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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN BERNARDINO

13 **THE PEOPLE OF THE STATE OF**
14 **CALIFORNIA,**
15 *Plaintiff,*
16 **v.**
17 **1. LASZLO CASTRO LENCSE**
(D.O.B. 03/26/1967)
18 **2. ANTONIO IEZZA, JR.**
(D.O.B. 07/31/1966)
19 **3. JAIME MOSAQUITES DIAZ**
(D.O.B. 01/11/1957)
20 **4. ELIGIO ORTEGA DOMINGUEZ**
(D.O.B. 05/19/1983)
21 **5. IVAN DOMINGUEZ LOPEZ**
(D.O.B. 04/04/1980)
22 **6. GEOVANY ORTEGA NARCISCO**
(D.O.B. 05/23/2002)
23 **7. GONZALO CACHU LUCATERO**
(D.O.B. 12/19/1963),
24
25
26
27 *Defendants.*

Case No. FWV21000389
FWV21000390
FWV21000391
FWV21000392
FWV21000393
FWV21000394
FWV21000395

FIRST AMENDED FELONY COMPLAINT

1 The undersigned is informed and believes that:

2 COUNT 1

3 **CONSPIRACY**

4 On and between September 10, 2020 and January 7, 2021, in the Counties of San
5 Bernardino and Los Angeles, the crime of CONSPIRACY, in violation of Penal Code Section
6 182(a)(1), a felony, was committed by LASZLO CASTRO LENCSE, ANTONIO IEZZA, JR.,
7 JAIME MOSAQUITES DIAZ, ELIGIO ORTEGA DOMINGUEZ, IVAN DOMINGUEZ
8 LOPEZ, GEOVANY ORTEGA NARCISCO, and GONZALO CACHU LUCATERO, who did
9 willfully and unlawfully conspire together and with another person and persons whose identity is
10 unknown to commit the crimes of Grand Theft, in violation of Penal Code section 487(a), a
11 felony, pursuant to and for the purpose of carrying out the objects and purposes of aforesaid
12 conspiracy, said defendants and other co-conspirators committed the following overt act(s):

- 13 1. On or about September 10, 2020, IVAN DOMINGUEZ LOPEZ traveled from an open air
14 lot behind 11659 Ramona Avenue, Chino, California (hereafter the "Chino Lot") in a box
15 truck and delivered a load of ineligible empty beverage containers (EBCs) to Greenyard
16 Recycling, located at 2570 S. Vineyard Avenue, Ontario, California, before returning to
17 the Chino Lot.
- 18 2. On or about September 10, 2020, IVAN DOMINGUEZ LOPEZ traveled to West Coast
19 Waste, located at 8607 Hemlock Avenue, Fontana, California, from the Chino Lot in a
20 semi-truck and picked up bales of EBCs.
- 21 3. On or about September 30, 2020, IVAN DOMINGUEZ LOPEZ left the Chino Lot in a
22 box truck and delivered five (5) super sacks of ineligible plastic EBCs to Greenyard
23 Recycling.
- 24 4. On or about October 1, 2020, IVAN DOMINGUEZ LOPEZ used a box truck to deliver
25 twelve (12) super sacks of ineligible plastic EBCs to Greenyard Recycling from the Chino
26 Lot before driving the box truck to a lot located at 2603 Ninth Street, Highland, California
27 (hereafter the "Highland Lot").

