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

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff.

**CASE NO. BA506714** 

v.

01 JUAN ORTEGA ORDORICA (DOB: 10/02/1973),

02 LEA MICHELLE SALAZAR (DOB: 10/31/1986),

03 LUIS ARMANDO CENICEROS, JR (DOB: 11/27/1991), and

04 YOLANDA BERUMEN (DOB: 04/01/1967)

Defendant(s).

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 January 1, 2016 to December 31, 2020, in the County of Los Angeles, the crime of GRAND THEFT BY EMBEZZLEMENT OF PUBLIC FUNDS in violation of PENAL CODE SECTION 505/514, a Felony, was committed by JUAN ORTEGA ORDORICA, while acting as the Division 4 Road Maintenance Supervisor for the Los Angeles County Department of Public Works (DFW), was an agent, servant, and employee of Los Angeles County who through the aiding and abetting of LUIS ARMANDO CENICEROS, JR. (LAC Equipment Rental), fraudulently appropriated public funds to a use or purpose not in the due and lawful execution of that trust, property in his possession and/or under his control by virtue of that trust and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950), resulting in a loss to the County of Los Angeles of at least \$88,621 involving the contracts with Quinn Company.

\* \* \* \* \*

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## COUNT 2

On or between January 1, 2016 to December 31, 2018, in the County of Los Angeles, the crime of GRAND THEFT BY EMBEZZLEMENT OF PUBLIC FUNDS in violation of PENAL CODE SECTION 505/514, a Felony, was committed by JUAN ORTEGA ORDORICA, while acting as the Division 4 Road Maintenance Supervisor for the Los Angeles County Department of Public Works (DPW), was an agent, servant, and employee of Los Angeles County who through the aiding and abetting of LUIS ARMANDO CENICEROS, JR. (LAC Equipment Rental) and LEA MICHELLE SALAZAR (Unlimited Construction Supply), fraudulently appropriated public funds to a use or purpose not in the due and lawful execution of that trust, property in his possession and/or under his control by virtue of that trust and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950), resulting in a loss to the County of Los Angeles of at least \$82,090 involving the contracts with Water Wagon (RK Truck Rentals).

\* \* \* \* \*

#### COUNT 3

On or between January 1, 2017 to December 31, 2020, in the County of Los Angeles, the crime of GRAND THEFT BY EMBEZZLEMENT OF PUBLIC FUNDS in violation of PENAL CODE SECTION 505/514, a Felony, was committed by JUAN ORTEGA ORDORICA, while acting as the Division 4 Road Maintenance Supervisor for the Los Angeles County Department of Public Works (DPW), was an agent, servant, and employee of Los Angeles County who through the aiding and abetting of LUIS ARMANDO CENICEROS, JR. (LAC Equipment Rental), LEA MICHELLE SALAZAR (Unlimited Construction Supply) and YOLANDA BERUMEN (L&N Construction Supply), fraudulently appropriated public funds to a use or purpose not in the due and lawful execution of that trust, property in his possession and/or under his control by virtue of that trust and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950), resulting in a loss to the County of Los Angeles of at least \$45,721 involving the contracts with C&W Construction Specialties.

\* \* \* \* \*

#### COUNT 4

On or between January 1, 2011 to December 31, 2018, in the County of Los Angeles, the crime of GRAND THEFT BY EMBEZZLEMENT OF PUBLIC FUNDS in violation of PENAL CODE SECTION 505/514, a Felony, was committed by JUAN ORTEGA ORDORICA, while acting as the Division 4 Road Maintenance Supervisor for the Los Angeles County Department of Public Works (DPW), was an agent, servant, and employee of Los Angeles County who through the aiding and abetting of YOLANDA BERUMEN (L&N Construction Supply), fraudulently appropriated public funds to a use or purpose not in the due and lawful execution of that trust, property in his possession and/or under his control by virtue of that trust and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950), resulting in a loss to the County of Los Angeles of at least \$18,461 involving the contracts with Atlas Construction Supply.

\* \* \* \*

### COUNT 5

On or between January 1, 2014 to December 31, 2017, in the County of Los Angeles, the crime of GRAND THEFT BY EMBEZZLEMENT OF PUBLIC FUNDS in violation of PENAL CODE SECTION 505/514, a Felony, was committed by JUAN ORTEGA ORDORICA, while acting as the Division 4 Road Maintenance Supervisor for the Los Angeles County Department of Public Works (DPW), was an agent, servant, and employee of Los Angeles County who through the aiding and abetting of LEA MICHELLE SALAZAR (Unlimited Construction Supply), fraudulently appropriated public funds to a use or purpose not in the due and lawful execution of that trust, property in his possession and/or under his control by virtue of that trust and/or secreted it with a fraudulent intent to appropriate it. That property had a value exceeding nine hundred fifty dollars (\$950), resulting in a loss to the County of Los Angeles of at least \$576,200 involving the contracts with NE Bridge Contractors.

Furthermore, as to count(s) 1, 2, 3, 4 and 5 the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by LOS ANGELES COUNTY DEPT. OF PUBLIC WORKS of, more than one hundred thousand dollars (\$100,000), thus subjecting to the additional punishment provided for in Penal Code sections 186.11(a)(3) and 12022.6(a)(1) and (2). This enhancement applies to JUAN ORTEGA ORDORICA, LEA MICHELLE SALAZAR, and LUIS ARMANDO CENICEROS, JR.

NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to Penal Code section 186.22 is imposed as part of the sentence for the above offense, within the meaning of Penal Code section 1170(h)(3).

Furthermore, as to count(s) 1, 2, 3, 4 and 5 the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by LOS ANGELES COUNTY DEPT. OF PUBLIC WORKS of, more than five hundred thousand dollars (\$500,000), thus subjecting to the additional punishment provided for in Penal Code sections 186.11(a)(2). This enhancement applies to JUAN ORTEGA ORDORICA and LEA MICHELLE SALAZAR.

NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to Penal Code section 186.22 is imposed as part of the sentence for the above offense, within the meaning of Penal Code section 1170(h)(3).

\* \* \* \*

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 BA506714, CONSISTS OF 5 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on July 1, 2022

SUSANA FRANCO

DECLARANT AND COMPLAINANT

GEORGE GASCÓN, DISTRICT ATTORNEY

DV.

CASPY HIGGINS DEPLITY

AGENCY: LACO D.A.

DR NO .:

I/O: SUSANA FRANCO

ID NO.: 648055

PHONE: (213) 713-5424

BUREAU OF

INVESTIGATION OCI201814463

OPERATOR: GS

PRELIM. TIME EST.: 8 HOUR(S)

<u>DEFENDANT</u> ORDORICA, JUAN ORTEGA	<u>CII NO.</u> 009450503	DOB_ 10/2/1973	BOOKING NO.	BAIL <u>RECOM'D</u> \$250,000	CUSTODY R'TN DATE
SALAZAR, LEA MICHELLE		10/31/1986	**	\$250,000	
CENICEROS, LUIS ARMANDO JR		11/27/1991		\$100,000	
BERUMEN, YOLANDA	024529994	4/1/1967		\$ 75,000	

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)

JUAI	ORTEGA ORDO	RICA		
Ct.	Charge	Charge Range	Allegation	Alleg. Effect
1	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	+2-3-5 State Prison
2	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
		,,,,,,	PC 186.11(a)(2)	+2-3-5 State Prison
3	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
	1	, ,	PC 186.11(a)(2)	+2-3-5 State Prison
4	PC 504&514	16,2,3 Prison+\$0-10,000	101011(4)(2)	+1
		1 1,2,2		+2-3-5 State Prison
5	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(2)	+1
		11,-,-	10 100.11(4)(2)	+2-3-5 State Prison
				· 2-3-3 State I fison
LEA	MICHELLE SALA	ZAR	19.	
Ct.	Charge	Charge Range	Allegation	Alleg. Effect
2	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
		, ,	PC 186.11(a)(2)	+2-3-5 State Prison
3	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
		, ,	PC 186.11(a)(2)	+2-3-5 State Prison
5	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
		, ,	PC 186.11(a)(2)	+2-3-5 State Prison
			10 100:11(2)(2)	2-3-5 State Hison
	ARMANDO CENI	CEROS, JR		
Ct.	<u>Charge</u>	Charge Range	<u>Allegation</u>	Alleg. Effect
1	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
2	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
3	PC 504&514	16,2,3 Prison+\$0-10,000	PC 186.11(a)(3)	+1
_	ANDA BERUMEN			
<u>Ct.</u> 3	Charge	Charge Range	Allegation	Alleg. Effect
	PC 504&514	16,2,3 Prison+\$0-10,000		
4	PC 504&514	16,2,3 Prison+\$0-10,000		

I order that the defendant(s) be held to answer there	efore and be admitted to bail in the sum of:
JUAN ORTEGA ORDORICA	Dollars
LEA MICHELLE SALAZAR	Dollars
LUIS ARMANDO CENICEROS, JR	Dollars
YOLANDA BERUMEN	Dollars
and be committed to the custody of the Sheriff of Learraignment in Superior Court will be:	os Angeles County until such bail is given. Date of
JUAN ORTEGA ORDORICA	in Dept
LEA MICHELLE SALAZAR	in Dept
LUIS ARMANDO CENICEROS, JR	in Dept
YOLANDA BERUMEN	in Dept
at: A.M.	a .
Data	
Date:	Committing Magistrate