

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

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

WS 01 JUAN RENALDO RODRIGUEZ (DOB: 11/29/1964),  
aka JOHN NOGUEZ,  
WS 02 RAMIN SALARI (DOB: 01/28/1963), and  
WS 03 MARK MCNEIL (DOB: 01/11/1958)

Defendant(s).

CASE NO. BA488826

**FELONY COMPLAINT  
FOR ARREST WARRANT**

**DISTRICT ATTORNEY'S OFFICE  
PUBLIC INTEGRITY DIVISION  
211 WEST TEMPLE STREET, SUITE 1000  
LOS ANGELES, CA 90012**

The undersigned is informed and believes that:

**COUNT 1**

On or between February 1, 2010 and December 31, 2011, 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 JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL who did unlawfully conspire together and with an unnamed co-conspirator to commit the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, and 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 NO. 1:**

On or about February 17, 2010, RAMIN SALARI gave a \$5,000 campaign donation to Los Angeles County Assessor candidate JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

**OVERT ACT NO. 2:**

On or about February 18, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 2328-001-009 (7444 Woodman Avenue, Van Nuys), a property represented by tax agent RAMIN SALARI, by \$3,186,814.

**OVERT ACT NO. 3:**

On or about February 18, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 7157-015-024 (2301 E. Market Street, Long Beach), a property represented by tax agent RAMIN SALARI, by \$2,000,000.

**OVERT ACT NO. 4:**

On or about March 17, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4406-006-006 (416 N. Rockingham Avenue, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$3,026,000.

**OVERT ACT NO. 5:**

On or about March 17, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4261-014-021 (1752 Federal Avenue, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$728,536.

**OVERT ACT NO. 6:**

On or about March 17, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4281-029-022 (902 Washington Avenue, Santa Monica), a property represented by tax agent RAMIN SALARI, by \$423,646.

**OVERT ACT NO. 7:**

On or about March 17, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4363-006-022 (641 Gayley Avenue, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$1,212,158.

**OVERT ACT NO. 8:**

On or about April 15, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4333-029-070 (230 S. Hamilton Drive, Beverly Hills), a property represented by tax agent RAMIN SALARI, by \$9,433,900.

**OVERT ACT NO. 9:**

On or about April 15, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4377-050-001 (2199 Pembroke Court, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$3,891,294.

**OVERT ACT NO. 10:**

On or about April 26, 2010, RAMIN SALARI caused the issuance of check number 3784 in the amount of \$80,000 to JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, which was accepted by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

**OVERT ACT NO. 11:**

On or about July 27, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4188-016-107 (415 Herondo Street, Hermosa Beach), a property represented by tax agent RAMIN SALARI, by \$26,692,747.

**OVERT ACT NO. 12:**

On or about July 27, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4188-016-072 (420 2nd Street, Hermosa Beach), a property represented by tax agent RAMIN SALARI, by \$27,123,838.

**OVERT ACT NO. 13:**

On or about July 27, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 6106-030-017 (16907 S. Normandie, Gardena), a property represented by tax agent RAMIN SALARI, by \$4,151,926.

**OVERT ACT NO.14:**

On or about July 27, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 7355-031-054 (21515 S. Western Avenue, Torrance), a property represented by tax agent RAMIN SALARI, by \$14,390,000.

**OVERT ACT NO. 15:**

On or about July 29, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the property described as Assessor Identification Number 4369-025-005 (901 Airole Way, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$5,839,088.

**OVERT ACT NO. 16:**

On or about July 29, 2010, MARK MCNEIL appeared at an Assessment Appeals Board hearing resulting in the reduction of the assessed value of the properties described as Assessor Identification Number 4369-024-007 (911 Tione Road, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$3,192,867; Assessor Identification

Number 4369-023-014 (911 Tione Road, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$1,999,959; and Assessor Identification Number 4369-023-015 (911 Tione Road, Los Angeles), a property represented by tax agent RAMIN SALARI, by \$29,466.

**OVERT ACT NO. 17:**

On or about July 29, 2010, RAMIN SALARI caused the issuance of check number 3839 in the amount of \$50,000 to JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, which was accepted by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

**OVERT ACT NO. 18:**

On or about September 29, 2010, RAMIN SALARI caused the issuance of check number 3902 in the amount of \$50,000 to JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, which was accepted by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

**OVERT ACT NO. 19:**

On or between the dates of October 1, 2010, and November 30, 2010, JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, told Assessor appraiser Scott Schenter to "Take care of our buddy Ramin."

**OVERT ACT NO. 20:**

On or between the dates of October 1, 2010, and November 30, 2010, RAMIN SALARI provided Assessor appraiser Scott Schenter with a list of Appraiser Identification Numbers (AINs) for properties represented by tax agent RAMIN SALARI, along with corresponding assessed values requested by RAMIN SALARI for each property.

