

1 BILL LOCKYER
Attorney General of the State of California
2 JO GRAVES
Chief Assistant Attorney General
3 MARK O. GEIGER
Senior Assistant Attorney General
4 ROBERT M. MORGESTER
Deputy Attorney General
5 State Bar No. 142236
1300 I Street
6 P.O. Box 944255
Sacramento, CA 94244-2550
7 Telephone: (916) 445-9330
Fax: (916) 323-5363
8 Attorneys for Plaintiff



9
10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SACRAMENTO

AGSCU13

12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 **COMPLAINT (FELONY)**

15 v.

16 **PHILLIP GOALWIN;**

17 Defendants.

06F09824

18 The People of the State of California upon oath of the undersigned, upon information and
19 belief complain against the Defendant **PHILLIP GOALWIN**, above named for the crimes as
20 follows:

21 **COUNT 1**

22 **(PRESENTATION OF FRAUDULENT CLAIM)**

23 In and between August 1, 2004, and December 30, 2005, at and in the County of
24 Sacramento, in the State of California, Defendant **PHILLIP GOALWIN**, did commit a felony
25 namely a violation of SECTION 72 OF THE PENAL CODE of the State of California, in that said
26 Defendants did unlawfully and with intent to defraud, present for allowance and payment a false and
27 fraudulent claim, bill, account, voucher and writing; to wit the presentation of six (6) fraudulent
28 invoices for payment to the California State Water Resources Control Board.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

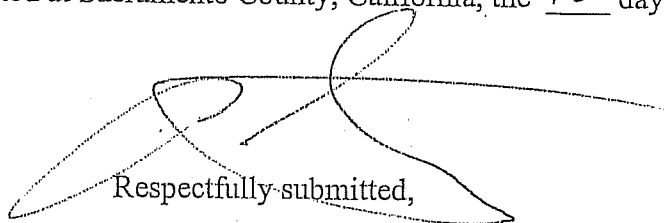
COUNT 2
(IDENTITY THEFT)

For a further and separate cause of Complaint, being a different offense from but connected it is commission with the charge set forth in Counts 1, complainant further complains and states in and between August 1, 2004, and December 30, 2005, at and in the County of Sacramento in the State of California, Defendant **PHILLIP GOALWIN**, did commit a felony namely a violation of SECTION 530.5 OF THE PENAL CODE of the State of California, in that said Defendants did willfully and unlawfully obtain personal identifying information on Solleco Environmental Equipment and used that information for an unlawful purpose and to obtain, and attempt to obtain, credit, goods, services and information in the name of Solleco Environmental Equipment without consent.

Pursuant to PENAL CODE SECTION 1054.5(B), the People are hereby informally requesting that defense counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3, and pursuant to the provisions of PENAL CODE SECTION 1054.7.

I declare upon information and belief and under penalty of perjury that the foregoing is true and correct.

Executed at Sacramento County, California, the 13th day of November, 2006.



Respectfully-submitted,

BILL LOCKYER
Attorney General of the State of California

JO GRAVES
Chief Assistant Attorney General

MARK O. GEIGER
Senior Assistant Attorney General

ROBERT M. MORGESTER
Deputy Attorney General

Attorneys for Plaintiff