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18
19 SUPERIOR COURT OF THE STATE OF CALIFORNIA
20 COUNTY OF LOS ANGELES

21
22 **PEOPLE OF THE STATE OF**
23 **CALIFORNIA,**

24 Plaintiff,

25 v.

26 **MARYAM ERAMBAKSH, AKA**
27 **MARYAM ERAM,**
28 (DOB: [REDACTED])

Defendant.

Case No.

FELONY COMPLAINT

The Attorney General of the State of California by this felony complaint hereby accuses Defendant MARYAM ERAMBAKSH, AKA MARYAM ERAM, of the following felonies:

COUNT 1
Insurance Fraud
Penal Code Section 550(a)(5)

From on or about April 15, 2015, to on or about October 11, 2022, in or around the County of Los Angeles, MARYAM ERAMBAKSH, AKA MARYAM ERAM, did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in

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CENTRAL CRIMINAL
LOS ANGELES SUPERIOR COURT

1 support of a false and fraudulent claim to the In-Home Supportive Services program in violation
2 of Penal Code § 550, subdivision (a)(5), a felony.

3 **Factors in Aggravation**
4 **Penal Code Section 1170(b)**

5 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
6 ERAMBAKHS, AKA MARYAM ERAM induced others to participate in the commission of this
7 crime or occupied a position of leadership or dominance over other participants, within the meaning
8 of California Rules of Court, rule 4.421, subdivision (a)(4).

9 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner in
10 which the crime was carried out by MARYAM ERAMBAKHS, AKA MARYAM ERAM
11 indicates planning, sophistication, or professionalism, within the meaning of California Rules of
12 Court, rule 4.421, subdivision (a)(8).

13 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner in
14 which this crime was committed by MARYAM ERAMBAKHS, AKA MARYAM ERAM
15 involved an actual taking of great monetary value, within the meaning of California Rules of Court,
16 rule 4.421, subdivision (a)(9).

17 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
18 ERAMBAKHS, AKA MARYAM ERAM took advantage of a position of trust or confidence to
19 commit the offense, within the meaning of California Rules of Court, rule 4.421, subdivision
20 (a)(11).

21 **COUNT 2**
22 **Healthcare Fraud**
Welfare and Institutions Code Section 14107(b)(4)

23 From on or about April 15, 2015, to on or about October 11, 2022, in or around the County
24 of Los Angeles, MARYAM ERAMBAKHS, AKA MARYAM ERAM, did knowingly and
25 willfully execute or attempt to execute a scheme or artifice to defraud the In-Home Supportive
26 Services program administered by the Department of Social Services, or to obtain, by means of
27 false or fraudulent pretenses, representations, or promises, any of the money or property owned by,
28 or under the custody or control of the Medi-Cal Program or any other healthcare program

1 administered by it, in violation of Welfare & Institutions Code section 14107, subdivision (b)(4), a
2 felony.

3 **Factors in Aggravation**
4 **Penal Code Section 1170(b)**

5 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
6 ERAMBAKHS, AKA MARYAM ERAM induced others to participate in the commission of this
7 crime or occupied a position of leadership or dominance over other participants, within the meaning
8 of California Rules of Court, rule 4.421, subdivision (a)(4).

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10 in which the crime was carried out by MARYAM ERAMBAKHS, AKA MARYAM ERAM
11 indicates planning, sophistication, or professionalism, within the meaning of California Rules of
12 Court, rule 4.421, subdivision (a)(8).

13 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
14 in which this crime was committed by MARYAM ERAMBAKHS, AKA MARYAM ERAM
15 involved an actual taking of great monetary value, within the meaning of California Rules of Court,
16 rule 4.421, subdivision (a)(9).

17 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
18 ERAMBAKHS, AKA MARYAM ERAM took advantage of a position of trust or confidence to
19 commit the offense, within the meaning of California Rules of Court, rule 4.421, subdivision
20 (a)(11).

21 **COUNT 3**
22 **Grand Theft**
23 **Penal Code Section 487(a)**

24 From on or about April 15, 2015, to on or about October 11, 2022, in or around the County
25 of Los Angeles, MARYAM ERAMBAKHS, AKA MARYAM ERAM, did unlawfully,
26 knowingly and designedly, by a false and fraudulent representation and pretense, obtain money
27 from the In-Home Supportive Services program, which had a value exceeding \$950 (Nine Hundred
28 and Fifty Dollars), in violation of Penal Code section 487, subdivision (a), a felony.

