

HEALTHCARE FRAUD
DIVISION

cf
WARRANT ISSUED

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.
01 RENE CARLOS AGUERO (DOB: 09/29/1951),
and
02 GUSTAVO ADOLFO LOPEZ (DOB: 11/19/1966),
Defendants.

CASE NO. BA508660

**FELONY COMPLAINT
FOR ARREST WARRANT**

cf
2017 SEP -9 PM 4:34
CIT North Hollywood
LAW ENFORCEMENT
7-5-17

The undersigned is informed and believes that:

COUNT 1

On or between January 1, 2017 and February 1, 2020, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by RENE CARLOS AGUERO and GUSTAVO ADOLFO LOPEZ, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of INSURANCE FRAUD, in violation of Section 550(b)(1) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACT 1

In 2017, the Computer Institute of Technology, North Hollywood (hereafter "CIT North Hollywood") contacted injured worker Laura Washington. CIT North Hollywood mailed a laptop to Washington, even though Washington was not interested in enrolling at CIT North Hollywood.

OVERT ACT 2

On or about March 7, 2017, CIT North Hollywood sent an Invoice for payment to Sedgwick, with reference of Laura Washington, for Computer Office Software Tuition, with an amount of \$6,000, despite the fact that Washington had never attended CIT North Hollywood, and had, in fact, returned the computer to CIT.

OVERT ACT 3

On or about March 7, 2017, CIT North Hollywood sent a Supplemental Job Displacement Benefits voucher (hereafter "SJDB") form with a signature for Laura Washington that also contained completed sections for the school details, which read Computer Institute of Technology, North Hollywood, dated 3/3/2017, even though Washington had only signed a blank voucher form that did not have any information indicating that she was attending CIT North Hollywood.

OVERT ACT 4

On or about March 7, 2017, CIT North Hollywood sent an Enrollment Agreement and Installment Contract to Sedgwick, which listed the CIT North Hollywood location as the "Main Campus" and another location at 4320 E. Gage Ave., Bell, CA as the "Branch Campus." This document indicated a signature purported to be made by Laura Washington, despite the fact that Washington had never signed a student enrollment agreement with CIT North Hollywood. It showed a total cost of \$6,000 for tuition, fees, and books even though Washington had never received books nor any other materials from CIT North Hollywood.

OVERT ACT 5

On or about March 7, 2017, CIT North Hollywood sent to Sedgwick an Internal Revenue Service W-9 Request for Taxpayer Identification Number and Certification form in regard to Washington's supposed enrollment. This W-9 form contained the information for CIT North Hollywood, Rene Aguero, with a Tax Identification Number (hereafter "TIN") of 95-4757336. It contained the signature of Rene Aguero, dated 02/16/2015.

OVERT ACT 6

On or about May 10, 2017, CIT North Hollywood sent an Invoice for payment to Adminsure, Inc. for \$6,000 for tuition, supplies, and a computer related to an Office Software Specialist course that was purportedly provided to injured worker Jolean Miller, despite the fact that Miller never enrolled in any classes at CIT North Hollywood, never received a computer nor other equipment from CIT North Hollywood and had, in fact, been living out of state during the time that CIT North Hollywood claimed she was attending classes.

OVERT ACT 7

On or about May 10, 2017, CIT North Hollywood sent to Adminsure, Inc. an Enrollment Agreement and Installment Contract with a signature purported to be by Jolean Miller, even though Miller never signed an Enrollment Agreement and Installment Contract with CIT North Hollywood.

OVERT ACT 8

On or about 2017, Rene Aguero contacted injured worker Geronimo Oporto. Aguero told Oporto that an instructor would go to his home to teach a course.

OVERT ACT 9

On or about July 7, 2017, CIT North Hollywood sent an Invoice for payment to Insurance Company of the West (hereafter "ICW") for \$6,000. It indicated that Geronimo Oporto was enrolled in an Office Software Specialist course and listed costs including tuition, supplies and a computer, despite the fact that Oporto had never enrolled in, nor received any training from CIT North Hollywood and had never received a computer nor any other supplies from CIT North Hollywood.

