CASH BOND
RECOMMENDED:
ALL DEF: $124,000.00
WARRANT

AGENCY#: IE201600120/DOI

MFG

MAY 22 2018

MICHAEL A. HESTRIN
DISTRICT ATTORNEY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAY 21 2018
V Ramirez

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff, v. SAMUEL EUGENE RAY TADLOCK III, AKA: SAMUEL E. TADLOCK AKA: SAM TABLOCK AKA: SAMUEL ER TADLOCK III DOB: 7/18/1982 MARLENE RENEE RAMIREZ, DOB: 4/9/1976 SCOTTY SETH CARLISLE, DOB: 3/31/1976 DANIEL IVAN HERRARTE, DOB: 11/10/1983 JORGE ALBERTO LOPEZ, AKA: JORGE ALBERTO LOPEZ JR. AKA: JORGE LOPEZ AKA: JORGE A. LOPEZ DOB: 10/1/1980 Defendants.	D.A.# 367934 CASE NO. RIF1802406 FELONY COMPLAINT OTHER - SPS

COUNT 1

The undersigned, under penalty of perjury upon information and belief, declares: That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ , committed a violation of Penal Code section 487, subdivision (a), a felony, in that on or about 11/25/2015, through and including 12/31/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully steal and take and defraud money, labor, real and personal property of COLONIAL LIFE, of a value exceeding Nine Hundred Fifty Dollars ($950.00) to wit: MONEY.

COUNT 2

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 4/7/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: JENNIFER J., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 3

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 5/7/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: JENNIFER J., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 4

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 470, subdivision (b), a felony, in that on or about 10/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully counterfeit and forge the seal and handwriting of another, to wit: JENNIFER J., with the intent to defraud.

COUNT 5

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/10/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: SAMANTHA A., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 6

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: ELIZABETH T., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 7

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: AMIR Z., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 8

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: CRYSTAL W., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 9

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: CALVIN H., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 10

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/18/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: CALVIN H., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 11

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: AMIR Z., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 12

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: ERIC B., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 13

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: COSTAS F., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 14

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: MAUREEN S., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 15

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: AARON S., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 16

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/23/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: CYNTHIA A., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 17

That the above named defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ committed a violation of Penal Code section 530.5, subdivision (a), a felony, in that on or about 12/31/2015, in the County of Riverside, State of California, the defendants did willfully and unlawfully obtain personal identifying information of another person, to wit: NICOLE F., and use that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property and medical information in the name of the other person without the consent of that person.

COUNT 18

That the above named defendant JORGE ALBERTO LOPEZ committed a violation of Insurance Code section 700, a felony, in that on or about 12/1/2015 through and including 12/31/2015, in the County of Riverside, State of California, the defendant did willfully and unlawfully, transact any class of insurance business, without first being admitted for that class by procuring a certificate of authority from the Insurance Commissioner.

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT – OVER $100K

It is further alleged that the said defendants SAMUEL EUGENE RAY TADLOCK III AND MARLENE RENEE RAMIREZ AND SCOTTY SETH CARLISLE AND DANIEL IVAN HERRARTE AND JORGE ALBERTO LOPEZ, committed two or more related felonies, a material element of which was fraud or embezzlement, which involved a pattern of related felony conduct, and this pattern of related felony conduct involved the taking of more than one hundred thousand dollars ($100,000.00), within the meaning of Penal Code section 186.11, subdivision (a), subsection (1).

PROBATION LIMITATION – EXCESSIVE TAKING ENHANCEMENT

It is further alleged that, except in an unusual case where the interest of justice would best be served within the meaning of California Rule of Court 4.413 subdivision (c), probation shall not be granted because the above offense of theft is of an amount exceeding one hundred thousand dollars ($100,000), within the meaning of Penal Code section 1203.045, subdivision (a).

MARSY'S LAW

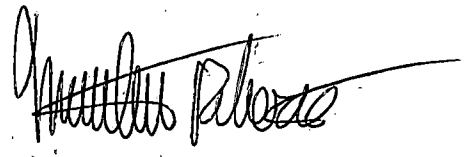
Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It is unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of California Penal Code § 1054.2a(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member or anyone else. Note exceptions in California Penal Code § 1054.2a(a) and (2).

DISCOVERY REQUEST

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

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

Michael A. Hestrin
District Attorney



Dated: April 26, 2018

By: Matthew M. Roberts
Deputy District Attorney

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