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FILED
Clerk of the Superior Court

FEB 16 2024

By: L. Brown
Central Division

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

MICHELLE MACK
[REDACTED]

KENNETH MACK
[REDACTED]

ALINA FRANCO
([REDACTED])

PRISCILLA SOPHIA RAMOS
([REDACTED])

KIMORA LEE GOODING
[REDACTED]

REINA MARIE MUNOZ
([REDACTED])

ASIA MEI DRAKE
[REDACTED]

SERENA MARIE REYES
[REDACTED]

ALEXANDRA AVERHART
[REDACTED] [REDACTED]

Defendants,

Case No. *CA23 02211*
FELONY COMPLAINT

1 The Attorney General of the State of California by this Felony Complaint accuses
2 Defendants MICHELLE MACK, KENNETH MACK, ALINA FRANCO, PRISCILLA SOPHIA
3 RAMOS, KIMORA LEE GOODING, REINA MARIE MUNOZ, ASIA MEI DRAKE, SERENA
4 MARIE REYES, and ALEXANDRA AVERHART of the following criminal offenses:

5 **COUNT 1**
6 **(Conspiracy to Commit Organized Retail Theft)**

7 On or about and between December 21, 2021 and October, 13, 2023, the Defendants
8 MICHELLE MACK, KENNETH MACK, ALINA FRANCO, PRISCILLA SOPHIA RAMOS,
9 KIMORA LEE GOODING, REINA MARIE MUNOZ, ASIA MEI DRAKE, SERENA MARIE
10 REYES, ALEXANDRA AVERHART, did, in the Counties of Alameda, Contra Costa, Kern, Los
11 Angeles, Marin, Napa, Orange, Placer, Riverside, Sacramento, San Bernadino, San Diego, San
12 Joaquin, San Mateo, Santa Clara, Solano, Sonoma, Stanislaus, Tulare, Ventura, and Yolo, State of
13 California, to wit: Conspiracy to Commit a Crime, in violation of section 182, subdivision (a)(1),
14 of the California Penal Code, in that said Defendants did unlawfully conspire together, and with
15 other persons, whose identities are not yet known, to commit the crime of Organized Retail Theft,
16 a felony, in violation of section 490.4, subdivision (a) of the Penal Code; that pursuant to and for
17 the purpose of carrying out the objectives and purpose of the aforesaid conspiracy, the said
18 Defendants committed the following overt acts:

19 **Overt Act 1**

20 On or between December 21, 2021, and March 16, 2022, GOODING exited an ULTA
21 Beauty store located at 1072 Camino Del Rio N, San Diego, CA, with merchandise she did not
22 pay for.

23 **Overt Act 2**

24 On or about June 11, 2022, GOODING and REYES exited ULTA Beauty stores located at
25 10653 Westview Parkway, San Diego, CA, with merchandise they did not pay for.

26 **Overt Act 3**

27 On or about October 24, 2022, RAMOS and MUNOZ exited an ULTA Beauty store
28 located at 10653 Westview Parkway, San Diego, CA, with merchandise they did not pay for.

1 **Overt Act 4**

2 On or about November 29, 2022, RAMOS and AVERHART exited an ULTA Beauty
3 store located at 31 Crutner Avenue, San Jose, CA, with merchandise they did not pay for.

4 **Overt Act 5**

5 On December 4, 2022, MACK messaged FRANCO “Are you still having product come in
6 on Friday?”; FRANCO responds “Yes.”

7 **Overt Act 6**

8 On or about January 31, 2023, GOODING and DRAKE exited an ULTA Beauty store
9 located at 30050 Haun Road, Menifee, CA, with merchandise they did not pay for.

10 **Overt Act 7**

11 On or about February 6, 2023, RAMOS and AVERHART exited an ULTA Beauty store
12 located at 2135 Bronze Star Drive, Woodland, CA, with merchandise they did not pay for.

13 **Overt Act 8**

14 On or about March 2, 2023, GOODING and DRAKE exited a Sunglass Hut located at
15 4595 Clairemont Drive, San Diego, CA, with merchandise they did not pay for.

16 **Overt Act 9**

17 On or about March 20, 2023, RAMOS and MUNOZ exited an ULTA Beauty store located
18 at 10071 Adams Avenue, Huntington Beach, CA, with merchandise they did not pay for.

