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CENTRAL CRIMINAL
LOS ANGELES SUPERIOR COURT

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES, CENTRAL COURT

12
13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA,

15 Plaintiff,

Case No. 25CJCF03583

FELONY COMPLAINT

16 v.

17 NANNETTE CABRALES

18 [DOB: [REDACTED]]

19 Defendant.

20 The Attorney General of the State of California, by this Felony Complaint, accuses
21 Defendant NANNETTE CABRALES of the following felonies, which are connected in their
22 commission:

23 COUNT 1

24 Medi-Cal Fraud

Welfare and Institutions Code Section 14107(b)(4)(B)

25 From on or about April 10, 2019, to on or about October 12, 2021, in the County of Los
26 Angeles, Defendant NANNETTE CABRALES did unlawfully obtain by means of false or
27 fraudulent pretenses, representations, or promises, any of the money or property owned by, or under
28 the custody and control of, the Medi-Cal program, in connection with the delivery of or payment

1 for health care benefits, services, goods, supplies, or merchandise; to wit IHSS services fraudulently
2 billed and not rendered, in violation of Welfare & Institutions Code section 14107, subdivision (b),
3 subdivision (4), subdivision (B), a felony.

4 **COUNT 2**
5 **Grand Theft**
6 **Penal Code Section 487(a)**

7 From on or about April 10, 2019, to on or about October 12, 2021, in the County of Los
8 Angeles, Defendant NANNETTE CABRALES did knowingly and designedly, by a false and
9 fraudulent representation and pretense, obtain money, labor and real and personal property by fraud,
10 specifically moneys received from fraudulently billed IHSS services not rendered, in violation of
11 Penal Code section 487, subdivision (a), a felony.

12 **Factors in Aggravation**
13 **Penal Code Section 1170**

14 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code section 1170, subdivision
15 (b), that the victim Celia R., was particularly vulnerable, within the meaning of California Rules of
16 Court, rule 4.421(a)(3).

17 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code section 1170, subdivision
18 (b), that the manner in which this crime was committed by NANNETTE CABRALES involved an
19 actual taking of great monetary value, within the meaning of California Rules of Court, rule
20 4.421(a)(9).

21 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code section 1170, subdivision
22 (b), that NANNETTE CABRALES took advantage of a position of trust or confidence to commit
23 the offense, within the meaning of California Rules of Court, rule 4.421(a)(11).

24 As to Counts 1 and 2, it is further alleged, pursuant to Penal Code section 1170, subdivision
25 (b), that NANNETTE CABRALES stole from the public by submitting fraudulent claims and
26 receiving money from the Medi-Cal program which should be a factor in aggravation that
27 reasonably relates to the defendant or the circumstances under which the crime was committed,
28 within the meaning of California Rules of Court, rule 4.421(c).

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

5 **NOTICE:** Conviction of one or more of these offenses will require the defendant to provide
6 a DNA sample and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal
7 to provide the samples and impressions is a crime.

8 **NOTICE:** The People of the State of California intend to present evidence and to seek jury
9 findings regarding any and all applicable factors in aggravation, pursuant to Penal Code section
10 1170, subdivision (b) and *Cunningham v. California* (2007) 549 U.S. 270.

11 **NON-DISCLOSURE OF DISCOVERY**

12 Any and all investigation reports, attachments, records, documents, audio and video
13 recordings, photographs, diagrams, evidence, and other materials, provided in discovery in this case
14 may contain personal identifying information of victims or witnesses. Pursuant to Penal Code
15 section 1054.2, “no attorney shall disclose or permit to be disclosed to a defendant, members of the
16 defendant’s family, or anyone else, the personal identifying information of a victim or witness
17 whose name is disclosed to the attorney” pursuant to section 1054.1, subdivision (a), other than the
18 name of the victim or witness, unless specifically permitted to do so by the court after a hearing
19 and a showing of good cause.

20 **REQUEST FOR DISCOVERY**

21 Pursuant to Penal Code section 1054.5, subdivision (b), the People informally request from
22 defense counsel all materials and information whose disclosure is required by Penal Code section
23 1054.3.

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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

Kathryn Fernandez

KATHRYN H. FERNANDEZ
Deputy Attorney General

*Attorneys for the People of the
State of California*