

~~JBF/DCG~~  
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6 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
7 COUNTY OF MONO

8 THE PEOPLE OF THE STATE OF  
9 CALIFORNIA,

10 Plaintiff,

11 vs.

12 ALEJANDRO SOLORIO CALDERON  
13 PO BOX 1802  
14 1401 Tavern Rd #A2  
15 Mammoth Lakes, CA 93546,

16 Defendant.

Case No: 24FEM5406

**FELONY COMPLAINT**

17 The undersigned, certifying upon information and belief, complains that in the County  
18 of Mono, State of California, the Defendant did commit the following crime(s):

19 **COUNT 1: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
20 VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

21 On or about May 15, 2024, in the County of Mono, State of California, the crime of  
22 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses, in violation of  
23 PC532(a), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did unlawfully,  
24 knowingly, and fraudulently get possession of money and property of another and obtain labor and  
25 service of another in violation of this section, said property, money, labor and service obtained  
26 having a value exceeding \$950.00.  
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1 **COUNT 2: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
2 Section PC484b (Felony)

3 On or about May 15, 2024, in the County of Mono, State of California, the crime of  
4 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
5 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
6 hundred dollars (\$2,350) from SANDRA LYNN FREIWALD for the purpose of obtaining and  
7 paying for services, labor, materials and equipment and willfully failed to apply such money for  
8 such purpose by willfully failing to complete the improvements for which funds were provided and  
9 wrongfully diverted the funds to a use other than that for which the funds were received.

10 **COUNT 3: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

11 On or about May 15, 2024, in the County of Mono, State of California, the crime of  
12 Embezzlement in violation PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
13 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
14 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

15 **COUNT 4: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
16 VALUE BY FALSE PRETENSES** - Violation of Section PC532(A) (Felony)

17 On or about August 14, 2023, in the County of Mono, State of California, the crime of  
18 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
19 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
20 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
21 and service of another in violation of this section, said property, money, labor and service obtained  
22 having a value exceeding \$950.00.

23 **COUNT 5: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
24 Section PC484b (Felony)

25 On or about August 14, 2023, in the County of Mono, State of California, the crime of  
26 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
27 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
28 hundred dollars (\$2,350) from KIRK MATTHEW WALLACE for the purpose of obtaining and  
paying for services, labor, materials and equipment and willfully failed to apply such money for  
such purpose by willfully failing to complete the improvements for which funds were provided and  
wrongfully diverted the funds to a use other than that for which the funds were received.

**COUNT 6: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

On or about August 14, 2023, in the County of Mono, State of California, the crime of  
Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

1 **COUNT 7: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
2 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

3 On or about May 26, 2023, in the County of Mono, State of California, the crime of  
4 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
5 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

6 **COUNT 8: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
7 **Section PC484b (Felony)**

8 On or about May 26, 2023, in the County of Mono, State of California, the crime of  
9 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
10 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
11 hundred dollars (\$2,350) from LINDA LEMMON for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

12 **COUNT 9: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

13 On or about May 26, 2023, in the County of Mono, State of California, the crime of  
14 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

15 **COUNT 10: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
16 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

17 On or about April 27, 2024, in the County of Mono, State of California, the crime of  
18 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
19 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

20 **COUNT 11: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
21 **Section PC484b (Misdemeanor)**

22 On or about April 27, 2024, in the County of Mono, State of California, the crime of  
23 Diverting Construction Funds Not Exceeding \$2,350 in violation of PC484b, a Misdemeanor, was  
24 committed in that ALEJANDRO SOLORIO CALDERON received money not exceeding two  
thousand three hundred dollars (\$2,350) from BILL BAILY for the purpose of obtaining and paying  
for services, labor, materials and equipment and willfully failed to apply such money for such  
purpose by willfully failing to complete the improvements for which funds were provided and  
wrongfully diverted the funds to a use other than that for which the funds were received.

