

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

ELECTRONICALLY FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

09/11/2019
11:36 AM

DAVID H. YAMASAKI, Clerk of the Court
19CF2542

6 THE PEOPLE OF THE STATE OF CALIFORNIA,) FELONY COMPLAINT
7) WARRANT
8 Plaintiff,)
9)
10 vs.) No.
11 ROMAN ANTHONY REYNA 07/10/69) OCDA SA 19-101
12 A2071788) SANTA ANA
13 Defendant(s))

14 The Orange County District Attorney charges that in Orange
15 County, California, the law was violated as follows:

16 COUNT 1: On or about August 10, 2018, in violation of Section
17 18203 of the Elections Code (FILE FRAUDULENT NOMINATION PAPERS),
18 a FELONY, ROMAN ANTHONY REYNA did unlawfully file and submit for
19 filing a nomination paper and declaration of candidacy for ROMAN
20 REYNA for CITY COUNCIL in SANTA ANA CITY ELECTION knowing that
it and part of it had been made falsely.

21 COUNT 2: On or about August 10, 2018, in violation of Section
22 118(a) of the Penal Code (PERJURY BY DECLARATION), a FELONY,
23 ROMAN ANTHONY REYNA, who testified, declared, deposed, and
24 certified under penalty of perjury in Nomination Paper, in a
25 case in which such testimony, declaration, deposition, and
26 certification is permitted by law, did willfully and unlawfully
state as true a material matter which the defendant knew was
false, namely: Lied about Residence Address.

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1 COUNT 3: On or about July 16, 2018, in violation of Section 118
2 (a) of the Penal Code (PERJURY BY DECLARATION), a FELONY, ROMAN
3 ANTHONY REYNA, who testified, declared, deposed, and certified
4 under penalty of perjury in VOTER REGISTRATION, in a case in
5 which such testimony, declaration, deposition, and certification
6 is permitted by law, did willfully and unlawfully state as true
7 a material matter which the defendant knew was false, namely:
8 LIED ABOUT HOME ADDRESS.

7 COUNT 4: On or about October 22, 2018, in violation of Section
8 118(a) of the Penal Code (PERJURY BY DECLARATION), a FELONY,
9 ROMAN ANTHONY REYNA, who testified, declared, deposed, and
10 certified under penalty of perjury in VOTER REGISTRATION, in a
11 case in which such testimony, declaration, deposition, and
12 certification is permitted by law, did willfully and unlawfully
13 state as true a material matter which the defendant knew was
14 false, namely: LIED ABOUT HOME ADDRESS.

13 COUNT 5: On or about August 10, 2019, in violation of Section
14 18201 of the Election Code (FRAUDULENT NOMINATION PAPERS), a
15 FELONY, ROMAN ANTHONY REYNA did unlawfully falsely make,
16 fraudulently deface, and destroy a nomination paper.

16 I declare under penalty of perjury, on information and belief,
17 that the foregoing is true and correct.

18 Dated 09-11-2019 at Orange County, California.
19 MP/RF 19F01460

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21 TODD SPITZER, DISTRICT ATTORNEY

22 by: /s/ MATTHEW PLUNKETT
23 MATTHEW PLUNKETT, Deputy District Attorney

24 RESTITUTION CLAIMED

25 [] None
26 [] \$ _____
27 [X] To be determined

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NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

Pursuant to Welfare & Institutions Code §827 and California Rule of Court 5.552, notice is hereby given that the People will seek a court order to disseminate the juvenile case file of the defendant/minor, if any exists, to all parties in this action, through their respective attorneys of record, in the prosecution of this case.