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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN
9 STOCKTON BRANCH

10 THE PEOPLE OF THE STATE OF CALIFORNIA,

11 Plaintiff,

12 vs.

13 NY TRAN,

14 Defendant(s).

No. 077-0926505
SAN JOAQUIN COUNTY
DISTRICT ATTORNEY'S OFFICE
CASE
DA Case: 0929959

Complaint No: 202211100006

COMPLAINT

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17 I, the undersigned, say, on information and belief, that in the County of SAN JOAQUIN, State
18 of California:

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20 **COUNT 1: Code Section PC 368(D) THEFT FROM ELDER OR DEPENDENT ADULT**
21 **EXCEEDING \$950**

22 On or about July 14, 2022 through and including August 4, 2022 in the County of San Joaquin,
23 California, NY TRAN did commit the crime of THEFT FROM ELDER OR DEPENDENT
24 ADULT EXCEEDING \$950, in violation of Section 368(d) of the Penal Code, a FELONY,
25 who at the time and place last aforesaid, unlawfully committed theft, embezzlement, forgery,
26 fraud, and identity theft with respect to the property and personal identifying information of an
27 elder and dependent adult, said property, moneys, labor, goods, and services taken and obtained
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1 having a value exceeding \$950.00 ***TO WIT: \$45,698.33, and knew and reasonably should
2 have known that said person, Ken Urabe, was an elder and dependent adult.

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4 For a further and separate cause of complaint, being a different offense from but connected in
5 its commission with the charge(s) above, complainant further complains and says:

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7 **COUNT 2: Code Section PC 487(A) GRAND THEFT:MONEY/LABOR/PROPERTY**

8 On or about July 14, 2022 through and including August 4, 2022 in the County of San Joaquin,
9 California, NY TRAN did commit the crime of GRAND
10 THEFT:MONEY/LABOR/PROPERTY, in violation of Section 487(a) of the Penal Code, a
11 FELONY, who at the time and place last aforesaid, did willfully and unlawfully take money
12 and personal property of another of a value exceeding nine hundred fifty dollars (\$950.00), to-
13 wit: Ken Urabe CHECK TOTALLING \$45,698.33.

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15 For a further and separate cause of complaint, being a different offense from but connected in
16 its commission with the charge(s) above, complainant further complains and says:

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18 **COUNT 3: Code Section PC 470(D) FORGERY**

19 On or about July 25, 2022 in the County of San Joaquin, California, NY TRAN did commit the
20 crime of FORGERY, in violation of Section 470(d) of the Penal Code, a FELONY, who at the
21 time and place last aforesaid did, with the intent to defraud, falsely make, alter, forge and
22 counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine, to-wit:
23 PERSONAL CHECK TOTALLING \$42,500.00, knowing the same to be false, altered, forged
24 and counterfeited.

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26 For a further and separate cause of complaint, being a different offense from but connected in
27 its commission with the charge(s) above, complainant further complains and says:

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COUNT 4: Code Section PC 530.5(A) IDENTITY THEFT

On or about July 14, 2022 through and including November 8, 2022 in the County of San Joaquin, California, NY TRAN did commit the crime of IDENTITY THEFT, in violation of Section 530.5(a) of the Penal Code, a FELONY, who at the time and place last aforesaid, did willfully and unlawfully obtain personal identifying information ***TO WIT: PERSONAL CHECKS, CREDIT CARD of Ken Urabe without authorization, and used that information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property, or medical information without the consent of said victim.

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge(s) above, complainant further complains and says:

COUNT 5: Code Section PC 484G USE OF CREDIT CARD OBTAIN UNDER 484(E) OR FORCED CARD

On or about July 14, 2022 through and including August 4, 2022 in the County of San Joaquin, California, NY TRAN did commit the crime of FRAUDULENT USE OF ACCESS CARD, in violation of Section 484g of the Penal Code, a FELONY, who at the time and place last aforesaid did willfully, unlawfully with intent to defraud, OBTAIN MONEY, GOODS, SERVICES AND ANYTHING ELSE OF VALUE BY REPRESENTING THAT HE/SHE WAS THE HOLDER OF AN ACCESS CARD WITHOUT THE CONSENT OF THE CARD HOLDER. It is further alleged that the value of all money, goods, services and other things of value obtained during the six consecutive month period ending AUGUST OF 2022 TOTALLING \$3,198.33.

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge(s) above, complainant further complains and says:

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COUNT 6: Code Section PC 470(D) FORGERY

On or about August 30, 2022 in the County of San Joaquin, California, NY TRAN did commit the crime of FORGERY, in violation of Section 470(d) of the Penal Code, a FELONY, who at the time and place last aforesaid did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine, to-wit: PERSONAL CHECK TOTALLING \$60,000.00, knowing the same to be false, altered, forged and counterfeited.

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge(s) above, complainant further complains and says:

COUNT 7: Code Section PC 470(D) FORGERY

On or about August 30, 2022 in the County of San Joaquin, California, NY TRAN did commit the crime of FORGERY, in violation of Section 470(d) of the Penal Code, a FELONY, who at the time and place last aforesaid did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine, to-wit: PERSONAL CHECK TOTALLING \$8,500.00, knowing the same to be false, altered, forged and counterfeited.

If the above-named defendant(s) is/are presently on probation in San Joaquin County, any evidence presented at a preliminary hearing in the instant case will be used not only as a basis for a holding order in this case but also as evidence of a violation of probation and, at any formal hearing on that violation of probation, the People will move the transcript of the preliminary hearing into evidence as a basis for the violation.

1 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
2 defendant and their attorney disclose to the People all information and materials described in
3 Penal Code Section 1054.3.

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5 I declare under penalty of perjury that the foregoing is true and correct except for those things
6 stated on information and belief and those I believe to be true.

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8 Executed on November 9, 2022, at Stockton, California.

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11 SEAN DOERING
12 Deputy District Attorney

13 SD/cw

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