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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

OCT 16 2024

S. Fredieu 

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
(Riverside)

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

JACOB JOSEPH AARON ROSTOVSKY,

Defendant.

NO. RIF2446500

INDICTMENT

AGENCY#: DAR2024108002/RDA

COUNT 1

The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY of a violation of Penal Code section 487, subdivision (a), a felony, in that on or about 9/1/2021 through 9/19/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully steal and take and defraud money, labor, real and personal property of RIVERSIDE COUNTY, of a value exceeding Nine Hundred Fifty Dollars (\$950.00) to wit: GRANT FUNDS – EMERGENCY SOLUTIONS GRANT. [16/2/3]

COUNT 2

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Count 1 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 9/1/2021, in the County of

1 Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud,
2 present for payment to a state board, state officer, county board, and county officer, authorized to
3 allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing,
4 to wit, ESG CLAIM 4. [16/2/3]

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6 COUNT 3

7 For a further and separate cause of action, being different offense from but connected in its
8 commission with the charge set forth in Counts 1 and 2 hereof, the Criminal Grand Jury of the
9 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
10 committed a violation of Penal Code section 118, a felony, in that on or about 9/1/2021, in the
11 County of Riverside, State of California, the defendant being a person who testified, declared,
12 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
13 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 4,
14 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
15 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

16
17 COUNT 4

18 For a further and separate cause of action, being different offense from but connected in its
19 commission with the charge set forth in Counts 1 through 3 hereof, the Criminal Grand Jury of the
20 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
21 committed a violation of Penal Code section 72, a felony, in that on or about 10/5/2021, in the
22 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
23 to defraud, present for payment to a state board, state officer, county board, and county officer,
24 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
25 and writing, to wit, ESG CLAIM 5. [16/2/3]

26
27 COUNT 5

28 For a further and separate cause of action, being different offense from but connected in its
29 commission with the charge set forth in Counts 1 through 4 hereof, the Criminal Grand Jury of the
30 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
31 committed a violation of Penal Code section 118, a felony, in that on or about 10/5/2021, in the
32 County of Riverside, State of California, the defendant being a person who testified, declared,
33 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
34 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 5,
35 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
36 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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COUNT 6

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 5 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 11/1/2021, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, ESG CLAIM 6. [16/2/3]

COUNT 7

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 6 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 118, a felony, in that on or about 11/1/2021, in the County of Riverside, State of California, the defendant being a person who testified, declared, deposed, and certified under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 6, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 8

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 7 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 12/1/2021, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, ESG CLAIM 7. [16/2/3]

COUNT 9

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 8 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY

1 committed a violation of Penal Code section 118, a felony, in that on or about 12/1/2021, in the
2 County of Riverside, State of California, the defendant being a person who testified, declared,
3 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
4 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 7,
5 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
6 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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COUNT 10

For a further and separate cause of action, being different offense from but connected in its
commission with the charge set forth in Counts 1 through 9 hereof, the Criminal Grand Jury of the
County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
committed a violation of Penal Code section 72, a felony, in that on or about 1/10/2022, in the
County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
to defraud, present for payment to a state board, state officer, county board, and county officer,
authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
and writing, to wit, ESG CLAIM 8. [16/2/3]

COUNT 11

For a further and separate cause of action, being different offense from but connected in its
commission with the charge set forth in Counts 1 through 10 hereof, the Criminal Grand Jury of the
County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
committed a violation of Penal Code section 118, a felony, in that on or about 1/10/2022, in the
County of Riverside, State of California, the defendant being a person who testified, declared,
deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 8,
did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 12

For a further and separate cause of action, being different offense from but connected in its
commission with the charge set forth in Counts 1 through 11 hereof, the Criminal Grand Jury of the
County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
committed a violation of Penal Code section 72, a felony, in that on or about 2/1/2022, in the
County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
to defraud, present for payment to a state board, state officer, county board, and county officer,

1 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
2 and writing, to wit, ESG CLAIM 9. [16/2/3]

