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WARRANT ISSUED

ORIGINAL

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.
01 KEVIN BOM (DOB: 06/03/1979),
02 STEFANIE RODRIGUEZ (DOB: 04/16/1985),
03 GREGORY MERRITT (DOB: 09/29/1955), and
04 PATRICIA CLEMENT (DOB: 07/27/1950)
Defendant(s).

CASE NO. BA445260

**FELONY COMPLAINT
FOR ARREST WARRANT**

**CENTRAL ORIGINAL
LOS ANGELES
SUPERIOR COURT**

2016 MAR 28 PM 3 30

FILED

The undersigned is informed and believes that:

COUNT 1

On or between October 31, 2012 and May 24, 2013, in the County of Los Angeles, the crime of CHILD ABUSE, in violation of PENAL CODE SECTION 273a(a), a Felony, was committed by KEVIN BOM, STEFANIE RODRIGUEZ, GREGORY MERRITT and PATRICIA CLEMENT, who did willfully and unlawfully, under circumstances likely to produce great bodily harm and death, injure, cause, and permit a child, GABRIEL FERNANDEZ, to suffer and to be inflicted with unjustifiable physical pain and mental suffering, and, having the care and custody of said child, injure, cause, and permit the person and health of said child to be injured and did willfully cause and permit said child to be placed in such situation that his/her person and health was/were endangered.

It is further alleged pursuant to section 12022.95 that the defendant(s), KEVIN BOM, STEFANIE RODRIGUEZ, GREGORY MERRITT and PATRICIA CLEMENT, under circumstances and conditions likely to produce great bodily harm and death, willfully caused and permitted a child to suffer, and inflicted thereon unjustifiable physical pain and injury that resulted in death, and having the care and custody of a child, under circumstances likely to produce great bodily harm and death, willfully caused and permitted that child to be injured and harmed and that injury and harm resulted in death.

COUNT 2

On or between October 31, 2012 and January 31, 2013, in the County of Los Angeles, the crime of PUBLIC RECORDS VIOLATION, in violation of GOVERNMENT CODE SECTION 6200, a Felony, was committed by KEVIN BOM and STEFANIE RODRIGUEZ, who was an officer having custody of a record, map, book, paper and court proceeding, filed and deposited in a public office, and placed in the defendant's hands and, as to the whole and part thereof, did steal, remove, secrete, destroy, mutilate, deface, alter and falsify said document.

* * * * *

COUNT 3

On or between January 30, 2013 and August 1, 2013, in the County of Los Angeles, the crime of PUBLIC RECORDS VIOLATION, in violation of GOVERNMENT CODE SECTION 6200, a Felony, was committed by GREGORY MERRITT and PATRICIA CLEMENT, who was an officer having custody of a record, map, book, paper and court proceeding, filed and deposited in a public office, and placed in the defendant's hands and, as to the whole and part thereof, did steal, remove, secrete, destroy, mutilate, deface, alter and falsify said document.

It is further alleged as to count(s) 1, 2 and 3, offenses described in Penal Code section 803(c), that the above violations were not discovered until May 23, 2013 by DCFS Analyst Denise DuFloth by reviewing the case file, and that no victim of said violations and no law enforcement agency chargeable with the investigation and prosecution of said violations had actual and constructive knowledge of said violations prior to said date because each defendant was a public official and employee at the time of the commission of the charged offenses, and his/her conduct was not ascertainable before that date, within the meaning of Penal Code section 803(c).

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples 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 seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

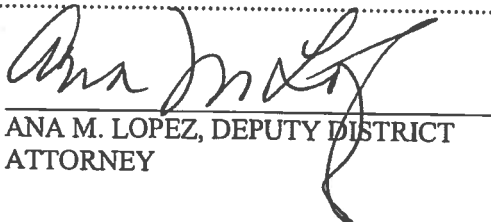
Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) KEVIN BOM, STEFANIE RODRIGUEZ, GREGORY MERRITT, and PATRICIA CLEMENT for the above-listed crimes. Wherefore, a warrant of arrest is requested for KEVIN BOM, STEFANIE RODRIGUEZ, GREGORY MERRITT, and PATRICIA CLEMENT.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA445260, CONSISTS OF 3 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on March 28, 2016.


MARY CENOVICH
DECLARANT AND COMPLAINANT

.....
JACKIE LACEY, DISTRICT ATTORNEY

BY: 
ANA M. LOPEZ, DEPUTY DISTRICT
ATTORNEY

AGENCY: LACO D.A.
BUREAU OF
INVESTIGATION

I/O: MARY CENOVICH ID NO.: 500579 PHONE:

DR NO.:

OPERATOR: NV

PRELIM. TIME EST.: 5 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
BOM, KEVIN		6/3/1979		\$155,000	
RODRIGUEZ, STEFANIE		4/16/1985		\$155,000	
MERRITT, GREGORY		9/29/1955		\$155,000	
CLEMENT, PATRICIA		7/27/1950		\$155,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

KEVIN BOM

BAIL: \$ 155,000

STEFANIE RODRIGUEZ

BAIL: \$ 155,000

GREGORY MERRITT

BAIL: \$ 155,000

PATRICIA CLEMENT

BAIL: \$ 155,000

DATE: 28 March 2016
4:03 P.M.

Michael E. Pastor
Judge of the Above Entitled Court
MICHAEL E. PASTOR



NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RTN DATE</u>
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FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

KEVIN BOM

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 273a(a)	2-4-6 State Prison	PC 803(c) PC 12022.95	Check Code +4 Yrs. State Prison
2	GC 6200	2-3-4 County Jail	PC 803(c)	Check Code

STEFANIE RODRIGUEZ

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 273a(a)	2-4-6 State Prison	PC 803(c) PC 12022.95	Check Code +4 Yrs. State Prison
2	GC 6200	2-3-4 County Jail	PC 803(c)	Check Code

GREGORY MERRITT

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 273a(a)	2-4-6 State Prison	PC 12022.95	+4 Yrs. State Prison
3	GC 6200	2-3-4 County Jail	PC 803(c)	Check Code

PATRICIA CLEMENT

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 273a(a)	2-4-6 State Prison	PC 12022.95	+4 Yrs. State Prison
3	GC 6200	2-3-4 County Jail	PC 803(c)	Check Code

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

KEVIN BOM	_____	Dollars
STEFANIE RODRIGUEZ	_____	Dollars
GREGORY MERRITT	_____	Dollars
PATRICIA CLEMENT	_____	Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

KEVIN BOM _____ in Dept _____

STEFANIE RODRIGUEZ _____ in Dept _____

GREGORY MERRITT _____ in Dept _____

PATRICIA CLEMENT _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate