

Date: 04/19/2024

By: Eva Reyes

RONALD J. FREITAS
District Attorney, County of San Joaquin
State Bar Number 135885
By: Donald Vaughn, SBN 232955
Chief Deputy District Attorney
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P.O. Box 990
Stockton, California 95201

Telephone: (209) 468-2400

Attorneys for Plaintiff

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

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

vs.

ANGELANN FLORES,

Defendant(s).

No. SO23-06303
SAN JOAQUIN COUNTY
SHERIFF'S OFFICE CASE
DA Case: 0964479

Complaint No: 202404195600

COMPLAINT

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

COUNT 1: Code Section PC 550(A)(4) MAKING FALSE OR FRAUDULENT CLAIMS

On or about November 15, 2023 through and including November 18, 2023 in the County of San Joaquin, California, ANGELANN FLORES did commit the crime of MAKING FALSE OR FRAUDULENT CLAIMS, in violation of Section 550(a)(4) of the Penal Code, a FELONY, who at the time and place last aforesaid did willfully, unlawfully, and knowingly present a false and fraudulent claim for the payment of a loss under a contract of insurance for the theft, destruction, damage, or conversion of a motor vehicle, a motor vehicle part, or

contents of a motor vehicle.

LEADERSHIP: Rule of Court 4.421(a)(4)

It is further alleged that said defendant, ANGELANN FLORES, induced others to participate in the commission of the crime and/or occupied a position of leadership or dominance over other participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section 1170(b).

PLANNING: Rule of 4.421(a)(8)

It is further alleged that said defendant, ANGELANN FLORES, committed the above crime in a way that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and Penal Code section 1170(b).

TRUST: Rule of Court 4.421(a)(11)

It is further alleged that said defendant, ANGELANN FLORES, committed the above crime by taking advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11) and Penal Code section 1170(b).

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 2: Code Section PC 424(A)1 EMBEZZLEMENT BY PUBLIC OFFICER

On or about January 1, 2023 through and including August 1, 2023 in the County of San Joaquin, California, ANGELANN FLORES did commit the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of Section 424(a)1 of the Penal Code, a FELONY, in that said defendant(s) did willfully and unlawfully appropriate to said defendant(s) own use public moneys of the Stockton Unified School District at a time when said defendant(s) was a person

1 charged with the receipt, safekeeping, transfer, or disbursement of said public moneys.

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3 LEADERSHIP: Rule of Court 4.421(a)(4)

4 It is further alleged that said defendant, ANGELANN FLORES, induced others to participate
5 in the commission of the crime and/or occupied a position of leadership or dominance over
6 other participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code
7 section 1170(b).

8
9 PLANNING: Rule of 4.421(a)(8)

10 It is further alleged that said defendant, ANGELANN FLORES, committed the above crime in
11 a way that indicates planning, sophistication, and/or professionalism, as set forth in Rule of
12 Court 4.421(a)(8) and Penal Code section 1170(b).

13
14 TRUST: Rule of Court 4.421(a)(11)

15 It is further alleged that said defendant, ANGELANN FLORES, committed the above crime
16 by taking advantage of a position of trust and/or confidence, as set forth in Rule of Court
17 4.421(a)(11) and Penal Code section 1170(b).

18
19 For a further and separate cause of complaint, being a different offense from but connected in
20 its commission with the charge(s) above, complainant further complains and says:

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22 **COUNT 3: Code Section PC 487(A) GRAND THEFT:MONEY/LABOR/PROPERTY**

23 On or about January 1, 2023 through and including August 1, 2023 in the County of San
24 Joaquin, California, ANGELANN FLORES did commit the crime of GRAND
25 THEFT:MONEY/LABOR/PROPERTY, in violation of Section 487(a) of the Penal Code, a
26 FELONY, who at the time and place last aforesaid, did willfully and unlawfully take money
27 and personal property of another of a value exceeding nine hundred fifty dollars (\$950.00), to-

wit: Stockton Unified School District Funds.

LEADERSHIP: Rule of Court 4.421(a)(4)

It is further alleged that said defendant, ANGELANN FLORES, induced others to participate in the commission of the crime and/or occupied a position of leadership or dominance over other participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code section 1170(b).

