

1 TORI VERBER SALAZAR
District Attorney
2 San Joaquin County
State Bar No. 213636
3 By: MARJORIE BURRISE
Deputy District Attorney
4 222 E. Weber Avenue
5 Stockton, CA 95202
6 209.468.2400; Fax 209.465.0371
7 Attorneys for Plaintiff

FILED
SUPERIOR COURT-STOCKTON

2019 MAY 24 AM 6:58

ROSA JUNQUEIRA, CLERK

Jenny Sanchez
DEPUTY

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN
9 Stockton Branch

10 The People of the State of California,
11 Plaintiff,

No. 15AA09907
CDI CASE
DA Case: CR-2018-4180948

12 v.

Court No:

13
14 ALEJANDRO CESAR MARTINEZ
CR-2018-0013632

AMENDED
COMPLAINT

15 Aka:
16 CORDOBA, ALEX
17 CORDOBA, ROBERT
CORDOBA, ROBERTO
18 HERNANDEZ, CARLOS
LESPIER, REY
19 RASADO JR, ANIBAL
RASADO, ROBERT
20 ROSADO, GUS
SANCHEZ, ANTHONY

21 And Does 1-12
22 DBA: Lion Legal Group, Inc.

23 GLORIA ELIZABETH AYALA
SERVIO A GOMEZ

24
25
26 Defendant (s).
27
28

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

3
4 **COUNT 1: FIRST DEGREE BURGLARY, PERSON PRESENT PC.459**

5 On or about November 5, 2014, in the County of San Joaquin,
6 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA and Does
7 1-12, DBA: "Lions Legal Group, Inc.", did commit the crime of
8 RESIDENTIAL BURGLARY in the FIRST DEGREE, in violation of 459 of
9 the Penal Code, a FELONY, who at the time and place last aforesaid,
10 did willfully and unlawfully enter an inhabited dwelling house and
11 trailer coach and inhabited portion of a building occupied by JULIO
12 GARCIA with the intent to commit larceny and any felony. "NOTICE:
13 The above offense is a serious felony within the meaning of Penal
14 Code Section 1192.7(c) and a violent felony within the meaning of
15 Penal Code 667.5(c)". It is further alleged that the above offense
16 is a violation of Penal Code Section 462(a). It is further alleged
17 that the above is a violent felony within the meaning of Penal Code
18 667.5(c) in that another person, other than an accomplice, was
19 present in the residence during the commission of the above
20 offense.
21

22
23 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

24 On June 15, 2015 Farmers Insurance informed Julio Cesar Garcia that
25 ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba Lion Legal
26 Group, Inc. was not an attorney and that JULIO CESAR GARCIA'S
27

1 \$15,000.00 settlement check was sent to Lions Legal Group, Inc. and
2 had been cashed. ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
3 Lion Legal Group, Inc. fled to Mexico from approximately May 12,
4 2015 through September 28, 2018; tolling of time suspended until
5 May 12, 2018 pursuant to Penal Code section 803 (d).
6

7 For a further and separate cause of complaint, being a different
8 offense from but connected in its commission with the charge(s)
9 above, complainant further complains and says:
10

11
12 **COUNT 2: FRAUDULENT CLAIM FOR INSURANCE PAYMENT PC.550 (A) (1)**

13 On or about October 29, 2014, in the County of San Joaquin,
14 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, "dba
15 Lions Legal Group, Inc." and Does 1-12, did commit the crime of
16 INSURANCE FRAUD, in violation of Section 550(a)(1) of the Penal
17 Code, a FELONY, who at the time and place last aforesaid, did
18 willfully, unlawfully and knowingly present and cause to be
19 presented a false and fraudulent claim for the payment of a loss
20 and payment of a loss under a contract of insurance: To Allstate
21 Insurance on behalf of Julio Cesar Garcia and Jose Puentes.
22

23
24 For a further and separate cause of complaint, being a different
25 offense from but connected in its commission with the charge(s)
26 above, complainant further complains and says:
27

1 **COUNT 3: GRAND THEFT OF PERSONAL PROPERTY OVER \$950 PC.487(a)**

2 On or about December 11, 2014, in the County of San Joaquin,
3 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, and
4 GLORIA ELIZABETH AYALA, dba Lions Legal Group, Inc. and Does 1-12,
5 did commit the crime of GRAND THEFT OF PERSONAL PROPERTY OVER
6 \$950.00 , in violation of Section 487(a) of the Penal Code, a
7 FELONY, who at the time and place last aforesaid, did willfully and
8 unlawfully take money and personal property of another of a value
9 exceeding nine hundred fifty dollars (\$950.00), to-wit: Insurance
10 claim settlement check from Allstate Insurance payable to Julio
11 Cesar Garcia in the amount of \$15,000.00, the property of JULIO
12 CESAR GARCIA, with the intent to permanently deprive Mr. Garcia of
13 his insurance settlement monies. LOSS: \$15,000, JULIO CESAR GARCIA.
14

15
16 For a further and separate cause of complaint, being a different
17 offense from but connected in its commission with the charge(s)
18 above, complainant further complains and says:
19

20 **COUNT 4: FIRST DEGREE BURGLARY, PERSON PRESENT PC.459**

21 On or about August 14, 2013, in the County of San Joaquin,
22 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
23 Lions Legal Group, Inc., and Does 1-12, did commit the crime of
24 RESIDENTIAL BURGLARY in the FIRST DEGREE, in violation of 459 of
25 the Penal Code, a FELONY, who at the time and place last aforesaid,
26 did willfully and unlawfully enter an inhabited dwelling house and
27

1 trailer coach and inhabited portion of a building occupied by JULIO
2 PEREZ-BAEZ with the intent to commit larceny and any felony.

3 "NOTICE: The above offense is a serious felony within the meaning
4 of Penal Code Section 1192.7(c) and a violent felony within the
5 meaning of Penal Code 667.5(c)". It is further alleged that the
6 above offense is a violation of Penal Code Section 462(a). It is
7 further alleged that the above is a violent felony within the
8 meaning of Penal Code 667.5(c) in that another person, other than
9 an accomplice, was present in the residence during the commission
10 of the above offense.
11

12
13 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

14 It is further alleged, pursuant to Penal Code Section 803(d), that
15 the statute of limitation for each offense set forth above is
16 tolled for a period of time for up to three (3) years after each
17 offense was committed, equal to the period of time that ALEJANDRO
18 CESAR MARTINEZ was out of the State of California.
19

20 For a further and separate cause of complaint, being a different
21 offense from but connected in its commission with the charge(s)
22 above, complainant further complains and says:
23

24
25 **COUNT 5: FRAUDULENT CLAIM FOR INSURANCE PAYMENT PC.550(A)(1)**

26 On or about August 21, 2013, in the County of San Joaquin,
27 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
28

1 Lions Legal Group, Inc., and Does 1-12 did commit the crime of
2 INSURANCE FRAUD, in violation of Section 550(a)(1) of the Penal
3 Code, a FELONY, who at the time and place last aforesaid, did
4 willfully, unlawfully and knowingly present and cause to be
5 presented a false and fraudulent claim for the payment of a loss
6 and payment of a loss under a contract of insurance. ALEJANDRO
7 CESAR MARTINEZ, aka ROBERTO CORDOBA, dba Lions Legal Group, Inc.
8 filed a claim with Mercury Insurance alleging Heriberto Perez-
9 Inzunza was injured in an auto collision.

10
11
12 **STATUTE OF LIMITATIONS-LATE DISCOVERY PC.803 (C)**

13 It is further alleged that the above violation was not discovered
14 until May 7, 2014 by Rhonda Leslie of California Department of
15 Insurance, and that no victim of said violation and no law
16 enforcement agency chargeable with the investigation and
17 prosecution of said violation had actual and constructive knowledge
18 of said violation prior to said date because on or about May 7,
19 2014 Mercury Insurance learned that ALEJANDRO CESAR MARTINEZ, aka
20 ROBERTO CORDOBA, dba Lions Legal, was not an attorney in the state
21 of California and that the medical bills Lions Legal Group, Inc.
22 submitted did not correspond to an existing medical provider.
23 Department of Insurance did not learn that ALEJANDRO CESAR
24 MARTINEZ, aka ROBERTO CORDOBA, dba Lions Legal, within the meaning
25 of Penal Code Section 803(c).
26
27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 6: GRAND THEFT OF PERSONAL PROPERTY OVER \$950 PC.487(a)**

6 On or about September 26, 2013, in the County of San Joaquin,
7 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, and
8 GLORIA ELIZABETH AYALA, dba Lions Legal Group, Inc., does 1-12, did
9 commit the crime of GRAND THEFT OF PERSONAL PROPERTY OVER \$950.00 ,
10 in violation of Section 487(a) of the Penal Code, a FELONY, who at
11 the time and place last aforesaid, did willfully and unlawfully
12 take money and personal property of another of a value exceeding
13 nine hundred fifty dollars (\$950.00), to-wit: insurance claim
14 settlement check from Mercury Insurance payable to Julio Perez-Baez
15 in the amount of \$3,817.34, the property of JULIO PEREZ-BAEZ, with
16 the intent to permanently deprive Mr. Perez-Baez of the full amount
17 of his insurance settlement monies. LOSS: \$3,817.34, JULIO PEREZ-
18 BAEZ.
19

20
21 **STATUTE OF LIMITATIONS-LATE DISCOVERY PC.803(C)**

22 It is further alleged that the above violation was not discovered
23 until May 7, 2014 by Rhonda Leslie of California Department of
24 Insurance, and that no victim of said violation and no law
25 enforcement agency chargeable with the investigation and
26 prosecution of said violation had actual and constructive knowledge
27
28

1 of said violation prior to said date because Department of
2 Insurance did not learn that ALEJANDRO CESAR MARTINEZ, aka ROBERTO
3 CORDOBA, dba Lions Legal was involved in this matter until August
4 29, 2017 when Investigator Rhonda Leslie requested files from
5 Mercury Insurance for claims involving Julio Perez-Baez. ALEJANDRO
6 CESAR MARTINEZ fled to Mexico from approximately May 12, 2015
7 through September 28, 2018; tolling of time suspended until May 12,
8 2018 pursuant to Penal Code section 803 (d).

9
10
11 For a further and separate cause of complaint, being a different
12 offense from but connected in its commission with the charge(s)
13 above, complainant further complains and says:

14
15 **COUNT 7: GRAND THEFT:MONEY/LABOR/PROPERTY PC.487 (A)**

16 On or about December 11, 2014, in the County of San Joaquin,
17 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CARDOBA and Does
18 1-12, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka
19 GLORIA SUAREZ, dba Lions Legal Group, Inc. did commit the crime of
20 GRAND THEFT:MONEY/LABOR/PROPERTY, in violation of Section 487(a) of
21 the Penal Code, a FELONY, who at the time and place last aforesaid,
22 did willfully and unlawfully take money and personal property of
23 another of a value exceeding nine hundred fifty dollars (\$950.00),
24 to-wit: insurance claim settlement check from Allstate Insurance
25 payable to Jose Puentes in the amount of \$15,000.00, the property

26
27 ;
28

1 of JOSE PUENTES, with the intent to permanently deprive Mr. Puentes
2 of his insurance settlement monies. LOSS: \$15,000.00, JOSE PUENTES.