**OVERT ACT NO. 21:**

On or between the dates of October 1, 2010, and January 3, 2011, Assessor appraiser Scott Schenter prepared multi-value transfer forms unlawfully reducing the assessed values of properties as requested by RAMIN SALARI.

**OVERT ACT NO. 22:**

On or about September 27, 2011, Los Angeles County Assessor JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, and senior Assessor's Office executives MARK MCNEIL, Eric Haagenson, and Andrew Stephens, went to the cafeteria across from the Assessment Appeals Board hearing room the morning of a scheduled hearing for Assessor Identification Number 2350-018-084 (EQR Academy Village Apartments, 5225 Blakeslee Avenue, North Hollywood),

a property represented by tax agent RAMIN SALARI, where JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, exchanged pleasantries with Michael Amado, the testifying appraiser, prior to the hearing.

**OVERT ACT NO. 23:**

On or about October 4, 2011, commonly referred to as BLACK TUESDAY, Los Angeles County Assessor JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, ordered a meeting at the Assessor's North District Office to discuss the September 27, 2011 Assessment Appeals Board hearing for Assessor Identification Number 2350-018-084 (EQR Academy Village Apartments) and allowed RAMIN SALARI to attend the meeting and admonish Michael Amado and Assessor staff about their appraisal skills and adverse valuations of RAMIN SALARI represented properties. JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, spoke telephonically at the meeting and urged his staff to work more cooperatively with RAMIN SALARI.

**OVERT ACT NO. 24:**

On or about December 6, 2011, MARK MCNEIL sent an email to Los Angeles County Assessor Office senior executives Andrew Stephens and Eric Haagenon complaining that certain Assessor employees were "undermining the department head" and daring him to defend RAMIN SALARI, "a known donor and political supporter."

**OVERT ACT NO. 25:**

On or about April 25, 2012, a list dated August 10, 1999, sent by RAMIN SALARI, consisting of properties represented by RAMIN SALARI, was found inside the home of Los Angeles County Assessor JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

**OVERT ACT NO. 26:**

On or about April 25, 2012, two typed lists with requests for action on properties represented by RAMIN SALARI and scheduled for Assessor valuation and/or hearings between October 2010 and March 2011 were found inside the home of Los Angeles County Assessor JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ.

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**COUNT 2**

On or about April 26, 2010, in the County of Los Angeles, the crime of ACCEPTING A BRIBE, in violation of PENAL CODE SECTION 68, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who unlawfully and knowingly asked for, received, and agreed to receive of and from RAMIN SALARI, a bribe, to wit,

\$80,000, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, Special Assistant to the Assessor of Los Angeles County, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

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### **COUNT 3**

On or about April 26, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ in respect to an act, decision, vote, opinion and proceeding of said JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, give and offer to give a bribe, to wit, \$80,000.

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### **COUNT 4**

On or about July 29, 2010, in the County of Los Angeles, the crime of ACCEPTING A BRIBE, in violation of PENAL CODE SECTION 68, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who unlawfully and knowingly asked for, received, and agreed to receive of and from RAMIN SALARI, a bribe, to wit, \$50,000, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, Special Assistant to the Assessor of Los Angeles County, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

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### **COUNT 5**

On or about July 29, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ in respect to an act, decision, vote, opinion and proceeding of said JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, give and offer to give a bribe, to wit, \$50,000.

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#### **COUNT 6**

On or about September 29, 2010, in the County of Los Angeles, the crime of ACCEPTING A BRIBE, in violation of PENAL CODE SECTION 68, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who unlawfully and knowingly asked for, received, and agreed to receive of and from RAMIN SALARI, a bribe, to wit, \$50,000, for the purpose of influencing the action of said defendant and upon an agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, Special Assistant to the Assessor of Los Angeles County, should be influenced thereby, said defendant being then and there a Ministerial Officer, employee, and appointee of the State of California.

\* \* \* \* \*

#### **COUNT 7**

On or about September 29, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ in respect to an act, decision, vote, opinion and proceeding of said JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, give and offer to give a bribe, to wit, \$50,000.

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#### **COUNT 8**

On or about February 18, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 2328-001-009 (7444 Woodman Avenue, Van Nuys) by \$3,186,814 resulting in a Los Angeles County property tax refund of \$38,909.17.

\* \* \* \* \*

**COUNT 9**

On or about February 18, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$38,909.17, by reducing the value of Assessor Identification Number 2328-001-009 (7444 Woodman Avenue, Van Nuys) by \$3,186,814.

\* \* \* \* \*

**COUNT 10**

On or about February 18, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 7157-015-024 (2301 E. Market Street, Long Beach) by \$2,000,000 resulting in a Los Angeles County property tax refund of \$22,634.70.

