

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
VA: 03/12/2019

Plaintiff,

vs.

JUDITH GIL (01/03/1954; F),
MINERVA GIL (03/17/1982; F)

BP6126(a) - 1 COUNT
BP22440 - 2 COUNTS
BP22443.3 - 1 COUNT
BP22444(c) - 1 COUNT
BP6126(a) - 1 COUNT
BP22440 - 2 COUNTS
BP22443.3 - 1 COUNT
BP6126(a) - 1 COUNT
BP22440 - 1 COUNT
BP22443.3 - 1 COUNT
BP22444(b) - 1 COUNT
BP22440 - 1 COUNT
BP22443.3 - 1 COUNT
BP6126(a) - 1 COUNT
PC487(a) - 1 COUNT
BP6126(a) - 1 COUNT
BP22440 - 1 COUNT
BP22443.3 - 1 COUNT

(20 TOTAL COUNTS)

Defendants.

MISDEMEANOR
COMPLAINT

Copy

Case number: 9CJ01129

SHERRI R. CARTER
Executive Officer/Clerk

By _____
Deputy Clerk

Issued by
MICHAEL N. FEUER
City Attorney

By _____
GINA LEE
Deputy City Attorney
Consumer and Workplace
Protection Unit

2019 JAN - 7 PM 1:38
CENTRAL OFFICE
LOS ANGELES SUPERIOR COURT
FILED

COUNT I

Comes now the undersigned and states that he is informed and believes, and upon such information and belief declares: That on or about 7/26/2016 and continuing through 03/20/2017 in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, a violation of Subdivision (a) of Section 6126 of the California Business and Professions Code was committed by JUDITH GIL (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did

unlawfully advertise and hold herself out as practicing and entitled to practice law and otherwise practicing law to Wilson B. while not an active member of the California State Bar or entitled to provide immigration law advice under any other authority.

MCI 6126(A)/04

COUNT II

For a further, separate and second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 07/26/2016 and continuing through 03/20/2017, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with Wilson B., without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to provide a written contract or agreement with Wilson B. as required by law pursuant to Subdivision (a) of Section 22442 of the California Business and Professions Code, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT III

For a further, separate and third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 07/26/2016 and continuing through 03/20/2017, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with Wilson B., without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) executed by a corporate surety admitted to do business in this state prior to engaging in the business or acting in the capacity of an immigration consultant with Wilson B. as required by law pursuant to Subdivision (a)(1) of Section 22443.1 of the California Business and Professions Code, which is made a misdemeanor

pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT IV

For a further, separate and fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 7/26/2016 and continuing through 03/20/2017, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22443.3 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully disseminate by any means any statement indicating directly or by implication that she engages in the business or acts in the capacity of an immigration consultant, or proposes to engage in the business or act in the capacity of an immigration consultant to Wilson B., without having on file with the Secretary of State a disclosure statement and a bond, in the amount of, and subject to the terms described in Section 22443.1 of the California Business and Professions Code, that is maintained throughout the period covered by the statement, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22443.3/04

COUNT V

For a further, separate and fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 07/26/2016, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (c) of Section 22444 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business or act in the capacity of an immigration consultant and made a statement to client Wilson B. that JUDITH GIL has special influence with the United States Citizenship and Immigration Services, or any other government agency that may have a bearing on the client's immigration matter, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22444(C)/04

COUNT VI

For a further, separate and sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 10/20/2018 in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, a violation of Subdivision (a) Section 6126 of the California Business and Professions Code was committed by JUDITH GIL (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully advertise and hold herself out as practicing and entitled to practice law and otherwise practicing law to undercover investigators of the Los Angeles County Department of Business and Consumer Affairs while not an active member of the California State Bar or entitled to provide immigration law advice under any other authority.