3
4 COUNT 13

5 For a further and separate cause of action, being different offense from but connected in its
6 commission with the charge set forth in Counts 1 through 12 hereof, the Criminal Grand Jury of the
7 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
8 committed a violation of Penal Code section 118, a felony, in that on or about 2/1/2022, in the
9 County of Riverside, State of California, the defendant being a person who testified, declared,
10 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
11 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 9,
12 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
13 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

14
15 COUNT 14

16 For a further and separate cause of action, being different offense from but connected in its
17 commission with the charge set forth in Counts 1 through 13 hereof, the Criminal Grand Jury of the
18 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
19 committed a violation of Penal Code section 72, a felony, in that on or about 3/1/2022, in the
20 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
21 to defraud, present for payment to a state board, state officer, county board, and county officer,
22 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
23 and writing, to wit, ESG CLAIM 10. [16/2/3]

24
25 COUNT 15

26 For a further and separate cause of action, being different offense from but connected in its
27 commission with the charge set forth in Counts 1 through 14 hereof, the Criminal Grand Jury of the
28 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
29 committed a violation of Penal Code section 118, a felony, in that on or about 3/1/2022, in the
30 County of Riverside, State of California, the defendant being a person who testified, declared,
31 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
32 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 10,
33 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
34 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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COUNT 16

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 15 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 4/6/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, ESG CLAIM 12. [16/2/3]

COUNT 17

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 16 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 118, a felony, in that on or about 4/6/2022, in the County of Riverside, State of California, the defendant being a person who testified, declared, deposed, and certified under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 12, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 18

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 17 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 4/28/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, ESG CLAIM 13/14. [16/2/3]

COUNT 19

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 18 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 118, a felony, in that on or about 4/28/2022, in the

1 County of Riverside, State of California, the defendant being a person who testified, declared,
2 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
3 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM
4 13/14, did willfully state as true a material matter which the defendant knew to be false, to wit:
5 THAT THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

6
7 COUNT 20

8 For a further and separate cause of action, being different offense from but connected in its
9 commission with the charge set forth in Counts 1 through 19 hereof, the Criminal Grand Jury of the
10 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
11 committed a violation of Penal Code section 72, a felony, in that on or about 6/1/2022, in the
12 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
13 to defraud, present for payment to a state board, state officer, county board, and county officer,
14 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
15 and writing, to wit, ESG CLAIM 15. [16/2/3]

16
17 COUNT 21

18 For a further and separate cause of action, being different offense from but connected in its
19 commission with the charge set forth in Counts 1 through 20 hereof, the Criminal Grand Jury of the
20 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
21 committed a violation of Penal Code section 118, a felony, in that on or about 6/1/2022, in the
22 County of Riverside, State of California, the defendant being a person who testified, declared,
23 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
24 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 15,
25 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
26 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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29 COUNT 22

30 For a further and separate cause of action, being different offense from but connected in its
31 commission with the charge set forth in Counts 1 through 21 hereof, the Criminal Grand Jury of the
32 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
33 committed a violation of Penal Code section 72, a felony, in that on or about 7/11/2022, in the
34 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
35 to defraud, present for payment to a state board, state officer, county board, and county officer,
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1 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
2 and writing, to wit, ESG CLAIM 16. [16/2/3]

3
4 COUNT 23

5 For a further and separate cause of action, being different offense from but connected in its
6 commission with the charge set forth in Counts 1 through 22 hereof, the Criminal Grand Jury of the
7 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
8 committed a violation of Penal Code section 118, a felony, in that on or about 7/11/2022, in the
9 County of Riverside, State of California, the defendant being a person who testified, declared,
10 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
11 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 16,
12 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
13 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

14
15 COUNT 24

16 For a further and separate cause of action, being different offense from but connected in its
17 commission with the charge set forth in Counts 1 through 23 hereof, the Criminal Grand Jury of the
18 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
19 committed a violation of Penal Code section 72, a felony, in that on or about 8/9/2022, in the
20 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
21 to defraud, present for payment to a state board, state officer, county board, and county officer,
22 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
23 and writing, to wit, ESG CLAIM 17. [16/2/3]

24
25 COUNT 25

26 For a further and separate cause of action, being different offense from but connected in its
27 commission with the charge set forth in Counts 1 through 24 hereof, the Criminal Grand Jury of the
28 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
29 committed a violation of Penal Code section 118, a felony, in that on or about 8/9/2022, in the
30 County of Riverside, State of California, the defendant being a person who testified, declared,
31 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
32 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 17,
33 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
34 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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COUNT 26

