

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO
)	
Plaintiff)	
)	
vs.)	
)	
Monique Forrest and Theresa Forrest,)	FELONY COMPLAINT
)	
)	
Defendants.)	DA CASE NO 2009-00-0067140

The undersigned is informed and believes that:

COUNT 1

On or about October 29, 2007 through February 24, 2009, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a felony, was committed by Theresa Forrest, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

COUNT 2

On or about October 29, 2007 through February 24, 2009, in the above named judicial district, the crime of ELDER OR DEPENDENT ADULT ABUSE, in violation of PENAL CODE SECTION 368(b)(1), a felony, was committed by Theresa Forrest, who did, under circumstances and conditions likely to produce great bodily harm and death, knowingly and willfully cause and permit Thomas Miller, an elder and dependent adult to suffer, and inflicted thereon, unjustifiable physical pain and mental suffering and, having the care and custody of said person, willfully caused and permitted him to be placed in a situation in which his health was endangered, and knew and reasonably should have known that said person, Thomas Miller, was an elder and dependent adult.

COUNT 3

On or about October 29, 2007 through February 24, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by Theresa Forrest, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Personal property of Centre Insurance Company and labor of Thomas Miller.

COUNT 4

On or about October 29, 2007 through February 24, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by Theresa Forrest, 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, time sheets, knowing the same to be false, altered, forged and counterfeited.

COUNT 5

On or about November 4, 2007 through March 26, 2009, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(6), a felony, was committed by Monique Forrest, who did aid, abet, solicit, conspire with another and did knowingly make and cause to be made a false and fraudulent claim for payment of a health care benefit.

It is further alleged that the claim or amount at issue exceeds nine hundred fifty dollars (\$950).

COUNT 6

On or about November 4, 2007 through March 26, 2009, in the above named judicial district, the crime of ELDER OR DEPENDENT ADULT ABUSE, in violation of PENAL CODE SECTION 368(b)(1), a felony, was committed by Monique Forrest, who did, under circumstances and conditions likely to produce great bodily harm and death, knowingly and willfully cause and permit Thomas Miller, an elder and dependent adult to suffer, and inflicted thereon, unjustifiable physical pain and mental suffering and, having the care and custody of said person, willfully caused and permitted him to be placed in a situation in which his health was endangered, and

knew and reasonably should have known that said person, Thomas Miller, was an elder and dependent adult.

COUNT 7

On or about November 4, 2007 through March 26, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by Monique Forrest, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Personal property of Centre Insurance Company, and labor of Thomas Miller.

COUNT 8

On or about November 4, 2007 through March 26, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by Monique Forrest, 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, time sheets, knowing the same to be false, altered, forged and counterfeited.

* * * * *

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 8 COUNTS.

Executed at San Bernardino, California, on December 22, 2011.

STEVE RIVERA

STEVE RIVERA
DECLARANT AND COMPLAINANT

Agency: District Attorney B of I-Workers Comp

Prelim Est. 01:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Monique Forrest	03/21/1960			
Theresa Forrest	10/04/1965			