBULA, CAMERON
ROSS ATKINS, RAYMUNDO BARO, YASHIO BELTRAN, JUSTIN BONNANO, JUSTIN
DAVIS, CESAR DELGADOSAUCEDO, CARLOS DESANTIAGOMORA, DERRICK
DOMMINGUEZ, DANIEL DONNELL, MOISES ESQUIVEL, KYLE GREEN, MIGUEL
GUZMAN, TIMOTHY HATCH, MOISES IRULA, ALEXANDER JUAREZ, SHAWN
MANCERA, MICHAEL MCCOY, JOSEPH MIKELAT, ALEX MONTES, DAMON
PATTERSON, LYNN PAULI, JAIRO PAZPENA, CHRISTOPHER PIGATI, CHRISTOPHER
SAMORA, NATALIE SANCHEZ, ERNESTO SERRANO, DEEPAK SINGH, RYAN SMITH,
JESUS VARGAS, FERNANDO VELASCO, RICARDO YANEZ and CHARLES
YEAGERREIMAN and to bring said defendants before any magistrate in Los Angeles County
pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Each defendant is to be admitted to bail in the sum of \$50,000.

Dated: 4/2/18
Time Issued: 3:02 (am/pm)


CHRISTOPHER K. LUI
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles



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Defendant	DOB	CII	DMV	Bail Requested
MARSHALL, AMIT "EMMIT"	12/19/1966	A27708539	C3398031	\$50,000
WAGGONER, ROBERT	6/30/1962	A24289237	C1368832	\$50,000
SOLOMONA, AARON	10/20/1983	A6031623 (Hawaii)	B9782024	\$50,000
GREENE, SANDOR	10/02/1956	A29705084	Nevada DL 1505527223	\$50,000
JIMENEZ, IVANOVA ARACELY	12/27/1971	A22238461	A180865	\$50,000
ARAMBULA, RANDY	4/03/1984	A32442926	D2247102	\$50,000
ATKINS, CAMERON ROSS	3/01/1981	A32767055	B8102544	\$50,000
BARO, RAYMUNDO	12/31/1984)	A29266242	D3814553	\$50,000
BELTRAN, YOSHIO	9/30/1984	A29184139	D1793387	\$50,000
BONNANO, JUSTIN	5/19/1982	A31634480	B8122768	\$50,000
DAVIS, JUSTIN	10/12/1988	A28927158	D7742665	\$50,000
DELGADOSAUCEDO, CEZAR	5/26/1985	A28330801	D4966780	\$50,000
DESANTIAGOMORA, CARLOS aka MORA, MISRAIM CARLOS	10/14/1980		B8078350	\$50,000
DOMINGUEZ, DERRICK	11/29/1983	A28453199	D2347161	\$50,000
DONNELL, DANIEL	8/20/1986	A26760775	Iowa DL 940-AL-5198	\$50,000
ESQUIVEL, MOISES	8/06/1985		D6225646	\$50,000
GREEN, KYLE	1/20/1980		Washington DL GREENKK20 1B0	\$50,000
GUZMAN, MIGUEL	2/24/1989	A32723815	E2530115	\$50,000

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HATCH, TIMOTHY	4/9/1982		D2563926	\$50,000
IRULA, MOISES	5/15/1987	A27050856	D6175382	\$50,000
JUAREZ, ALEXANDER	6/20/1981		B7859615	\$50,000
MANCERA, SHAWN	1/26/1984	A30008064	B8492127	\$50,000
MCCOY, MICHAEL	7/2/1984	A29638864	D2451043	\$50,000
MIKELAT, JOSEPH	8/27/1981	A37145817		
MONTES, ALEX	2/8/1985	A28776632	D5888423	\$50,000
PATTERSON, DAMON	1/23/1984	A27136664	D1276658	\$50,000
PAULI, LYNN	12/14/1985		F5512228	
PAZPENA, JAIRO	10/26/1978	A26785104	B7283219	\$50,000
PIGATI, CHRISTOPHER	4/25/1986	A24921194	D4765573	\$50,000
SAMORA, CHRISTOPHER	2/27/1985		Colorado DL 002650455	\$50,000
SANCHEZ, NATALIE	2/22/1985	A28747597	D2328736	\$50,000
SERRANO, ERNESTO	9/26/1988		D6450244	\$50,000
SINGH, DEEPAK	8/10/1985	A24823702	D3448135	\$50,000
SMITH, RYAN	9/4/1986	FBI # 863738HD2	F7296990	\$50,000
VARGAS, JESUS	6/01/1971	A30386695	E1844090	\$50,000
VELASCO, FERNANDO	8/20/1985	A24696112	D3891465	\$50,000
YANEZ, RICARDO	2/18/1986	A29704898	D5892310	\$50,000
YEAGERREIMAN, CHARLES	8/11/1981	A30743289	B9053067	\$50,000
Investigating Agenc(ies)	Dpt of Veterans Affairs, OIG; FBI; California Dept. of Justice			
Investigating Officer	VA-OIG Special Agent Thomas Walker			
Phone No.	(310) 478-3711 x49650			
Case No.	46G-LA-5857922 - ALLIANCE TRUCKING			
Prelim Estimate	2 days			

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

It appearing to me that the offense in the complaint has been committed and there is sufficient cause to believe the defendant(s) guilty thereof, I order that the defendant(s) be held to answer for the following:

(Strike out or add as applicable)

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	1	PC 182(a)	16-2-3	PC186 PC 186.11	Forfeiture Forfeiture/2, 3, 5 yrs
(2) WAGGONER, ROBERT					
(3) SOLOMONA, AARON					
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					
(6) ARAMBULA, RANDY					
(7) ATKINS, CAMERON ROSS					
(8) BARO, RAYMUNDO					
(9) BELTRAN, YASHIO					
(10) BONNANO, JUSTIN					
(11) DAVIS, JUSTIN					
(12) DELGADOSAUCEDO, CESAR					
(13) DESANTIAGOMORA, CARLOS					
(14) DOMMINGUEZ, DERRICK					Forfeiture
(15) DONNELL, DANIEL					Forfeiture/2,

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(16)	ESQUIVEL, MOISES	1	PC 182(a)	16-2-3	PC186	3, 5 yrs
(17)	GREEN, KYLE				PC 186.11(a)(2)	
(18)	GUZMAN, MIGUEL					
(19)	TIMOTHY HATCH					
(20)	IRULA, MOISES					
(21)	JUAREZ, ALEXANDER					
(22)	MANCERA, SHAWN					
(23)	MCCOY, MICHAEL					
(24)	MIKELAT, JOSEPH					
(25)	MONTES, ALEX					
(26)	PATTERSON, DAMON					
(27)	PAZPENA, JAIRO					
(28)	PAULI, LYNN					
(29)	PIGATI, CHRISTOPHER					
(30)	SAMORA, CHRISTOPHER					
(31)	SANCHEZ, NATALIE					
(32)	SERRANO, ERNESTO					
(33)	SINGH, DEEPAK					
(34)	SMITH, RYAN					
(35)	VARAS, JESUS					
(36)	VELASCO,					

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FERNANDO					
(37) YANEZ, RICARDO					
(38) YEAGERREIMAN, CHARLES					

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Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	2	PC 487(a)	16-2-3	PC186	Forfeiture
(2) WAGGONER, ROBERT				PC 186.11	Forfeiture/2, 3, 5 yrs
(3) SOLOMONA, AARON				PC803 (c)	Tolling
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					
(6) ARAMBULA, RANDY					
(7) ATKINS, CAMERON ROSS					
(8) BARO, RAYMUNDO					
(9) BELTRAN, YASHIO					
(10) BONNANO, JUSTIN					
(11) DAVIS, JUSTIN					
(12) DELGADOSAUCEDO, CESAR					
(13) DESANTIAGOMORA, CARLOS					
(14) DOMMINGUEZ, DERRICK					
(15) DONNELL, DANIEL					
(16) ESQUIVEL, MOISES					
(17) GREEN, KYLE					
(18) GUZMAN, MIGUEL					

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(19) TIMOTHY HATCH	2	PC 487(a)	16-2-3	PC186	Forfeiture
(20) IRULA, MOISES					
(21) JUAREZ, ALEXANDER				PC 186.11 PC 803(c)	Forfeiture/2, 3, 5 yrs Tolling
(22) MANCERA, SHAWN					
(23) MCCOY, MICHAEL					
(24) MIKELAT, JOSEPH					
(25) MONTES, ALEX					
(26) PATTERSON, DAMON					
(27) PAZPENA, JAIRO					
(28) PAULI, LYNN					
(29) PIGATI, CHRISTOPHER					
(30) SAMORA, CHRISTOPHER					
(31) SANCHEZ, NATALIE					
(32) SERRANO, ERNESTO					
(33) SINGH, DEEPAK					
(34) SMITH, RYAN					
(35) VARAS, JESUS					
(36) VELASCO, FERNANDO					
(37) YANEZ, RICARDO					
(38) YEAGERREIMAN, CHARLES					

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Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	3	PC530.5(c)(3)	16-2-3	PC186	Forfeiture
(2) WAGGONER, ROBERT				PC 186.11	Forfeiture/2, 3, 5 yrs
(3) SOLOMONA, AARON				PC 803(c)	Tolling
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	4	PC 470(b) and 47	16-2-3	PC186	Forfeiture
(2) WAGGONER, ROBERT				PC 186.11	Forfeiture/2, 3, 5 yrs
(3) SOLOMONA, AARON				PC 803(c)	Tolling
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	5	PC 550(a)(5)	16-2-3	PC186	Forfeiture
(2) WAGGONER, ROBERT				PC 186.11	Forfeiture/2, 3, 5 yrs
(3) SOLOMONA, AARON				PC 803(c)	Tolling
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					
(6) ARAMBULA, RANDY					
(7) ATKINS, CAMERON ROSS					
(8) BARO, RAYMUNDO					
(9) BELTRAN, YASHIO					
(10) BONNANO, JUSTIN					
(11) DAVIS, JUSTIN					
(12) DELGADOSAUCEDO, CESAR					
(13) DESANTIAGOMORA, CARLOS					
(14) DOMMINGUEZ, DERRICK					
(15) DONNELL, DANIEL					
(16) ESQUIVEL, MOISES					
(17) GREEN, KYLE					
(18) GUZMAN, MIGUEL					
(19) TIMOTHY HATCH					

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(20)	IRULA, MOISES	5	PC 550(a)(5)	16-2-3	PC186	Forfeiture
(21)	JUAREZ, ALEXANDER				PC 186.11	Forfeiture/2, 3, 5 yrs
(22)	MANCERA, SHAWN				PC 803(c)	Tolling
(23)	MCCOY, MICHAEL					
(24)	MIKELAT, JOSEPH					
(25)	MONTES, ALEX					
(26)	PATTERSON, DAMON					
(27)	PAZPENA, JAIRO					
(28)	PAULI, LYNN					
(29)	PIGATI, CHRISTOPHER					
(30)	SAMORA, CHRISTOPHER					
(31)	SANCHEZ, NATALIE					
(32)	SERRANO, ERNESTO					
(33)	SINGH, DEEPAK					
(34)	SMITH, RYAN					
(35)	VARAS, JESUS					
(36)	VELASCO, FERNANDO					
(37)	YANEZ, RICARDO					
(38)	YEAGERREIMAN, CHARLES					

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
(1) MARSHALL, AMIT "EMMIT"	6	PC 134	16-2-3	PC186	Forfeiture
(2) WAGGONER, ROBERT				PC 186.11	Forfeiture/2, 3, 5 yrs
(3) SOLOMONA, AARON				PC 803(c)	Tolling
(4) SANDOR GREENE					
(5) JIMENEZ, IVANOVA ARACELY					

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I ORDER that the defendant(s) named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

- AMIT "EMMIT" MARSHALL \$ _____
- ROBERT WAGGONER \$ _____
- AARON SOLOMONA \$ _____
- SANDOR GREENE \$ _____
- IVANOVA ARACELY JIMENEZ \$ _____
- RANDY ARAMBULA \$ _____
- CAMERON ROSS ATKINS \$ _____
- RAYMUNDO BARO \$ _____
- YASHIO BELTRAN \$ _____
- JUSTIN BONNANO \$ _____
- JUSTIN DAVIS \$ _____
- CESAR DELGADOSAUCEDO \$ _____
- CARLOS DESANTIAGOMORA \$ _____
- DERRICK DOMMINGUEZ \$ _____
- DANIEL DONNELL \$ _____

1	MOISES ESQUIVEL	\$ _____
2	KYLE GREEN	\$ _____
3	MIGUEL GUZMAN	\$ _____
4	TIMOTHY HATCH	\$ _____
5	MOISES IRULA	\$ _____
6	ALEXANDER JUAREZ	\$ _____
7	SHAWN MANCERA	\$ _____
8	MICHAEL MCCOY	\$ _____
9	JOSEPH MIKELAT	\$ _____
10	ALEX MONTES	\$ _____
11	DAMON PATTERSON	\$ _____
12	LYNN PAULI	\$ _____
13	JAIRO PAZPENA	\$ _____
14	CHRISTOPHER PIGATI	\$ _____
15	CHRISTOPHER SAMORA	\$ _____
16	NATALIE SANCHEZ	\$ _____
17	ERNESTO SERRANO	\$ _____
18	DEEPAK SINGH	\$ _____
19	RYAN SMITH	\$ _____
20	JESUS VARGAS	\$ _____
21	FERNANDO VELASCO	\$ _____
22	RICARDO YANEZ	\$ _____
23	CHARLES YEAGERREIMAN	\$ _____
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And that said defendant(s) be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

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

Magistrate Date
Superior Court of California