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2 STATE BAR # 237986
COUNTY OF SAN LUIS OBISPO
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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO
DEPARTMENT 7

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11 THE PEOPLE OF THE STATE OF
CALIFORNIA
12 Plaintiff,

COURT CASE NO. 24F-09189
AMENDED COMPLAINT

13 vs.

14 **ROBERT CONRAD VASQUEZ**
DOB: 09/24/1987
15 ID NO. D000466000
CII: A33702107

DA CASE NO. 079-708142

16

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Defendant.

Appearance Date: January 28, 2026

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20 The District Attorney of San Luis Obispo County, California, hereby accuses the
21 above named defendant of the following criminal offenses:

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Count 1

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On or between February 1, 2019 and April 30, 2019, in the County of San Luis Obispo,
State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
Felony, was committed in that ROBERT CONRAD VASQUEZ, and while said defendant
was an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did
unlawfully take from Scott O'Brien Fire and Safety Company money and personal property
which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

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Count 2

On or between May 1, 2019 and August 31, 2019, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 3

On or between September 1, 2019 and December 31, 2019, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, and while said defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 4

On or between January 1, 2020 and April 30, 2020, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

Count 5

On or between May 1, 2020 and August 31, 2020, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said

1 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
2 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
3 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
4 (\$950).

5 Count 6

6 On or between September 1, 2020 and December 31, 2020, in the County of San Luis
7 Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of
8 PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said
9 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
10 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
11 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
12 (\$950) in any 12 consecutive month period.

13 PC803.5: Spec Alleg-Statute Of Limitations-Late Discovery-Pc115 And Pc530.5 ("Zamora"
14 Allegation)

15 It is further alleged as to counts 1 through 6 that the above violations were not discovered
16 until October, 2023, by Scott O'Brien when he began to investigate company finances after
17 money was drawn from a family members' bank account to pay a company debt, and that
18 no victim of said violation and no law enforcement agency chargeable with the
19 investigation and prosecution of said violation had actual and constructive knowledge of
20 said violation prior to said date because defendant was a trusted employee who had
21 control over company finances, within the meaning of Penal Code Section 803.5.

22 Count 7

23 On or between January 1, 2021 and April 30, 2021, in the County of San Luis Obispo,
24 State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
25 Felony, was committed in that ROBERT CONRAD VASQUEZ, and while said
26 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
27 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
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1 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
2 (\$950).

3 Count 8

4 On or between May 1, 2021 and August 31, 2021, in the County of San Luis Obispo, State
5 of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
6 Felony, was committed in that ROBERT CONRAD VASQUEZ, while said defendant was
7 an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully
8 take from Scott O'Brien Fire and Safety Company money and personal property which
9 aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950) .

10 Count 9

11 On or between September 1, 2021 and December 31, 2021, in the County of San Luis
12 Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of
13 PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, and while said
14 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
15 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
16 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
17 (\$950).

18 Count 10

19 On or between January 1, 2022 and April 30, 2022, in the County of San Luis Obispo,
20 State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
21 Felony, was committed in that ROBERT CONRAD VASQUEZ, while said defendant was
22 an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully
23 take from Scott O'Brien Fire and Safety Company money and personal property which
24 aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

25 Count 11

26 On or between May 1, 2022 and August 31, 2022, in the County of San Luis Obispo, State
27 of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a

1 Felony, was committed in that ROBERT CONRAD VASQUEZ while said defendant was an
2 agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully
3 take from said Scott O'Brien Fire and Safety Company money and personal property which
4 aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

5 Count 12

6 On or between September 1, 2022 and December 31, 2022, in the County of San Luis
7 Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of
8 PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said
9 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
10 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
11 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
12 (\$950).

13 Count 13

14 On or between January 1, 2023 and April 30, 2023, in the County of San Luis Obispo,
15 State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
16 Felony, was committed in that ROBERT CONRAD VASQUEZ while said defendant(s) was
17 (were) an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did
18 unlawfully take from Scott O'Brien Fire and Safety Company money and personal property
19 which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950).

20 Count 14

21 On or between May 1, 2023 and August 31, 2023, in the County of San Luis Obispo, State
22 of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a
23 Felony, was committed in that ROBERT CONRAD VASQUEZ, while said
24 defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety
25 Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and
26 personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
27 (\$950).

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Count 15

On or between September 1, 2023 and September 30, 2023, in the County of San Luis Obispo, State of California, the crime of Grand Theft By Embezzlement in violation of PC487(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ, while said defendant was an agent, servant, and employee of Scott O'Brien Fire and Safety Company, did unlawfully take from Scott O'Brien Fire and Safety Company money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950) in any 12 consecutive month period.

Enhancement

PC186.11(a)(3): Spec Alleg - Aggravated White Collar Crime

It is further alleged, pursuant to Penal Code section 186.11(a), that the offenses set forth in counts 1 through 15 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than One Hundred Thousand Dollars (\$100,000).

Count 16

On or about October 16, 2024, in the County of San Luis Obispo, State of California, the crime of Possession Of An Assault Weapon in violation of PC30605(a), a Felony, was committed in that ROBERT CONRAD VASQUEZ did unlawfully possess an assault weapon, to wit: Smith and Wesson AR-15 pattern rifle.

Count 17

On or about January 30, 2020, in the County of San Luis Obispo, State of California, the crime of Filing a False Income Tax Return in violation of Revenue and Taxation Code section 19706, a Felony, was committed in that ROBERT CONRAD VASQUEZ did willfully and unlawfully with the intent to evade any tax, made, rendered, signed, or verified any false or fraudulent return or statement, or supplied any false or fraudulent information to the Franchise Tax Board.

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Count 18

On or about February 19, 2021, in the County of San Luis Obispo, State of California, the crime of Filing a False Income Tax Return in violation of RT19706, a Felony, was committed in that ROBERT CONRAD VASQUEZ did willfully and unlawfully with the intent to evade any tax, made, rendered, signed, or verified any false or fraudulent return or statement, or supplied any false or fraudulent information to the Franchise Tax Board.

Count 19

On or about January 31, 2022, in the County of San Luis Obispo, State of California, the crime of Filing a False Income Tax Return in violation of Revenue and Taxation Code section 19706, a Felony, was committed in that ROBERT CONRAD VASQUEZ did willfully and unlawfully with the intent to evade any tax, made, rendered, signed, or verified any false or fraudulent return or statement, or supplied any false or fraudulent information to the Franchise Tax Board.

PC803.5: Spec Alleg-Statute Of Limitations-Late Discovery ("Zamora" Allegation)

It is further alleged as to counts 17, 18, and 19, that the above violations were not discovered until on or about January 30, 2025, by Detective R. Overacker when he reviewed records obtained by search warrant from the Franchise Tax Board, and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said date because defendant's W-2s from 2019, 2020, and 2021, provided to the Franchise Tax Board, did not accurately reflect his income, within the meaning of Penal Code Section 803.5.

Count 20

On or about February 5, 2023, in the County of San Luis Obispo, State of California, the crime of Filing a False Income Tax Return in violation of Revenue and Taxation Code section 19706, a Felony, was committed in that ROBERT CONRAD VASQUEZ did willfully and unlawfully with the intent to evade any tax, made, rendered, signed, or verified any

1 false or fraudulent return or statement, or supplied any false or fraudulent information to
2 the Franchise Tax Board.

3 Count 21

4 On or about March 26, 2024, in the County of San Luis Obispo, State of California, the
5 crime of Filing a False Income Tax Return in violation of Revenue and Taxation Code
6 section 19706, a Felony, was committed in that ROBERT CONRAD VASQUEZ did willfully
7 and unlawfully with the intent to evade any tax, made, rendered, signed, or verified any
8 false or fraudulent return or statement, or supplied any false or fraudulent information to
9 the Franchise Tax Board.

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11 It is further alleged pursuant to Penal Code Section 1170(b)(2) that one or more of the
12 following factors in aggravation listed in California Rule of Court 4.421 may apply to the
13 defendant(s) or to conduct of the defendant(s):

14 4.421(a)(3) The victim was particularly vulnerable.

15 4.421(a)(4) The defendant induced others to participate in the commission of the crime
16 and occupied a position of leadership and dominance of other participants in its
17 commission.

18 4.421(a)(6) The defendant threatened witnesses, unlawfully prevented and dissuaded
19 witnesses from testifying, suborned perjury, and in any other way illegally interfered with
20 the judicial process.

21 4.421(a)(7) The defendant is charged with other crimes for which consecutive sentences
22 can be imposed but for which concurrent sentences shall be imposed.

23 4.421(a)(8) The manner in which the crime was carried out indicates planning,
24 sophistication, or professionalism.

25 4.421(a)(9) The crime involved an attempted or actual taking or damage of great monetary

26 value.4.421(a)(11) The defendant took advantage of a position of trust and confidence to
27 commit the offense.

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

3 I declare that an investigation has been conducted to determine if said Defendant(s)
4 did commit the stated crime, which reports are attached hereto and incorporated herein by
5 reference, and that the facts therein show probable cause that the said Defendant(s) did
6 commit the crime. Your declarant requests the issuance of a Warrant of Arrest either if
7 said Defendant(s) do not appear voluntarily in response to an appearance letter, or if no
8 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 January 26, 2026, 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: January 26, 2026

15 DAN DOW
16 DISTRICT ATTORNEY

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18 By: _____
19 BEN G BLUMENTHAL
20 DEPUTY DISTRICT ATTORNEY

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

24 Dated: _____
25 _____
26 Judge of the Superior Court

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SUMMARY PAGE					
Cnt	Charge	Range	Defendant(s)	Special Allegation	Effect
1	PC487(a)		Robert Conrad Vasquez		
2	PC487(a)		Robert Conrad Vasquez		
3	PC487(a)		Robert Conrad Vasquez		
4	PC487(a)		Robert Conrad Vasquez		
5	PC487(a)		Robert Conrad Vasquez		
6	PC487(a)		Robert Conrad Vasquez		
7	PC487(a)		Robert Conrad Vasquez		
8	PC487(a)		Robert Conrad Vasquez		
9	PC803.5				
10	PC487(a)		Robert Conrad Vasquez		
11	PC487(a)		Robert Conrad Vasquez		
12	PC487(a)		Robert Conrad Vasquez		
13	PC487(a)		Robert Conrad Vasquez		
14	PC487(a)		Robert Conrad Vasquez		
15	PC487(a)		Robert Conrad Vasquez		
16	PC487(a)		Robert Conrad Vasquez		
17	PC487(a)		Robert Conrad Vasquez		
18	PC487(a)		Robert Conrad Vasquez		
19	PC186.11(a)(3)				
20	PC30605(a)		Robert Conrad Vasquez		
21	RT19706		Robert Conrad Vasquez		
22	RT19706		Robert Conrad Vasquez		
23	RT19706		Robert Conrad Vasquez		
24	PC803.5				
25	RT19706		Robert Conrad Vasquez		
26	RT19706		Robert Conrad Vasquez		