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8 Attorneys for Plaintiff

9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF KERN

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

13 Plaintiff,

14 v.

15 **BRYANNA MICHAL JAGELS,**

16 Defendant.

CASE NO.

COMPLAINT (FELONY)

Arraignment

DATE: January 26, 2004

TIME: 8:30 a.m.

DEPT: 11

17
18 I, the undersigned, say on information and belief, that in the County of Kern, State of
19 California:

20 **COUNT ONE**

21 That on or between June 2, 2003, and September 2, 2003, defendant BRYANNA
22 MICHAL JAGELS did commit a FELONY, namely, a violation of Section 11173(a) of the Health
23 & Safety Code, OBTAINING CONTROLLED SUBSTANCE BY FRAUD, and did unlawfully
24 obtain and attempt to obtain a controlled substance, to wit: Norco and Vicodin and did procure and
25 attempt to procure the administration of and prescription for said controlled substance by fraud,
26 deceit and misrepresentation.

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COUNT TWO

For a further and separate cause of action, being a different offense from, but connected in its commission with the charge set forth in Count One hereof, complainant complains and says:

That on or between June 2, 2003, and October 21, 2003, defendant BRYANNA MICHAL JAGELS did commit a FELONY, namely, a violation of Section 459 of the Penal Code, BURGLARY, and did unlawfully enter doctors' offices with the intent to commit larceny and any offense punishable as a felony, to wit: a violation of Section 11173(a) of the Health & Safety Code.

COUNT THREE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One and Two hereof, complainant complains and says:

That on or between July 14, 2003, and October 21, 2003, defendant BRYANNA MICHAL JAGELS did commit a FELONY, namely, a violation of Section 11173(a) of the Health & Safety Code, OBTAINING CONTROLLED SUBSTANCE BY FRAUD, and did unlawfully obtain and attempt to obtain a controlled substance, to wit: Norco, Soma, Celebrex, and Vioxx and did procure and attempt to procure the administration of and prescription for said controlled substance by fraud, deceit and misrepresentation.

COUNT FOUR

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Three hereof, complainant complains and says:

That on or between October 13, 2003, and November 21, 2003, defendant BRYANNA MICHAL JAGELS did commit a FELONY, namely, a violation of Section 459 of the Penal Code, BURGLARY, and did unlawfully enter various drug stores, including Longs Drugs and Ming and H Drugs, with the intent to commit larceny and any offense punishable as a felony, to wit: a violation of Section 4324(a) of the Business & Professions Code.

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COUNT FIVE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Four hereof, complainant complains and says:

That on or about October 13, 2003, defendant BRYANNA MICHAL JAGELS did commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE PRESCRIPTION for a drug.

COUNT SIX

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Five hereof, complainant complains and says:

That on or about November 5, 2003, defendant BRYANNA MICHAL JAGELS did commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE PRESCRIPTION for a drug.

COUNT SEVEN

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Six hereof, complainant complains and says:

That on or about November 6, 2003, defendant BRYANNA MICHAL JAGELS did commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE PRESCRIPTION for a drug.

COUNT EIGHT

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Seven hereof, complainant complains and says:

1 That on or about November 15, 2003, defendant BRYANNA MICHAL JAGELS did
2 commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions
3 Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE
4 PRESCRIPTION for a drug.

5 **COUNT NINE**

6 For a further and separate cause of action, being a different offense from, but connected
7 in its commission with the charges set forth in Counts One through Eight hereof, complainant
8 complains and says:

9 That on or about November 21, 2003, defendant BRYANNA MICHAL JAGELS did
10 commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions
11 Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE
12 PRESCRIPTION for a drug.

13 **COUNT TEN**

14 For a further and separate cause of action, being a different offense from, but connected
15 in its commission with the charges set forth in Counts One through Nine hereof, complainant
16 complains and says:

17 That on or about November 26, 2003, defendant BRYANNA MICHAL JAGELS did
18 commit a MISDEMEANOR, namely, a violation of Section 4324(a) of the Business & Professions
19 Code, and falsely made, altered, forged, uttered, passed or attempted to pass, as genuine, a FALSE
20 PRESCRIPTION for a drug.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed this ____ day of January, 2004, at Sacramento, California.

23 _____
24 MICHAEL P. FARRELL
Deputy Attorney General

25 **DISCOVERY REQUEST**

26 Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby
27 requested that all materials and information as set forth in Penal Code section 1054.3(a) and (b) be
28 provided to the People.