19 **Overt Act 10**

20 On or about May 25, 2023, RAMOS exited a SEPHORA store located at 9300 Culver
21 Blvd #109, Culver City, CA, with merchandise she did not pay for.

22 **Overt Act 11**

23 On or about October 13, 2023, DRAKE exited an ULTA Beauty store located at 3625
24 Riverside Plaza Drive, Riverside, CA, with merchandise she did not pay for.

25 **Overt Act 12**

26 On or about January 7, 2023, GOODING messages MACK stating “I’m not stealing
27 regular I’m going to start filling up my bag quick. So I want to know stuff I can grab in bulks
28 too.”

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Overt Act 13

On or about January 10, 2023, GOODING texts MACK “do you have a lot of girls working for u rn?”

Overt Act 14

On or about January 17, 2023, MACK sent a text message to KENNETH to “meet Aleena at 10” and “She’s going to give u money.”

Overt Act 15

On or about February 21, 2023, MACK messaged GOODING a screenshot of “Online Makeup Store” with the address 5521 Mission Road #394, Bonsall, CA, to ship product to.

Overt Act 16

On or about February 28, 2023, GOODING messaged MACK a picture of box of makeup product with a USPS receipt and shipment label.

Overt Act 17

On or about February 23, 2023, MACK messaged KENNETH, “Even without lancome we still did well...meeting spot for Aleena at 11AM...I’ll put the makeup for Aleena by the front door.”

Overt Act 18

On or about March 14, 2023, MACK messaged GOODING “I need Asia’s (DRAKE’s) information to send the money to her...”

Overt Act 19

On or about March 20, 2023, KENNETH messaged MACK picture of bin full of paper “Lots of orders let’s get shipping.”

Overt Act 20

On or about July 8, 2023, MACK messaged FRANCO “Did you get some new girls? I really need product so if you have anything please let me know”

Overt Act 21

On November 9, 2023, and December 23, 2023, FRANCO and MACK exchanged \$57,239.00 in Apple Cash funds.

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Overt Act 22

On or about December 6, 2023, MACK and KENNETH were in possession of \$300,005.16 worth of makeup and other retail product in their residence in Bonsall, CA.

Overt Act 23

On or about December 6, 2023, FRANCO was in possession of \$67,504.33 worth of retail product in her residence in Colton, CA.

**COUNT 2
(Organized Retail Theft)**

On or about and between December 21, 2021 and October, 13, 2023, the Defendants MICHELLE MACK, KENNETH MACK, ALINA FRANCO, PRISCILLA SOPHIA RAMOS, KIMORA LEE GOODING, REINA MARIE MUNOZ, ASIA MEI DRAKE, SERENA MARIE REYES, ALEXANDRA AVERHART, in the State of California, did commit the crime of ORGANIZED RETAIL THEFT, in violation of Penal Code section 490.4(a)(1), a felony, in that they did willfully and unlawfully act in concert with one or more person to steal merchandise from one or more merchant’s with the intent to sell, exchange, or return the merchandise for value, in which the violations are committed on two or more separate occasions within a twelve month period, in which the aggregate value of the merchandise stolen, received, purchased, or possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit, stolen merchandise from the ULTA, SEPHORA, and other stores.

**COUNT 3
(Grand Theft)**

On or about December 21, 2021, Defendant GOODING, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**(COUNT 4)
(Grand Theft)**

On or between January 9, 2022, Defendant RAMOS, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took

1 the property of another, to wit, ULTA retail merchandise, valued above \$950.

2 **COUNT 5**
3 **(Grand Theft)**

4 On or about January 16, 2022, Defendant GOODING, in the County of Santa Clara, in
5 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
6 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

7 **COUNT 6**
8 **(Grand Theft)**

9 On or about January 16, 2022, Defendant GOODING, in the County of Santa Clara, in
10 violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that
11 in COUNT 5, in that she knowingly took the property of another, to wit, ULTA retail
12 merchandise, valued above \$950.

13 **COUNT 7**
14 **(Grand Theft)**

15 On or about March 11, 2022, Defendant GOODING, in the County of Santa Clara, in
16 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
17 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

18 **COUNT 8**
19 **(Grand Theft)**

20 On or about May 30, 2022, Defendant RAMOS, in the County of Yolo, in violation of
21 Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the
22 property of another, to wit, ULTA retail merchandise, valued above \$950.

23 **COUNT 9**
24 **(Grand Theft)**

25 On or about June 6, 2022, Defendant RAMOS, in the County of Alameda, in violation of
26 Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the
27 property of another, to wit, ULTA retail merchandise, valued above \$950.
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**COUNT 10
(Grand Theft)**

On or about June 11, 2022, Defendants GOODING and REYES, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 11
(Grand Theft)**

On or about June 11, 2022, Defendants GOODING and REYES, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 10, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 12
(Grand Theft)**

On or about June 11, 2022, Defendants GOODING and REYES, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNTS 10 and 11, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 13
(Grand Theft)**

On or about June 11, 2022, Defendants GOODING and REYES, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 14
(Grand Theft)**

On or between June 13, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 15
(Grand Theft)**

On or between June 13, 2022, Defendants GOODING and REYES, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 16
(Grand Theft)**

On or about June 30, 2022, Defendant RAMOS, in the County of Solano, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 13
(Grand Theft)**

On or about July 2, 2022, Defendant RAMOS, in the County of Contra Costa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 14
(Grand Theft)**

On or about July 5, 2022, Defendant RAMOS, in the County of San Joaquin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 15
(Grand Theft)**

On or between July 14, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 16
(Grand Theft)**

On or between July 14, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 15, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 17
(Grand Theft)**

On or between July 14, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 15 and 16, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 18
(Grand Theft)**

On or between July 15, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 19
(Grand Theft)**

On or between July 15, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 18, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 20
(Grand Theft)**

On or between July 15, 2022, Defendants GOODING and REYES, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony

1 separate from that in COUNT 18 and 19, in that they knowingly took the property of another, to
2 wit, ULTA retail merchandise, valued above \$950.

3 **COUNT 21**
4 **(Grand Theft)**

5 On or between July 15, 2022, Defendants GOODING and REYES, in the County of
6 Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in
7 that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
8 \$950.

9 **COUNT 22**
10 **(Grand Theft)**

11 On or between July 16, 2022, Defendants GOODING and REYES, in the County of San
12 Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate
13 from that in COUNT 15 and 16, in that they knowingly took the property of another, to wit,
14 ULTA retail merchandise, valued above \$950.

15 **COUNT 23**
16 **(Grand Theft)**

17 On or between July 16, 2022, Defendants GOODING and REYES, in the County of San
18 Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate
19 from that in COUNT 22, in that they knowingly took the property of another, to wit, ULTA retail
20 merchandise, valued above \$950.

21 **COUNT 24**
22 **(Grand Theft)**

23 On or about September 2, 2022, Defendant RAMOS, in the County of Yolo, in violation of
24 Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the
25 property of another, to wit, ULTA retail merchandise, valued above \$950.
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**COUNT 25
(Grand Theft)**

On or about September 15, 2022, Defendant RAMOS, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 26
(Grand Theft)**

On or about September 17, 2022, Defendant RAMOS, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 27
(Grand Theft)**

On or about September 26, 2022, Defendants RAMOS and MUNOZ, in the County of Napa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, retail merchandise, ULTA valued above \$950.

**COUNT 28
(Grand Theft)**

On or about September 26, 2022, Defendants RAMOS and MUNOZ, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, retail merchandise, ULTA valued above \$950.

**COUNT 29
(Grand Theft)**

On or about October 24, 2022, Defendants RAMOS and MUNOZ, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 30
(Grand Theft)**

On or about October 25, 2022, Defendants RAMOS and MUNOZ, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 31
(Grand Theft)**

On or about November 4, 2022, Defendants RAMOS and MUNOZ, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 32
(Grand Theft)**

On or about November 4, 2022, Defendants RAMOS and MUNOZ, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 31, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 33
(Grand Theft)**

On or about November 4, 2022, Defendants RAMOS and MUNOZ, in the County of Contra Costa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 34
(Grand Theft)**

On or about November 8, 2022, Defendants RAMOS and MUNOZ, in the County of San Joaquin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that

1 they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
2 \$950.

3 **COUNT 35**
4 **(Grand Theft)**

5 On or about November 17, 2022, Defendants RAMOS and AVERHART, in the County
6 Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that
7 they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
8 \$950.

9 **COUNT 36**
10 **(Grand Theft)**

11 On or about November 19, 2022, Defendants RAMOS and AVERHART, in the County
12 Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony,
13 in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued
14 above \$950.

15 **COUNT 37**
16 **(Grand Theft)**

17 On or about November 25, 2022, Defendant RAMOS and AVERHART, in the County of
18 San Joaquin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in
19 that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
20 \$950.

21 **COUNT 38**
22 **(Grand Theft)**

23 On or about November 25, 2022, Defendant RAMOS, in the County of Yolo, in violation
24 of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took
25 the property of another, to wit, ULTA retail merchandise, valued above \$950.

26 **COUNT 39**
27 **(Grand Theft)**

28 On or about November 29, 2022, Defendant RAMOS and AVERHART, in the County of
Santa Clara, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in

1 that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
2 \$950.

3 **COUNT 40**
4 **(Grand Theft)**

5 On or about November 29, 2022, Defendant RAMOS and AVERHART, in the County of
6 Santa Clara, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony
7 separate from that in COUNT 39, in that they knowingly took the property of another, to wit,
8 ULTA retail merchandise, valued above \$950.

9 **COUNT 41**
10 **(Grand Theft)**

11 On or about December 3, 2022, Defendant GOODING, in the County of Tulare, in
12 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
13 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

14 **COUNT 42**
15 **(Grand Theft)**

16 On or about December 4, 2022, Defendant GOODING, in the County of Los Angeles, in
17 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
18 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

19 **COUNT 43**
20 **(Grand Theft)**

21 On or about December 4, 2022, Defendant GOODING, in the County of Los Angeles, in
22 violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that
23 in COUNT 42, in that she knowingly took the property of another, to wit, ULTA retail
24 merchandise, valued above \$950.

25 **COUNT 44**
26 **(Grand Theft)**

27 On or about December 5, 2022, Defendant GOODING, in the County of Los Angeles, in
28 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 45
(Grand Theft)**

On or about December 5, 2022, Defendant GOODING, in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 46
(Grand Theft)**

On or about December 5, 2022, Defendant GOODING, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 47
(Grand Theft)**

On or about January 23, 2023, Defendants RAMOS and AVERHART, in the County of San Mateo, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 48
(Grand Theft)**

On or about January 30, 2023, Defendants GOODING and DRAKE, in the County of Ventura, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 49
(Grand Theft)**

On or about January 30, 2023, Defendants GOODING and DRAKE, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 50
(Grand Theft)**

On or about January 30, 2023, Defendants GOODING and DRAKE, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 49, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 51
(Grand Theft)**

On or about January 30, 2023, Defendants RAMOS, MUNOZ, and AVERHART, in the Counties of Santa Clara, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 52
(Grand Theft)**

On or about January 31, 2023, Defendants GOODING and DRAKE, in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 53
(Grand Theft)**

On or about January 31, 2023, Defendants GOODING and DRAKE, in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 52, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 54
(Grand Theft)**

On or about February 6, 2023, Defendants RAMOS and AVERHART, in the County of Solano, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that

1 they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
2 \$950.

3 **COUNT 55**
4 **(Grand Theft)**

5 On or about February 6, 2023, Defendants RAMOS and AVERHART, in the County of
6 Yolo, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that
7 they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
8 \$950.

9 **COUNT 56**
10 **(Grand Theft)**

11 On or about February 15, 2023, Defendant GOODING, in the County of Los Angeles, in
12 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
13 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

14 **COUNT 57**
15 **(Grand Theft)**

16 On or about February 15, 2023, Defendant GOODING, in the County of San Bernadino, in
17 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
18 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

19 **COUNT 58**
20 **(Grand Theft)**

21 On or about February 16, 2023, Defendant GOODING, in the County of San Bernadino, in
22 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
23 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

24 **COUNT 59**
25 **(Grand Theft)**

26 On or about February 16, 2023, Defendant GOODING, in the County of San Diego, in
27 violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she
28 knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 60
(Grand Theft)**

On or about February 16, 2023, Defendant GOODING, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 59, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 61
(Grand Theft)**

On or about February 25, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 62
(Grand Theft)**

On or about February 25, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 61, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 63
(Grand Theft)**

On or about February 25, 2023, Defendant RAMOS, in the County of Ventura, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 64
(Grand Theft)**

On or about February 26, 2023, Defendant RAMOS, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 65
(Grand Theft)**

On or about February 26, 2023, Defendant RAMOS, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 64, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 66
(Grand Theft)**

On or about February 27, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 67
(Grand Theft)**

On or about March 2, 2023, Defendants GOODING and DRAKE, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA and SUNGLASS HUT retail merchandise, valued above \$950.