OVERT ACT 10

On or about July 7, 2017, CIT North Hollywood sent to ICW an Enrollment Agreement and Installment Contract with a signature purported to be Geronimo Oporto and dated 6/27/2017, even though Oporto never signed any Enrollment Agreement and Installment Contract with CIT North Hollywood.

OVERT ACT 11

On or about July 7, 2017, CIT North Hollywood sent to ICW an SJDB voucher form with a signature purported to be Geronimo Oporto, dated 6/27/2017, even though Oporto never signed a voucher form for CIT North Hollywood.

OVERT ACT 12

On or about June 2017, Adriana of the Computer Institute of Technology, Bell (hereafter "CIT Bell") contacted injured worker Maria Elena Badillo and asked if Badillo was interested in attending a school in Bell Gardens. Adriana told Badillo that she could take classes online and would receive a free computer.

OVERT ACT 13

On or about June 6, 2017, CIT Bell sent an Invoice for payment to York Risk Services Group (hereafter "York") for \$9,000. The Invoice claimed tuition fee, registration fee, computer allowance, software allowance for Maria Elena Badillo, even though Badillo never received any training from CIT Bell, nor received any computer nor any other equipment from CIT Bell.

OVERT ACT 14

On or about June 6, 2017, CIT Bell sent to York an Enrollment Agreement and Installment Contract, dated 6/5/2017 with a signature purporting to be Maria Badillo as well as a signature of Gustavo Lopez, even though injured worker Badillo never signed an Enrollment Agreement and Installment Contract for CIT Bell.

OVERT ACT 15

On or about June 6, 2017, CIT Bell sent to York an SJDB voucher form with a signature purporting to be Maria Badillo, dated 6/1/2017, even though Badillo never signed an SJDB voucher form for CIT Bell.

OVERT ACT 16

On or about 2017, Rene Agüero contacted injured worker Rafaela Mora. Agüero, through Mora's daughter, stated that CIT North Hollywood would send an instructor to Mora's home to teach her English. Agüero stated that Mora was entitled to \$2,500 and would receive a computer and directed Mora to sign a blank SJDB voucher form.

OVERT ACT 17

On or about March 2, 2017, CIT North Hollywood sent an Invoice for payment to Liberty Mutual Insurance for \$6,000 for tuition for Computer Office Software for Rafaela Mora, despite the fact that Mora never received any classes, never received a computer, nor any other equipment from CIT North Hollywood.

OVERT ACT 18

Additionally, CIT North Hollywood sent to Liberty Mutual Insurance, an Enrollment Agreement and Installment Contract with a signature purported to be made by Rafaela Mora dated 02/28/2017, even though Mora never signed any enrollment agreement with CIT North Hollywood.

OVERT ACT 19

On or about November 15, 2017, Steve Pineda of CIT North Hollywood contacted injured worker Jose Arroyo. Pineda told Arroyo that he was entitled to \$5,000 and that CIT North Hollywood would send an instructor to Arroyo's home.

OVERT ACT 20

On or about November 24, 2017, CIT North Hollywood sent an Invoice for payment to Employers Insurance for \$6,000 that indicated enrollment by Jose Arroyo in an Office Software Specialist course, start date of 11/27/2017, despite the fact the Arroyo had never received any training and had never received any materials or equipment from CIT North Hollywood.

OVERT ACT 21

On or about January 22, 2018, CIT North Hollywood sent to Employers an SJDB voucher form, purportedly for Arroyo with the Training Provider Contact Name of Rene Aguero.

OVERT ACT 22

On or about August 2018, CIT North Hollywood employee Pineda contacted injured worker Manuel Lopez. Pineda told Lopez that an instructor would contact him shortly.

OVERT ACT 23

On or about September 24, 2018, CIT North Hollywood sent an Invoice for payment to Mid-Century Insurance for \$6,000. This invoice stated that Manuel Lopez had enrolled in a course for Office Software Specialist. It stated that Manuel Lopez had received a laptop valued at \$850, as well as software and hardware, despite the fact that injured worker Lopez never received a computer and never received any training whatsoever from CIT North Hollywood.

