

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO
)	
Plaintiff)	
)	
vs.)	
)	
David Alan Boucher)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2012-00-0041497

The undersigned is informed and believes that:

COUNT 1

On or about April 13, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 2

On or about April 11, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0142056, knowing the same to be false, altered, forged and counterfeited.

COUNT 3

On or about April 11, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Foresight

Capital Partners 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 Foresight Capital Partners.

COUNT 4

On or about June 5, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 5

On or about May 31, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0221292, knowing the same to be false, altered, forged and counterfeited.

COUNT 6

On or about May 31, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Foresight Capital Partners 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 Foresight Capital Partners.

COUNT 7

On or about August 1, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure

and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 8

On or about July 30, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0310012, knowing the same to be false, altered, forged and counterfeited.

COUNT 9

On or about July 30, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of ReconTrust Company 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 ReconTrust Company.

COUNT 10

On or about July 26, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 11

On or about July 25, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and

attempt to offer to pass, as true and genuine, Grant Deed 2012-0299260, knowing the same to be false, altered, forged and counterfeited.

COUNT 12

On or about July 25, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of TDR Servicing 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 TDR Servicing.

COUNT 13

On or about August 3, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 14

On or about August 3, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0315392, knowing the same to be false, altered, forged and counterfeited.

COUNT 15

On or about August 3, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Federal National Mortgage Association 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 Federal National Mortgage Association.

COUNT 16

On or about November 16, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 17

On or about November 10, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0489832, knowing the same to be false, altered, forged and counterfeited.

COUNT 18

On or about November 10, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Federal National Mortgage Association 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 Federal National Mortgage Association.

COUNT 19

On or about August 4, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within

this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 20

On or about August 3, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0330472, knowing the same to be false, altered, forged and counterfeited.

COUNT 21

On or about August 3, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Wells Fargo 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 Wells Fargo.

COUNT 22

On or about June 22, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 23

On or about April 25, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0251805, knowing the same to be false, altered, forged and counterfeited.

COUNT 24

On or about April 25, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Federal Home Loan Mortgage Corp 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 Federal Home Loan Mortgage Corp.

COUNT 25

On or about August 30, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 26

On or about August 24, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0365288, knowing the same to be false, altered, forged and counterfeited.

COUNT 27

On or about August 24, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of GMAC 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 GMAC.

COUNT 28

On or about November 30, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 29

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0507206, knowing the same to be false, altered, forged and counterfeited.

COUNT 30

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of GMAC 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 GMAC.

COUNT 31

On or about December 28, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 32

On or about December 15, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0549638, knowing the same to be false, altered, forged and counterfeited.

COUNT 33

On or about December 15, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of GMAC 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 GMAC.

COUNT 34

On or about November 8, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 35

On or about November 8, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0464833, knowing the same to be false, altered, forged and counterfeited.

COUNT 36

On or about November 8, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 37

On or about November 29, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 38

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0504905, knowing the same to be false, altered, forged and counterfeited.

COUNT 39

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 40

On or about November 30, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 41

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0507207, knowing the same to be false, altered, forged and counterfeited.

COUNT 42

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 43

On or about December 1, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 44

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0509243, knowing the same to be false, altered, forged and counterfeited.

COUNT 45

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 46

On or about December 1, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 47

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0509244, knowing the same to be false, altered, forged and counterfeited.

COUNT 48

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 49

On or about December 1, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 50

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0509525, knowing the same to be false, altered, forged and counterfeited.

COUNT 51

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 52

On or about December 1, 2011, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 53

On or about November 28, 2011, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2011-0509526, knowing the same to be false, altered, forged and counterfeited.

COUNT 54

On or about November 28, 2011, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 55

On or about April 23, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 56

On or about April 11, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0156075, knowing the same to be false, altered, forged and counterfeited.

COUNT 57

On or about April 11, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 58

On or about May 25, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 59

On or about May 17, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0206248, knowing the same to be false, altered, forged and counterfeited.

COUNT 60

On or about May 17, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

COUNT 61

On or about August 7, 2012, in the above named judicial district, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a felony, was committed by David Alan Boucher, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

COUNT 62

On or about August 2, 2012, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by David Alan Boucher, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Grant Deed 2012-0316066, knowing the same to be false, altered, forged and counterfeited.

COUNT 63

On or about August 2, 2012, 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 David Alan Boucher, who did willfully and unlawfully obtain personal identifying information of Bank of America 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 Bank of America.

It is further alleged, as to Counts 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 31, 34, 37, 40, 43, 46, 49, 52, 55, 58, and 61, that pursuant to Penal Code section 1170(h)(3) defendant(s) David Alan Boucher is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) David Alan Boucher has a prior serious or violent felony conviction;

defendant(s) David Alan Boucher has been convicted of a crime with a Penal Code section 186.11 enhancement;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

* * * * *

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 63 COUNT(S).

Executed at San Bernardino, California, on August 29, 2012.

T. Greco

T. Greco

DECLARANT AND COMPLAINANT

Agency: District Attorney B of I-REF

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
David Alan Boucher	08/21/1956			