

1 XAVIER BECERRA
Attorney General of California
2 ROBERT MORGESTER
Senior Assistant Attorney General
3 NATASHA HOWARD
Deputy Attorney General
4 State Bar No. 225406
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6176
6 E-mail: natasha.howard@doj.ca.gov
Attorneys for People
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

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

13 Plaintiff,

14 v.

16 **STEVE FARZAM
17 (DOB: 7/21/1978),**

18 Defendant.
19

Case No. BA476060

**FELONY COMPLAINT FOR
ARREST WARRANT**

20
21 The Attorney General of the State of California accuses the above-named Defendant of the
22 following offenses, which are connected to each other in their commission:

23 **COUNT 1**

24 On or about and between March 1, 2017 through March 31, 2017, in the County of Los
25 Angeles, the crime of ATTEMPTING TO DISSUADE A WITNESS in violation of PENAL
26 CODE SECTION 136.1(a)(2), a Felony, was committed by Defendant STEVE FARZAM, who
27 did knowingly and maliciously attempt to prevent and dissuade Libbier Hernandez, a witness,
28 from attending and giving testimony at a trial, proceeding, and inquiry authorized by law.

FILED
2019 NOV 15 AM 8:58
LOS ANGELES SUPERIOR COURT

1 **COUNT 2**

2 On or about March 24, 2017, in the County of Los Angeles, the crime of IDENTITY
3 THEFT in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by STEVE
4 FARZAM, who did willfully and unlawfully with the intent to defraud acquire and retain
5 possession of personal identifying information of another person, to wit, Libier Hernandez, and
6 used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods,
7 services, real property, and medical information without the consent of Libier Hernandez.

8 **COUNT 3**

9 On or about March 24, 2017, in the County of Los Angeles, the crime of IDENTITY
10 THEFT in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by STEVE
11 FARZAM, who did willfully and unlawfully with the intent to defraud acquire and retain
12 possession of personal identifying information of another person, to wit, Ivan Hernandez, and
13 used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods,
14 services, real property, and medical information without the consent of Ivan Hernandez.

15 **COUNT 4**

16 On or about February 14, 2018, in the County of Los Angeles, the crime of
17 COUNTERFEIT SEAL in violation of PENAL CODE SECTION 472, a Felony, was committed
18 by STEVE FARZAM, who did unlawfully and with intent to defraud, forge and counterfeit a Los
19 Angeles County Superior Court seal and did falsely make forge and counterfeit an impression
20 purporting to be an impression of said seal, and did possess such counterfeited seal and
21 impression, knowing it to be counterfeited and did conceal the fact that the seal was counterfeit.

22 **CONCLUSION**

23 All of the foregoing is contrary to the form, force, and effect of the above-named statutes,
24 and is against the peace and dignity of the People of the State of California.

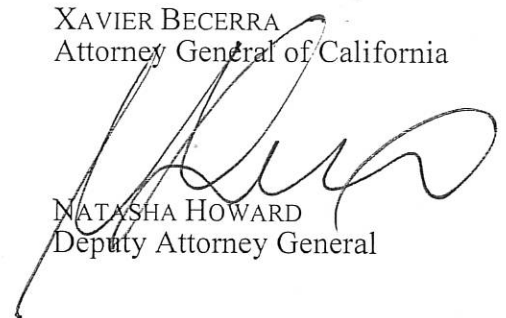
25 Attached hereto and incorporated by reference is a declaration in support of an arrest
26 warrant and complaint with accompanying official reports and documents of a law enforcement
27 agency.

28 //

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th
2 day of November 2019, at Los Angeles, California.

3
4 Respectfully Submitted,

5 XAVIER BECERRA
6 Attorney General of California

7
8 
9 NATASHA HOWARD
10 Deputy Attorney General

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

NOTICE TO DEFENDANTS AND ATTORNEYS

Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

NOTICE TO ATTORNEYS

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject 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."

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

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Detective Ken Bryant of the Los Angeles Police Department, Major Crimes Division, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by Defendant STEVE FARZAM: Identity Theft in violation of Penal Code section 530.5(a); Attempted Witness Intimidation in violation of Penal Code section 136.1(a)(2); and Counterfeit Seal in violation of Penal Code section 472.

Therefore, you are commanded to arrest STEVE FARZAM, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

Dated: _____

Time Issued: _____ (am/pm)

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles

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

Defendant	DOB	CII	CDL	Bail Requested
FARZAM, Steve	[REDACTED]			\$140,000
Investigating Agency	LAPD			
Investigating Officer	Detective Ken Bryant			
Phone No.	[REDACTED]			
Prelim Estimate	2 hours			

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

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)

STEVE FARZAM

<u>Ct.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
1	PC 136.2(a)(2)	16-2-3		
2	PC 530.5(a)	16-2-3		
3	PC 530.5(a)	16-2-3		
4	PC 472	16-2-3		

I ORDER that the defendant named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

Steve FARZAM \$ _____

And that said defendant be committed to the custody of the Sheriff until such bail is given.

The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
(Date)

Magistrate Date
Superior Court of California