3
4 For a further and separate cause of complaint, being a different
5 offense from but connected in its commission with the charge(s)
6 above, complainant further complains and says:

7
8 **COUNT 8: GRAND THEFT:MONEY/LABOR/PROPERTY PC.487 (A)**

9
10 On or about February 4, 2015, in the County of San Joaquin,
11 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CARDOBA and Does
12 1-12, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka
13 GLORIA SUAREZ, dba Lions Legal Group, Inc., did commit the crime of
14 GRAND THEFT:MONEY/LABOR/PROPERTY, in violation of Section 487(a) of
15 the Penal Code, a FELONY, who at the time and place last aforesaid,
16 did willfully and unlawfully take money and personal property of
17 another of a value exceeding nine hundred fifty dollars (\$950.00),
18 to-wit: insurance claim settlement check from Farmers Insurance
19 payable to Jose Puentes in the amount of \$25,000.00, the property
20 of JOSE PUENTES, with the intent to permanently deprive Mr. Puentes
21 of his insurance settlement monies. However, it was a duplicate
22 claim for injuries of which Mr. Puentes was not entitled to. LOSS:
23 \$25,000.00, FARMERS INSURANCE.
24
25
26
27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 9: INSURANCE FRAUD PC.550 (A) (2)**

6 On or about October 29, 2014 - January 16, 2015, in the County of
7 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
8 CORDOBA, dba Lions Legal Group, Inc. Does: 1-12, did commit the
9 crime of INSURANCE FRAUD, in violation of Section 550(a)(2) of the
10 Penal Code, a FELONY, who at the time and place last aforesaid, did
11 willfully, unlawfully, and knowingly aid, abet, solicit, and
12 conspire with another and did knowingly and with the intent to
13 defraud present multiple claims for the same loss and injury,
14 including presentation of multiple claims to more than one insurer,
15 to wit: ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba Lions
16 Legal Group, Inc. submitted a claim to Allstate Insurance and
17 Farmers Insurance for Jose Puentes' injuries.
18
19

20 **COUNT 10: MAKING FALSE OR FRAUDULENT CLAIMS PC.550 (A) (5)**

21 On or about January 16, 2015 - January 21, 2015, in the County of
22 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
23 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
24 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-21, did
25 commit the crime of MAKING FALSE OR FRAUDULENT CLAIMS, in violation
26 of 550(a)(5) of the Penal Code, a FELONY, in that said defendant
27
28

1 did aid, abet, solicit, conspire with another and did knowingly
2 prepare, make and subscribe a writing, with intent to present and
3 use it, and to allow it to be presented in support of a false and
4 fraudulent claim.

5
6 For a further and separate cause of complaint, being a different
7 offense from but connected in its commission with the charge(s)
8 above, complainant further complains and says:

9
10
11 **COUNT 11: MAKING FALSE OR FRAUDULENT CLAIMS PC.550 (A) (6)**

12 On or about August 21, 2013 - April 29, 2014, in the County of San
13 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
14 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
15 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
16 crime of MAKING FALSE OR FRAUDULENT CLAIMS, in violation of Section
17 550(a)(6) of the Penal Code, a FELONY, in that said defendant(s)
18 did willfully, unlawfully, and knowingly aid, abet, solicit and
19 conspire with another and did knowingly make and cause to be made a
20 false and fraudulent claim for payment of a health care benefit, to
21 wit: Lions Legal Group, Inc. submitted medical bills to Mercury
22 Insurance for medical treatment of JULIO PEREZ-BAEZ, MIGUEL MATA,
23 AND HERIBERTO PEREZ-INZUNZA.
24

1 **STATUTE OF LIMITATIONS-LATE DISCOVERY PC.803 (C)**

2 It is further alleged that the above violation was not discovered
3 until August 29, 2017 by Rhonda Leslie of California Department of
4 Insurance, and that no victim of said violation and no law
5 enforcement agency chargeable with the investigation and
6 prosecution of said violation had actual and constructive knowledge
7 of said violation prior to said date because Rhonda Leslie of
8 California Department of Insurance Because: On or about May 7, 2014
9 Mercury Insurance learned that ALEJANDRO CESAR MARTINEZ, aka
10 ROBERTO CORDOBA, dba Lions Legal, was not an attorney in the state
11 of California and that the medical bills Lions Legal Group, Inc.
12 submitted did not correspond to an existing medical provider.
13 Department of Insurance did not learn that ALEJANDRO CESAR
14 MARTINEZ, aka ROBERTO CORDOBA, dba Lions Legal was involved in this
15 matter until August 29, 2017 when Investigator Rhonda Leslie
16 requested files from Mercury Insurance in this matter. ALEJANDRO
17 CESAR MARTINEZ fled to Mexico from approximately May 12, 2015
18 through September 28, 2018; tolling of time suspended until May 12,
19 2018 pursuant to Penal Code section 803 (d).
20

21
22
23 For a further and separate cause of complaint, being a different
24 offense from but connected in its commission with the charge(s)
25 above, complainant further complains and says:
26
27
28

1 **COUNT 12: INSURANCE FRAUD PC.550(B) (1)**

2 On or about January 16, 2015 - January 21, 2015, in the County of
3 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
4 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
5 aka GLORIA SUAREZ, dba Lions Legal Group, Inc. does 1-12, did
6 commit the crime of INSURANCE FRAUD, in violation of Section
7 550(b) (1) of the Penal Code, a FELONY, in that said defendant(s)
8 assisted, conspired with another to and presented and caused to be
9 presented a written and oral statement as part of, and in support
10 of and opposition to, a claim for payment and other benefit to an
11 insurance policy, knowing that the statement contained false and
12 misleading information concerning a material fact, to-wit: Lions
13 Legal Group, Inc. submitted documentation to Allstate Insurance in
14 support of an insurance claim for Julio Cesar Garcia.
15

16
17 For a further and separate cause of complaint, being a different
18 offense from but connected in its commission with the charge(s)
19 above, complainant further complains and says:
20

21 **COUNT 13: INSURANCE FRAUD PC.550(B) (1)**

22 On or about November 6, 2014 - January 21, 2015, in the County of
23 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
24 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
25 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-12, did
26 commit the crime of INSURANCE FRAUD, in violation of Section
27

