

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

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO. FSB1003597
)	
Plaintiff)	SECOND AMENDED
)	
vs.)	FELONY COMPLAINT
)	
Sir Isaac Lindsay)	
Veronica Denise Lindsay)	
dba Lindsay's Mortorcade and Protective Services,)	DA CASE NO. 2010-00-0045579
)	
Defendants.)	

The undersigned is informed and believes that:

COUNT 1

On or about April 6, 2006, in the above named judicial district, the crime of OBTAINING MONEY, LABOR OR PROPERTY BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a felony, was committed by Sir Issac Lindsay and Veronica Denise Lindsay, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section.

It is further alleged as to count 1 offenses described in Penal Code section 803(c), that the above violation was not discovered until October 4, 2006 by Nancy Anderson from the Moreno Valley School District, Risk Management when she learned from a third party that Lindsey Protective Services did not have workers compensation insurance, and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date because she learned of the fraud from third party on that date, within the meaning of Penal Code section 803(c).

COUNT 2

On or about April 6, 2006, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by Sir Issac Lindsay and Veronica Denise Lindsay, 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, Certificate of Insurance, knowing the same to be false, altered, forged and counterfeited.

It is further alleged as to count 2, offenses described in Penal Code section 803(c), that the above violation was not discovered until October 4, 2006 by Nancy Anderson from the Moreno Valley School District, Risk Management when she learned from a third party that Lindsey Protective Services did not have workers compensation insurance, and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date because she learned of the fraud from third party on that date, within the meaning of Penal Code section 803(c).

COUNT 3

On or about April 6, 2006, 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 Sir Issac Lindsay and Veronica Denise Lindsay, 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.

It is further alleged as to count 3, offenses described in Penal Code section 803(c), that the above violation was not discovered until October 4, 2006 by Nancy Anderson from the Moreno Valley School District, Risk Management when she learned from a third party that Lindsey Protective Services did not have workers compensation insurance, and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date because she learned of the fraud from third party on that date, within the meaning of Penal Code section 803(c).

COUNT 4

On or about November 9, 2006, in the above named judicial district, the crime of OBTAINING MONEY, LABOR OR PROPERTY BY FALSE PRETENSES, in violation of PENAL CODE SECTION 532(a), a felony, was committed by Sir Issac Lindsay and Veronica Denise Lindsay, who did unlawfully, knowingly, designedly and fraudulently get possession of money and property, and obtain labor and service of another in violation of this section.

COUNT 5

On or about November 9, 2006, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(d), a felony, was committed by Sir Issac Lindsay and Veronica Denise Lindsay, 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, Certificate of Insurance, knowing the same to be false, altered, forged and counterfeited.

COUNT 6

On or about November 9, 2006, 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 Sir Issac Lindsay and Veronica Denise Lindsay, 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.

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

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

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

Executed at San Bernardino, California, on September 9, 2010.

Kenneth S. Kurator

Kenneth S. Kurator
DECLARANT AND COMPLAINANT

Agency: Dept of Insurance Fraud Rancho

Prelim Est. 01:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Sir Issac Lindsay	03/01/1949	1008301721		
Veronica Denise Lindsay	11/17/1952	1008344374		