

LARRY D. MORSE II
DISTRICT ATTORNEY
2222 M STREET
MERCED, CALIFORNIA 95340
(209) 385-7381

FILED
MERCED COUNTY
DEC 21 PM 12:20
CLERK OF THE SUPERIOR COURT

SUPERIOR COURT, COUNTY OF MERCED
STATE OF CALIFORNIA
~~ZELENA SMITH~~

THE PEOPLE OF THE STATE OF CALIFORNIA)
PLAINTIFF,)
)
VS.)
)
BRUCE NEAL HOAGLAND [REDACTED])
DEFENDANT(S))

CRM 006990

CRIMINAL COMPLAINT

THE DISTRICT ATTORNEY OF MERCED COUNTY, CALIFORNIA HEREBY ACCUSES THE ABOVE NAMED DEFENDANT(S) OF THE FOLLOWING CRIMINAL OFFENSES OCCURRING IN THE COUNTY OF MERCED, STATE OF CALIFORNIA.

COUNT 1

ON OR ABOUT NOVEMBER 1, 2001, DEFENDANT(S) BRUCE NEAL HOAGLAND DID COMMIT A FELONY, NAMELY, A VIOLATION OF SECTION 118(A) OF THE CALIFORNIA PENAL CODE, PERJURY, IN THAT SAID DEFENDANT, BEING A PERSON WHO, HAVING TAKEN AN OATH THAT (S)HE WOULD TESTIFY, DECLARE, DEPOSE, AND CERTIFY UNDER PENALTY OF PERJURY, DID WILLFULLY AND CONTRARY TO SUCH OATH STATE AS TRUE A MATERIAL MATTER WHICH (S)HE KNEW TO BE FALSE, TO WIT: THAT HE HAD NOT BEEN CONVICTED OF A CRIME ON AN APPLICATION FOR A STATE CONTRACTOR'S LICENSE. THIS VIOLATION WAS DISCOVERED ON OR ABOUT SEPTEMBER 29, 2009.

COUNT 2

ON OR ABOUT DECEMBER 23, 2008, DEFENDANT(S) BRUCE NEAL HOAGLAND DID COMMIT A FELONY, NAMELY, A

VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY PREPARE FALSE EVIDENCE, TO WIT: SPILL BUCKET TESTING REPORT FORM WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 3

ON OR ABOUT JANUARY 9, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A FELONY, NAMELY, A
VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY PREPARE FALSE EVIDENCE, TO WIT: MONITORING SYSTEM CERTIFICATION WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 4

ON OR ABOUT JANUARY 14, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE, FALSIFYING MONITORING RECORDS, IN THAT SAID DEFENDANT DID KNOWINGLY FALSIFY A MONITORING RECORD THAT IS REQUIRED UNDER CHAPTER 6.7 OF THE HEALTH AND SAFETY CODE, TO WIT: SPILL BUCKET TESTING REPORT FORM .

COUNT 5

ON OR ABOUT JANUARY 14, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE, FALSIFYING MONITORING RECORDS, IN THAT SAID DEFENDANT DID KNOWINGLY FALSIFY A MONITORING RECORD THAT IS REQUIRED UNDER CHAPTER 6.7 OF THE HEALTH AND SAFETY CODE, TO WIT: MONITORING SYSTEM CERTIFICATION .

COUNT 6

ON OR ABOUT JANUARY 9, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A FELONY, NAMELY, A
VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF
FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY
PREPARE FALSE EVIDENCE, TO WIT: SPILL BUCKET TESTING REPORT FORM
WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR
DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR
INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 7

ON OR ABOUT JANUARY 9, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A FELONY, NAMELY, A
VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF
FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY
PREPARE FALSE EVIDENCE, TO WIT: MONITORING SYSTEM CERTIFICATION
WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR
DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR
INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 8

ON OR ABOUT JANUARY 14, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE,
FALSIFYING MONITORING RECORDS, IN THAT SAID DEFENDANT DID KNOWINGLY FALSIFY
A MONITORING RECORD THAT IS REQUIRED UNDER CHAPTER 6.7 OF THE HEALTH AND
SAFETY CODE, TO WIT: SPILL BUCKET TESTING REPORT FORM .

COUNT 9

ON OR ABOUT JANUARY 14, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE,
FALSIFYING MONITORING RECORDS, IN THAT SAID DEFENDANT DID KNOWINGLY FALSIFY
A MONITORING RECORD THAT IS REQUIRED UNDER CHAPTER 6.7 OF THE HEALTH AND
SAFETY CODE, TO WIT: MONITORING SYSTEM CERTIFICATION .