**COUNT 68
(Grand Theft)**

On or about March 2, 2023, Defendants GOODING and DRAKE, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 67, in that they knowingly took the property of another, to wit, ULTA and SUNGLASS HUT retail merchandise, valued above \$950.

**COUNT 69
(Grand Theft)**

On or about March 2, 2023, Defendants GOODING and DRAKE, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 67 and 68, in that they knowingly took the property of another, to wit, ULTA and SUNGLASS HUT retail merchandise, valued above \$950.

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**COUNT 70
(Grand Theft)**

On or about March 7, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA and SEPHORA retail merchandise, valued above \$950.

**COUNT 71
(Grand Theft)**

On or about March 9, 2023, Defendant GOODING, in the County of Placer, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 72
(Grand Theft)**

On or about March 10, 2023, Defendants GOODING and DRAKE, in the County of Alameda, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 73
(Grand Theft)**

On or about March 10, 2023, Defendants GOODING and DRAKE, in the County of Alameda, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 72, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 74
(Grand Theft)**

On or about March 10, 2023, Defendants GOODING and DRAKE, in the County of Contra Costa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 75
(Grand Theft)**

On or about March 20, 2023, Defendants RAMOS and MUNOZ, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 76
(Grand Theft)**

On or about March 25, 2023, Defendants GOODING and DRAKE, in the County of Ventura, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 77
(Grand Theft)**

On or about March 25, 2023, Defendants RAMOS and MUNOZ, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 78
(Grand Theft)**

On or about March 25, 2023, Defendants RAMOS and MUNOZ, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 77, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 79
(Grand Theft)**

On or about March 26, 2023, Defendants GOODING and DRAKE, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that

1 they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
2 \$950.

3 **COUNT 80**
4 **(Grand Theft)**

5 On or about March 26, 2023, Defendants GOODING and DRAKE, in the County of
6 Orange in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate
7 from that in COUNT 79, in that they knowingly took the property of another, to wit, ULTA retail
8 merchandise, valued above \$950.

9 **COUNT 81**
10 **(Grand Theft)**

11 On or about March 26, 2023, Defendants GOODING and DRAKE, in the County of Los
12 Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in
13 that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
14 \$950.

15 **COUNT 82**
16 **(Grand Theft)**

17 On or about March 26, 2023, Defendants GOODING and DRAKE, in the County of Los
18 Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony
19 separate from that in COUNT 81, in that they knowingly took the property of another, to wit,
20 ULTA retail merchandise, valued above \$950.

21 **COUNT 83**
22 **(Grand Theft)**

23 On or about March 26, 2023, Defendants GOODING and DRAKE, in the County of San
24 Bernadino, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in
25 that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above
26 \$950.
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**COUNT 84
(Grand Theft)**

On or about March 27, 2023, Defendants RAMOS and MUNOZ, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 85
(Grand Theft)**

On or about April 5, 2023, Defendants RAMOS and MUNOZ, in the County of Alameda, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 86
(Grand Theft)**

On or about April 5, 2023, Defendants RAMOS and MUNOZ, in the County of Solano, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 87
(Grand Theft)**

On or about April 24, 2023, Defendants RAMOS and MUNOZ, in the County of Marin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 88
(Grand Theft)**

On or about April 24, 2023, Defendants RAMOS and MUNOZ, in the County of Sonoma, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 89
(Grand Theft)**

On or about May 9, 2023, Defendant GOODING, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 90
(Grand Theft)**

On or about May 9, 2023, Defendant GOODING, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 89, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 91
(Grand Theft)**

On or about May 10, 2023, Defendant GOODING, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 92
(Grand Theft)**

On or about May 10, 2023, Defendants RAMOS and MUNOZ, in the County of Yolo, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 93
(Grand Theft)**

On or about May 18, 2023, Defendant RAMOS, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 94
(Grand Theft)**

On or about May 18, 2023, Defendant RAMOS, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 93, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 95
(Grand Theft)**

On or about May 18, 2023, Defendant RAMOS, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 93 and 94, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 96
(Grand Theft)**

On or about May 19, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 97
(Grand Theft)**

On or about May 19, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 96, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 98
(Grand Theft)**

On or about May 24, 2023, Defendants GOODING and DRAKE, in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 99
(Grand Theft)**

On or about May 25, 2023, Defendants GOODING and DRAKE, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 100
(Grand Theft)**

On or about May 25, 2023, Defendants GOODING and DRAKE, in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 99, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 101
(Grand Theft)**

On or about May 25, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 102
(Grand Theft)**

On or about June 5, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 103
(Grand Theft)**

On or about June 5, 2023, Defendant RAMOS, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 102, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 104
(Grand Theft)**

On or about June 5, 2023, Defendant RAMOS, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 105
(Grand Theft)**

On or about June 10, 2023, Defendant GOODING, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 106
(Grand Theft)**

On or about June 10, 2023, Defendant GOODING, in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 105, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 107
(Grand Theft)**

On or about June 10, 2023, Defendant GOODING, in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 108
(Grand Theft)**

On or about June 23, 2023, Defendant RAMOS, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 109
(Grand Theft)**

On or about June 23, 2023, Defendant RAMOS, in the County of Yolo, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 110
(Grand Theft)**

On or about June 24, 2023, Defendant RAMOS, in the County of San Joaquin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 111
(Grand Theft)**

On or about June 24, 2023, Defendant RAMOS, in the County of San Joaquin, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 110, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 112
(Grand Theft)**

On or about July 1, 2023, Defendant RAMOS, in the County of Solano, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 113
(Grand Theft)**

On or about July 9, 2023, Defendant RAMOS, in the County of Kern, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 114
(Grand Theft)**

On or about July 9, 2023, Defendant GOODING, in the County of San Francisco, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, BLOOMINGDALE’S retail merchandise, valued above \$950.

**COUNT 115
(Grand Theft)**

On or about August 6, 2023, Defendant GOODING, in the County of Alameda, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, PRADA retail merchandise, valued above \$950.

**COUNT 116
(Grand Theft)**

On or about August 23, 2023, Defendants RAMOS and MUNOZ, in the County of Yolo, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 117
(Grand Theft)**

On or about August 26, 2023, Defendants RAMOS and MUNOZ, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 118
(Grand Theft)**

On or about August 29, 2023, Defendant RAMOS, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 119
(Grand Theft)**

On or about August 29, 2023, Defendant RAMOS, in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 118, in that they knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 120
(Grand Theft)**

On or about September 5, 2023, Defendant RAMOS in the County of Napa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 121
(Grand Theft)**

On or about September 5, 2023, Defendant RAMOS in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 122
(Grand Theft)**

On or about September 6, 2023, Defendant RAMOS in the County of Contra Costa, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 123
(Grand Theft)**

On or about September 6, 2023, Defendant RAMOS in the County of Alameda, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 124
(Grand Theft)**

On or about September 24, 2023, Defendant RAMOS in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 125
(Grand Theft)**

On or about October 12, 2023, Defendant DRAKE in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 126
(Grand Theft)**

On or about October 12, 2023, Defendant DRAKE in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 125, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 127
(Grand Theft)**

On or about October 12, 2023, Defendant DRAKE in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 128
(Grand Theft)**

On or about October 13, 2023, Defendant DRAKE in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

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**COUNT 129
(Grand Theft)**

On or about October 13, 2023, Defendant DRAKE in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 128, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 130
(Grand Theft)**

On or about October 13, 2023, Defendant DRAKE in the County of Riverside, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony separate from that in COUNT 128 and 129, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 131
(Grand Theft)**

On or about October 13, 2023, Defendant DRAKE in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, ULTA retail merchandise, valued above \$950.

**COUNT 132
(Grand Theft)**

On or about March 2, 2023, Defendants GOODING and DRAKE in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, Sunglass Hut (Luxottica) retail merchandise, valued above \$950.

**COUNT 133
(Grand Theft)**

On or about May 3, 2023, Defendants GOODING and DRAKE in the County of Orange, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, Sunglass Hut (Luxottica) retail merchandise, valued above \$950.