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**COUNT 11**

On or about February 18, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$22,634.70 by reducing the value of Assessor Identification Number 7157-015-024 (2301 E. Market Street, Long Beach), by \$2,000,000.

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#### **COUNT 12**

On or about February 18, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 406-006-006 (416 N. Rockingham Avenue, Los Angeles) by \$3,026,000 resulting in a Los Angeles County property tax refund of \$114,311.05.

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#### **COUNT 13**

On or about March 17, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$114,311.05 by reducing the value of Assessor Identification Number 406-006-006 (416 N. Rockingham Avenue, Los Angeles) by \$3,026,000.

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#### **COUNT 14**

On or about March 17, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4261-014-021 (1752 Federal Avenue, Los Angeles) by \$728,536 resulting in a Los Angeles County property tax refund of \$8,954.92.

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### COUNT 15

On or about March 17, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$8,954.92, by reducing the value of Assessor Identification Number 4261-014-021 (1752 Federal Avenue, Los Angeles) by \$728,536.

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### COUNT 16

On or about March 17, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4281-029-022 (902 Washington Avenue, Santa Monica) by \$423,646 resulting in a Los Angeles County property tax refund of \$4,766.80.

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### COUNT 17

On or about March 17, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$4,766.80, by reducing the value of Assessor Identification Number 4281-029-022 (902 Washington Avenue, Santa Monica) by \$423,646.

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### **COUNT 18**

On or about March 17, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4363-006-022 (641 Gayley Avenue, Los Angeles) by \$1,212,158 resulting in a Los Angeles County property tax refund of \$14,816.77.

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### **COUNT 19**

On or about March 17, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$14,816.77, by reducing the value of Assessor Identification Number 4363-006-022 (641 Gayley Avenue, Los Angeles) by \$1,212,158.

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### **COUNT 20**

On or about April 15, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4333-029-070 (230 S. Hamilton Drive, Beverly Hills) by \$9,433,900 resulting in a Los Angeles County property tax refund of \$103,429.47.

\* \* \* \* \*

### **COUNT 21**

On or about April 15, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$103,429.47, by reducing the value of Assessor Identification Number 4333-029-070 (230 S. Hamilton Drive, Beverly Hills) by \$9,433,900.

\* \* \* \* \*

### **COUNT 22**

On or about April 15, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4377-050-001 (2199 Pembrige Court, Los Angeles) by \$3,891,294 resulting in a Los Angeles County property tax refund of \$47,951.54.

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### **COUNT 23**

On or about April 15, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$47,951.54, by reducing the value of Assessor Identification Number 4377-050-001 (2199 Pembrige Court, Los Angeles) by \$3,891,294.

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#### **COUNT 24**

On or about July 27, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4188-016-107 (415 Herondo Street, Hermosa Beach) by \$26,692,747 resulting in a Los Angeles County property tax refund of \$279,786.30.

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#### **COUNT 25**

On or about July 27, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$279,786.30, by reducing the value of Assessor Identification Number 4188-016-107 (415 Herondo Street, Hermosa Beach) by \$26,692,747.

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#### **COUNT 26**

On or about July 27, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4188-016-072 (420 2<sup>nd</sup> Street, Hermosa Beach) by \$27,123,838 resulting in a Los Angeles County property tax refund of \$284,304.88.

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#### **COUNT 27**

On or about July 27, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$284,304.88, by reducing the value of Assessor Identification Number 4188-016-072 (420 2<sup>nd</sup> Street, Hermosa Beach) by \$27,123,838.

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#### **COUNT 28**

On or about July 27, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 6106-030-017 (16907 S. Normandie, Gardena) by \$4,151,926 resulting in a Los Angeles County property tax refund of \$49,712.89.

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#### **COUNT 29**

On or about July 27, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$49,712.89, by reducing the value of Assessor Identification Number 6106-030-017 (16907 S. Normandie, Gardena) by \$4,151,926.

\* \* \* \* \*

### **COUNT 30**

On or about July 27, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 7355-031-054 (21515 S. Western Avenue, Torrance) by \$14,390,000 resulting in a Los Angeles County property tax refund of \$157,752.32.

\* \* \* \* \*

### **COUNT 31**

On or about July 27, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$157,752.32, by reducing the value of Assessor Identification Number 7355-031-054 (21515 S. Western Avenue, Torrance) by \$14,390,000.

\* \* \* \* \*

### **COUNT 32**

On or about July 29, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4369-025-005 (901 Airole Way, Los Angeles) by \$5,839,088 resulting in a Los Angeles County property tax refund of \$71,263.38.

\* \* \* \* \*

### COUNT 33

On or about July 29, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$71,263.38, by reducing the value of Assessor Identification Number 4369-025-005 (901 Airole Way, Los Angeles) by \$5,839,088.

\* \* \* \* \*

### COUNT 34

On or about July 29, 2010, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did a manner not incidental and minimal, without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another by an unlawful reduction of the Los Angeles County property roll value and/or recommended property roll value for Assessor Identification Number 4369-024-007 (911 Tione Road, Los Angeles) by \$3,192,867, Assessor Identification Number 4369-023-014 (911 Tione Road, Los Angeles) by \$1,999,959 and Assessor Identification Number 4369-023-015 (911 Tione Road, Los Angeles) by \$29,466 resulting in a Los Angeles County property tax refund of \$63,734.98.

\* \* \* \* \*

### COUNT 35

On or about July 29, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, RAMIN SALARI and MARK MCNEIL, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$63,734.98, by reducing the values of Assessor Identification Number 4369-024-007 (911 Tione Road, Los Angeles) by \$3,192,867, Assessor Identification Number 4369-023-014 (911 Tione Road, Los Angeles) by \$1,999,959 and Assessor Identification Number 4369-023-015 (911 Tione Road, Los Angeles) by \$29,466.



\* \* \* \* \*

**COUNT 36**

On or about May 29, 2002, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 37**

On or about September 12, 2002, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 38**

On or about December 18, 2002, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$35,000.

\* \* \* \* \*

**COUNT 39**

On or about April 14, 2003 in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 40**

On or about September 12, 2003, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$5,000.

\* \* \* \* \*

**COUNT 41**

On or about September 23, 2003, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$5,000.

\* \* \* \* \*

**COUNT 42**

On or about December 17, 2004, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$4,000.

\* \* \* \* \*

**COUNT 43**

On or about January 3, 2005, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$6,500.

\* \* \* \* \*

#### **COUNT 44**

On or about February 13, 2005, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$9,000.

\* \* \* \* \*

#### **COUNT 45**

On or about May 23, 2006, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$16,842.

\* \* \* \* \*

#### **COUNT 46**

On or about June 8, 2006, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$2,903.

\* \* \* \* \*

#### **COUNT 47**

On or about July 9, 2006, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$8,000.

\* \* \* \* \*

**COUNT 48**

On or about August 18, 2006, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 49**

On or about January 3, 2007, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$8,027.

\* \* \* \* \*

**COUNT 50**

On or about February 4, 2007, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$12,887.

\* \* \* \* \*

**COUNT 51**

On or about April 16, 2007, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$15,000.

\* \* \* \* \*

**COUNT 52**

On or about August 23, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$30,000.

\* \* \* \* \*

**COUNT 53**

On or about October 8, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 54**

On or about October 29, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$10,000.

\* \* \* \* \*

**COUNT 55**

On or about December 7, 2010, in the County of Los Angeles, the crime of BRIBING AN EXECUTIVE OFFICER, in violation of PENAL CODE SECTION 67, a Felony, was committed by RAMIN SALARI, who did unlawfully and with intent to influence SCOTT SCHENTER in respect to an act, decision, vote, opinion and proceeding of said SCOTT SCHENTER, give and offer to give a bribe, to wit, \$50,000.

\* \* \* \* \*

#### **COUNT 56**

On or about September 21, 2003, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ who was an appraiser employed by the Los Angeles County Assessor's Office and did unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$54,131.32, by reducing the value of Assessor Identification Number 5144-002-019 (612 South Broadway, Los Angeles).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 57**

On or about September 21, 2003, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, while JOHN NOGUEZ was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$54,131.32, by reducing the value of Assessor Identification Number 5144-002-019 (612 South Broadway, Los Angeles).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 58**

On or about September 21, 2003, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN

NOGUEZ, and RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$54,131.32, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

#### **COUNT 59**

On or about October 31, 1999, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who was an appraiser employed by the Los Angeles County Assessor's Office and did unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$257,536.73, by reducing the value of Assessor Identification Number 5144-003-016 (601 South Broadway, Los Angeles).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 60**

On or about October 31, 1999, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, while JOHN NOGUEZ was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$257,536.73, by reducing the value of Assessor Identification Number 5144-003-016 (601 South Broadway, Los Angeles).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 61**

On or about October 31, 1999, in the County of Los Angeles the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, and RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$257,536.73, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

#### **COUNT 62**

On or between January 1, 2003 and December 31, 2008, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$218,871, by reducing the value of Assessor Identification Number 8940-314-038 (Power Acura, 3311 Pacific Coast Highway, Torrance).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 63**

On or between January 1, 2003 and December 31, 2008, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$218,871, the property of LOS ANGELES COUNTY.