PLANNING: Rule of 4.421(a)(8)

It is further alleged that said defendant, ANGELANN FLORES, committed the above crime in a way that indicates planning, sophistication, and/or professionalism, as set forth in Rule of Court 4.421(a)(8) and Penal Code section 1170(b).

TRUST: Rule of Court 4.421(a)(11)

It is further alleged that said defendant, ANGELANN FLORES, committed the above crime by taking advantage of a position of trust and/or confidence, as set forth in Rule of Court 4.421(a)(11) and Penal Code section 1170(b).

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 4: Code Section PC 504A EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER

On or about January 1, 2023 through and including August 1, 2023 in the County of San Joaquin, California, ANGELANN FLORES did commit the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of Section 504a of the Penal Code, a FELONY, who at the time and place last aforesaid did fraudulently remove, conceal and

1 dispose of goods, chattels and effects, leased or let to her, him and them by an instrument in
2 writing, and personal property and effects of another in her, his and their possession, under a
3 contract of purchase not yet fulfilled, and was a person in possession of such goods, chattels
4 and effects knowing them to be subject to such lease and contract of purchase and did so
5 remove, conceal and dispose of the same with intent to injure and defraud the lessor and owner
6 thereof.

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8 LEADERSHIP: Rule of Court 4.421(a)(4)

9 It is further alleged that said defendant, ANGELANN FLORES, induced others to participate
10 in the commission of the crime and/or occupied a position of leadership or dominance over
11 other participants in its commission, as set forth in Rule of Court 4.421(a)(4) and Penal Code
12 section 1170(b).

13
14 PLANNING: Rule of 4.421(a)(8)

15 It is further alleged that said defendant, ANGELANN FLORES, committed the above crime in
16 a way that indicates planning, sophistication, and/or professionalism, as set forth in Rule of
17 Court 4.421(a)(8) and Penal Code section 1170(b).

18
19 TRUST: Rule of Court 4.421(a)(11)

20 It is further alleged that said defendant, ANGELANN FLORES, committed the above crime
21 by taking advantage of a position of trust and/or confidence, as set forth in Rule of Court
22 4.421(a)(11) and Penal Code section 1170(b).

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26 If the above-named defendant(s) is/are presently on probation in San Joaquin County, any
27 evidence presented at a preliminary hearing in the instant case will be used not only as a basis
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1 for a holding order in this case but also as evidence of a violation of probation and, at any
2 formal hearing on that violation of probation, the People will move the transcript of the
3 preliminary hearing into evidence as a basis for the violation.
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5 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that the
6 defendant and their attorney disclose to the People all information and materials described in
7 Penal Code Section 1054.3.
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9 I declare under penalty of perjury that the foregoing is true and correct except for those things
10 stated on information and belief and those I believe to be true.
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12 Executed on April 19, 2024, at Stockton, California.

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14 DONALD VAUGHN
15 Chief Deputy District Attorney

16 DV/cw
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FILED

SUPERIOR COURT-STOCKTON

SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN JOAQUIN

STOCKTON BRANCH

STEPHANIE BOHRER, CLERK

BY *Kiera Sedrow*
OFFICIAL

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

ANGELANN FLORES,

Defendant.

No. CR-2024-0004281

CR No. SO23-06303

DA No. 0964479

FELONY

SAN JOAQUIN COUNTY
SHERIFF'S OFFICE CASE
DDA VAUGHN

ARREST WARRANT

THE PEOPLE OF THE STATE OF CALIFORNIA,
TO ANY PEACE OFFICER OF THE STATE:

Complaint on oath having this day been made before me that the crimes of
PC550(A)(4) MAKING FALSE OR FRAUDULENT CLAIMS F
PC424(a)1 EMBEZZLEMENT BY PUBLIC OFFICER F
PC487(A) GRAND THEFT:MONEY/LABOR/PROPERTY F
PC504A EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER F
have been committed and accusing defendant thereof;

YOU ARE THEREFORE COMMANDED forthwith to arrest the above-named defendant and
bring him or her before the San Joaquin County Superior Court, 180 E. Weber Avenue,
Stockton, CA 95202, or in case of my absence or inability to act, before the nearest or most
accessible magistrate in San Joaquin County.

Defendant is to (\$) Bail
be admitted to bail (\$) Penalty Assessment
in the sum of (\$ 175,000) Total Bail

Defendant ☐ MAY or ☒ MAY NOT be released on signed promise to appear (§§ 818/853.6
PC). If for a felony, this warrant may be served at night.

Witness my hand and the seal of said Court, this 19th day of April, 2024.

Richard M. Mallett (Seal)
JUDGE OF THE SUPERIOR COURT

Richard M. Mallett

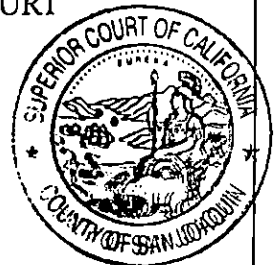
☐ Order for Arrest Warrant DENIED:

☐ No probable cause

☐ DA to issue letter to appear

☐ Incorrect charging

☐ Other



SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

BOOKING #: 24-05834

☒ STOCKTON BRANCH
180 E Weber Ave
Stockton CA 95202

☐ MANTECA BRANCH
315 E Center Street
Manteca CA 95336

☐ LODI BRANCH
217 W Elm Street
Lodi CA 95240

NOTICE, REFERRAL, O.R. AGREEMENT

PEOPLE vs. FLORES, ANGELANN LORRAINE Prob. #323682 DOB: 03/14/1977 Date: 04/19/24

COURT APPEARANCE DATE	05/06/24 @1:30P.M.	Dept.	8B/8C	Level	LEVEL 2
COURT APPEARANCE DATE		Dept.		Level	
COURT APPEARANCE DATE		Dept.		Level	
CHARGES AW:CR-2024-0004281 (PC 487A), PC 504A, PC 424(A)1, PC 550(A)(4))					

AS CONDITIONS FOR BEING RELEASED ON HIS/HER OWN RECOGNIZANCE/BAIL, DEFENDANT AGREES TO ALL OF THE FOLLOWING CONDITIONS:

- Obey all laws and promise to obey all reasonable conditions of release imposed by the court or magistrate.
- Have no new citations.
- Appear at all times and places as ordered by the Court or Magistrate releasing Defendant and as ordered by any Court in which, or by any magistrate before whom, the charge is subsequently pending.
- Understand that the willful failure to appear to answer the charge(s) herein is a separate violation, regardless of the disposition of this case, of which punishment may be: If **Misdemeanor**; six months in jail and/or \$1,000 fine. If **Felony**; three years in state prison and/or \$10,000 fine.
- Not leave the state without this Court's permission.
- Waive extradition if Defendant fails to appear as required and is apprehended outside the State of California.
- Stay 100 yards away from the victim(s) place of residence, employment, and school, and not contact victim, or have anyone contact victim on Defendant's behalf.
- Not harass, annoy, or threaten victim(s).
- Not drive a motor vehicle without a valid California driver's license in possession/and proper insurance.
- Not operate a motor vehicle after consuming any alcohol.
- Abstain from the use of drugs or narcotics.
- Not associate with drug dealers or drug users, and/or known gang members.
- Not possess weapons, firearms, or deadly weapons.
- Submit to drug, narcotic, or alcohol test as directed by Probation Officer or Peace Officer.
- Submit Defendant's person, vehicle, place of residence or area over which Defendant has had control to search for and seizure of Unlimited at any time of the day or night, with or without a search warrant, probable cause, or defendant's consent, as directed by any peace officer.
- Do not own, purchase, receive, possess, or have under his or her control any firearms, ammunition, and ammunition feeding devices, including but not limited to magazines.
- Report to and begin participation in Pretrial Monitoring within 1 business day of release. See attached reporting instructions.
- Choose an item.

FILED
APR 22 2024
STEPHANIE BOHRER, CLERK
BY *[Signature]* DEPUTY

THESE CONDITIONS REMAIN IN EFFECT UNTIL MODIFIED BY THE COURT. IF NO CASE IS FILED RELATED TO THIS BOOKING BY THE LISTED COURT APPEARANCE DATE ABOVE, THESE CONDITIONS SHALL EXPIRE ON THAT DATE.

I, (Officer) *Miller* 395, have interpreted this form to the above-named defendant.

I have received a copy, read and understand the above conditions of agreement:

[Signature]
DEFENDANT'S SIGNATURE

3948 GOSTAGE WAY
STREET ADDRESS

(209) 740-3436
TELEPHONE NO.

STOCKTON, CA 95206
CITY AND STATE

PRETRIAL COPY

[Signature]
PTS 17 (8/16)

APR 22 2024