1 2 3 4 5	COUNTY OF SAN LUIS OBISPO COURTHOUSE ANNEX, 4TH FLOOR SAN LUIS OBISPO, CA 93408	Court copy DA copy Probation copy Defendant copy Restitution Sub Fel/Iss Misd
6 7 8 9	SUPERIOR COUR COUNTY OF SAI DEPAR	N LUIS OBISPO
10 11 12	THE PEOPLE OF THE STATE OF CALIFORNIA Plaintiff,	COURT CASE NO. COMPLAINT
13 14 15	vs. CLAIRE CATLIN EASTIN DOB: 05/27/1968 ID NO. D000141273 AKA CLAIRE NOEL CATLIN	18F-10910 DA CASE NO. 079-627581
16 17 18	Defendant.	Appearance Date:
19	The District Attorney of San Luis Obispo	o County, California, hereby accuses the
20	above named defendant of the following crimin	nal offenses:
21	Cour	
22	On or between January 1, 2012 and December	•
23 24	State of California, the crime of Grand Theft By Felony, was committed in that CLAIRE CATLIN	
25	and December 1, 2014, and while said defendation	
26	Life Community Church, did unlawfully take fro	
27	personal property which aggregates to a value	
28	(\$950) in any 12 consecutive month period.	6
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1	Count 2
2	On or between December 2, 2014 and December 31, 2017, in the County of San Luis
3	Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of
4	PC487(a), a Felony, was committed in that CLAIRE CATLIN EASTIN on and between
5	December 2, 2014 and December 31, 2017, and while said defendant was an agent,
6	servant, and employee of Life Community Church, did unlawfully take from said Life
7	Community Church money and personal property which aggregates to a value exceeding
8	Nine Hundred Fifty Dollars (\$950) in any 12 consecutive month period.
9	Enhancement
10	PC186.11(a)(3): Spec Alleg - Aggravated White Collar Crime
11	It is further alleged, pursuant to Penal Code section 186.11(a), that the offenses set forth ir
12	Counts 1, 2, and 3 are related felonies, a material element of which is fraud and
13	embezzlement, which involve a pattern of related felony conduct, and the pattern of related
14	felony conduct involves the taking of more than One Hundred Thousand Dollars
15	(\$100,000).
16	Enhancement
17	PC12022.6(a)(2): Spec Alleg-Excessive Loss Over \$200,000
18	It is further alleged as to Counts 1 and 2 that in the commission of the above offense(s) the
19	said defendant, CLAIRE CATLIN EASTIN, with the intent to do so, took, damaged, and
20	destroyed property of a value exceeding \$200,000, within the meaning of Penal Code
21	section 12022.6(a)(2).
22	Enhancement
23	PC803(c): Spec Alleg-Statute Of Limitations-Late Discovery (Zamora Allegation)
24	It is further alleged as to Counts 1 and 2, offenses described in Penal Code section
25	803(c),that the above violation was not discovered until May, 2018 by staff of Life
26	Community Church by review of bookkeeping and other records, and that no victim of said
27	violation and no law enforcement agency chargeable with the investigation and
28	prosecution of said violation had actual and constructive knowledge of said violation prior PAGE - 2 -
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to said date because defendant was the primary person responsible for bookkeeping for
Life Community Church and had taken measures to conceal her theft by falsifying records,
within the meaning of Penal Code section 803(c).

## Count 3

<sup>5</sup> On or between January 1, 2018 and April 26, 2018, in the County of San Luis Obispo,

<sup>6</sup> State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a

Felony, was committed in that CLAIRE CATLIN EASTIN on and between January 1, 2018
 and April 26, 2018, and while said defendant was an egent, approximate and employee of Life

<sup>8</sup> and April 26, 2018, and while said defendant was an agent, servant, and employee of Life

<sup>9</sup> Community Church, did unlawfully take from said Life Community Church money and

<sup>10</sup> personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars

11 (\$950) in any 12 consecutive month period.

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All of which is contrary to the statute in such cases made and provided, and against
 the peace and dignity of the People of the State of California.

I declare that an investigation has been conducted to determine if said Defendant(s)
did commit the stated crime, which reports are attached hereto and incorporated herein by
reference, and that the facts therein show probable cause that the said Defendant(s) did
commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
said Defendant(s) do not appear voluntarily in response to an appearance letter, or if no
appearance letter was issued.

9 Discovery Request: Pursuant to Penal Code Section 1054.5(b), the People are
10 hereby informally requesting that defense counsel provide discovery to the people as
11 required by Penal Code Section 1054.3.

12 On this day November 13, 2018, in the County of San Luis Obispo, I certify and 13 declare under penalty of perjury that the foregoing is true and correct.

14 Dated: November 13, 2018

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Dated:

DAN DOW DISTRICT A

MICHAEL S FRYE DEPUTY DISTRICT ATTORNEY

20 Upon review of the reports attached and incorporated herein by reference, I find sufficient
21 probable cause to warrant the defendant(s) continued detention.

Judge of the Superior Court

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		SUMMAR		
Cnt	Charge	Range	Defendant(s)	Special Allegation
1	PC487(a)	16-2-3 County Jail	Claire Catlin Eastin	7 anogation :
	PC186.11(a)(3), PC12022.6(a)(2),	Jan		
	PC803(c)			
2	PC487(a)	16-2-3 County Jail	Claire Catlin Eastin	
	PC186.11(a)(3), PC12022.6(a)(2),			
	PC803(c)			
3	PC487(a)	16-2-3 County Jail	Claire Catlin Eastin	