

On or about August 29, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of John Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of John Doe.

COUNT 4

On or about September 28, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of John Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of John Doe.

COUNT 5

On or about August 29, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of John Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of John Doe.

COUNT 6

On or about September 14, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of John Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of John Doe.

COUNT 7

On or about August 29, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of Jane Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Jane Doe.

COUNT 8

On or about September 8, 2020, in the above named judicial district, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully obtain personal identifying information of Jane Doe and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Jane Doe.

COUNT 9

On or about August 29, 2020, in the above named judicial district, the crime of GRAND THEFT OF ACCESS CARD ACCOUNT INFORMATION, in violation of PENAL CODE SECTION 484e(d), a felony, was committed by Ashley Darlene Kelly, who did unlawfully acquire and retain possession of access card account information with respect to an access card validly issued to another person, without the cardholder's and issuer's consent, with the intent to use it fraudulently.

COUNT 10

On or about August 29, 2020, in the above named judicial district, the crime of GRAND THEFT OF ACCESS CARD ACCOUNT INFORMATION, in violation of PENAL CODE SECTION

484e(d), a felony, was committed by Ashley Darlene Kelly, who did unlawfully acquire and retain possession of access card account information with respect to an access card validly issued to another person, without the cardholder's and issuer's consent, with the intent to use it fraudulently.

COUNT 11

On or about August 29, 2020, in the above named judicial district, the crime of GRAND THEFT OF ACCESS CARD ACCOUNT INFORMATION, in violation of PENAL CODE SECTION 484e(d), a felony, was committed by Ashley Darlene Kelly, who did unlawfully acquire and retain possession of access card account information with respect to an access card validly issued to another person, without the cardholder's and issuer's consent, with the intent to use it fraudulently.

COUNT 12

On or about August 29, 2020, in the above named judicial district, the crime of GRAND THEFT OF ACCESS CARD ACCOUNT INFORMATION, in violation of PENAL CODE SECTION 484e(d), a felony, was committed by Ashley Darlene Kelly, who did unlawfully acquire and retain possession of access card account information with respect to an access card validly issued to another person, without the cardholder's and issuer's consent, with the intent to use it fraudulently.

COUNT 13

On or about August 29, 2020, in the above named judicial district, the crime of FALSE STATEMENT, REPRESENTATION OR CONCEALMENT, in violation of UNEMPLOYMENT INSURANCE CODE SECTION 2101(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully make a false statement and representation and did knowingly fail to disclose a material fact to obtain, increase, reduce and defeat a benefit and payment pursuant to subsection 1 of this section.

COUNT 14

On or about August 29, 2020, in the above named judicial district, the crime of FALSE STATEMENT, REPRESENTATION OR CONCEALMENT, in violation of UNEMPLOYMENT INSURANCE CODE SECTION 2101(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully make a false statement and representation and did knowingly fail to disclose a material fact to obtain, increase, reduce and defeat a benefit and payment pursuant to subsection 1 of this section.

COUNT 15

On or about August 29, 2020, in the above named judicial district, the crime of FALSE STATEMENT, REPRESENTATION OR CONCEALMENT, in violation of UNEMPLOYMENT INSURANCE CODE SECTION 2101(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully make a false statement and representation and did knowingly fail to disclose a material fact to obtain, increase, reduce and defeat a benefit and payment pursuant to subsection 1 of this section.

COUNT 16

On or about August 29, 2020, in the above named judicial district, the crime of FALSE STATEMENT, REPRESENTATION OR CONCEALMENT, in violation of UNEMPLOYMENT INSURANCE CODE SECTION 2101(a), a felony, was committed by Ashley Darlene Kelly, who did willfully and unlawfully make a false statement and representation and did knowingly fail to disclose a material fact to obtain, increase, reduce and defeat a benefit and payment pursuant to subsection 1 of this section.

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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 16 COUNT(S).

Executed at San Bernardino, California, on February 4, 2021.

D. Tulcan

D. Tulcan

DECLARANT AND COMPLAINANT

Agency: Rancho Cucamonga Police Dept

Prelim Est. 00:00

Defendant

Ashley Darlene Kelly

Birth Date

11/28/1988

Booking No.

2101342040

CII No.

A39002846

NCIC