1 550(b)(1) of the Penal Code, a FELONY, in that said defendant(s)
2 assisted, conspired with another to and presented and caused to be
3 presented a written and oral statement as part of, and in support
4 of and opposition to, a claim for payment and other benefit to an
5 insurance policy, knowing that the statement contained false and
6 misleading information concerning a material fact, to-wit: Lions
7 Legal Group, Inc. submitted documentation to Allstate Insurance in
8 support of an insurance claim for Jose Puentes.
9

10
11 For a further and separate cause of complaint, being a different
12 offense from but connected in its commission with the charge(s)
13 above, complainant further complains and says:
14

15 **COUNT 14: INSURANCE FRAUD PC.550(B)(1)**

16 On or about November 6, 2014 - January 21, 2015, in the County of
17 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
18 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
19 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-12, did
20 commit the crime of INSURANCE FRAUD, in violation of Section
21 550(b)(1) of the Penal Code, a FELONY, in that said defendant(s)
22 assisted, conspired with another to and presented and caused to be
23 presented a written and oral statement as part of, and in support
24 of and opposition to, a claim for payment and other benefit to an
25 insurance policy, knowing that the statement contained false and
26 misleading information concerning a material fact, to-wit: Lions
27
28

1 Legal Group, Inc. submitted documentation to Farmers Insurance in
2 support of an insurance claim for Jose Puentes.

3
4 For a further and separate cause of complaint, being a different
5 offense from but connected in its commission with the charge(s)
6 above, complainant further complains and says:

7
8 **COUNT 15: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

9
10 On or about January 16, 2015 - January 21, 2015, in the County of
11 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
12 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
13 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-12, did
14 commit the crime of MAKING FALSE STATEMENT IN AN INSURANCE CLAIM,
15 in violation of Section 550(b) (2) of the Penal Code, a FELONY, who
16 at the time and place last aforesaid did willfully, unlawfully, and
17 knowingly prepare and make a written and oral statement that was
18 intended to be presented to an insurer in connection with and in
19 support of a claim and payment and other benefits pursuant to an
20 insurance policy, knowing said statement contained false and
21 misleading information concerning a material fact, to-wit: Lions
22 Legal Group, Inc. submitted documentation to Allstate Insurance in
23 support of an insurance claim for Julio Cesar Garcia.
24
25
26
27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 16: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

6 On or about November 6, 2014 - January 21, 2015, in the County of
7 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
8 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
9 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-12, did
10 commit the crime of MAKING FALSE STATEMENT IN AN INSURANCE CLAIM,
11 in violation of Section 550(b) (2) of the Penal Code, a FELONY, who
12 at the time and place last aforesaid did willfully, unlawfully, and
13 knowingly prepare and make a written and oral statement that was
14 intended to be presented to an insurer in connection with and in
15 support of a claim and payment and other benefits pursuant to an
16 insurance policy, knowing said statement contained false and
17 misleading information concerning a material fact, to-wit: Lions
18 Legal Group, Inc. submitted documentation to Allstate Insurance in
19 support of an insurance claim for Jose Puentes.
20
21

22 For a further and separate cause of complaint, being a different
23 offense from but connected in its commission with the charge(s)
24 above, complainant further complains and says:
25
26
27
28

1 **COUNT 17: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

2 On or about November 6, 2014 - January 21, 2015, in the County of
3 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
4 CORDOBA, dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA,
5 aka GLORIA SUAREZ, dba Lions Legal Group, Inc., does 1-12, did
6 commit the crime of MAKING FALSE STATEMENT IN AN INSURANCE CLAIM,
7 in violation of Section 550(b) (2) of the Penal Code, a FELONY, who
8 at the time and place last aforesaid did willfully, unlawfully, and
9 knowingly prepare and make a written and oral statement that was
10 intended to be presented to an insurer in connection with and in
11 support of a claim and payment and other benefits pursuant to an
12 insurance policy, knowing said statement contained false and
13 misleading information concerning a material fact, to-wit: Lions
14 Legal Group, Inc. submitted documentation to Farmers Insurance in
15 support of an insurance claim for Jose Puentes.
16

17
18 For a further and separate cause of complaint, being a different
19 offense from but connected in its commission with the charge(s)
20 above, complainant further complains and says:
21

22 **COUNT 18: INSURANCE FRAUD PC.550(B) (1)**

23 On or about August 21, 2013 - April 29, 2014, in the County of San
24 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
25 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
26 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
27

1 crime of INSURANCE FRAUD, in violation of Section 550(b)(1) of the
2 Penal Code, a FELONY, in that said defendant(s) assisted, conspired
3 with another to and presented and caused to be presented a written
4 and oral statement as part of, and in support of and opposition to,
5 a claim for payment and other benefit to an insurance policy,
6 knowing that the statement contained false and misleading
7 information concerning a material fact, to-wit: Lions Legal Group,
8 Inc. submitted documentation to Mercury Insurance in support of an
9 insurance claim for Julio Perez-Baez.
10

11
12 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

13 It is further alleged, pursuant to Penal Code Section 803(d), that
14 the statute of limitation for each offense set forth above is
15 tolled for a period of time for up to three (3) years after each
16 offense was committed, equal to the period of time that ALEJANDRO
17 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
18 California.
19

20 For a further and separate cause of complaint, being a different
21 offense from but connected in its commission with the charge(s)
22 above, complainant further complains and says:
23

24
25 **COUNT 19: INSURANCE FRAUD PC.550(B)(1)**

26 On or about August 21, 2013 - April 29, 2014, in the County of San
27 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
28

1 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
2 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
3 crime of INSURANCE FRAUD, in violation of Section 550(b)(1) of the
4 Penal Code, a FELONY, in that said defendant(s) assisted, conspired
5 with another to and presented and caused to be presented a written
6 and oral statement as part of, and in support of and opposition to,
7 a claim for payment and other benefit to an insurance policy,
8 knowing that the statement contained false and misleading
9 information concerning a material fact, to-wit: Lions Legal Group,
10 Inc. submitted documentation to Mercury Insurance in support of an
11 insurance claim for Miguel Mata.
12

13
14 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

15 It is further alleged, pursuant to Penal Code Section 803(d), that
16 the statute of limitation for each offense set forth above is
17 tolled for a period of time for up to three (3) years after each
18 offense was committed, equal to the period of time that ALEJANDRO
19 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
20 California.
21

22
23 For a further and separate cause of complaint, being a different
24 offense from but connected in its commission with the charge(s)
25 above, complainant further complains and says:
26
27
28

1 **COUNT 20: INSURANCE FRAUD PC.550(B) (1)**

2 On or about August 21, 2013 - April 29, 2014, in the County of San
3 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
4 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
5 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
6 crime of INSURANCE FRAUD, in violation of Section 550(b)(1) of the
7 Penal Code, a FELONY, in that said defendant(s) assisted, conspired
8 with another to and presented and caused to be presented a written
9 and oral statement as part of, and in support of and opposition to,
10 a claim for payment and other benefit to an insurance policy,
11 knowing that the statement contained false and misleading
12 information concerning a material fact to-wit: Lions Legal Group,
13 Inc. submitted documentation to Mercury Insurance in support of an
14 insurance claim for Heribert Perez-Inzunza.
15

16
17 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

18 It is further alleged, pursuant to Penal Code Section 803(d), that
19 the statute of limitation for each offense set forth above is
20 tolled for a period of time for up to three (3) years after each
21 offense was committed, equal to the period of time that ALEJANDRO
22 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
23 California.
24

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

4
5 **COUNT 21: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

6 On or about August 21, 2013 - April 29, 2014, in the County of San
7 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
8 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
9 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
10 crime of MAKING FALSE STATEMENT IN AN INSURANCE CLAIM, in violation
11 of Section 550(b) (2) of the Penal Code, a FELONY, who at the time
12 and place last aforesaid did willfully, unlawfully, and knowingly
13 prepare and make a written and oral statement that was intended to
14 be presented to an insurer in connection with and in support of a
15 claim and payment and other benefits pursuant to an insurance
16 policy, knowing said statement contained false and misleading
17 information concerning a material fact to-wit: Lions Legal Group,
18 Inc. submitted documentation to Mercury Insurance in support of an
19 insurance claim for Julio Perez-Baez.
20

21
22 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

23 It is further alleged, pursuant to Penal Code Section 803(d), that
24 the statute of limitation for each offense set forth above is
25 tolled for a period of time for up to three (3) years after each
26 offense was committed, equal to the period of time that ALEJANDRO
27

1 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
2 California.

3
4 For a further and separate cause of complaint, being a different
5 offense from but connected in its commission with the charge(s)
6 above, complainant further complains and says:

7
8 **COUNT 22: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

9
10 On or about August 21, 2013 - April 29, 2014, in the County of San
11 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
12 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
13 SUAREZ, dba Lions Legal Group, Inc., does 1-12, in violation of
14 Section 550(b) (2) of the Penal Code, a FELONY, who at the time and
15 place last aforesaid did willfully, unlawfully, and knowingly
16 prepare and make a written and oral statement that was intended to
17 be presented to an insurer in connection with and in support of a
18 claim and payment and other benefits pursuant to an insurance
19 policy, knowing said statement contained false and misleading
20 information concerning a material fact to-wit: Lions Legal Group,
21 Inc. submitted documentation to Mercury Insurance in support of an
22 insurance claim for Miguel Mata.

23
24
25 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

26 It is further alleged, pursuant to Penal Code Section 803(d), that
27 the statute of limitation for each offense set forth above is

1 tolled for a period of time for up to three (3) years after each
2 offense was committed, equal to the period of time that ALEJANDRO
3 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
4 California.

5
6 For a further and separate cause of complaint, being a different
7 offense from but connected in its commission with the charge(s)
8 above, complainant further complains and says:
9

10
11 **COUNT 23: MAKING FALSE STATEMENT IN AN INSURANCE CLAIM PC.550(B) (2)**

12 On or about August 21, 2013 - April 29, 2014, in the County of San
13 Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA,
14 dba Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
15 SUAREZ, dba Lions Legal Group, Inc., does 1-12, did commit the
16 crime of MAKING FALSE STATEMENT IN AN INSURANCE CLAIM, in violation
17 of Section 550(b) (2) of the Penal Code, a FELONY, who at the time
18 and place last aforesaid did willfully, unlawfully, and knowingly
19 prepare and make a written and oral statement that was intended to
20 be presented to an insurer in connection with and in support of a
21 claim and payment and other benefits pursuant to an insurance
22 policy, knowing said statement contained false and misleading
23 information concerning a material fact to-wit: Lions Legal Group,
24 Inc. submitted documentation to Mercury Insurance in support of an
25 insurance claim for Heribert Perez-Inzunza.
26

1 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

2 It is further alleged, pursuant to Penal Code Section 803(d), that
3 the statute of limitation for each offense set forth above is
4 tolled for a period of time for up to three (3) years after each
5 offense was committed, equal to the period of time that ALEJANDRO
6 CESAR MARTINEZ and GLORIA ELIZABETH AYALA was out of the State of
7 California.

8
9 For a further and separate cause of complaint, being a different
10 offense from but connected in its commission with the charge(s)
11 above, complainant further complains and says:
12

13
14 **COUNT 24: SOLICIT/ETC BUSINESS THROUGH FALSE/ETC INSURANCE CLAIM
PC.549**

15 On or about October 29, 2014, in the County of San Joaquin,
16 California, SERVIO A GOMEZ, did commit the crime of SOLICIT/ETC
17 BUSINESS THROUGH FALSE/ETC INSURANCE CLAIM, in violation of Section
18 549 of the Penal Code, a FELONY, who at the time and place last
19 aforesaid, did willfully and unlawfully solicit or refer business
20 with reckless disregard for whether the individual or entity for
21 whom the solicitation or referral was made, or the individual or
22 entity who is solicited or referred, intends to violate Sections
23 550 of the Penal Code or Section 1871.4 of the Insurance Code.
24