MCI 6126(A)/04

COUNT VII

For a further, separate and seventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 10/20/2018 and continuing through 11/2/2018, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with undercover investigators of the Los Angeles County Department of Business and Consumer Affairs without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to conspicuously display in her office a notice that shall be at least 12 by 20 inches with boldface type or print with each character at least one inch in height and width in English and in the native language of the immigration consultant's clientele, to wit, Spanish, that contains the following information:

a statement that the immigration consultant is not an attorney, the services that the immigration consultant provides and the current and total fee for each service; the name of each immigration consultant employed at each location; and the full name, address, and evidence of compliance with any applicable bonding requirement, including bond number,

as required by law pursuant to Subdivision (a) of Section 22442.2 of the California Business and Professions Code, which is made a misdemeanor

pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT VIII

For a further, separate and eighth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 10/20/2018 and continuing through 11/2/2018, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with undercover investigators of the Los Angeles County Department of Business and Consumer Affairs, without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) executed by a corporate surety admitted to do business in this state prior to engaging in the business or acting in the capacity of an immigration consultant with undercover investigators as required by law pursuant to Subdivision (a)(1) of Section 22443.1 of the California Business and Professions Code, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT IX

For a further, separate and ninth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Counts I hereof, affiant further alleges that on or about 10/20/2018 and continuing through 11/02/2018, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22443.3 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully disseminate by any means any statement indicating directly or by ~~implication that she engages in the business or acts in the capacity of an~~ immigration consultant, or proposes to engage in the business or act in the capacity of an immigration consultant, to undercover investigators of the Los Angeles County Department of Business and Consumer Affairs without having on file with the Secretary of State a disclosure statement and a bond, in the amount of, and subject to the terms described in Section 22443.1 of the California Business and Professions Code, that is

maintained throughout the period covered by the statement, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22443.3/04

COUNT X

For a further, separate and tenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges on or about 01/01/2017 and continuing through 01/31/2017 in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, a violation of Subdivision (a) of Section 6126 of the California Business and Professions Code was committed by JUDITH GIL (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully advertise and hold herself out as practicing and entitled to practice law and otherwise practicing law to Olga O. while not an active member of the California State Bar or entitled to provide immigration law advice under any other authority.

MCI 6126(A)/04

COUNT XI

For a further, separate and eleventh cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/01/2017 and continuing through 01/31/2017, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with Olga O., without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) executed by a corporate surety admitted to do business in this state prior to engaging in the business or acting in the capacity of an immigration consultant with Olga O. as required by law pursuant to Subdivision (a)(1) of Section 22443.1 of the ~~California Business and Professions Code, which is made a misdemeanor~~ pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT XII

For a further, separate and twelfth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/01/2017 and continuing through 01/31/2017, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22443.3 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully disseminate by any means any statement indicating directly or by implication that she engages in the business or acts in the capacity of an immigration consultant, or proposes to engage in the business or act in the capacity of an immigration consultant to Olga O., without having on file with the Secretary of State a disclosure statement and a bond, in the amount of, and subject to the terms described in Section 22443.1 of the California Business and Professions Code, that is maintained throughout the period covered by the statement, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22443.3/04

COUNT XIII

For a further, separate and thirteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 01/01/2017 and continuing through 01/31/2017, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (b) of Section 22444 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business or act in the capacity of an immigration consultant and made a promise or guarantee to client Olga O. without said promise or guarantee being in writing and without basis in fact for making the guarantee, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22444(B)/04

COUNT XIV

For a further, separate and fourteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 2/14/18 and continuing through 3/12/18, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was

committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for compensation, with Zaira F., without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) executed by a corporate surety admitted to do business in this state prior to engaging in the business or acting in the capacity of an immigration consultant with Zaira F. as required by law pursuant to Subdivision (a) (1) of Section 22443.1 of the California Business and Professions Code, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT XV

For a further, separate and fifteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 2/14/18 and continuing through 3/12/18, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22443.3 of the California Business and Professions Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully disseminate by any means any statement indicating directly or by implication that she engages in the business or acts in the capacity of an immigration consultant, or proposes to engage in the business or act in the capacity of an immigration consultant to Zaira F., without having on file with the Secretary of State a disclosure statement and a bond, in the amount of, and subject to the terms described in Section 22443.1 of the California Business and Professions Code, that is maintained throughout the period covered by the statement, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22443.3/04

COUNT XVI

For a further, separate and sixteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in ~~Count I hereof, affiant further alleges that on or about 2/14/18 and~~ continuing through 3/12/18, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, a violation of Subdivision (a) of Section 6126 of the California Business and Professions Code was committed by JUDITH GIL (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully advertise and hold herself out as practicing and entitled to practice law

and otherwise practicing law to Zaira F. while not an active member of the California State Bar or entitled to provide immigration law advice under any other authority.

