

WARRANT ISSUED

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

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.
01 CARLOS ANTONIO DE BOURBON GALD MONTENEGRO (DOB: 09/09/1967),
aka MARK ANTHONY GONSALVES, and
02 MARCOS RAUL AREVALO (DOB: 03/15/1986)
Defendant(s).

CASE NO. BA491333

FELONY COMPLAINT
FOR ARREST WARRANT

DISTRICT ATTORNEY'S OFFICE
PUBLIC INTEGRITY DIVISION
211 WEST TEMPLE STREET, SUITE 1000
LOS ANGELES, CA 90012

LOS ANGELES SUPERIOR COURT
2020 NOV 12 PM 2:47
FILED

The undersigned is informed and believes that:

COUNT 1

On or between July 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT ANY CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of VOTER FRAUD - REGISTER FICTIOUS PERSONS, in violation of Section 18101 of the Elections Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

Overt Act 1: On and between July 6, 2020 and August 7, 2020, the City Clerk of the City of Hawthorne issued nomination papers to Carlos Montenegro for the office of Mayor of the City of Hawthorne, located in the County of Los Angeles.

Overt Act 2: On and between July 6, 2020 and August 7, 2020, Carlos Montenegro circulated his nomination papers and collected and/or entered 41 names, addresses, and signatures thereon of persons who purportedly supported his nomination for the office of Mayor of the City of Hawthorne, located in the County of Los Angeles.

Overt Act 3: On and between July 6, 2020 and August 7, 2020, Carlos Montenegro declared under penalty of perjury on declarations of circulator that he saw the 41 signatures on the nomination papers being written for the persons whose names, addresses, and signatures appeared on the nomination papers.

Overt Act 4: On and between July 6, 2020 and August 7, 2020, Carlos Montenegro submitted and filed the signed nomination papers containing 41 signatures and addresses to the City Clerk of the City of Hawthorne, along with the declarations of circulator, and affidavits of nominee.

Overt Act 5: On or about August 10, 2020, Carlos Montenegro caused or procured the City Clerk of the City of Hawthorne to submit his nomination papers for the office of Mayor of the City of Hawthorne to the Los Angeles County Registrar-Recorder's Office for signature verification.

Overt Act 6: On or about August 11, 2020, the Los Angeles County Registrar-Recorder's validated 18 of the 41 names, addresses, and signatures on Carlos Montenegro's nomination papers; and that information was transmitted to him by the City Clerk of the City of Hawthorne.

Overt Act 7: On and between September 22, 2020 and October 7, 2020, the City Clerk of the City of Hawthorne issued write-in candidate nomination papers to Carlos Montenegro for the office of Mayor in the City of Hawthorne, located in the County of Los Angeles.

Overt Act 8: On and between October 1, 2020 and October 7, 2020, Carlos Montenegro circulated his nomination papers and collected and/or entered 32 names, addresses, and signatures of fictitious, non-existent, or deceased persons who purportedly supported his nomination for the office of Mayor of the City of Hawthorne, located in the County of Los Angeles.

Overt Act 9: On and between October 1, 2020 and October 7, 2020, Carlos Montenegro collected and/or entered 32 names and addresses of fictitious, non-existent, or deceased persons on 32 voter registration applications, using a post office box or his home address as the mailing address for the voter registrants to receive vote by mail ballots, or other correspondence from the Los Angeles County Registrar-Recorder's Office, or the California Secretary of State.

Overt Act 10: On or about October 7, 2020, Carlos Montenegro declared under penalty of perjury on a declaration of circulator that he saw the 32 signatures on the nomination papers being written for the fictitious, non-existent, or deceased persons whose names, addresses, and signatures appeared on the nomination papers.

Overt Act 11: On and between October 7, 2020 and October 12, 2020, Carlos Montenegro submitted and filed signed write-in candidate nomination papers containing 32 signatures and addresses for fictitious, non-existent, or deceased persons with the City Clerk of the City of Hawthorne, along with the signed declaration of circulator, and affidavit of nominee.

Overt Act 12: On and between October 7, 2020 and October 12, 2020, attached to his write-in candidate nomination papers, Carlos Montenegro submitted and filed 32 voter registration applications for fictitious, non-existent, or deceased persons with the City Clerk of the City of Hawthorne for processing by the Los Angeles County Registrar-Recorder's Office, and the California Secretary of State.

Overt Act 13: On or about October 13, 2020, Carlos Montenegro caused or procured the City Clerk of the City of Hawthorne to submit his write-in candidate nomination papers for the office of Mayor of the City of Hawthorne to the Los Angeles County Registrar-Recorder's Office for signature verification, along with voter registration applications for 32 fictitious, non-existent, or deceased persons.

Overt Act 14: On or about October 13, 2020, Carlos Montenegro caused or procured the Los Angeles County Registrar-Recorder's Office, and the California Secretary of State to process the 32 voter registration applications containing the names, addresses, and signatures of fictitious, non-existent, or deceased persons.

Overt Act 15: On or after October 13, 2020, Carlos Montenegro caused or procured the Los Angeles County Registrar-Recorder's Office to issue vote by mail ballots to 29 of the 32 fictitious, non-existent, or deceased persons whose voter registration applications were submitted by him.