OVERT ACT 24

On or about September 24, 2018, CIT North Hollywood sent to Mid-Century Insurance an Enrollment Agreement and Installment Contract dated 8/29/18 that purported to have the signature of Manuel Lopez, despite the fact that Lopez had never signed an Enrollment Agreement and Installment Contract with CIT North Hollywood.

OVERT ACT 25

On or about September 24, 2018, CIT North Hollywood sent an SJDB voucher form to Mid-Century Insurance that contained both a signature of Manuel Lopez and completed school information for CIT North Hollywood, even though Lopez had only signed a blank voucher form that contained no information about CIT North Hollywood.

OVERT ACT 26

On or about August 2018, a representative from CIT North Hollywood promised injured worker Carmin Espinosa a computer. CIT North Hollywood emailed Espinosa and directed her to electronically initial the documents. A representative from CIT North Hollywood told Espinosa that CIT North Hollywood would send her a computer and she could take classes online.

OVERT ACT 27

On or about September 12, 2018, CIT North Hollywood sent an Invoice for payment to ICW for \$6,000 for tuition, a laptop computer, software, and hardware related to an Office Software Specialist course, purportedly for Carmen Espinosa, despite the fact that Espinosa never received a computer, never attended any classes online nor otherwise at CIT North Hollywood.

OVERT ACT 28

On or about September 12, 2018, CIT North Hollywood sent to ICW an Enrollment Agreement which indicated that Espinosa had enrolled in an Office Software course which included textbooks, a laptop, tuition and fees, despite the fact that Espinosa had never enrolled in, nor participated in any classes at CIT North Hollywood whatsoever.

OVERT ACT 29

On or about 2018, Josie from Ortega Counseling Center contacted injured worker Marlene Montoya. Josie told Montoya that she was entitled to benefits like a computer. Montoya signed documents to enroll at CIT Bell.

OVERT ACT 30

On or about December 5, 2018, CIT Bell sent an Invoice for payment to York for \$3,900 for tuition and materials for student Marlene Montoya, despite the fact that Montoya never attended nor completed any classes with CIT Bell.

OVERT ACT 31

On or about July 2018, a representative of CIT Bell contacted injured worker Willie Ford. CIT Bell sent to Ford forms which Ford signed electronically in order to enroll in an Office Software Specialist program.

OVERT ACT 32

On or about July 19, 2018, CIT Bell sent an Invoice for payment to York for \$3,900. The invoice indicated billing for tuition, books, materials, supplies, and fees for a course for Willie Ford, despite the fact that Ford had never attended any classes at CIT Bell, never received any equipment or materials from CIT Bell.

OVERT ACT 33

On or about July 19, 2018, CIT Bell sent to York a W-9 form with name of ABCG California, Inc. DBA Computer Institute of Technology, address of 4130 E. Gage Ave., Bell, CA, TIN 27-3252067, and the signature of Gustavo Lopez, dated of 04/13/2017.

OVERT ACT 34

On or about February 10, 2020, CIT North Hollywood sent an Invoice for payment to CNA Insurance (hereafter "CNA") for \$5,000 for tuition and fees for a Computer Office Specialist class, purportedly begun by Mr. Gene Grable on 02/10/2020, despite the fact that Mr. Grable had died nearly six months prior to that date at the Antelope Valley Hospital, in Los Angeles, CA on September 23, 2019.

OVERT ACT 35

On or about February 10, 2020, CIT North Hollywood sent an Enrollment Agreement to CNA with a signature and initials purportedly made by Grable on 01/28/20, despite the fact that Mr. Grable had died nearly five months prior to that date.

OVERT ACT 36

On or about February 10, 2020, CIT North Hollywood sent to CNA an SJDB voucher form with a signature purportedly made by Grable on 01/14/20, despite the fact that Mr. Grable had died nearly five months prior to that date.