1 **COUNT 12: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

2 On or about April 27, 2024, in the County of Mono, State of California, the crime of  
3 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
4 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
5 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

6 **COUNT 13: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
7 VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

8 On or about December 3, 2023, in the County of Mono, State of California, the crime of  
9 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
10 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
11 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
12 and service of another in violation of this section, said property, money, labor and service obtained  
13 having a value exceeding \$950.00.

14 **COUNT 14: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of  
15 Section PC484b (Felony)**

16 On or about December 3, 2023, in the County of Mono, State of California, the crime of  
17 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
18 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
19 hundred dollars (\$2,350) from KELLY LITCHGE for the purpose of obtaining and paying for  
20 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
21 by willfully failing to complete the improvements for which funds were provided and wrongfully  
22 diverted the funds to a use other than that for which the funds were received.

23 **COUNT 15: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

24 On or about December 3, 2023, in the County of Mono, State of California, the crime of  
25 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
26 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
27 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

28 **COUNT 16: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

On or about April 12, 2023, in the County of Mono, State of California, the crime of  
Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

1 **COUNT 17: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
2 Section PC484b (Felony)

3 On or about April 12, 2023, in the County of Mono, State of California, the crime of  
4 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
5 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
6 hundred dollars (\$2,350) from CHELSEA HEINRICH for the purpose of obtaining and paying for  
7 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
8 by willfully failing to complete the improvements for which funds were provided and wrongfully  
9 diverted the funds to a use other than that for which the funds were received.

10 **COUNT 18: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

11 On or about April 12, 2023, in the County of Mono, State of California, the crime of  
12 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
13 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
14 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

15 **COUNT 19: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
16 VALUE BY FALSE PRETENSES** - Violation of Section PC532(A) (Felony)

17 On or about July 7, 2022, in the County of Mono, State of California, the crime of  
18 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
19 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
20 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
21 and service of another in violation of this section, said property, money, labor and service obtained  
22 having a value exceeding \$950.00.

23 **COUNT 20: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
24 Section PC484b (Felony)

25 On or about July 7, 2022, in the County of Mono, State of California, the crime of Diverting  
26 Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed in that  
27 ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three hundred  
28 dollars (\$2,350) from JOSH FLATOW for the purpose of obtaining and paying for services, labor,  
materials and equipment and willfully failed to apply such money for such purpose by willfully  
failing to complete the improvements for which funds were provided and wrongfully diverted the  
funds to a use other than that for which the funds were received.

**COUNT 21: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

On or about July 7, 2022, in the County of Mono, State of California, the crime of  
Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

1 **COUNT 22: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
2 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

3 On or about April 10, 2024, in the County of Mono, State of California, the crime of  
4 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
5 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

6 **COUNT 23: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
7 **Section PC484b (Felony)**

8 On or about April 10, 2024, in the County of Mono, State of California, the crime of  
9 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
10 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
11 hundred dollars (\$2,350) from MICHAEL WOODARD for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

12 **COUNT 24: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

13 On or about April 10, 2024, in the County of Mono, State of California, the crime of  
14 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
15 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

16 **COUNT 25: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
17 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

18 On or about June 8, 2023, in the County of Mono, State of California, the crime of  
19 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
20 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

21 **COUNT 26: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
22 **Section PC484b (Felony)**

23 On or about June 8, 2023, in the County of Mono, State of California, the crime of  
24 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
25 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
hundred dollars (\$2,350) from MAURICE TORRES for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

1 **COUNT 27: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

2 On or about June 8, 2023, in the County of Mono, State of California, the crime of  
3 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
4 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
5 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

6 **COUNT 28: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
7 VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

8 On or about August 15, 2023, in the County of Mono, State of California, the crime of  
9 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
10 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
11 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
12 and service of another in violation of this section, said property, money, labor and service obtained  
13 having a value exceeding \$950.00.