Overt Act 16: On or about October 14, 2020, the Los Angeles County Registrar-Recorder's Office validated 2 of the 32 names, addresses, and signatures on Carlos Montenegro's write-in candidate nomination papers; and that information was transmitted to him by the City Clerk of the City of Hawthorne.

Overt Act 17: On and between July 1, 2020 and October 15, 2020, Carlos Montenegro, Marcos Arevalo, and other unknown coconspirators, collected and/or entered the names, addresses, and signatures for fictitious, non-existent, or deceased persons, on over 8000 voter registration applications, for processing by the Los Angeles County Registrar-Recorder's Office, and the California Secretary of State.

Overt Act 18: On and between July 1, 2020 and October 15, 2020, Carlos Montenegro, Mark Arevalo, and other unknown coconspirators, submitted and filed over 8000 voter registration applications for fictitious, non-existent, or deceased persons, for processing with the Los Angeles County Registrar-Recorder's Office, and the California Secretary of State.

Overt Act 19: On and between July 1, 2020 and October 15, 2020, Carlos Montenegro opened three post office boxes located in the City of Hawthorne.

Overt Act 20: On and between July 1, 2020 and October 15, 2020, Carlos Montenegro, Mark Arevalo, and other unknown coconspirators, used these post office boxes, as well as Carlos Montenegro's home address, as mailing addresses for over 8000 voter registration applications for fictitious, non-existent, or deceased persons, that were submitted for processing to the Los Angeles County Registrar-Recorder's Office, and the California Secretary of State.

Overt Act 21: On and between July 1, 2020 and October 15, 2020, Carlos Montenegro, and other unknown coconspirators, planned to use the post offices boxes, and his home address, to collect vote by mail ballots for over 8000 fictitious, non-existent, and deceased voter registrants, in order to cast ballots for Carlos Montenegro for the office of Mayor for the City of Hawthorne, and/or other candidates and measures.

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COUNT 2

On or between July 1, 2020 and July 31, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 3

On or between July 1, 2020 and July 31, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 4

On or between July 1, 2020 and July 31, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 5

On or between July 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 6

On or between August 1, 2020 and August 31, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 7

On or between August 1, 2020 and August 31, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 8

On or between August 1, 2020 and August 31, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 9

On or between August 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 10

On or between September 1, 2020 and September 30, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 11

On or between September 1, 2020 and September 30, 2020, in the County of Los Angeles, the crime of VOTER FRAUD REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 12

On or between September 1, 2020 and September 30, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 13

On or between September 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 14

On or between October 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 15

On or between October 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 16

On or between October 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 17

On or between October 1, 2020 and October 15, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO and MARCOS RAUL AREVALO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 18

On or between July 6, 2020 and August 10, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 19

On or between July 6, 2020 and August 10, 2020, in the County of Los Angeles, the crime of PERJURY UNDER OATH, in violation of PENAL CODE SECTION 118(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who being a person who, having taken an oath that he/she would testify, declare, depose, and certify truly before a competent tribunal, officer, and person, to wit, that he circulated nomination papers for the office of the Mayor of the City of Hawthorne, and saw the signatures thereon being written, in a case in which such an oath may by law be administered, and did contrary to such oath state as true a material matter which he/she knew to be false.

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COUNT 20

On or between September 22, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 21

On or between September 22, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PERJURY UNDER OATH, in violation of PENAL CODE SECTION 118(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who being a person who, having taken an oath that he/she would testify, declare, depose, and certify truly before a competent tribunal, officer, and person, to wit, that he circulated nomination papers for the office of the Mayor of the City of Hawthorne, and saw the signatures thereon being written, in a case in which such an oath may by law be administered, and did contrary to such oath state as true a material matter which he/she knew to be false.

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COUNT 22

On or about October 1, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 23

On or about October 1, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 24

On or about October 1, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 25

On or between October 1, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 26

On or about October 2, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 27

On or about October 2, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 28

On or about October 2, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 29

On or between October 2, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 30

On or about October 4, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, a voter registration card, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 31

On or about October 4, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 32

On or about October 4, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 33

On or between October 4, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 34

On or about October 5, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 35

On or about October 5, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 36

On or about October 5, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

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COUNT 37

On or between October 5, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

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COUNT 38

On or about October 6, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTER FICTITIOUS PERSONS, in violation of ELECTIONS CODE SECTION 18101, a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully completed, or caused or procured the completion of, in whole or in part, voter registration applications, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter.

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COUNT 39

On or about October 6, 2020, in the County of Los Angeles, the crime of VOTER FRAUD - REGISTERING A NON-EXISTENT PERSON TO VOTE, in violation of ELECTIONS CODE SECTION 18100(b), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly and willfully signed, and/or caused or procured the signing of, an affidavit of registration of a nonexistent person, and mailed and/or delivered, and/or caused or procured the mailing or delivery of, that affidavit to a county elections official.