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 25 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 9/6/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, ESG CLAIM 18. [16/2/3]

COUNT 27

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 26 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 118, a felony, in that on or about 9/6/2022, in the County of Riverside, State of California, the defendant being a person who testified, declared, deposed, and certified under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 18, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 28

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 27 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 487, subdivision (a), a felony, in that on or about 11/10/2022 through 2/28/2023, in the County of Riverside, State of California, the defendant did willfully and unlawfully steal and take and defraud money, labor, real and personal property of RIVERSIDE COUNTY, of a value exceeding Nine Hundred Fifty Dollars (\$950.00) to wit: GRANT FUNDS – HOUSING AND URBAN DEVELOPMENT GRANT. [16/2/3]

COUNT 29

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 28 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 10/28/2022, in the

1 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
2 to defraud, present for payment to a state board, state officer, county board, and county officer,
3 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
4 and writing, to wit, HUD CLAIM 1. [16/2/3]

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6 COUNT 30

7 For a further and separate cause of action, being different offense from but connected in its
8 commission with the charge set forth in Counts 1 through 29 hereof, the Criminal Grand Jury of the
9 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
10 committed a violation of Penal Code section 118, a felony, in that on or about 10/28/2022, in the
11 County of Riverside, State of California, the defendant being a person who testified, declared,
12 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
13 deposition, and certification is permitted by law under penalty of perjury, to wit, HUD CLAIM 1,
14 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
15 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

16
17 COUNT 31

18 For a further and separate cause of action, being different offense from but connected in its
19 commission with the charge set forth in Counts 1 through 30 hereof, the Criminal Grand Jury of the
20 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
21 committed a violation of Penal Code section 72, a felony, in that on or about 10/25/2022, in the
22 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
23 to defraud, present for payment to a state board, state officer, county board, and county officer,
24 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
25 and writing, to wit, HUD CLAIM 2. [16/2/3]

26
27 COUNT 32

28 For a further and separate cause of action, being different offense from but connected in its
29 commission with the charge set forth in Counts 1 through 31 hereof, the Criminal Grand Jury of the
30 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
31 committed a violation of Penal Code section 118, a felony, in that on or about 10/25/2022, in the
32 County of Riverside, State of California, the defendant being a person who testified, declared,
33 deposed, and certified under penalty of perjury in a case in which such testimony, declaration,
34 deposition, and certification is permitted by law under penalty of perjury, to wit, HUD CLAIM 2,
35 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT
36 THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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COUNT 33

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 32 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 11/2/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, HUD CLAIM 3. [16/2/3]

COUNT 34

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 33 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 118, a felony, in that on or about 11/2/2022, in the County of Riverside, State of California, the defendant being a person who testified, declared, deposed, and certified under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, HUD CLAIM 3, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSEMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 35

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 34 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 12/6/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, HUD CLAIM 4. [16/2/3]

COUNT 36

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 35 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY

1 committed a violation of Penal Code section 72, a felony, in that on or about 1/17/2023, in the
2 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
3 to defraud, present for payment to a state board, state officer, county board, and county officer,
4 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
5 and writing, to wit, HUD CLAIM 5. [16/2/3]

6
7 **COUNT 37**

8 For a further and separate cause of action, being different offense from but connected in its
9 commission with the charge set forth in Counts 1 through 36 hereof, the Criminal Grand Jury of the
10 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
11 committed a violation of Penal Code section 487, subdivision (a), a felony, in that on or about
12 5/25/2022 through 2/7/2023, in the County of Riverside, State of California, the defendant did
13 willfully and unlawfully steal and take and defraud money, labor, real and personal property of
14 CITY OF PALM SPRINGS, of a value exceeding Nine Hundred Fifty Dollars (\$950.00) to
15 wit: PUBLIC FUNDS. [16/2/3]

16
17 **COUNT 38**

18 For a further and separate cause of action, being different offense from but connected in its
19 commission with the charge set forth in Counts 1 through 37 hereof, the Criminal Grand Jury of the
20 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
21 committed a violation of Penal Code section 72, a felony, in that on or about 5/25/2022, in the
22 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
23 to defraud, present for payment to a state board, state officer, county board, and county officer,
24 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
25 and writing, to wit, PALM SPRINGS INVOICE 1. [16/2/3]

26
27 **COUNT 39**

28 For a further and separate cause of action, being different offense from but connected in its
29 commission with the charge set forth in Counts 1 through 38 hereof, the Criminal Grand Jury of the
30 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
31 committed a violation of Penal Code section 72, a felony, in that on or about 9/26/2022, in the
32 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent
33 to defraud, present for payment to a state board, state officer, county board, and county officer,
34 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher
35 and writing, to wit, PALM SPRINGS INVOICE 4. [16/2/3]

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COUNT 40

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 39 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 10/5/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, PALM SPRINGS INVOICE 5. [16/2/3]

COUNT 41

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 40 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 72, a felony, in that on or about 12/8/2022, in the County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent to defraud, present for payment to a state board, state officer, county board, and county officer, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher and writing, to wit, PALM SPRINGS INVOICE 6. [16/2/3]

COUNT 42

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 41 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 424, subdivision (a)(1), a felony, in that on or about 10/14/2022, through and including 2/7/2023, in the County of Riverside, State of California, while employed as CEO of QUEER WORKS, and a person charged with the receipt, safekeeping, transfer, and disbursement of public monies of QUEER WORKS, the defendant did willfully and unlawfully and without authority of law, appropriate to their own use and the use of another the sum of \$500,000.00 (FIVE HUNDRED THOUSAND DOLLARS). [2/3/4 prison]

COUNT 43

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 42 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 504, a felony, in that on or about 10/14/2022, through

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COUNT 47

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 46 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 10/18/2022 through 10/19/2022, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

[16/2/3]

COUNT 48

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 47 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 10/25/2022 through 10/31/2022, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

[16/2/3]

COUNT 49

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 48 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 10/31/2022 through 11/1/2022, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

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COUNT 50

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 49 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 11/28/2022 through 12/2/2022, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 51

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 50 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 2/3/2023, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 52

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 51 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 9/5/2023, in the County of Riverside, State of California, the defendant did willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total value exceeding Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion, management, establishment, and carrying on of any criminal activity, and knowing that the monetary instrument is derived directly or indirectly from criminal activity.

COUNT 53

For a further and separate cause of action, being different offense from but connected in its commission with the charge set forth in Counts 1 through 52 hereof, the Criminal Grand Jury of the

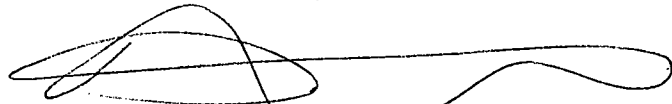
1 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY
2 committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about
3 9/5/2023, in the County of Riverside, State of California, the defendant did willfully, knowingly
4 and unlawfully conduct a transaction involving monetary instruments of a total value exceeding
5 Five Thousand Dollars (\$5,000.00) with the specific intent to promote and facilitate the promotion,
6 management, establishment, and carrying on of any criminal activity, and knowing that the
7 monetary instrument is derived directly or indirectly from criminal activity.

8
9 It is further alleged that the said defendant JACOB JOSEPH AARON ROSTOVSKY,
10 committed two or more related felonies, a material element of which was fraud or embezzlement,
11 which involved a pattern of related felony conduct, and this pattern of related felony conduct
12 involved the taking of more than five hundred thousand dollars (\$500,000.00) within the meaning
13 of Penal Code section 186.11, subdivision (a)(2). [2/3/5 prison]

14
15
16 October 16, 2024

MICHAEL A. HESTRIN

District Attorney



VINCENT A. FABRIZIO

Chief Deputy District Attorney

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18
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20
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22 VAF:smg

23
24 Names of witnesses examined by the Criminal Grand Jury on finding of the foregoing

25 Indictment:

26 Kristopher Mooney

27 Brandon Trahan

28 Megan Gomez

29 Justin Clifton

30 Steven Roe

31 Jay Virata

32 David Wall

33 A TRUE BILL:



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36 Foreperson of the Criminal Grand Jury