\* \* \* \* \*



#### **COUNT 64**

On or between January 1, 2001 and December 31, 2008, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$205,497, by reducing the values of Assessor Identification Number 8940-262-017 and Assessor Identification Number 8940-262-018 (King Harbor, Redondo Beach Pier).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 65**

On or between January 1, 2001 and December 31, 2008, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$205,497, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

#### **COUNT 66**

On or between January 1, 2001 and December 31, 2011, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$2,866,246, by

reducing the value of Assessor Identification Number 8940-370-049 (Tahiti Marina, 13900 Tahiti Way, Marina del Rey).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 67**

On or between January 1, 2001 and December 31, 2011, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$2,866,246, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

#### **COUNT 68**

On or between January 1, 2001 and December 31, 2006, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$1,388,351, by reducing the value of Assessor Identification Number 8940-314-003 (Torrance Towne Center, 2601 Airport Drive, Torrance).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

**COUNT 69**

On or between January 1, 2001 and December 31, 2006, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$1,388,351, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

**COUNT 70**

On or between January 1, 2002 and December 31, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$228,632, by reducing the value of Assessor Identification Number 8940-314-033 (Raamco Motors, 2955 Pacific Coast Highway, Torrance).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

**COUNT 71**

On or between January 1, 2002 and December 31, 2007, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit property taxes in the amount of approximately \$228,632, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

### **COUNT 72**

On or between January 1, 2004 and December 31, 2008, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$122,687, by reducing the value of Assessor Identification Number 8940-262-005 (Cheesecake Factory, 605 North Harbor Drive, Redondo Beach).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

### **COUNT 73**

On or between January 1, 2004 and December 31, 2008, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit property taxes in the amount of approximately \$122,687, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

### **COUNT 74**

On or between January 1, 1999 and December 31, 2010, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by RAMIN SALARI who did aid, abet, advise or encourage SCOTT SCHENTER, while SCOTT SCHENTER was an appraiser employed by the Los Angeles County Assessor's Office, to unlawfully and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he had in his possession and under his control by virtue of his trust, and did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, a Los Angeles County property tax refund of approximately \$4,193,572, by

reducing the value of Assessor Identification Number 8940-253-005 (Plaza Las Fuentes, 135 North Los Robles Avenue, Pasadena).

It is further alleged that the said embezzlement and defalcation was from the public funds of the County of Los Angeles within the meaning of Penal Code section 514.

\* \* \* \* \*

#### **COUNT 75**

On or between January 1, 1999 and December 31, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by RAMIN SALARI, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, property taxes in the amount of approximately \$4,193,572, the property of LOS ANGELES COUNTY.

\* \* \* \* \*

#### **COUNT 76**

On or about December 16, 2010, in the County of Los Angeles, the crime of PERJURY BY DECLARATION, in violation of PENAL CODE SECTION 118(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who did unlawfully, under penalty of perjury, declare as true that which was known to be false, to wit, that the information contained in his Statement of Economic Interests, Form 700, and any attached schedules for 2010 is true and complete.

\* \* \* \* \*

#### **COUNT 77**

On or about January 26, 2011, in the County of Los Angeles, the crime of PERJURY BY DECLARATION, in violation of PENAL CODE SECTION 118(a), a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who did unlawfully, under penalty of perjury, declare as true that which was known to be false, to wit, that the information contained in his Statement of Economic Interests, Form 700, and any attached schedules for 2010 is true and complete.

\* \* \* \* \*

### COUNT 78

On or about July 27, 2011, in the County of Los Angeles, the crime of PUBLIC RECORDS VIOLATION, in violation of GOVERNMENT CODE SECTION 6200, a Felony, was committed by JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, who was an officer having custody of a record, book, and/or paper, filed and/or deposited in a public office, and/or placed in the defendant's hands and, as to the whole and/or part thereof, did willfully alter and/or falsify said document.

\* \* \* \* \*

### PENAL CODE SECTION 12022.6 ENHANCEMENT-JUAN RODRIGUEZ, AKA JOHN NOGUEZ

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 56, 58, 59, and 61 that in the commission of the above offenses, the said defendant, JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6(a)(3).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 56, 58, 59, and 61 that in the commission of the above offenses, said defendant, JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6(a)(2).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 56, 58, 59, and 61 that in the commission of the above offenses, said defendant, JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, with the intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6(a)(1).

It is further alleged that despite its repeal on January 1, 2018, Penal Code section 12022.6 still applies to the charged crimes pursuant to People v. Abrahamian (2020) 45 Cal.App.5th 314 and People v. Medeiros (2020) 46 Cal.App.5th 1142.

\* \* \* \* \*

### PENAL CODE SECTION 12022.6 ENHANCEMENT-RAMIN SALARI

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 that in the commission

of the above offenses, said defendant, RAMIN SALARI, with the intent to do so, took, damaged and destroyed property of a value exceeding \$3,200,000, within the meaning of Penal Code section 12022.6(a)(4).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 that in the commission of the above offenses, said defendant, RAMIN SALARI, with the intent to do so, took, damaged and destroyed property of a value exceeding \$1,300,000, within the meaning of Penal Code section 12022.6(a)(3).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 that in the commission of the above offenses, said defendant, RAMIN SALARI, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6(a)(2).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 that in the commission of the above offenses, said defendant RAMIN SALARI, with the intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6(a)(1).

It is further alleged that despite its repeal on January 1, 2018, Penal Code section 12022.6 still applies to the charged crimes pursuant to People v. Abrahamian (2020) 45 Cal.App.5th 314 and People v. Medeiros (2020) 46 Cal.App.5th 1142.

\* \* \* \* \*

#### **PENAL CODE SECTION 12022.6 ENHANCEMENT-MARK MCNEIL**

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35 that in the commission of the above offense(s), said defendant MARK MCNEIL, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6(a)(2).

It is further alleged as to count(s) 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35 that in the commission of the above offense(s), said defendant MARK MCNEIL, with the

intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6(a)(1).

It is further alleged that despite its repeal on January 1, 2018, Penal Code section 12022.6 still applies to the charged crimes pursuant to People v. Abrahamian (2020) 45 Cal.App.5th 314 and People v. Medeiros (2020) 46 Cal.App.5th 1142.

\* \* \* \* \*

**PENAL CODE SECTION 186.11 ENHANCEMENT-JUAN RODRIGUEZ, AKA JOHN NOGUEZ**

It is further alleged, pursuant to Penal Code section 186.11(a), as to defendant JUAN RENALDO RODRIGUEZ, aka JOHN NOGUEZ, that the offenses set forth in counts 1, 2, 4, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 56, 58, 59, and 61 are related felonies, a material element of which is fraud and embezzlement, the pattern of which involves the taking of, or results in the loss of, more than \$500,000.

\* \* \* \* \*

**PENAL CODE SECTION 186.11 ENHANCEMENT-RAMIN SALARI**

It is further alleged, pursuant to Penal Code section 186.11(a), as to defendant RAMIN SALARI, that the offenses set forth in counts 1, 3, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 are related felonies, a material element of which is fraud and embezzlement, the pattern of which involves the taking of, or results in the loss of, more than \$500,000.

\* \* \* \* \*

**PENAL CODE SECTION 186.11 ENHANCEMENT-MARK MCNEIL**

It is further alleged, pursuant to Penal Code section 186.11(a), as to defendant MARK MCNEIL, that the offenses set forth in counts 1, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35 are related felonies, a material element of which is fraud and embezzlement, the pattern of which involves the taking of, or results in the loss of, more than \$500,000.



### STATUTE OF LIMITATIONS

It is further alleged, pursuant to Penal Code section 804, that the prosecution for the criminal conduct by John Noguez, Ramin Salari, and/or Mark McNeil, set forth in counts 1 to 78, was initially commenced in case BA403666, as follows: On October 16, 2012, a felony complaint was filed and an arrest warrant was issued for the criminal conduct set forth in counts 1, 2, 3, 4, 5, 6, 7, 12, 13, 14, 15, 18, 19, 24, 25, 26, 27, 30, 31, 52, 53, 54, 55, 76, 77, and 78 above. On or about April 22, 2013, the defendants were arraigned on the first amended felony complaint for the additional criminal conduct set forth in counts 8, 9, 10, 11, 16, 17, 20, 21, 22, 23, 28, 29, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 above. On June 7, 2013, the defendants were arraigned on the second amended felony complaint that alleged no new criminal conduct. On October 28, 2013, the defendants were arraigned on the third amended felony complaint for the additional criminal conduct set forth in counts 56, 57, 58, 59, 60, and 61 above. On or about July 5, 2016, the defendants were arraigned on the fourth amended felony complaint that alleged no new criminal conduct.

It is further alleged, pursuant to Penal Code section 803(b), that the time limitations against John Noguez, Ramin Salari, and Mark McNeil, for the same criminal conduct alleged herein, was tolled while case BA403666 was pending. Case BA403666 was pending from October 16, 2012 to July 27, 2020.

It is further alleged, pursuant to Penal Code sections 801.5, 803(c), and 804, that the prosecution for the offenses set forth in counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35 was initially commenced on October 16, 2012 or April 22, 2013, which was within four years after the completion of the offenses.

It is further alleged, pursuant to Penal Code section 803(c), that the offenses set forth in counts 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, and 51 were not discovered until between August 23, 2012 and September 4, 2012 by Los Angeles District Attorney Investigators who, in reviewing Ramin Salari's financial records, uncovered sixteen payments Ramin Salari and the Assessment Appeals Services made to Scott Schenter's wife from May 29, 2002 through April 16, 2007; and that no victim of said violations and no law enforcement agency chargeable with the investigation and prosecution of said violations had actual and constructive knowledge of said violations prior to said date within the meaning of Penal Code section 803(c) because these bribes were concealed by Scott Schenter and Ramin Salari and were described by Ramin Salari as "referral fees." Pursuant to Penal Code sections 801.5 and 804, the

prosecution for said offenses was initially commenced on or about April 22, 2013, which was within four years after discovery of the commission of the offenses.

It is further alleged, pursuant to Penal Code sections 801.5, 803(c), and 804, that the prosecution for the offenses set forth in counts 52, 53, 54, and 55 was initially commenced on October 16, 2012, which was within four years after the completion of the offenses.

It is further alleged, pursuant to Penal Code section 803(c), that the offenses set forth in counts 56, 57, 58, 59, 60, and 61 were not discovered until May 8, 2013 by Los Angeles District Attorney Investigators upon interviews and review of documents, and that no victim of said violations and no law enforcement agency chargeable with the investigation and prosecution of said violations had actual and constructive knowledge of said violations prior to said date. Pursuant to Penal Code sections 801.5 and 804, the prosecution for said offenses was initially commenced on or about October 28, 2013, which was within four years after discovery of the commission of the offenses.

It is further alleged, pursuant to Penal Code section 803(c), that the offenses set forth in counts 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, and 75 were not discovered until June 22, 2012 by Los Angeles District Attorney Investigators during an interview with Scott Schenter, and that no victim of said violations and no law enforcement agency chargeable with the investigation and prosecution of said violations had actual and constructive knowledge of said violations prior to said date within the meaning of Penal Code section 803(c). Pursuant to Penal Code sections 801.5 and 804, the prosecution for said offenses was initially commenced on April 22, 2013, which was within four years after discovery of the commission of the offenses.

It is further alleged, pursuant to Penal Code sections 801.5, 803(c), and 804, that the prosecution for the offenses set forth in counts 76, 77, and 78 was initially commenced on October 16, 2012, which was within four years after the completion of the offense.

\* \* \* \* \*

**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: 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 section 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 section 29810.**

THIS COMPLAINT, CASE NUMBER BA488826, CONSISTS OF 78 COUNTS.

The undersigned swears under penalty of perjury that she is a peace officer for the State of California and that as part of her official duties, has read and is sufficiently familiar with the underlying facts set forth in counts 1 through 78 of the this criminal complaint, attached hereto and incorporated herein, and that the facts and information set forth in this complaint, and in the accompanying documents are true to the best of the undersigned's information and belief and establish probable cause for the issuance of a warrant of arrest for defendants JUAN RENALDO RODRIGUEZ (aka JOHN NOGUEZ), RAMIN SALARI, and MARK MCNEIL. Wherefore, a warrant of arrest is requested for JUAN RENALDO RODRIGUEZ (aka JOHN NOGUEZ), RAMIN SALARI, and MARK MCNEIL.

Executed at LOS ANGELES, County of Los Angeles, on July 27, 2020.



WENDIE CONTRERAS  
DECLARANT AND COMPLAINANT

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

JUAN RENALDO RODRIGUEZ (aka JOHN NOGUEZ)

\$1,160,000

RAMIN SALARI

\$1,160,000

MARK MCNEIL

\$ 985,000

DATE:

7/27/20



JUDGE OF THE ABOVE-TITLED COURT  
GEORGE G. LOMELI

JACKIE LACEY  
District Attorney

BY:

A handwritten signature in blue ink, appearing to read "Bobby Zoumberakis", is written over a horizontal line.

BOBBY ZOUMBERAKIS  
Deputy District Attorney

AGENCY: LACO D.A.  
BUREAU OF  
INVESTIGATION

I/O: WENDIE  
CONTRERAS

ID NO.: 645584 PHONE: (213) 257-2569

DR NO.: P110739

OPERATOR: CC

PRELIM. TIME EST.: 20 DAYS

DEFENDANT	CII NO.	DOB	BOOKING NO.	BAIL RECOM'D	CUSTODY R'TN DATE
RODRIGUEZ, JUAN RENALDO		11/29/1964		\$1,160,000	
SALARI, RAMIN		1/28/1963		\$1,160,000	
MCNEIL, MARK		1/11/1958		\$985,000	

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.

