

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	
	)	
Plaintiff	)	
	)	
vs.	)	<i>FELONY COMPLAINT</i>
	)	
Michael Lynn Cooper,	)	
	)	
Defendant	)	DA CASE NO 2020-00-0042523

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The undersigned is informed and believes that:

COUNT 1.

On or about April 16, 2020, in the above named judicial district, the crime of **ENGAGING IN A MOTOR VEHICLE SPEED CONTEST ON A HIGHWAY CAUSING BODILY INJURY**, in violation of **VEHICLE CODE SECTION 23109(e)(2)**, a misdemeanor, was committed by **Michael Lynn Cooper**, who engaged in a motor vehicle speed contest on a highway proximately causing bodily injury to **Travis Horrington**.

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COUNT 2.

On or about April 16, 2020, in the above named judicial district, the crime of **DRIVING OVER 100 MPH ON A HIGHWAY**, in violation of **VEHICLE CODE SECTION 22348(b)**, an infraction, was committed by **Michael Lynn Cooper**, who did unlawfully drive a vehicle at 118 MPH on Holt Blvd. in the City of Ontario, state of California.

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COUNT 3.

On or about April 16, 2020, in the above named judicial district, the crime of **FALSE INFORMATION TO A POLICE OFFICER**, in violation of **VEHICLE CODE SECTION 31**, a misdemeanor, was committed by **Michael Lynn Cooper**, who did unlawfully give information to a peace officer in the performance of his duties under the provisions of the Vehicle Code of California when said defendant knew that such information was false.

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COUNT 4.

On or about April 17, 2020, in the above named judicial district, the crime of **CONCEALMENT OF, OR FAILURE TO, DISCLOSE MATERIAL FACT REGARDING INSURANCE BENEFITS**, in violation of **PENAL CODE SECTION 550(b)(3)**, a felony, was committed by **Michael Lynn Cooper**, who did willfully conceal and/or knowingly fail to disclose the occurrence of an event that affected his initial or continued right or entitlement to an insurance benefits or payment, or the amount of any benefit or payment to which she may have been entitled, to wit: *Defendant concealed from Esurance Adjusters that he was traveling at 118 MPH while racing another vehicle on a city street in downtown Ontario at the time he crashed his vehicle.*

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COUNT 5.

On or about April 21, 2020, in the above named judicial district, the crime of **GRAND THEFT**, in violation of **PENAL CODE SECTION 487(a)**, a felony, was committed by **Michael Lynn Cooper**, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money by fraud from Esurance, specifically, \$35,321.65.

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COUNT 6.

On or about May 8, 2020, in the above named judicial district, the crime of **INSURANCE FRAUD**, in violation of **PENAL CODE SECTION 550(b)(1)**, a felony, was committed by **Michael Lynn Cooper**, who presented an oral statement as part of and in support of a claim for payment and other benefit to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact, to wit: *Defendant concealed from Esurance Adjusters that he was traveling at 118 MPH while racing another vehicle on a city street in downtown Ontario at the time he crashed and specifically falsely claimed that he was not racing at the time of his vehicle crash.*

\* \* \* \* \*

**NOTICE TO DEFENDANT AND DEFENDANT’S ATTORNEY**  
***Pursuant to Penal Code Sections 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.***

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 6 COUNTS.

Executed at San Bernardino, California, on October 19, 2020.

*J. Barbo*

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**C.D.I. Det. J. Barbo**  
**DECLARANT AND COMPLAINANT**

Agency: Dept of Insurance - Rancho

Prelim Est. 01:30

Defendant	Birth Date	Booking No.	CII No.	NCIC
<b>Michael Lynn Cooper</b>	03/02/1965			