1 **Factors in Aggravation**
2 **Penal Code Section 1170(b)**

3 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
4 ERAMBAKHS, AKA MARYAM ERAM induced others to participate in the commission of this
5 crime or occupied a position of leadership or dominance over other participants, within the meaning
6 of California Rules of Court, rule 4.421, subdivision (a)(4).

7 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that the manner
8 in which the crime was carried out by MARYAM ERAMBAKHS, AKA MARYAM ERAM
9 indicates planning, sophistication, or professionalism, within the meaning of California Rules of
10 Court, rule 4.421, subdivision (a)(8).

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12 in which this crime was committed by MARYAM ERAMBAKHS, AKA MARYAM ERAM
13 involved an actual taking of great monetary value, within the meaning of California Rules of Court,
14 rule 4.421, subdivision (a)(9).

15 It is further alleged, pursuant to Penal Code section 1170, subdivision (b), that MARYAM
16 ERAMBAKHS, AKA MARYAM ERAM took advantage of a position of trust or confidence to
17 commit the offense, within the meaning of California Rules of Court, rule 4.421, subdivision
18 (a)(11).

19 **FIRST SPECIAL ALLEGATION**
20 **Statute of Limitations and Tolling**
Penal Code Sections 801.5, 803(c) & 803.5

21 Pursuant to Penal Code section 801.5 and 803, subdivision (c), it is alleged that the crimes
22 in Counts 1 through 3 are theft-related offenses, have as material element of fraud, or are
23 enumerated offenses as described in section 803, subdivision (c).

24 Pursuant to section 801.5, as to Counts 1 through 3, the prosecution was commenced within
25 four years of the completion of the crimes on October 15, 2022, the last pay period MARYAM
26 ERAMBAKHS, AKA MARYAM ERAM, billed the In-Home Supportive Services program.

27 Pursuant to Penal Code section 803, subdivision (c), it is alleged that the crimes in Counts
28 1 through 3 were not discovered until January 5, 2024, when Department of Health Care Services

Investigator Janae Cormier determined that she had enough evidence constituting probable cause to obtain a search warrant for bank records.

NOTICE: Pursuant to Evidence Code section 1101, subdivision (b), the People hereby give notice that they intend to use what is known as section 1101, subdivision (b) evidence to show "motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or accident," and/or to attack the credibility of any witness.

NOTICE: Pursuant to Penal Code section 1170, subdivision (b), the People hereby give notice that they intend to present evidence and seek jury findings regarding all applicable circumstances and factors in aggravations. (Cunningham v. California (2007) 549 U.S. 270).

NOTICE: Pursuant to Penal Code section 296, subdivision (a)(1), any conviction or plea to one or more felonies will require that Defendants provide buccal swab samples, right thumbprints, and a full palm print impression of each hand, and any blood specimens or other biological samples to law enforcement. Pursuant to Penal Code section 296.1, subdivision (a)(1)(A), any defendant arrested for a felony shall provide said samples during the "booking or intake" process or any time "prior to release" from custody. Willful refusal to provide the samples and impressions is a crime under Penal Code section 298.1, subdivision (a).

NON-DISCLOSURE OF DISCOVERY

Pursuant to Penal Code section 1054.2, "no attorney shall disclose or permit to be disclosed to a Defendant, members of the Defendant's family, or anyone else, the personal identifying information of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of section 1054.1, other than the name of the victim or witness, unless specifically permitted to do so by the court after a hearing and a showing of good cause." Any and all investigation reports, attachments, records, documents, audio and video recordings, photographs, diagrams, evidence, and other materials, provided in discovery in this case may contain personal identifying information of victims or witnesses and shall not be disclosed without court order.

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REQUEST FOR DISCOVERY

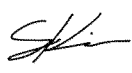
Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from defense counsel all materials and information whose disclosure is required by Penal Code section 1054.3.

DECLARATION

I verify under information and belief, pursuant to Penal Code section 806, the foregoing is true and correct.

Dated: June 20, 2025

Respectfully submitted,
ROB BONTA
Attorney General of California



SAMUEL S. KIM
Deputy Attorney General
Attorneys for the People of the State of California