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**COUNT 134
(Grand Theft)**

On or about May 25, 2023, Defendants GOODING and DRAKE in the County of San Diego, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, SUNGLASS HUT (LUXOTTICA) retail merchandise, valued above \$950.

**COUNT 135
(Grand Theft)**

On or about March 8, 2023, Defendant RAMOS in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, SEPHORA retail merchandise, valued above \$950.

**COUNT 136
(Grand Theft)**

On or about May 16, 2023, Defendant RAMOS in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, SEPHORA retail merchandise, valued above \$950.

**COUNT 137
(Grand Theft)**

On or about February 18, 2022, Defendant GOODING in the County of Sacramento, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, SEPHORA retail merchandise, valued above \$950.

**COUNT 138
(Grand Theft)**

On or about May 25, 2023, Defendant RAMOS in the County of Los Angeles, in violation of Section 487 subdivision (a) of the Penal Code, committed a felony, in that she knowingly took the property of another, to wit, SEPHORA retail merchandise, valued above \$950.

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COUNT 139
(Receipt of Stolen Property)

From on or about December 21, 2021, and December 6, 2023, Defendants MACK and KENNETH, in the County of San Diego, in violation of section 496, subdivision (b) of the Penal Code, committed a felony, in that they did willfully and unlawfully buy or receive property exceeding \$950 in value that had been stolen and/or obtained in a manner constituting theft or extortion, under circumstances that should cause reasonable inquiry to ascertain that the person had the legal right to sell or deliver it, and willfully failed to make a reasonable inquiry before taking possession of the property obtained, to wit, beauty and other retail product.

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COUNT 140
(Receipt of Stolen Property)

From on or about December 21, 2021, and December 6, 2023, Defendant FRANCO, in the County of San Bernadino, in violation of section 496, subdivision (b) of the Penal Code, committed a felony, in that she did willfully and unlawfully buy or receive property exceeding \$950 in value that had been stolen and/or obtained in a manner constituting theft or extortion, under circumstances that should cause reasonable inquiry to ascertain that the person had the legal right to sell or deliver it, and willfully failed to make a reasonable inquiry before taking possession of the property obtained, to wit, beauty and other retail product.

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SPECIAL ALLEGATION 1
(Aggravated White Collar Crime Enhancement)

As to Counts 1 through 140 it is further alleged that in the commission of the above offenses, all Defendants violated Penal Code 186.11, subdivision (a)(2), in that the offenses set forth in Counts 1 through 139 are related felonies, a material element of which is fraud, which involves a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

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SPECIAL ALLEGATION 2
(Theft of Amount Over \$100,000.00)

It is further alleged that all Defendants, in the commission of the offenses alleged in Counts 1 through 140, with the intent to do so, committed theft in a value exceeding one hundred

1 thousand dollars (\$100,000) within the meaning of Penal Code Section 1203.045.

2 **SENTENCING FACTORS**
3 **(Aggravating Factors)**

4 The People further allege, pursuant to California Penal Code section 1170(b) and California
5 Rules of Court 4.421(a), that for each of the following crimes charged, there exist circumstances
6 in aggravation that are factors relating to the crime which are not elements of the individual
7 crimes charged:

- 8 1. For Counts 1 through 140, the manner in which Defendants carried out the crimes
9 indicates planning, sophistication, or professionalism (CA Rule of Court 4.421(a)(8));
- 10 2. For Counts 1 through 140, Defendant MACK induced others to participate in the
11 commission of the crime or occupied a position of leadership or dominance of other
12 participants in its commission (CA Rule of Court 4.421(a)(4));
- 13 3. For Counts 1 through 138, Defendants' crime sprees involved actual taking or damage
14 of great monetary value (CA Rule of Court 4.421(a)(9)).

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

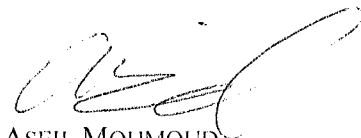
18 **DECLARATION**

19 I verify under information and belief, pursuant to Penal Code Section 806, that the
20 forgoing is true and correct.

21 Dated: February 16, 2024

Respectfully submitted,

22 ROB BONTA
23 Attorney General of California



24 ASEIL MOHMOUD
25 Deputy Attorney General
26 *Attorneys for the People*

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