OVERT ACT 37

On or about February 10, 2020, CIT North Hollywood sent to CNA a W-9 form with name of Rene Agüero, Computer Institute of Technology, address 6444 Bellingham Ave., Suite 202, North Hollywood, CA, with TIN 95-4757336, signed and dated on 01/15/2020.

* * * * *

COUNT 2

On or about September 24, 2018, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(1), a Felony, was committed by RENE CARLOS AGÜERO, who assisted, conspired with another to and presented and caused to be presented a written and oral statement as part of, and in support of and opposition to, a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: MID-CENTURY NSURANCE, CLAIM NUMBER WC10148365.

* * * * *

COUNT 3

On or about September 24, 2018, in the County of Los Angeles, the crime of FORGERY NOT RELATING TO A CHECK, BOND, BANK BILL, NOTE, OR MONEY ORDER, in violation of PENAL CODE SECTION 470(a), a Felony, was committed by RENE CARLOS AGUERO, who with the intent to defraud, signed the name of another person or of a fictitious person to a contract , specifically, CIT ENROLLMENT AGREEMENT WITH NAME OF MANUEL LOPEZ, knowing that he had no authority to do so.

* * * * *

COUNT 4

On or about September 24, 2018, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT, in violation of PENAL CODE SECTIONS 664 and 487(a), a Felony, was committed by RENE CARLOS AGUERO, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from MID-CENTURY INSURANCE, specifically, \$6,000.00, which had a value exceeding nine hundred fifty dollars (\$950).

* * * * *

COUNT 5

On or about September 24, 2018, in the County of Los Angeles, the crime of OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN VALUE BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a Felony, was committed by RENE CARLOS AGUERO, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section, said property, money, labor and service obtained having a value exceeding \$950.00.

* * * * *

COUNT 6

On or about September 12, 2018, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(1), a Felony, was committed by RENE CARLOS AGUERO, who assisted, conspired with another to and presented and caused to be presented a written and oral statement as part of, and in support of and opposition to, a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: INSURANCE COMPANY OF THE WEST, CLAIM NUMBER 2016017338.

* * * * *

COUNT 7

On or about September 12, 2018, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT, in violation of PENAL CODE SECTIONS 664 and 487(a), a Felony, was committed by RENE CARLOS AGUERO, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from INSURANCE COMPANY OF THE WEST, specifically, \$6,000.00, which had a value exceeding nine hundred fifty dollars (\$950).

* * * * *

COUNT 8

On or about September 12, 2018, in the County of Los Angeles, the crime of OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN VALUE BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a Felony, was committed by RENE CARLOS AGUERO, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section, said property, money, labor and service obtained having a value exceeding \$950.00.

* * * * *

COUNT 9

On or about December 5, 2018, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(1), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who assisted, conspired with another to and presented and caused to be presented a written and oral statement as part of, and in support of and opposition to, a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: YORK RISK SERVICES GROUP, CLAIM NUMBER SCIH-043412.

* * * * *

COUNT 10

On or about December 21, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from YORK RISK SERVICES GROUP, specifically, \$3,900.00, which had a value exceeding nine hundred fifty dollars (\$950).

* * * * *

COUNT 11

On or about December 5, 2018, in the County of Los Angeles, the crime of OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN VALUE BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section, said property, money, labor and service obtained having a value exceeding \$950.00.

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COUNT 12

On or about July 19, 2018, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(1), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who assisted, conspired with another to and presented and caused to be presented a written and oral statement as part of, and in support of and opposition to, a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: YORK RISK SERVICES GROUP, CLAIM NUMBER NPWA-559458.

* * * * *

COUNT 13

On or about August 2, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from YORK RISK SERVICES GROUP, specifically, \$3,900.00, which had a value exceeding nine hundred fifty dollars (\$950).

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COUNT 14

On or about July 19, 2018, in the County of Los Angeles, the crime of OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN VALUE BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a Felony, was committed by GUSTAVO ADOLFO LOPEZ, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section, said property, money, labor and service obtained having a value exceeding \$950.00.

It is further alleged as to counts 12, 13, and 14 that victims Willie Ford and York Services Group did not discover and could not reasonable have discovered the offense set forth herein before August 31, 2022 within the meaning of Penal Code section 803(c):

On July 19, 2018, CIT sent an Invoice to victim York Services Group for \$3,900 for tuition and other expenses related to a course known as Office Software Specialist for victim and injured worker Willie Ford.

On or about August 2, 2018, York Services Group paid CIT in response to the invoice it had received regarding Willie Ford.

On September 4, 2018, Willie Ford telephoned CIT to inquire about his training start date because he had been previously informed by CIT that he was to begin training on this same date. A CIT representative named Josie told Ford that CIT was waiting for books and that it would take another two weeks. After two weeks, Ford telephoned CIT once again and was told by a CIT representative that the books were still on back order.

On or around October of 2018, Ford received a call back from a representative at CIT and was informed that someone was going to call him with three to four days to set up his computer online as he was required to take an online computer class before starting his enrolled course. Ford never received this follow-up phone call from CIT.

On or around November 2018, Ford called CIT again because he had not heard from anyone. The answering CIT representative told Ford that she did not understand why he was told about waiting for books because his course was online. Ford contacted CIT several times after this phone call and left several messages on the CIT answering machine, but never got a return phone call from CIT. Ultimately, he was unable to leave anymore phone messages because the voice mailbox was full.

In January 2019, Ford called Ortega Counseling Center (the counseling center that had introduced him to CIT), and was told that CIT had closed. Ortega Counseling Center told Ford that he could file a complaint with the Bureau for Private Postsecondary Education (BPPE).

On March 8, 2019, Ford submitted a complaint form to BPPE.

On March 11, 2019, Ford's complaint form was acknowledged by BPPE.

On April 23, 2020 California Department of Justice, Deputy Attorney General Kim Kasreliovich contacted Detective Sergeant Clarisa Jimenez of the California Department of Insurance. Kasreliovich stated that she had recently received an email from a victim (Willie Ford) of fraud perpetrated by CIT. Kasreliovich provided Ford's contact information to Jimenez.

On April 24, 2020, Detective Sergeant Jimenez spoke with Willie Ford and subsequently obtained documents from him that are relevant to these offenses.

Due to the fact that victim Ford did not learn that he would be prevented from participating in and completing his course from CIT until January 2019, Ford could not have reasonably discovered the fraud prior to that time.

* * * * *

COUNT 15

On or about February 10, 2020, in the County of Los Angeles, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(1), a Felony, was committed by RENE CARLOS AGUERO, who assisted, conspired with another to and presented and caused to be presented a written and oral statement as part of, and in support of and opposition to, a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: CNA INSURANCE, CLAIM NUMBER E3374443.

* * * * *

COUNT 16

On or about February 10, 2020, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT, in violation of PENAL CODE SECTIONS 664 and 487(a), a Felony, was committed by RENE CARLOS AGUERO, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor and real and personal property by fraud from CNA INSURANCE, specifically, \$5,000.00, which had a value exceeding nine hundred fifty dollars (\$950).

* * * * *

COUNT 17

On or about February 24, 2020, in the County of Los Angeles, the crime of FORGERY NOT RELATING TO A CHECK, BOND, BANK BILL, NOTE, OR MONEY ORDER, in violation of PENAL CODE SECTION 470(a), a Felony, was committed by RENE CARLOS AGUERO, who with the intent to defraud, signed the name of another person or of a fictitious person to a contract , specifically, CIT ENROLLMENT AGREEMENT WITH NAME OF GENE GRABLE, knowing that he had no authority to do so.

