

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

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|--|---|----------------------------|
| THE PEOPLE OF THE STATE OF CALIFORNIA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| Mark Redheffer, |) | FELONY COMPLAINT |
| |) | |
| |) | |
| Defendant. |) | DA CASE NO 2018-00-0069970 |

The undersigned is informed and believes that:

COUNT 1

On or about October 28, 2016, in the above-named judicial district, the crime of CONCEALMENT OF, OR FAILURE TO, DISCLOSE MATERIAL FACT REGARDING INSURANCE BENEFITS, in violation of PENAL CODE SECTION 550(b)(3), a felony, was committed by Mark Redheffer, who did willfully conceal and/or knowingly fail to disclose the occurrence of an event that affected his initial or continued right or entitlement to an insurance benefits or payment, or the amount of any benefit or payment to which he may have been entitled, to wit: that he previously used injectable androgenic steroids.

COUNT 2

On or about April 7, 2017, in a judicial district within the State of California, the crime of WORKERS' COMPENSATION INSURANCE FRAUD, in violation of INSURANCE CODE SECTION 1871.4(a)(1), a felony, was committed by Mark Redheffer, who made or caused to be made a knowingly false or fraudulent material statement in support of a claim for compensation in order to obtain benefits as defined in section 3207 of the Labor Code, to wit: he falsely stated "No," when asked during his deposition, "Have you taken steroids?"

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COUNT 3

On or about April 7, 2017, in a judicial district within the State of California, the crime of ATTEMPTED PERJURY UNDER OATH, in violation of PENAL CODE SECTION 664/118, a felony, was committed by Mark Redheffer, who being a person, having taken an oath that he would testify, declare, depose, and certify truly before a competent tribunal, officer, and person, to wit, Ruth Ikeda Sato, CSR No. 12671, in a case in which such an oath may by law be administered, to wit, deposition, did contrary to such oath attempt to state as true a material matter which he knew to be false, to wit: he falsely stated "No," when asked, "Have you taken steroids?"

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 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.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 3 COUNT(S).

Executed at San Bernardino, California, on March 18, 2020.

Michael Chiriatti
Michael Chiriatti
DECLARANT AND COMPLAINANT

Agency: District Attorney B of I-Workers Comp

Prelim Est. 01:00

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|----------------|------------|-------------|---------|------|
| Defendant | Birth Date | Booking No. | CII No. | NCIC |
| Mark Redheffer | 11/10/1971 | | | |