14 **COUNT 29: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of  
15 Section PC484b (Felony)**

16 On or about August 15, 2023, in the County of Mono, State of California, the crime of  
17 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
18 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
19 hundred dollars (\$2,350) from GRETA CAMPBELL for the purpose of obtaining and paying for  
20 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
21 by willfully failing to complete the improvements for which funds were provided and wrongfully  
22 diverted the funds to a use other than that for which the funds were received.

23 **COUNT 30: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

24 On or about August 15, 2023, in the County of Mono, State of California, the crime of  
25 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
26 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
27 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

28 **COUNT 31: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

On or about August 22, 2023, in the County of Mono, State of California, the crime of  
Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

1 **COUNT 32: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
Section PC484b (Felony)

2 On or about August 22, 2023, in the County of Mono, State of California, the crime of  
3 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
4 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
5 hundred dollars (\$2,350) from STEFAN KOCEV for the purpose of obtaining and paying for  
6 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

7 **COUNT 33: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

8 On or about August 22, 2023, in the County of Mono, State of California, the crime of  
9 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

10 **COUNT 34: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
11 **VALUE BY FALSE PRETENSES** - Violation of Section PC532(A) (Felony)

12 On or about January 5, 2024, in the County of Mono, State of California, the crime of  
13 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
14 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

15 **COUNT 35: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
16 Section PC484b (Felony)

17 On or about January 5, 2024, in the County of Mono, State of California, the crime of  
18 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
19 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
20 hundred dollars (\$2,350) from GRAHAM KOLB for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

21 **COUNT 36: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

22 On or about January 5, 2024, in the County of Mono, State of California, the crime of  
23 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.



1 **COUNT 37: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
2 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

3 On or about April 27, 2023, in the County of Mono, State of California, the crime of  
4 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
5 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

6 **COUNT 38: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
7 **Section PC484b (Felony)**

8 On or about April 27, 2023, in the County of Mono, State of California, the crime of  
9 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
10 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
11 hundred dollars (\$2,350) from VIRGINIA BREWER for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

12 **COUNT 39: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

13 On or about April 27, 2023, in the County of Mono, State of California, the crime of  
14 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

15 **COUNT 40: GRAND THEFT FROM ELDER OR DEPENDENT ADULT - Violation of**  
16 **Section PC368(d) (Felony)**

17 On or about April 27, 2023, in the County of Mono, State of California, the crime of Grand  
18 Theft From Elder Or Dependent Adult in violation of PC368(d), a Felony, was committed in that  
19 ALEJANDRO SOLORIO CALDERON did unlawfully commit theft, embezzlement, and fraud,  
said property, money, labor, goods, and services taken and obtained having a value exceeding  
\$950.00, and knew and reasonably should have known that said person, VIRGINIA BREWER, was  
an elder.

20 **COUNT 41: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
21 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

22 On or about May 24, 2023, in the County of Mono, State of California, the crime of  
23 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
24 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

1 **COUNT 42: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
2 Section PC484b (Felony)

3 On or about May 24, 2023, in the County of Mono, State of California, the crime of  
4 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
5 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
6 hundred dollars (\$2,350) from MARK ROBERT LEDEL for the purpose of obtaining and paying  
7 for services, labor, materials and equipment and willfully failed to apply such money for such  
8 purpose by willfully failing to complete the improvements for which funds were provided and  
9 wrongfully diverted the funds to a use other than that for which the funds were received.

10 **COUNT 43: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

11 On or about May 24, 2023, in the County of Mono, State of California, the crime of  
12 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
13 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
14 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

15 **COUNT 44: GRAND THEFT FROM ELDER OR DEPENDENT ADULT** - Violation of  
16 Section PC368(d) (Felony)

17 On or about May 24, 2023, in the County of Mono, State of California, the crime of Grand  
18 Theft From Elder Or Dependent Adult in violation of PC368(d), a Felony, was committed in that  
19 ALEJANDRO SOLORIO CALDERON did unlawfully commit theft, embezzlement, and fraud,  
20 said property, money, labor, goods, and services taken and obtained having a value exceeding  
21 \$950.00, and knew and reasonably should have known that said person, MARK ROBERT LEDEL,  
22 was an elder.