* * * * *

COUNT 18

On or about February 24, 2020, in the County of Los Angeles, the crime of FORGERY NOT RELATING TO A CHECK, BOND, BANK BILL, NOTE, OR MONEY ORDER, in violation of PENAL CODE SECTION 470(a), a Felony, was committed by RENE CARLOS AGUERO, who with the intent to defraud, signed the name of another person or of a fictitious person to a contract , specifically, STUDENT JOB DISPLACEMENT BENEFIT VOUCHER FORM WITH NAME OF GENE GRABLE, knowing that he had no authority to do so.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

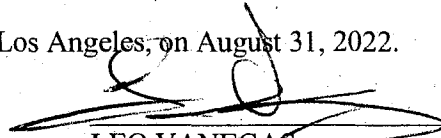
NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form ("PPR") pursuant to Penal Code § 29810.

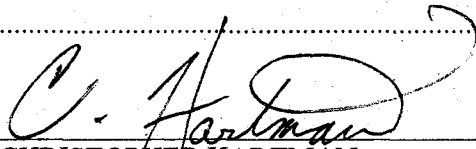
Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendants RENE CARLOS AGUERO and GUSTAVO ADOLFO LOPEZ for the above-listed crimes. Wherefore, a warrant of arrest is requested for RENE CARLOS AGUERO and GUSTAVO ADOLFO LOPEZ.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA508660, CONSISTS OF 18 COUNTS.

Executed at LOS ANGELES, County of Los Angeles, on August 31, 2022.


LEO VANEGAS
DECLARANT AND COMPLAINANT

.....
GEORGE GASCÓN, DISTRICT ATTORNEY

BY: 
CHRISTOPHER HARTMAN
DEPUTY DISTRICT ATTORNEY

AGENCY: CALIF DEPT OF INSURANCE I/O: LEO VANEGAS ID NO.: 640 PHONE: (714) 623-8655
DR NO.: 17CW015853 OPERATOR: ab PRELIM. TIME EST.: 5 HOURS

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
AGUERO, RENE CARLOS		9/29/1951		\$160,000	
LOPEZ, GUSTAVO ADOLFO		11/19/1966		\$155,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendants, the warrant is so ordered.

RENE AGUERO

BAIL: \$ 125,000

GUSTAVO LOPEZ

BAIL: \$ 125,000

DATE: 9/12/22



N Stone
Judge of the Above Entitled Court

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NATALIE STONE

FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offenses have been committed and that there is sufficient cause to believe that the following defendants guilty thereof, to wit:

RENE CARLOS AGUERO

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	PC 550(b)(1)	2-3-5 County Jail		
3	PC 470(a)	16-2-3 Yrs.Jail+\$0-10,000		
4	PC 664/487(a)	16,2,3 Jail+\$0-10,000		
5	PC 532(a)	16,2,3 County Jail		
6	PC 550(b)(1)	2-3-5 County Jail		
7	PC 664/487(a)	16,2,3 Jail+\$0-10,000		
8	PC 532(a)	16,2,3 County Jail		
15	PC 550(b)(1)	2-3-5 County Jail		
16	PC 664/487(a)	16,2,3 Jail+\$0-10,000		
17	PC 470(a)	16-2-3 Yrs.Jail+\$0-10,000		
18	PC 470(a)	16-2-3 Yrs.Jail+\$0-10,000		

GUSTAVO ADOLFO LOPEZ

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
9	PC 550(b)(1)	2-3-5 County Jail		
10	PC 487(a)	16,2,3 Jail+\$0-10,000		
11	PC 532(a)	16,2,3 County Jail		
12	PC 550(b)(1)	2-3-5 County Jail	PC 803(c)	Check Code
13	PC 487(a)	16,2,3 Jail+\$0-10,000	PC 803(c)	Check Code
14	PC 532(a)	16,2,3 County Jail	PC 803(c)	Check Code

I order that the defendants be held to answer therefore and be admitted to bail in the sum of:

RENE CARLOS AGUERO _____ Dollars

GUSTAVO ADOLFO LOPEZ _____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

RENE CARLOS AGUERO _____ in Dept _____

GUSTAVO ADOLFO LOPEZ _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate

RECEIVED
CLERK OF SUPERIOR COURT
LOS ANGELES COUNTY
JUL 15 11 30 AM '05