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COUNT 40

On or about October 6, 2020, in the County of Los Angeles, the crime of INTERFERENCE WITH PROMPT TRANSFER OF COMPLETED AFFIDAVIT, in violation of ELECTIONS CODE SECTION 18103, a Misdemeanor, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who knowingly or negligently interfered with the prompt transfer of a completed affidavit of registration to the county elections official, retained a voter's completed registration card, without the voter's authorization, for more than three days, excluding Saturdays, Sundays, and state holidays, or after the close of registration, or denied a voter the right to return to the county elections official the voter's own completed registration card.

* * * * *

COUNT 41

On or between October 6, 2020 and October 13, 2020, in the County of Los Angeles, the crime of PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a), a Felony, was committed by CARLOS ANTONIO DE BOURBON GALD MONTENEGRO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

* * * * *

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.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

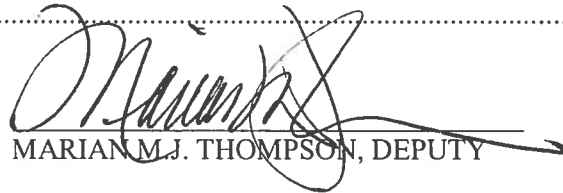
Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) CARLOS ANTONIO DE MONTENEGRO and MARCOS RAUL AREVALO for the above-listed crimes. Wherefore, a warrant of arrest is requested for CARLOS ANTONIO DE MONTENEGRO and MARCOS RAUL AREVALO.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA491333, CONSISTS OF 41 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on November 12, 2020.


WENDIE CONTRERAS
DECLARANT AND COMPLAINANT

JACKIE LACEY, DISTRICT ATTORNEY

BY: 
MARIAN M.J. THOMPSON, DEPUTY

AGENCY: LACO D.A. I/O: WENDIE ID NO.: 645584 PHONE : (213) 257-2525
 BUREAU OF CONTRERAS
 INVESTIGATION
DR NO.: P200398 OPERATOR: CB PRELIM. TIME EST.: 2 WEEK(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>
MONTENEGRO, CARLOS ANTONIO DE BOURBON GALD AREVALO, MARCOS RAUL		9/9/1967 3/15/1986			

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.

CARLOS MONTENEGRO

BAIL: \$ 615,000⁻

MARCOS AREVALO

BAIL: \$ 235,000⁻

DATE: 11/13/20



[Handwritten Signature]

Judge of the Above Entitled Court

ELEANOR J. HUNTER

NON-WARRANT DEFENDANTS:

<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>
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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)

CARLOS ANTONIO DE MONTENEGRO

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		
2	EL 18101			
3	EL 18100(b)	16,2,3+\$0-10,000		
4	EL 18103			
5	PC 115(a)	16,2,3 State Prison		
6	EL 18101			
7	EL 18100(b)	16,2,3+\$0-10,000		
8	EL 18103			
9	PC 115(a)	16,2,3 State Prison		
10	EL 18101			
11	EL 18100(b)	16,2,3+\$0-10,000		
12	EL 18103			
13	PC 115(a)	16,2,3 State Prison		
14	EL 18101			
15	EL 18100(b)	16,2,3+\$0-10,000		
16	EL 18103			
17	PC 115(a)	16,2,3 State Prison		
18	PC 115(a)	16,2,3 State Prison		
19	PC 118(a)	2-3-4 County Jail		
20	PC 115(a)	16,2,3 State Prison		
21	PC 118(a)	2-3-4 County Jail		
22	EL 18101			
23	EL 18100(b)	16,2,3+\$0-10,000		
24	EL 18103			
25	PC 115(a)	16,2,3 State Prison		
26	EL 18101			
27	EL 18100(b)	16,2,3+\$0-10,000		
28	EL 18103			
29	PC 115(a)	16,2,3 State Prison		
30	EL 18101			
31	EL 18100(b)	16,2,3+\$0-10,000		
32	EL 18103			
33	PC 115(a)	16,2,3 State Prison		
34	EL 18101			
35	EL 18100(b)	16,2,3+\$0-10,000		
36	EL 18103			
37	PC 115(a)	16,2,3 State Prison		
38	EL 18101			
39	EL 18100(b)	16,2,3+\$0-10,000		
40	EL 18103			
41	PC 115(a)	16,2,3 State Prison		

MARCOS RAUL AREVALO

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 182(a)(1)	Check Code County Jail		

2	EL 18101	
3	EL 18100(b)	16,2,3+\$0-10,000
4	EL 18103	
5	PC 115(a)	16,2,3 State Prison
6	EL 18101	
7	EL 18100(b)	16,2,3+\$0-10,000
8	EL 18103	
9	PC 115(a)	16,2,3 State Prison
10	EL 18101	
11	EL 18100(b)	16,2,3+\$0-10,000
12	EL 18103	
13	PC 115(a)	16,2,3 State Prison
14	EL 18101	
15	EL 18100(b)	16,2,3+\$0-10,000
16	EL 18103	
17	PC 115(a)	16,2,3 State Prison

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

CARLOS ANTONIO DE BOURBON GALD MONTENEGRO _____ Dollars

MARCOS RAUL AREVALO _____ 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:

CARLOS ANTONIO DE BOURBON GALD MONTENEGRO _____ in Dept _____

MARCOS RAUL AREVALO _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate