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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SAN DIEGO, CENTRAL COURTHOUSE  
12

13 **THE PEOPLE OF THE STATE OF**  
14 **CALIFORNIA,**

15 Plaintiff,

16 v.

17 **RHAY ROXANNE TAYLOR**  
18 [DOB: REDACTED]

19 Defendant.

Case No. CD308110

**FELONY COMPLAINT**

20 The Attorney General of the State of California, by this Felony Complaint, accuses  
21 Defendant RHAY ROXANNE TAYLOR of the following felonies, which are connect in their  
22 commission:

23 **COUNT 1**  
24 **Medi-Cal Fraud**  
**Welfare and Institutions Code Section 14107(b)**

25 From on or about May 14, 2021, to on or about October 31, 2023, in the County of San  
26 Diego, Defendant RHAY ROXANNE TAYLOR 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

**FILED**  
Clerk of the Superior Court

**JUN 10 2025**

By: K. Cersosimo, Deputy

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 (4) (B), a felony.

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

7 From on or about May 14, 2021, to on or about October 31, 2023, in the County of San  
8 Diego, Defendant RHAY ROXANNE TAYLOR 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 Alan K. 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 RHAY ROXANNE TAYLOR involved  
19 an 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 RHAY ROXANNE TAYLOR took advantage of a position of trust or confidence to  
23 commit 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 RHAY ROXANNE TAYLOR 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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**NOTICE:** Pursuant to Evidence Code section 1101, subdivision (b), the People hereby give notice that they intend to use what is known as 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. Evidence Code section 1101, subdivision (b).

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

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

## NON-DISCLOSURE OF DISCOVERY

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. 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 section 1054.1, subdivision (a), 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.

## 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.

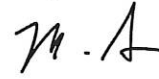
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1 Dated: June 10, 2025

Respectfully Submitted,

2 ROB BONTA  
3 Attorney General of California

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5 MARK J. SWENSSON  
6 Deputy Attorney General

7 *Attorneys for the People of the*  
8 *State of California*