23 **COUNT 45: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
24 VALUE BY FALSE PRETENSES** - Violation of Section PC532(A) (Felony)

25 On or about May 17, 2023, in the County of Mono, State of California, the crime of  
26 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
27 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
28 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

**COUNT 46: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
Section PC484b (Felony)

On or about May 17, 2023, in the County of Mono, State of California, the crime of  
Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
hundred dollars (\$2,350) from JAMIE MACDOUGALL for the purpose of obtaining and paying  
for services, labor, materials and equipment and willfully failed to apply such money for such  
purpose by willfully failing to complete the improvements for which funds were provided and  
wrongfully diverted the funds to a use other than that for which the funds were received.

1 **COUNT 47: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

2 On or about May 17, 2023, in the County of Mono, State of California, the crime of  
3 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
4 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
5 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

6 **COUNT 48: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
7 VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

8 On or about August 8, 2023, in the County of Mono, State of California, the crime of  
9 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
10 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
11 unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
12 and service of another in violation of this section, said property, money, labor and service obtained  
13 having a value exceeding \$950.00.

14 **COUNT 49: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of  
15 Section PC484b (Felony)**

16 On or about August 8, 2023, in the County of Mono, State of California, the crime of  
17 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
18 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
19 hundred dollars (\$2,350) from KIRSTIN WATSON for the purpose of obtaining and paying for  
20 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
21 by willfully failing to complete the improvements for which funds were provided and wrongfully  
22 diverted the funds to a use other than that for which the funds were received.

23 **COUNT 50: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

24 On or about August 8, 2023, in the County of Mono, State of California, the crime of  
25 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
26 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
27 entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

28 **COUNT 51: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN  
VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

On or about September 29, 2023, in the County of Mono, State of California, the crime of  
Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

1 **COUNT 52: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350** - Violation of  
2 Section PC484b (Misdemeanor)

3 On or about September 29, 2023, in the County of Mono, State of California, the crime of  
4 Diverting Construction Funds Not Exceeding \$2,350 in violation of PC484b, a Felony, was  
5 committed in that ALEJANDRO SOLORIO CALDERON received money not exceeding two  
6 thousand three hundred dollars (\$2,350) from DOUG NISTERCHUK for the purpose of obtaining  
and paying for services, labor, materials and equipment and willfully failed to apply such money for  
such purpose by willfully failing to complete the improvements for which funds were provided and  
wrongfully diverted the funds to a use other than that for which the funds were received.

7 **COUNT 53: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

8 On or about September 29, 2023, in the County of Mono, State of California, the crime of  
9 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

10 **COUNT 54: OBTAINING MONEY, LABOR OR PROPERTY NOT EXCEEDING \$950 IN**  
11 **VALUE BY FALSE PRETENSES** - Violation of Section PC532(A) (Misdemeanor)

12 On or about May 23, 2024, in the County of Mono, State of California, the crime of  
13 Obtaining Money, Labor Or Property Not Exceeding \$950 In Value By False Pretenses in violation  
14 of PC532(A), a Misdemeanor, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value not exceeding \$950.00.

15 **COUNT 55: EMBEZZLEMENT** - Violation of Section PC503 (Misdemeanor)

16 On or about May 23, 2024, in the County of Mono, State of California, the crime of  
17 Embezzlement in violation of PC503, a Misdemeanor, was committed in that ALEJANDRO  
18 SOLORIO CALDERON did unlawfully and fraudulently appropriate to his own use property which  
was entrusted to him, amounting to or not in excess of \$950.00, in violation of Penal Code section  
503.