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- 1 5. On or about October 22, 2020, GEOVANY ORTEGA NARCISCO loaded super sacks
2 into a trailer at the Chino Lot.
- 3 6. On or about October 22, 2020, West Coast Waste imported approximately 18,340 pounds
4 of aluminum EBCs from RENUOIL of America located in Las Vegas, Nevada.
- 5 7. On or about October 22, 2020, a semi-truck trailer arrived at West Coast Waste, and
6 unidentified co-conspirators used forklifts to unload bales of EBCs into the warehouse
- 7 8. On or about October 22, 2020, a second semi-truck trailer was loaded with bales of EBCs
8 using two forklifts at West Coast Waste, one of which was operated by JAIME
9 MOSAQUITES DIAZ.
- 10 9. On or about October 27, 2020, IVAN DOMINGUEZ LOPEZ and ELIGIO ORTEGA
11 DOMINGUEZ traveled from the Chino Lot to West Coast Waste in a semi-truck and
12 picked up forty-nine (49) super sacks of EBCs before returning to the Chino Lot.
- 13 10. On or about October 28, 2020, IVAN DOMINGUEZ LOPEZ drove a box truck from the
14 Chino lot to Greenyard Recycling and unloaded eight (8) super sacks of ineligible EBCs
15 before returning to the Chino Lot.
- 16 11. On or about October 28, 2020, GEOVANY ORTEGA NARCISCO assisted IVAN
17 DOMINGUEZ LOPEZ in loading a flatbed Nissan owned by ELIGIO ORTEGA
18 DOMINGUEZ with ineligible EBCs, before delivering the EBCs to A&A Recycling,
19 located at 2246 S. Euclid Avenue, Ontario, California.
- 20 12. On or about October 28, 2020, West Coast Waste imported approximately 24,840 pounds
21 of plastic EBCs from RENUOIL of America located in Las Vegas, Nevada.
- 22 13. On or about October 29, 2020, unidentified co-conspirators working at West Coast Waste
23 unloaded sixty-nine (69) bales of EBCs from a semi-truck trailer into the warehouse.
- 24 14. On or about October 29, 2020, two forklifts were used at West Coast Waste by
25 unidentified co-conspirators to load approximately seventy-two (72) bales of EBCs into a
26 second semi-truck trailer.
- 27 15. On or about October 29, 2020, JAIME MOSAQUITES DIAZ took photographs of a third
28 semi-truck trailer that arrived at West Coast Waste. Two bales of EBCs loaded into the

- 1 trailer before JAIME MOSQUITES DIAZ took photographs. Next, the two bales were
2 removed and bales of plastic wrap were loaded into the semi-truck trailer, which departed
3 shortly thereafter.
- 4 16. On or about October 29, 2020 JAIME MOSAQUITES DIAZ took photographs of a fourth
5 semi-truck trailer that arrived at West Coast Waste. Two bales of EBCs loaded into the
6 trailer before JAIME MOSQUITES DIAZ took photographs. Next, the two bales were
7 removed and bales of plastic wrap were loaded into the semi-truck trailer, which departed
8 shortly thereafter.
- 9 17. On or about November 3, 2020, IVAN DOMINGUEZ LOPEZ traveled to West Coast
10 Waste in a semi-truck trailer, along with ELIGIO ORTEGA DOMINGUEZ, and picked
11 up super sacks of EBCs.
- 12 18. On or about November 3, 2020, ANTONIO IEZZA, JR. sent a processor invoice to the
13 California Department of Resources Recycling and Recovery (Cal Recycle) for payment,
14 claiming that West Coast Waste had cancelled approximately 14,289.3 pounds of plastic
15 between October 24, 2020, and October 28, 2020.
- 16 19. On or about November 5, 2020, unidentified co-conspirators loaded bales of EBC into a
17 semi-truck trailer at West Coast Waste.
- 18 20. On or about November 5, 2020, a semi-truck from SA Recycling delivered EBC material
19 to West Coast Waste, which unidentified co-conspirators packed into super sacks.
- 20 21. On or about November 6, 2020, unidentified co-conspirators at West Coast Waste
21 unloaded bales of EBCs from two semi-truck trailers, and later loaded bales of EBCs into
22 a third semi-truck trailer.
- 23 22. On or about November 7, 2020, unidentified co-conspirators loaded bales of EBCs into a
24 semi-truck trailer at West Coast Waste.
- 25 23. On or about November 11, 2020, West Coast Waste imported approximately 24,740
26 pounds of plastic EBCs from RENUOIL of America located in Las Vegas, Nevada.

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- 1 24. On or about November 11, 2020, LASZLO CASTRO LENCSE, ANTONIO IEZZA, JR.,
2 JAIME MOSAQUITES DIAZ were at West Coast Waste when approximately fifty (50)
3 bales of EBCs were unloaded from a semi-truck trailer by unidentified co-conspirators.
- 4 25. On or about November 12, 2020, a semi-truck arrived at West Coast Waste, was loaded
5 with bales of EBCs by unidentified co-conspirators, and later departed.
- 6 26. On or about November 12, 2020, a second semi-truck (CA #9E39521) was loaded with
7 plastic EBCs by unidentified co-conspirators at West Coast Waste. It departed, but later
8 returned and the trailer was unloaded the same bales by the unidentified co-conspirators.
- 9 27. On or about November 12, 2020, a third semi-truck (CA #9D39521 and CA# 4CZ8658)
10 came to West Coast Waste where bales of plastic EBCs were unloaded by unidentified co-
11 conspirators, and later departed.
- 12 28. On or about November 12, 2020, a semi-truck trailer (CA # 9E29896) departed the Chino
13 lot driven by IVAN DOMINGUEZ LOPEZ. The semi-truck trailer travelled to West
14 Coast Waste where forklifts, one of which was operated by JAIME MOSAQUITES
15 DIAZ, were used to load the trailer with sixty-three (63) bales of EBCs. The semi-truck
16 trailer later returned to the Chino Lot.
- 17 29. On or about November 13, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
18 CalRecycle for payment, claiming that West Coast Waste cancelled approximately
19 13,324.7 pounds of plastic from November 1, 2020 to November 6, 2020.
- 20 30. On or about November 17, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
21 CalRecycle for payment, claiming that West Coast Waste cancelled approximately
22 14,634.2 pounds of plastic from November 7, 2020 to November 13, 2020.
- 23 31. On or about November 18, 2020, LASZLO CASTRO LENCSE conversed with an
24 unidentified co-conspirator before the unidentified co-conspirator drove a semi-truck
25 loaded with bales of plastic EBCs from West Coast Waste to an industrial complex
26 located at 8369 Miliken Avenue, Rancho Cucamonga, California.
- 27 32. On or about November 18, 2020, GEOVANY ORTEGA NARCISCO assisted IVAN
28 DOMINGUEZ LOPEZ inside a trailer at the Chino Lot.

- 1 33. IVAN DOMINGUEZ LOPEZ used a box truck to transport and drop off eight (8) super
2 sacks of ineligible EBCs at Greenyard Recycling. An unidentified co-conspirator at
3 Greenyard Recycling mixed the contents of the super sacks delivered by IVAN
4 DOMINGUEZ LOPEZ into super sacks already loaded in trucks, which were later driven
5 to Basic Fibers, a recycling processor, located at 6019 S. Manhattan Pl., Los Angeles, CA.
- 6 34. On or about November 18, 2020, IVAN DOMINGUEZ LOPEZ drove a box truck to West
7 Coast Waste, where he picked up twenty-three (23) super sacks of EBCs and drove back
8 them back to the Chino Lot.
- 9 35. On or about November 19, 2020, GEOVANY ORTEGA NARCISCO loaded a Ford
10 Expedition in the Chino lot with large bags of ineligible EBCs. The vehicle loaded with
11 ineligible EBCs was later driven away by ELIGIO ORTEGA DOMINGUEZ.
- 12 36. On or about November 19, 2020, IVAN DOMINGUEZ LOPEZ drove a semi-truck (CA
13 #9E29896) from the Chino Lot to West Coast Waste where forklifts, one of which was
14 operated by JAIME MOSAQUITES DIAZ, were used to load fifty-one (51) super sacks
15 of EBCs into the trailer before it left for the Chino Lot. ELIGIO ORTEGA
16 DOMINGUEZ was at West Coast Waste when these events took place.
- 17 37. On or about November 20, 2020, ELIGIO ORTEGA DOMINGUEZ, IVAN
18 DOMINGUEZ LOPEZ, and GEOVANY ORTEGA NARCISCO unloaded bags of
19 ineligible EBCs from a box truck into a stake bed truck and black SUV before the vehicles
20 departed the Chino Lot.
- 21 38. On or about November 24, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
22 CalRecycle for payment, claiming that West Coast Waste cancelled approximately
23 14,433.1 pounds of plastic from November 14 to November 20.
- 24 39. On or about December 1, 2020, ELIGIO ORTEGA DOMINGUEZ, along with an
25 unidentified co-conspirator, transferred ineligible EBC material into a stake-bed truck and
26 Ford Expedition at the Chino Lot before delivering the ineligible EBCs to an unknown
27 location.

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- 1 40. On or about December 2, 2020, ELIGIO ORTEGA DOMINGUEZ and GEOVANY
2 ORTEGA NARCISCO repeatedly loaded ineligible EBC material into a stake-bed truck
3 and Ford Expedition at the Chino Lot before delivering the ineligible EBCs to an
4 unknown location.
- 5 41. On or about December 3, 2020, ELIGIO ORTEGA DOMINGUEZ and unidentified co-
6 conspirators repeatedly loaded ineligible EBCs into a stake-bed truck and Ford Expedition
7 at the Chino Lot before delivering the ineligible EBCs to an unknown location.
- 8 42. On or about December 4, 2020, unidentified co-conspirators repeatedly loaded ineligible
9 EBCs into a stake-bed truck and Ford Expedition at the Chino Lot before delivering the
10 ineligible EBCs to an unknown location.
- 11 43. On or about December 5, 2020, unidentified co-conspirators repeatedly loaded ineligible
12 EBC material into a stake-bed truck and Ford Expedition at the Chino Lot before
13 delivering the ineligible EBCs to an unknown location.
- 14 44. On or about December 7, 2020, IVAN DOMINGUEZ LOPEZ, ELIGIO ORTEGA
15 DOMINGUEZ, and GEOVANY ORTEGA NARCISCO loaded vehicles at the Chino Lot
16 with ineligible EBCs and delivered them to an unknown location.
- 17 45. On or about December 8, 2020, unidentified co-conspirators at West Coast Waste
18 unloaded seventy-five (75) bales of aluminum EBCs from a semi-truck trailer.
19 ANTONIO IEZZA, JR. was on site and assisted by picking up loose plastic EBCs.
- 20 46. On or about December 8, 2020, a semi-truck (CA #WP91635) was loaded with fifty-five
21 (55) bales of plastic EBCs by two forklifts, one of which was operated by JAIME
22 MOSAQUITES DIAZ.
- 23 47. On or about December 8, 2020, GONZALO CACHU LUCATERO drove the loaded
24 semi-truck (CA #WP91635 and CA #4LV9025), which is registered to GONZALO
25 CACHU LUCATERO, to East 55th Street, Vernon, California (hereafter the "Vernon
26 Lot") where the plastic EBCs were unloaded into a box truck.

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- 1 48. On or about December 8, 2020, IVAN DOMINGUEZ LOPEZ, ELIGIO ORTEGA
2 DOMINGUEZ, and GEOVANY ORTEGA NARCISCO loaded vehicles at the Chino Lot
3 with ineligible EBCs and delivered them to an unknown location.
- 4 49. On or about December 9, 2020, unidentified co-conspirators entered the Vernon Lot with
5 a white van (CA #5Z04986), which was loaded with ineligible EBCs from a container in
6 the Vernon Lot. That same day, the unidentified co-conspirators drove the white van to
7 Greenyard Recycling and unloaded the ineligible EBCs.
- 8 50. On or about December 9, 2020, IVAN DOMINGUEZ LOPEZ, ELIGIO ORTEGA
9 DOMINGUEZ, and GEOVANY ORTEGA NARCISCO loaded vehicles at the Chino Lot
10 with ineligible EBCs and delivered them to an unknown location.
- 11 51. On or about December 10, 2020, IVAN DOMINGUEZ LOPEZ, ELIGIO ORTEGA
12 DOMINGUEZ, and GEOVANY ORTEGA NARCISCO loaded vehicles at the Chino Lot
13 with ineligible EBCs and delivered them to an unknown location.
- 14 52. On or about December 11, 2020, IVAN DOMINGUEZ LOPEZ, ELIGIO ORTEGA
15 DOMINGUEZ, and GEOVANY ORTEGA NARCISCO loaded vehicles at the Chino Lot
16 with ineligible EBCs and delivered them to an unknown location.
- 17 53. On or about December 16, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
18 CalRecycle for payment, claiming that West Coast Waste cancelled approximately 5,477
19 pounds of plastic from December 8, 2020 to December 10, 2020.
- 20 54. On or about December 17, 2020, ELIGIO ORTEGA DOMINGUEZ and an unidentified
21 co-conspirator loaded a stake-bed truck with ineligible EBCs at the Chino Lot. ELIGIO
22 ORTEGA DOMINGUEZ later drove it to an unknown location.
- 23 55. On or about December 18, 2020, ELIGIO ORTEGA DOMINGUEZ and GEOVANY
24 ORTEGA NARCISCO loaded a stake-bed truck with ineligible EBCs at the Chino Lot.
25 ELIGIO ORTEGA DOMINGUEZ later drove it to an unknown location.
- 26 56. On or about December 18, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
27 CalRecycle for payment, claiming that West Coast Waste cancelled approximately
28 78,845.9 pounds of plastic from November 14, 2020 to November 20, 2020.

1 57. On or about December 18, 2020, ANTONIO IEZZA, JR. submitted a processor claim to
2 CalRecycle for payment, claiming that West Coast Waste cancelled approximately
3 60,371.6 pounds of plastic from November 14, 2020 to November 20, 2020.

4 58. On or about December 22, 2020, ELIGIO ORTEGA DOMINGUEZ and GEOVANY
5 ORTEGA NARCISCO loaded a Ford Expedition and stake-bed truck with bags of
6 ineligible EBCs at the Chino Lot, and later drove it to an unknown location.

7 59. On or about December 30, 2020, an individual believed to be IVAN DOMINGUEZ
8 LOPEZ and an unidentified co-conspirator loaded a Ford Expedition with ineligible EBCs
9 at the Chino Lot, and later drove it to an unknown location.

10 60. On or about January 7, 2021, ELIGIO ORTEGA DOMINGUEZ and an unidentified co-
11 conspirator loaded a Ford Expedition at the Chino Lot with ineligible EBCs and delivered
12 them to an unknown location.

13 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
14 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
15 It is further alleged that the above offense is a violation of Penal Code section 462(a).

16 **COUNT 2**

17 **GRAND THEFT**

18 On and between September 10, 2020 and January 7, 2021, in the Counties of San Bernardino
19 and Los Angeles, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of
20 Penal Code section 487(a), a felony, was committed by LASZLO CASTRO LENCSE,
21 ANTONIO IEZZA, JR., JAIME MOSAQUITES DIAZ, ELIGIO ORTEGA DOMINGUEZ,
22 IVAN DOMINGUEZ LOPEZ, GEOVANY ORTEGA NARCISCO, and GONZALO CACHU
23 LUCATERO, who did unlawfully take money and personal property of a value exceeding Nine
24 Hundred Fifty Dollars (\$950), to wit: the property of the State of California.

25 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
26 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
27 It is further alleged that the above offense is a violation of Penal Code section 462(a).

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1 COUNT 3

2 **PRESENTATION OF FRAUDULENT CLAIM**

3 On and between November 3, 2020 and December 16, 2020, in the County of San
4 Bernardino, the crime of PRESENTATION OF FRAUDULENT CLAIM, in violation of Penal
5 Code section 72, a felony, was committed by ANTONIO IEZZA, JR., who did willfully and
6 unlawfully and with intent to defraud, present for allowance and payment a false and fraudulent
7 claim, bill, account, voucher and writing, to wit: processor invoice numbers 450355, 451587,
8 451762, 452344, 452344_1, and 452344_2, to the State of California Department of Resources
9 Recycling and Recovery (CalRecycle).

10 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
11 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
12 It is further alleged that the above offense is a violation of Penal Code section 462(a).

13 COUNT 4

14 **RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN VALUE**

15 On and between September 10, 2020 and January 8, 2021, in the County of San Bernardino,
16 the crime of RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN VALUE, in violation
17 Penal Code section 496(a), a felony, was committed by ELIGIO ORTEGA DOMINGUEZ and
18 IVAN DOMINGUEZ LOPEZ, who, knowing the property to be so stolen or obtained, bought or
19 received property that had been stolen or that had been obtained in any manner constituting theft
20 or extortion, to wit: a 1997 Dorsey Trailer (CA License 4NW7932).

21 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
22 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
23 It is further alleged that the above offense is a violation of Penal Code section 462(a).