COUNT 10

ON OR ABOUT JULY 21, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A FELONY, NAMELY, A
VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF
FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY
PREPARE FALSE EVIDENCE, TO WIT: SPILLBUCKET TESTING REPORT FORM
WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR
DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR
INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 11

ON OR ABOUT JULY 21, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A FELONY, NAMELY, A
VIOLATION OF SECTION 134 OF THE CALIFORNIA PENAL CODE, PREPARATION OF
FALSE EVIDENCE, IN THAT SAID DEFENDANT(S) DID WILLFULLY AND UNLAWFULLY
PREPARE FALSE EVIDENCE, TO WIT: MONITORING SYSTEM CERTIFICATION
WITH INTENT TO PRODUCE IT OR ALLOW IT TO BE PRODUCED FOR ANY FRAUDULENT OR
DECEITFUL PURPOSE, AS GENUINE OR TRUE, UPON ANY TRIAL, PROCEEDING OR
INQUIRY WHATEVER, AUTHORIZED BY LAW.

COUNT 12

ON OR ABOUT AUGUST 3, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE,
FALSIFYING MONITORING RECORDS, IN THAT SAID DEFENDANT DID KNOWINGLY FALSIFY
A MONITORING RECORD THAT IS REQUIRED UNDER CHAPTER 6.7 OF THE HEALTH AND
SAFETY CODE, TO WIT: SPILL BUCKET TESTING REPORT FORM .

COUNT 13

ON OR ABOUT AUGUST 3, 2009, DEFENDANT(S)
BRUCE NEAL HOAGLAND
DID COMMIT A MISDEMEANOR, NAMELY, A
VIOLATION OF SECTION 25299(F)(1) OF THE CALIFORNIA HEALTH AND SAFETY CODE,

AN INVESTIGATION HAS BEEN CONDUCTED TO DETERMINE IF SAID DEFENDANT(S) DID COMMIT THE STATED CRIME(S). REPORTS OF THE INVESTIGATION, ATTACHED HERETO AND INCORPORATED BY REFERENCE, SHOW PROBABLE CAUSE THAT DEFENDANT(S) DID COMMIT THE CRIME.

ON THIS DECEMBER 21, 2009 , IN THE COUNTY OF MERCED, I CERTIFY AND DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

LARRY D. MORSE II
DISTRICT ATTORNEY

BY 
DEPUTY DISTRICT ATTORNEY

THE DISTRICT ATTORNEY REQUESTS THE COURT SET THIS MATTER FOR ARRAIGNMENT AND A NOTIFICATION LETTER BE MAILED TO THE DEFENDANT. IF THE DEFENDANT FAILS TO APPEAR OR IF THE NOTIFICATION LETTER IS RETURNED BY THE POST OFFICE, IT IS REQUESTED THAT A WARRANT OF ARREST BE ISSUED PURSUANT TO PENAL CODE SECTION 813 OR 1427.

PURSUANT TO PENAL CODE SECTION 1054.5(B), THE PEOPLE ARE HEREBY INFORMALLY REQUESTING THAT DEFENDANT AND HIS OR HER ATTORNEY PROVIDE TO THE PEOPLE THE DISCOVERY REQUIRED BY PENAL CODE 1054.3. THIS IS A CONTINUING REQUEST PURSUANT TO THE PROVISIONS OF PENAL CODE SECTION 1054.7.

NOTICE TO ATTORNEY

THE MATERIALS ACCOMPANYING THIS NOTICE MAY INCLUDE INFORMATION ABOUT WITNESSES WHICH IS DISCLOSED TO YOU PURSUANT TO PENAL CODE SECTION

"NO ATTORNEY MAY DISCLOSE OR PERMIT TO BE DISCLOSED A DEFENDANT, MEMBERS OF THE DEFENDANT'S FAMILY OR A WITNESS WHOSE NAME IS DISCLOSED TO THE ATTORNEY PUR TO SUBDIVISION (A) SECTION 1054.1 UNLESS SPECIFICALLY PERMITTED TO DO SO BY THE COURT AFTER A HEARING AND SHOWING OF GOOD CAUSE."
WILLFUL VIOLATION OF THIS SUBDIVISION BY AN ATTORNEY IS FOR PURPOSES OF THIS SECTION, ALL NAMES INCLUDED IN THE REPORTS ARE DEEMED TO BE WITNESSES PURSUANT TO SUBDIVISION SECTION 1054.1.

DA CASE NO.: DMF0907611