

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO
)	
Plaintiff)	
)	
vs.)	
)	
Selena Edwards)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2014-00-0021855

The undersigned is informed and believes that:

COUNT 1

On or about January 28, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 2

On or about January 28, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 3

On or about January 28, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed

by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 4

On or about February 1, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 5

On or about February 1, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 6

On or about February 1, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 7

On or about February 7, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 8

On or about February 7, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 9

On or about February 7, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 10

On or about March 2, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 11

On or about March 2, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 12

On or about March 7, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 13

On or about March 25, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 14

On or about March 25, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for

compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 15

On or about March 25, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 16

On or about March 29, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 17

On or about March 29, 2013, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 18

On or about March 29, 2013, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

COUNT 19

On or about January 19, 2014, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(a)(5), a felony, was committed by Selena Edwards, who did aid, abet, solicit, conspire with another and did knowingly prepare, make and subscribe a writing, with intent to present and use it, and to allow it to be presented in support of a false and fraudulent claim.

COUNT 20

On or about January 19, 2014, in the above named judicial district, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(2), a felony, was committed by Selena Edwards, who presented or caused to be presented a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: Defendant exaggerated the extent of her injuries and falsified what purported to be supporting documents.

COUNT 21

On or about January 19, 2014, in the above named judicial district, the crime of INSURANCE FRAUD, in violation of PENAL CODE SECTION 550(b)(2), a felony, was committed by Selena Edwards, who assisted, conspired with another to and prepared and made a written and oral statement that was intended to be presented to an insurer and an insurance claimant in connection with, and in support of and opposition to, a claim and payment and other benefit

pursuant to an insurance policy, knowing that the statement contained false and misleading information concerning a material fact.

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 21 COUNT(S).

Executed at San Bernardino, California, on October 22, 2014.

Lori Pozuelos

Lori Pozuelos

DECLARANT AND COMPLAINANT

Agency: Dept of Insurance - Rancho

Prelim Est. 00:00

Defendant
Selena Edwards

Birth Date
06/23/1976

Booking No.

CII No.
A32344164

NCIC