25
26
27
28

1 **STATUTE OF LIMITATIONS-LATE DISCOVERY PC.803 (C)**

2 It is further alleged that the above violation was not discovered
3 until 04/20/2015 by RHONDA LESLIE, of OF CALIFORNIA DEPARTMENT OF
4 INSURANCE, and that no victim of said violation and no law
5 enforcement agency chargeable with the investigation and
6 prosecution of said violation had actual and constructive knowledge
7 of said violation prior to said date because Allstate Insurance and
8 Farmer Insurance informed Jose Puentes of suspicious activity
9 related to his insurance claim within the meaning of Penal Code
10 Section 803(c).
11

12
13 For a further and separate cause of complaint, being a different
14 offense from but connected in its commission with the charge(s)
15 above, complainant further complains and says:
16

17 **COUNT 25: MONEY LAUNDERING PC.186.10 (A)**

18 On or about December 19, 2014, in the County of San Joaquin,
19 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
20 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
21 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of MONEY
22 LAUNDERING, in violation of Section 186.10(a) if the Penal Code, a
23 FELONY, in that said defendant did willful and unlawfully conduct
24 and attempt to conduct a transaction involving a monetary
25 instrument or instruments of a value exceeding five thousand
26 dollars (\$5000.00) through a financial institution with the intent
27
28

1 to promote, manage, establish, carry on, and facilitate the
2 promotion, management, establishment, and carrying on of any
3 criminal activity and knowing that the monetary instrument
4 represented the proceeds of, and was derived directly or indirectly
5 from the proceeds of, criminal activity. To wit: GRAND THEFT. On
6 December 19, 2017 Defendants Alejandro Cesar Martinez and Gloria
7 Ayala deposited into a bank account for Lions Legal Group, Inc. an
8 Allstate Insurance check payable to Lions Legal Group and Julio C.
9 Garcia and San Joaquin General in the amount of \$15,000.00 with a
10 signed endorsement on the back in the name of "Julio C. Garcia".
11

12
13 For a further and separate cause of complaint, being a different
14 offense from but connected in its commission with the charge(s)
15 above, complainant further complains and says:
16

17 **COUNT 26: MONEY LAUNDERING PC.186.10(A)**

18 On or about December 19, 2014, in the County of San Joaquin,
19 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
20 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
21 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of MONEY
22 LAUNDERING, in violation of Section 186.10(a) of the Penal Code, a
23 FELONY, in that said defendant did willful and unlawfully conduct
24 and attempt to conduct a transaction involving a monetary
25 instrument or instruments of a value exceeding five thousand
26 dollars (\$5000.00) through a financial institution with the intent
27

1 to promote, manage, establish, carry on, and facilitate the
2 promotion, management, establishment, and carrying on of any
3 criminal activity and knowing that the monetary instrument
4 represented the proceeds of, and was derived directly or indirectly
5 from the proceeds of, criminal activity. To wit: GRAND THEFT. On
6 December 19, 2017 Defendants Alejandro Cesar Martinez and Gloria
7 Ayala deposited into a bank account for Lions Legal Group, Inc. an
8 Allstate Insurance check payable to Lions Legal Group and Julio C.
9 Garcia and San Joaquin General in the amount of \$15,000.00 with a
10 signed endorsement on the back in the name of "Jose Puentes",
11 although Jose Puentes was not named on the face of the check.
12

13
14 For a further and separate cause of complaint, being a different
15 offense from but connected in its commission with the charge(s)
16 above, complainant further complains and says:

17
18 **COUNT 27: MONEY LAUNDERING PC.186.10 (A)**

19 On or about February 4, 2015, in the County of San Joaquin,
20 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
21 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
22 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of MONEY
23 LAUNDERING, in violation of Section 186.10(a) of the Penal Code, a
24 FELONY, in that said defendant did willful and unlawfully conduct
25 and attempt to conduct a transaction involving a monetary
26 instrument or instruments of a value exceeding five thousand
27

1 dollars (\$5000.00) through a financial institution with the intent
2 to promote, manage, establish, carry on, and facilitate the
3 promotion, management, establishment, and carrying on of any
4 criminal activity and knowing that the monetary instrument
5 represented the proceeds of, and was derived directly or indirectly
6 from the proceeds of, criminal activity. To wit: GRAND THEFT. On
7 December 19, 2017 Defendants Alejandro Cesar Martinez and Gloria
8 Ayala deposited into a bank account for Lions Legal Group, Inc. a
9 Mercury Insurance check payable to Jose Puentes and Attorney Lions
10 Legal Group in the amount of \$25,000.00 with a signed endorsement
11 on the back in the name of "Jose Puentes".
12

13
14 For a further and separate cause of complaint, being a different
15 offense from but connected in its commission with the charge(s)
16 above, complainant further complains and says:
17

18 **COUNT 28: FORGERY PC.470 (A)**

19 On or about December 19, 2014, in the County of San Joaquin,
20 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
21 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
22 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of
23 FORGERY, in violation of Section 470(a) of the Penal Code, a
24 FELONY, who at the time and place last aforesaid did willfully and
25 unlawfully with the intent to defraud, and knowingly without
26 authority to do so, sign the name of another person and of a
27

1 fictitious person, to-wit: GRAND THEFT. On December 19, 2017
2 Defendants Alejandro Cesar Martinez and Gloria Ayala deposited into
3 a bank account for Lions Legal Group, Inc. an Allstate Insurance
4 check payable to Lions Legal Group and Julio C. Garcia and San
5 Joaquin General in the amount of \$15,000.00 with a signed
6 endorsement on the back in the name of "Julio C. Garcia".
7

8 For a further and separate cause of complaint, being a different
9 offense from but connected in its commission with the charge(s)
10 above, complainant further complains and says:
11

12
13 **COUNT 29: FORGERY PC.470 (A)**

14 On or about December 19, 2014, in the County of San Joaquin,
15 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
16 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
17 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of
18 FORGERY, in violation of Section 470(a) of the Penal Code, a
19 FELONY, who at the time and place last aforesaid did willfully and
20 unlawfully with the intent to defraud, and knowingly without
21 authority to do so, sign the name of another person and of a
22 fictitious person, to-wit: GRAND THEFT. On December 19, 2017
23 Defendants Alejandro Cesar Martinez and Gloria Ayala deposited into
24 a bank account for Lions Legal Group, Inc. an Allstate Insurance
25 check payable to Lions Legal Group and Julio C. Garcia and San
26 Joaquin General in the amount of \$15,000.00 with a signed
27

1 endorsement on the back in the name of "Jose Puentes", although
2 Jose Puentes was not named on the face of the check.