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

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

*(Strike out or add as applicable)*

**JUAN RENALDO RODRIGUEZ**

<b>Ct. No.</b>	<b>Charge</b>	<b>Charge Range</b>	<b>Allegation</b>	<b>Alleg. Effect</b>
1	PC 182(a)	16-2-3 County Jail	PC 186.11(a)	+2, 3, 5-State Prison
2	PC 68	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
4	PC 68	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
6	PC 68	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
8	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
9	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
10	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
11	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
12	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
13	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2)	+3 Yrs. +2 Yrs.

			PC 12022.6(a)(1) PC 186.11(a)	+1 Yrs. +2, 3, 5 State Prison
14	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
15	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
16	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
17	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
18	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
19	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
20	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
21	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
22	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
23	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
24	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2)	+3 Yrs. +2 Yrs.

			PC 12022.6(a)(1) PC 186.11(a)	+1 Yrs. +2, 3, 5 State Prison
25	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
26	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
27	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
28	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
29	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
30	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
31	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
32	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
33	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
34	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
35	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2)	+3 Yrs. +2 Yrs.

			PC 12022.6(a)(1) PC 186.11(a)	+1 Yrs. +2, 3, 5 State Prison
56	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
58	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
59	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
61	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
76	PC 118(a)	2-3-4 County Jail		
77	PC 118(a)	2-3-4 County Jail		
78	GC 6200	2-3-4 County Jail		



**RAMIN SALARI**

<b>Ct. No.</b>	<b>Charge</b>	<b>Charge Range</b>	<b>Allegation</b>	<b>Alleg. Effect</b>
1	PC 182(a)	16-2-3 County Jail	PC 186.11(a)	+2, 3, 5-State Prison
3	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
5	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
7	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
8	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
9	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
10	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
11	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
12	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
13	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
14	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison

15	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
16	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
17	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
18	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
19	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
20	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
21	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
22	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
23	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
24	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4)	+4 Yrs.

			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
25	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
26	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
27	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
28	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
29	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
30	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
31	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
32	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.
			PC 12022.6(a)(2)	+2 Yrs.
			PC 12022.6(a)(1)	+1 Yrs.
			PC 186.11(a)	+2, 3, 5 State Prison
33	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4)	+4 Yrs.
			PC 12022.6(a)(3)	+3 Yrs.

			PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
34	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
35	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
36	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
37	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
38	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
39	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
40	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
41	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
42	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
43	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
44	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
45	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
46	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
47	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
48	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
49	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
50	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5-State Prison
51	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
52	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
53	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
54	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison
55	PC 67	2-3-4 State Prison	PC 186.11(a)	+2, 3, 5 State Prison

57	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
58	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
60	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
61	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
62	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
63	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
64	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
65	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
66	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4)	+16, 2, 3 State Prison +4 Yrs.

			PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
67	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
68	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
69	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
70	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
71	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
72	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
73	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs. +2, 3, 5 State Prison
74	PC 504	16-2-3 State Prison	PC 514 PC 12022.6(a)(4) PC 12022.6(a)(3) PC 12022.6(a)(2) PC 12022.6(a)(1)	+16, 2, 3 State Prison +4 Yrs. +3 Yrs. +2 Yrs. +1 Yrs.

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PC 487(a)

16-2-3 County Jail

PC 186.11(a)

+2, 3, 5 State Prison

PC 12022.6(a)(4)

+4 Yrs.

PC 12022.6(a)(3)

+3 Yrs.

PC 12022.6(a)(2)

+2 Yrs.

PC 12022.6(a)(1)

+1 Yrs.

PC 186.11(a)

+2, 3, 5 State Prison

**MARK MCNEIL**

<b>Ct. No.</b>	<b>Charge</b>	<b>Charge Range</b>	<b>Allegation</b>	<b>Alleg. Effect</b>
1	PC 118(a)	16-2-3 County Jail	PC 186.11(a)	+2, 3, 5-State Prison
8	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
9	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
10	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
11	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
12	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
13	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
14	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
15	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
16	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
17	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
18	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
19	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison



20	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
21	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
22	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
23	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
24	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
25	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
26	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
27	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
28	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
29	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
30	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
31	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
32	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
33	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison

34	PC 424(a)	2-3-4 State Prison	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison
35	PC 487(a)	16-2-3 County Jail	PC 12022.6(a)(2) PC 12022.6(a)(1) PC 186.11(a)	+2 Yrs. +1 Yrs. +2, 3, 5 State Prison

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

JUAN RENALDO RODRIGUEZ	_____ Dollars
RAMIN SALARI	_____ Dollars
MARK MCNEIL	_____ 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:

JUAN RENALDO RODRIGUEZ	_____ in Dept _____
RAMIN SALARI	_____ in Dept _____
MARK MCNEIL	_____ in Dept _____

at: \_\_\_\_\_ A.M.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Committing Magistrate*