19 **COUNT 56: CONTRACTING WITHOUT A LICENSE** - Violation of Section BP7028(a)  
20 (Misdemeanor)

21 On and between January 1, 2023 through September 5, 2024, in the County of Mono, State  
22 of California, the crime of Contracting Without A License in violation of BP7028(a), a  
23 Misdemeanor, was committed in that ALEJANDRO SOLORIO CALDERON engaged in the  
business of, and/or acted in the capacity of, a contractor within California when he performed acts  
covered by the Contractors' State License Law under a license that was under suspension.

1 **COUNT 57: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
2 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

3 On or about October 31, 2023, in the County of Mono, State of California, the crime of  
4 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
5 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

6 **COUNT 58: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
7 **Section PC484b (Felony)**

8 On or about October 31, 2023, in the County of Mono, State of California, the crime of  
9 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
10 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
11 hundred dollars (\$2,350) from BILLY LIVESAY for the purpose of obtaining and paying for  
services, labor, materials and equipment and willfully failed to apply such money for such purpose  
by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

12 **COUNT 59: EMBEZZLEMENT - Violation of Section PC503 (Felony)**

13 On or about October 31, 2023, in the County of Mono, State of California, the crime of  
14 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
15 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

16 **COUNT 60: OBTAINING MONEY, LABOR OR PROPERTY EXCEEDING \$950 IN**  
17 **VALUE BY FALSE PRETENSES - Violation of Section PC532(A) (Felony)**

18 On or about October 11, 2023, in the County of Mono, State of California, the crime of  
19 Obtaining Money, Labor Or Property Exceeding \$950 In Value By False Pretenses in violation of  
20 PC532(A), a Felony, was committed in that ALEJANDRO SOLORIO CALDERON did  
unlawfully, knowingly, and fraudulently get possession of money and property, and obtain labor  
and service of another in violation of this section, said property, money, labor and service obtained  
having a value exceeding \$950.00.

21 **COUNT 61: DIVERTING CONSTRUCTION FUNDS EXCEEDING \$2,350 - Violation of**  
22 **Section PC484b (Felony)**

23 On or about October 11, 2023, in the County of Mono, State of California, the crime of  
24 Diverting Construction Funds Exceeding \$2,350 in violation of PC484b, a Felony, was committed  
25 in that ALEJANDRO SOLORIO CALDERON received money exceeding two thousand three  
26 hundred dollars (\$2,350) from BEN BOERSEMA for the purpose of obtaining and paying for  
27 services, labor, materials and equipment and willfully failed to apply such money for such purpose  
28 by willfully failing to complete the improvements for which funds were provided and wrongfully  
diverted the funds to a use other than that for which the funds were received.

1 **COUNT 62: EMBEZZLEMENT** - Violation of Section PC503 (Felony)

2 On or about October 11, 2023, in the County of Mono, State of California, the crime of  
3 Embezzlement in violation of PC503, a Felony, was committed in that ALEJANDRO SOLORIO  
4 CALDERON did unlawfully and fraudulently appropriate to his own use property which was  
entrusted to him, amounting to or in excess of \$950.00, in violation of Penal Code section 503.

5 **\*\*\*NOTICE TO DEFENSE COUNSEL OR DEFENDANT\*\*\***

6 Pursuant to Penal Code section 1054.5(b), the People hereby informally request discovery to the  
7 People pursuant to Penal Code section 1054.3 and *People v. Roland* (2004) 124 Cal.App.4th 154  
8 [PC 1054.3 requires of the defense “not only the disclosure of relevant written and recorded  
9 statements of intended witnesses, other than the defendant, but also the disclosure of relevant  
10 oral statements communicated directly to counsel by such a witness or communicated to counsel  
11 via an investigator or some other third party.”]

12 I DECLARE UNDER PENALTY OF PERJURY, BASED UPON INFORMATION  
13 AND BELIEF, THAT THE FOREGOING IS TRUE AND CORRECT.

14 Executed at the County of Mono, California on this 5th day of September, 2024.

15 

16 Brad Allan Braaten  
17 Deputy District Attorney