3
4 For a further and separate cause of complaint, being a different
5 offense from but connected in its commission with the charge(s)
6 above, complainant further complains and says:

7
8 **COUNT 30: FORGERY PC.470 (A)**

9
10 On or about February 4, 2015, in the County of San Joaquin,
11 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
12 Lions Legal Group, Inc., and GLORIA ELIZABETH AYALA, aka GLORIA
13 SUAREZ, dba Lions Legal Group, Inc., did commit the crime of
14 FORGERY, in violation of Section 470(a) of the Penal Code, a
15 FELONY, who at the time and place last aforesaid did willfully and
16 unlawfully with the intent to defraud, and knowingly without
17 authority to do so, sign the name of another person and of a
18 fictitious person, to-wit: GRAND THEFT. On December 19, 2017
19 Defendants Alejandro Cesar Martinez and Gloria Ayala deposited into
20 a bank account for Lions Legal Group, Inc. a Mercury Insurance
21 check payable to Jose Puentes and Attorney Lions Legal Group in the
22 amount of \$25,000.00 with a signed endorsement on the back in the
23 name of "Jose Puentes".
24
25
26
27
28

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

4
5 **COUNT 31: CONSPIRACY:COMMIT CRIME PC.182 (A) (1)**

6 On or about July 23, 2013, in the County of San Joaquin,
7 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
8 Lions Legal Group, Inc.; GLORIA ELIZABETH AYALA, aka GLORIA SUAREZ,
9 dba Lions Legal Group, Inc.; and Servio Gomez, did commit the crime
10 of CONSPIRACY TO COMMIT A CRIME, in violation of Section 182(a)(1)
11 of the Penal Code, a FELONY, who at the time and place last
12 aforesaid, did willfully and unlawfully conspire together with
13 another person and persons whose identity is unknown to commit the
14 crime of GRAND THEFT in violation of 487(A) of the PENAL Code, a
15 felony; that pursuant to and for the purpose of carrying out the
16 objects and purposes of the aforesaid conspiracy, said defendant(s)
17 committed the following overt act and acts at and in the County of
18 SAN JOAQUIN:

19
20 **OVERT ACTS: 1.** On July 23, 2013 Gloria Ayala and/or Alejandro
21 Cesar Martinez incorporated Lions Legal Group in the state of
22 Wyoming.

23
24 **OVERT ACTS: 2.** Gloria Ayala listed the corporate address Lions
25 Legal Group as 9500 Coral Road, Oakland, California.

26 **OVERT ACTS: 3.** Gloria Ayala owns a home at 9500 Coral Road,
27 Oakland, California. ;

1 **OVERT ACTS: 4.** Gloria Ayala listed herself as an Agent for
2 Lions Legal Group, Inc.

3 **OVERT ACTS: 5.** Gloria Ayala and/or Alejandro Cesar Martinez
4 listed Robert Rosado as the Treasurer, Gloria Ayala as the
5 Secretary, and Fred Ahoori as the President of Lions Legal Group in
6 the Articles of Incorporation.

7 **OVERT ACTS: 6.** Goria Ayala received insurance checks for Lions
8 Legal Group, Inc. at 9500 Coral Road, Oakland, California.

9 **OVERT ACTS: 7.** Fred Ahoori is Servio Gomez's nephew.

10 **OVERT ACTS: 8.** Servio Gomez allowed Alejandro Cesar Martinez
11 to live in Fred Ahoori's home.

12 **OVERT ACTS: 9.** Servio Gomez provided the address of 4053
13 Angelina Lane, Stockton, California to Alejandro Cesar Martinez for
14 the purpose of receiving mail on behalf of Lions Legal Group, Inc.

15 **OVERT ACTS: 10.** Servio Gomez received insurance checks on
16 behalf of Lions Legal Group, Inc. at Fred Ahoori's home.

17 **OVERT ACTS: 11.** Alejandro Cesar Martinez told Servio Gomez that
18 he would give him a "kick back" if Servio Gomez brought cases to
19 Alejandro Cesar Martinez.

20 **OVERT ACTS: 12.** Servio Gomez referred Julio Cesar Garcia to
21 Alejandro Cesar Martinez (aka Alex Cordoba) for attorney
22 representation.

23 **OVERT ACTS: 13.** Gloria Ayala, aka Gloria Suarez, opened a bank
24 account at Bank of America for Lions Legal Group Inc.
25
26
27
28

1 **OVERT ACTS: 14.** Gloria Ayala, aka Gloria Suarez, listed herself
2 as the only signor for the Lions Legal Group, Inc. account at Bank
3 of America.

4 **OVERT ACTS: 15.** Gloria Ayala opened a bank account at JP Morgan
5 Chase on January 17, 2014 for Lions Legal Group Inc.

6 **OVERT ACTS: 16.** Gloria Ayala listed herself as the only signor
7 for the Lions Legal Group, Inc. account at JP Morgan Chase Bank.

8 **OVERT ACTS: 17.** Gloria Ayala gave Alejandro Cesar Martinez
9 access to the Lions Legal Group, Inc. accounts at Bank of America
10 and JP Morgan Chase Bank.

11 **OVERT ACTS: 18.** Alejandro Cesar Martinez gave Servio Gomez the
12 ATM card to access to the Lions Legal Group, Inc. accounts at Bank
13 of America bank and/or JP Morgan Chase account.

14
15
16 For a further and separate cause of complaint, being a different
17 offense from but connected in its commission with the charge(s)
18 above, complainant further complains and says:

19
20 **COUNT 32: FALSE AFFIDAVIT AS PERJURY PC.118A**

21 On or about December 13, 2014, in the County of San Joaquin,
22 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
23 Lions Legal Group, Inc., did commit the crime of FALSE AFFIDAVIT AS
24 PERJURY, a violation of Section 118a of the Penal Code, a felony,
25 in that said defendant did willfully and unlawfully enter a false
26 affidavit as perjury to the State of California. Alejandro Cesar
27

1 Martinez signed a Receipt, Release and Trust Agreement with
2 Allstate Insurance with the name Jose Puentes.

3
4 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

5 It is further alleged, pursuant to Penal Code Section 803(d), that
6 the statute of limitation for each offense set forth above is
7 tolled for a period of time for up to three (3) years after each
8 offense was committed, equal to the period of time that ALEJANDRO
9 CESAR MARTINEZ was out of the State of California.

10
11
12 For a further and separate cause of complaint, being a different
13 offense from but connected in its commission with the charge(s)
14 above, complainant further complains and says:

15
16 **COUNT 33: FALSE AFFIDAVIT AS PERJURY PC.118A**

17 On or about December 13, 2014, in the County of San Joaquin,
18 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
19 Lions Legal Group, Inc., did commit the crime of FALSE AFFIDAVIT AS
20 PERJURY, a violation of Section 118a of the Penal Code, a felony,
21 in that said defendant did willfully and unlawfully enter a false
22 affidavit as perjury to the State of California. Alejandro Cesar
23 Martinez signed a Receipt, Release and Trust Agreement with
24 Allstate Insurance with the name Julio Garcia.
25
26
27
28

1 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

2 It is further alleged, pursuant to Penal Code Section 803(d), that
3 the statute of limitation for each offense set forth above is
4 tolled for a period of time for up to three (3) years after each
5 offense was committed, equal to the period of time that ALEJANDRO
6 CESAR MARTINEZ was out of the State of California.

7
8 For a further and separate cause of complaint, being a different
9 offense from but connected in its commission with the charge(s)
10 above, complainant further complains and says:
11

12
13 **COUNT 34: FALSE AFFIDAVIT AS PERJURY PC.118A**

14 On or about January 20, 2015, in the County of San Joaquin,
15 California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO CORDOBA, dba
16 Lions Legal Group, Inc., did commit the crime of FALSE AFFIDAVIT AS
17 PERJURY, a violation of Section 118a of the Penal Code, a felony,
18 in that said defendant did willfully and unlawfully enter a false
19 affidavit as perjury to the State of California. Alejandro Cesar
20 Martinez signed a Receipt, Release and Trust Agreement with Farmers
21 Insurance with the name Jose Puentes.
22

23
24 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

25 It is further alleged, pursuant to Penal Code Section 803(d), that
26 the statute of limitation for each offense set forth above is
27 tolled for a period of time for up to three (3) years after each
28

1 offense was committed, equal to the period of time that ALEJANDRO
2 CESAR MARTINEZ was out of the State of California.

3
4 For a further and separate cause of complaint, being a different
5 offense from but connected in its commission with the charge(s)
6 above, complainant further complains and says:

7
8 **COUNT 35: UNAUTHORIZED ADVERTISE/PRACTICE LAW BP.6126(A)**

9
10 On or about November 5, 2014 - February 1, 2015, in the County of
11 San Joaquin, California, ALEJANDRO CESAR MARTINEZ, aka ROBERTO
12 CORDOBA, dba Lions Legal Group, Inc., did commit the crime of
13 UNAUTHORIZED ADVERTISE/PRACTICE LAW, in violation of Section
14 6126(a) of the Business and Professions Code, a MISDEMEANOR, who at
15 the time and place last aforesaid was a person who was not an
16 active member of the State Bar of the State of California who did
17 unlawfully advertise himself/herself as practicing and entitled to
18 practice law and otherwise practice law.

19
20 **STATUTE OF LIMITATIONS TOLLED PC.803(D)**

21 It is further alleged, pursuant to Penal Code Section 803(d), that
22 the statute of limitation for each offense set forth above is
23 tolled for a period of time for up to three (3) years after each
24 offense was committed, equal to the period of time that ALEJANDRO
25 CESAR MARTINEZ was out of the State of California.
26

27
28

1 For a further and separate cause of complaint, being a different
2 offense from but connected in its commission with the charge(s)
3 above, complainant further complains and says:
4

5 **COUNT 36: USE OF PERSONAL IDENTIFYING INFORMATION OF ANOTHER**
6 **PC. 530.5**

7 On or about May 17, 2019, in the County of San Joaquin, California,
8 ALEJANDRO CESAR MARTINEZ, did commit the crime of USE OF PERSONAL
9 IDENTIFYING INFORMATION OF ANOTHER, in violation of Section 530.5
10 of the Penal Code, a FELONY, who at the time and place last
11 aforesaid did willfully and unlawfully obtain personal identifying
12 information of another, to wit: Rey Martinez Lespier, DOB:
13 01/05/1967, and used that information for an unlawful purpose.
14

15
16
17 If the above-named defendant(s) is/are presently on probation in
18 San Joaquin County, any evidence presented at a preliminary hearing
19 in the instant case will be used not only as a basis for a holding
20 order in this case but also as evidence of a violation of probation
21 and, at any formal hearing on that violation of probation, the
22 People will move the transcript of the preliminary hearing into
23 evidence as a basis for the violation.
24

25 Pursuant to Penal Code Section 1054.5(b), the People hereby
26 informally request that the defendant and his/her attorney disclose
27
28

1 to the People all information and materials described in Penal Code
2 Section 1054.3.

3


4 I declare under penalty of perjury that the foregoing is true and
5 correct except for those things stated on information and belief
6 and those I believe to be true.

7

8

Executed on 5/23/2019, at Stockton, California.

9

10  _____

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28