24 COUNT 5

25 **UNLAWFUL RECYCLING**

26 On and between September 10, 2020 and January 7, 2021, in the County of San Bernardino,
27 the crime of UNLAWFUL RECYCLING, in violation of Public Resource Code Section
28 14591(b)(1)(A), a felony, was committed by ANTONIO IEZZA, JR., who with the intent to

1 defraud the State of California did submit a false or fraudulent claim for payment as a processor,
2 for every empty beverage container received by the processor from a certified recycling center,
3 curbside program, or dropoff or collection program, pursuant to Public Resource Code Section
4 14573.

5 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
6 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.

7 It is further alleged that the above offense is a violation of Penal Code section 462(a).

8 **COUNT 6**

9 **UNLAWFUL RECYCLING**

10 On and between September 10, 2020 and January 7, 2021, in the Counties of San Bernardino
11 and Los Angeles, the crime of UNLAWFUL RECYCLING, in violation of Public Resource Code
12 Section 14591(b)(1)(D), a felony, was committed by LASZLO CASTRO LENCSE, ANTONIO
13 IEZZA, JR., JAIME MOSAQUITES DIAZ, ELIGIO ORTEGA DOMINGUEZ, IVAN
14 DOMINGUEZ LOPEZ, GEOVANY ORTEGA NARCISCO, and GONZALO CACHU
15 LUCATERO, who with the intent to defraud the State of California did redeems out-of-state
16 containers, rejected containers, line breakage, or containers that have already been redeemed.

17 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
18 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.

19 It is further alleged that the above offense is a violation of Penal Code section 462(a).

20 **COUNT 7**

21 **UNLAWFUL RECYCLING**

22 On and between September 10, 2020 and January 7, 2021, in the Counties of San Bernardino
23 and Los Angeles, the crime of UNLAWFUL RECYCLING, in violation of Public Resource Code
24 Section 14591(b)(1)(E), a felony, was committed by LASZLO CASTRO LENCSE, ANTONIO
25 IEZZA, JR., JAIME MOSAQUITES DIAZ, ELIGIO ORTEGA DOMINGUEZ, IVAN
26 DOMINGUEZ LOPEZ, and GEOVANY ORTEGA NARCISCO, who with the intent to defraud
27 the State of California did return redeemed containers to the California marketplace for
28 redemption.

1 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
2 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
3 It is further alleged that the above offense is a violation of Penal Code section 462(a).

4 **COUNT 8**

5 **UNLAWFUL RECYCLING**

6 On and between September 10, 2020 and January 7, 2021, in the County of San Bernardino,
7 the crime of UNLAWFUL RECYCLING, in violation of Public Resource Code Section
8 14591(b)(1)(F), a felony, was committed by LASZLO CASTRO LENCSE, ANTONIO IEZZA,
9 JR., JAIME MOSAQUITES DIAZ, and GONZALO CACHU LUCATERO, who with the intent
10 to defraud the State of California did bring out-of-state containers, rejected containers, or line
11 breakage to the California marketplace for redemption.

12 **NOTICE:** Conviction of this offense will require you to provide specimens and samples
13 pursuant to Penal Code section 296. Willful refusal to provide the specimens is a crime.
14 It is further alleged that the above offense is a violation of Penal Code section 462(a).

15 **FIRST SPECIAL ALLEGATION**

16 **[THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045(A))]**

17 It is further alleged that LASZLO CASTRO LENCSE, ANTONIO IEZZA, JR., and JAIME
18 MOSAQUITES DIAZ, in the commission of the Grand Theft count alleged against them in this
19 First Amended Felony Complaint, with the intent to do so, took funds of a value exceeding one
20 hundred thousand dollars (\$100,000) within the meaning of Penal Code section 1203.045.

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1 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
2 CORRECT AND THAT THIS FIRST AMENDED FELONY COMPLAINT CONSISTS OF
3 EIGHT (8) COUNTS AND ONE (1) SPECIAL ALLEGATION.

4 Executed in San Bernardino, County of San Bernardino, on February 4, 2021.

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6 
7 MICHAEL MORA
8 DECLARANT AND COMPLAINANT

9
10 XAVIER BECERRA,
11 ATTORNEY GENERAL

12 BY: 
13 NICHOLAS B.C. SCHULTZ
14 DEPUTY ATTORNEY GENERAL

15 **NOTICE TO DEFENDANT AND ATTORNEY**

16 Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby
17 informally request that defense counsel provide discovery to the People as required by Penal
18 Code section 1054.3.

