

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

SP
LOS ANGELES SUPERIOR COURT
2017 SEP 13 AM 9:02
FILED

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| THE PEOPLE OF THE STATE OF CALIFORNIA, v. NOL 01 REFUGIO RODRIGUEZ (DOB: 07/12/1971), and NOL 02 ELIZABETH TINAJERO MELENDREZ (DOB: 09/02/1972) | Plaintiff, Defendant(s). |
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CASE NO. BA460879

FELONY COMPLAINT

**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 November 6, 2014 and May 19, 2015, 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 REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who did unlawfully conspire together to commit the crime of Assumed Name Contribution, in violation of Section 84301 of the Government Code, a misdemeanor; 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:

- 1) On or about November 29, 2014, Defendant Rodriguez and Defendant Melendrez organized a gathering in order to begin fundraising for Defendant Rodriguez's campaign for a seat on the LAUSD Board of Education.
- 2) On or about December 19, 2014, Defendant Rodriguez cashed out a \$26,000 business investment.
- 3) On and between December 19, 2014 and December 20, 2014, Defendant Rodriguez provided Defendant Melendrez with a \$26,000 check and Defendant Rodriguez provided Defendant Melendrez with instructions on what to do with the money.
- 4) On or about December 20, 2014, Defendant Melendrez deposited the money received from Defendant Rodriguez into an account in the names of Defendant Rodriguez's parents.
- 5) On and between December 20, 2014, and December 31, 2014, Defendant Melendrez caused Defendant Rodriguez's mother to sign sixteen checks dated between the aforementioned time period and made payable to family and friends who had "donated" money to Defendant Rodriguez's campaign.
- 6) Beginning on or about December 20, 2014, Defendant Melendrez delivered the sixteen checks aforementioned to the payees named therein.

- 7) On and between December 20, 2014, and December 31, 2014, Defendant Melendrez delivered cash reimbursements to individuals who had "donated" to Defendant Rodriguez's campaign.
- 8) On or about January 12, 2015, Defendant Rodriguez signed under penalty of perjury and caused to be filed a California Fair Political Practices Commission Form 460 listing the 25 names as legitimate donors to his campaign.

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COUNT 2

On or about January 12, 2015, 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 REFUGIO RODRIGUEZ, who did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: the source of campaign contributions on a Calif. FPPC Form 460.

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COUNT 3

On or about January 12, 2015, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by REFUGIO RODRIGUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 4

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 5

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 6

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 7

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 8

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 9

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 10

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 11

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 12

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 13

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 14

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 15

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 16

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 17

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 18

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 19

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 20

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 21

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 22

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 23

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 24

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 25

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 26

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 27

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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COUNT 28

On or between December 10, 2014 and December 31, 2014, in the County of Los Angeles, the crime of ASSUMED NAME CONTRIBUTION, in violation of GOVERNMENT CODE SECTION 84301, a Misdemeanor, was committed by REFUGIO RODRIGUEZ and ELIZABETH TINAJERO MELENDREZ, who unlawfully caused campaign contributions to be made without disclosing the true name and identity of the contributors and those on whose behalf the contributions were made.

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

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

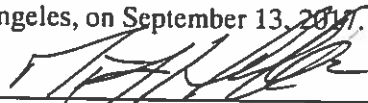
NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents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

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

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

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA460879, CONSISTS OF 28 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on September 13, 2017.



TIMOTHY DOBBIN
DECLARANT AND COMPLAINANT

.....
JACKIE LACEY, DISTRICT ATTORNEY

BY: 

SUSAN SER, DEPUTY

AGENCY: LACO D.A.
BUREAU OF
INVESTIGATION
DR NO.: P150619

I/O: TIMOTHY DOBBIN ID NO.: 452129 PHONE:
OPERATOR: GS PRELIM. TIME EST.: 2 DAY(S)

| <u>DEFENDANT</u> | <u>CII NO.</u> | <u>DOB</u> | <u>BOOKING NO.</u> | <u>BAIL RECOM'D</u> | <u>CUSTODY RTN DATE</u> |
|----------------------------------|----------------|------------|------------------------|-------------------------|-----------------------------|
| RODRIGUEZ, REFUGIO | | 7/12/1971 | | \$61,250 | 9/13/17 |
| MELENDREZ, ELIZABETH TINAJERO | | 9/2/1972 | | \$26,250 | 9/13/17 |

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)

REFUGIO RODRIGUEZ

| <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|------------|---------------|------------------------|-------------------|----------------------|
| 1 | PC 182(a)(1) | Check Code County Jail | | |
| 2 | PC 118(a) | 2-3-4 County Jail | | |
| 3 | PC 115(a) | 16-2-3 County Jail | | |
| 4 | GC 84301 | | | |
| 5 | GC 84301 | | | |
| 6 | GC 84301 | | | |
| 7 | GC 84301 | | | |
| 8 | GC 84301 | | | |
| 9 | GC 84301 | | | |
| 10 | GC 84301 | | | |
| 11 | GC 84301 | | | |
| 12 | GC 84301 | | | |
| 13 | GC 84301 | | | |
| 14 | GC 84301 | | | |
| 15 | GC 84301 | | | |
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| 17 | GC 84301 | | | |
| 18 | GC 84301 | | | |
| 19 | GC 84301 | | | |
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| 23 | GC 84301 | | | |
| 24 | GC 84301 | | | |
| 25 | GC 84301 | | | |
| 26 | GC 84301 | | | |
| 27 | GC 84301 | | | |
| 28 | GC 84301 | | | |

ELIZABETH TINAJERO MELENDREZ

| <u>Ct.</u> | <u>Charge</u> | <u>Charge Range</u> | <u>Allegation</u> | <u>Alleg. Effect</u> |
|------------|---------------|------------------------|-------------------|----------------------|
| 1 | PC 182(a)(1) | Check Code County Jail | | |
| 4 | GC 84301 | | | |
| 5 | GC 84301 | | | |
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| 7 | GC 84301 | | | |
| 8 | GC 84301 | | | |
| 9 | GC 84301 | | | |
| 10 | GC 84301 | | | |
| 11 | GC 84301 | | | |
| 12 | GC 84301 | | | |
| 13 | GC 84301 | | | |
| 14 | GC 84301 | | | |
| 15 | GC 84301 | | | |
| 16 | GC 84301 | | | |
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28 GC 84301

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

REFUGIO RODRIGUEZ _____ Dollars

ELIZABETH TINAJERO MELENDREZ _____ 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:

REFUGIO RODRIGUEZ _____ in Dept _____

ELIZABETH TINAJERO MELENDREZ _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate