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CENTRAL CRIMINAL
LOS ANGELES SUPERIOR COURT

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10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES
13

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

16 Plaintiff,

17 v.

18
19 **XYLINE YVETTE GILBERT**
[DOB: [REDACTED],

20 Defendant.

Case No. 25CJCF03580-01

**FELONY COMPLAINT FOR
ARREST WARRANT**

21
22 The Attorney General of the State of California, by this Felony Complaint, accuses
23 Defendant XYLINE YVETTE GILBERT of the following felonies, which are connected together
24 in their commission:

25 **COUNT 1**

26 **In-Home Supportive Services (IHSS) Fraud
Welfare and Institutions Code Section 14107**

27 From on or about May 1, 2015, to on or about October 15, 2022, in the County of Los
28 Angeles, Defendant XYLINE GILBERT did knowingly and willfully execute, or attempt to

1 execute, a scheme or artifice to defraud IHSS Program, in violation of Welfare and Institutions
2 Code section 14107, subdivision (b)(4), a felony.

3 **COUNT 2**
4 **False and Fraudulent Claims**
5 **Penal Code Section 550**

6 From on or about May 1, 2015 to on or about October 15, 2022, in the County of Los
7 Angeles, Defendant XYLINA GILBERT did knowingly conceal, or knowingly fail to disclose the
8 occurrence of, an event that affected her initial or continued right or entitlement to any insurance
9 benefit or payment, or the amount of any benefit or payment to which GILBERT was entitled, *to*
10 *wit:* from the State of California's IHSS program, in violation of Penal Code section 550,
11 subdivision (b)(3), a felony.

12 **COUNT 3**
13 **Grand Theft**
14 **Penal Code Section 487**

15 From on or about May 1, 2015 to on or about October 15, 2022, in the County of Los
16 Angeles, Defendant XYLINA GILBERT did knowingly and designedly, by a false and fraudulent
17 representation and pretense obtain property by fraud from the State of California, which had a
18 value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Ninety Nine Thousand Four Hundred
19 and Eight One Dollars and Eighty One Cents (\$99,481.81), in violation of Penal Code section
20 487, subdivision (a), a felony.

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

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

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

4 **NON-DISCLOSURE OF DISCOVERY**

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

13 **REQUEST FOR DISCOVERY**

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

17 **DECLARATION**

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

20
21 Dated: June 18th, 2025

22 Respectfully Submitted,

23 ROB BONTA
24 Attorney General of California

25 

26 AISHWARYA NAIDU
27 Deputy Attorney General

28 *Attorneys for the People of the
State of California*