19 **NOTICE TO ATTORNEY**

20 Any materials accompanying this complaint or provided by the People in this case may
21 contain information about witnesses. Such information is subject to Penal Code section 1054.2,
22 which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or
23 telephone number of a victim or witness whose name is disclosed to the attorney pursuant to
24 subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a
25 hearing and a showing of good cause."
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1 AGENCY: CALIFORNIA DEPARTMENT OF JUSTICE BUREAU OF INVESTIGATION

2 PRELIM. TIME. EST.: One (1) Day

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4 <u>DEFENDANT</u>	<u>CII</u>	<u>DOB</u>	<u>BOOKING</u>	<u>BAIL</u>	<u>CUSTODY</u>
			<u>NO.</u>	<u>RECOM'D</u>	<u>RTN DATE</u>
5 LASZLO CASTRO LENCSE		(03/26/1967)		\$250,000	
6 ANTONIO IEZZA, JR.		(07/31/1966)		\$250,000	
7 JAIME MOSAQUITES DIAZ		(01/11/1957)		\$250,000	
8 ELIGIO ORTEGA DOMINGUEZ		(05/19/1983)		\$50,000	
9 IVAN DOMINGUEZ LOPEZ		(04/04/1980)		\$50,000	
10 GEOVANY ORTEGA NARCISCO		(05/23/2002)		\$50,000	
11 GONZALO CACHU LUCATERO		(12/19/1963)		\$50,000	

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ELIGIO ORTEGA DOMINGUEZ

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16-2-3		
2	PC 487(a)	16-2-3		
4	PC 496(a)	16-2-3		
6	PR 14591(b)(1)(D)	16-2-3		
7	PR 14591(b)(1)(E)	16-2-3		

IVAN DOMINGUEZ LOPEZ

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16-2-3		
2	PC 487(a)	16-2-3		
4	PC 496(a)	16-2-3		
6	PR 14591(b)(1)(D)	16-2-3		
7	PR 14591(b)(1)(E)	16-2-3		

GEOVANY ORTEGA NARCISCO

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16-2-3		
2	PC 487(a)	16-2-3		
6	PR 14591(b)(1)(D)	16-2-3		
7	PR 14591(b)(1)(E)	16-2-3		

GONZALO CACHU LUCATERO

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	16-2-3		
2	PC 487(a)	16-2-3		
8	PR 14591(b)(1)(F)	16-2-3		

I ORDER that the defendant named above be held to answer for the above-described offenses and allegations, and be admitted to bail in the sum of:

///
///

1 LASZLO CASTRO LENCSE _____ DOLLARS
 2 ANTONIO IEZZA, JR. _____ DOLLARS
 3 JAIME MOSAQUITES DIAZ _____ DOLLARS
 4 ELIGIO DOMINGUEZ ORTEGA _____ DOLLARS
 5 IVAN DOMINGUEZ LOPEZ _____ DOLLARS
 6 GEOVANY ORTEGA NARCISCO _____ DOLLARS
 7 GONZALO CACHU LUCATERO _____ DOLLARS
 8
 9

10 I ORDER that the defendant named above be held to answer for the above-described
 11 offenses and allegations, that bail be denied, and that said defendant be remanded to the custody
 12 of the Sheriff. The date of felony arraignment is set for:

13
 14 LASZLO CASTRO LENCSE _____ in Dept _____
 15 ANTONIO IEZZA, JR. _____ in Dept _____
 16 JAIME MOSAQUITES DIAZ _____ in Dept _____
 17 ELIGIO DOMINGUEZ ORTEGA _____ in Dept _____
 18 IVAN DOMINGUEZ LOPEZ _____ in Dept _____
 19 GEOVANY ORTEGA NARCISCO _____ in Dept _____
 20 GONZALO CACHU LUCATERO _____ in Dept _____
 21

22 at: _____ A.M.

23
 24 Date _____

_____ *Committing Magistrate*

25
 26
 27
 28