MCI 6126(A)/04

COUNT XVII

For a further, separate and seventeenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 2/14/18 and continuing through 3/12/18, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Subdivision (a) of Section 487 of the California Penal Code was committed by JUDITH GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did willfully and unlawfully steal, take, carry lead and drive away the personal property of another, of a value exceeding nine-hundred and fifty dollars (\$950.00), to wit, \$4,000, the property of Zaira F.

MCI 487(A)/04

COUNT XVIII

For a further, separate and eighteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 03/27/2017 and continuing through 5/7/2017, at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, a violation of Subdivision (a) of Section 6126 of the California Business and Professions Code was committed by MINERVA GIL (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully advertise and hold herself out as practicing and entitled to practice law and otherwise practicing law to Wilson B. while not an active member of the California State Bar or entitled to provide immigration law advice under any other authority.

MCI 6126(A)/04

COUNT XIX

For a further, separate and nineteenth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in ~~Count I hereof~~, affiant further alleges that on or about 03/27/2017 and continuing through 5/7/2017, in and at the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22440 of the California Business and Professions Code was committed by MINERVA GIL(whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully engage in the business and act in the capacity of an immigration consultant, for

compensation, with Wilson B., without having been authorized to practice law or authorized by federal law to represent persons before the Board of Immigration Appeals or the United States Citizenship and Immigration Services, and failed to file with the Secretary of State a bond of one hundred thousand dollars (\$100,000) executed by a corporate surety admitted to do business in this state prior to engaging in the business or acting in the capacity of an immigration consultant with Wilson B. as required by law pursuant to Subdivision (a)(1) of Section 22443.1 of the California Business and Professions Code, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22440/04

COUNT XX

For a further, separate and twentieth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 03/27/2017 and continuing through 5/7/2017, in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit, violation of Section 22443.3 of the California Business and Professions Code was committed by MINERVA GIL, (whose true name(s) to affiant is(are) unknown), who at the time and place last aforesaid, did unlawfully disseminate by any means any statement indicating directly or by implication that she engages in the business or acts in the capacity of an immigration consultant, or proposes to engage in the business or act in the capacity of an immigration consultant to Wilson B., without having on file with the Secretary of State a disclosure statement and a bond, in the amount of, and subject to the terms described in Section 22443.1 of the California Business and Professions Code, that is maintained throughout the period covered by the statement, which is made a misdemeanor pursuant to Section 22445(b) of the California Business and Professions Code.

MCI 22443.3/04

All of which is contrary to the law and against the peace and dignity of the People of the State of California. Declarant and complainant therefore prays that a warrant may be issued for the arrest of said defendant(s) and that he/she may be dealt with according to law.

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

Executed at Los Angeles, California on December 29, 2018

VOLUNTARY APPEARANCE

Department 48
Los Angeles Superior Court
March 12, 2019

A. Zebayyan Munez
Declarant and Complainant

INFORMAL DISCOVERY NOTICE

TO THE ABOVE-NAMED DEFENDANT(S) AND/OR ATTORNEY(S) FOR DEFENDANT(S):

Plaintiff, the People of the State of California, hereby requests discovery/disclosure from the defendant(s) and his or her attorney(s) in this case pursuant to California Penal Code Sections 1054.3 and 1054.5.

YOU ARE HEREBY NOTIFIED that if complete disclosure is not made within 15 days of this request, plaintiff will seek -- on or before the next court date, or as soon as practicable thereafter -- a court order enforcing the provisions of California Penal Code Section 1054.1, subdivisions (b) and (c). This is an ongoing request for any of the listed items which become known to the defendant(s) and his or her attorney(s) after the date of compliance.

The written statements and reports attached hereto constitute discoverable materials designated in California Penal Code Section 1054.1. Any additional material discoverable pursuant to California Penal Code Section 1054.1 that becomes known to plaintiff will be provided to the defense.

If, prior to or during trial, as a result of this request plaintiff obtains additional evidence or material subject to disclosure under a previous defense request or court order pursuant to California Penal Code Section 1054.1, plaintiff will disclose the existence of that evidence or material within a reasonable time.

DISCOVERY MATERIALS SHOULD BE DELIVERED TO A DEPUTY CITY ATTORNEY IN MASTER CALENDAR COURT ON THE FIRST TRIAL DATE.