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9	State Bar No. 167454	6	
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12	SUPERIOR COURT OF CALIFORNIA		
13	COUNTY OF RIVERSIDE		
14	(Riverside)		
15			
16	THE PEOPLE OF THE STATE OF CALIFORNIA,	NO. RIF2446500	
17			
18	Plaintiff,		
19	v.	INDICTMENT	
20			
21	JACOB JOSEPH AARON ROSTOVSKY,		
22	Defendant.	AGENCY#: DAR2024108002/RD	4
23			
24	COUNT 1		
25	The Criminal Grand Jury of the County of Riverside by this Indictment hereby accuses		
26	JACOB JOSEPH AARON ROSTOVSKY of a violation of Penal Code section 487, subdivision (a),		
27	a felony, in that on or about 9/1/2021 through 9/19/2022, in the County of Riverside, State of		
28	California, the defendant did willfully and unlawfully steal and take and defraud money, labor, real		
29	and personal property of RIVERSIDE COUNTY, of a value exceeding Nine Hundred Fifty Dollars		
30	(\$950.00) to wit: GRANT FUNDS – EMERGENCY SOLUTIONS GRANT. [16/2/3]		
31			
32	COUNT 2		
33	For a further and separate cause of action, being different offense from but connected in its		
34	commission with the charge set forth in Count 1 hereof, the Criminal Grand Jury of the County of		
35	Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a		
36	violation of Penal Code section 72, a felony, in that on or about 9/1/2021, in the County of		
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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 4. [16/2/3]

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 committed a violation of Penal Code section 118, a felony, in that on or about 9/1/2021, in the 10 County of Riverside, State of California, the defendant being a person who testified, declared, 11 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 REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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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 committed a violation of Penal Code section 72, a felony, in that on or about 10/5/2021, in the 21 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 and writing, to wit, ESG CLAIM 5. [16/2/3] 25

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 committed a violation of Penal Code section 118, a felony, in that on or about 10/5/2021, in the 31 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, deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 5, 34 35 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT 36 THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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 REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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 8

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

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17 18 committed a violation of Penal Code section 118, a felony, in that on or about 12/1/2021, 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 7, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

COUNT 10

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

COUNT 11

19 For a further and separate cause of action, being different offense from but connected in its 20 commission with the charge set forth in Counts 1 through 10 hereof, the Criminal Grand Jury of the 21 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 22 committed a violation of Penal Code section 118, a felony, in that on or about 1/10/2022, in the 23 County of Riverside, State of California, the defendant being a person who testified, declared, 24 deposed, and certified under penalty of perjury in a case in which such testimony, declaration, 25 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 8, 26 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT 27 THE REIMBURSMENT 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,

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

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COUNT 13

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

COUNT 14

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

COUNT 15

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

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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 4 committed a violation of Penal Code section 72, a felony, in that on or about 4/6/2022, in the 6 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]

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COUNT 17

For a further and separate cause of action, being different offense from but connected in its 12 commission with the charge set forth in Counts 1 through 16 hereof, the Criminal Grand Jury of the 13 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 14 committed a violation of Penal Code section 118, a felony, in that on or about 4/6/2022, in the 15 County of Riverside, State of California, the defendant being a person who testified, declared, 16 deposed, and certified under penalty of perjury in a case in which such testimony, declaration, 17 deposition, and certification is permitted by law under penalty of perjury, to wit, ESG CLAIM 12, 18 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT 19 THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison] 20

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]

For a further and separate cause of action, being different offense from but connected in its 33 commission with the charge set forth in Counts 1 through 18 hereof, the Criminal Grand Jury of the 34 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 35 committed a violation of Penal Code section 118, a felony, in that on or about 4/28/2022, in the 36

COUNT 19

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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 13/14, did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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]

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 County of Riverside, State of California, the defendant being a person who testified, declared, 22 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 THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison] 26

COUNT 22

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 21 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 7/11/2022, 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,

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

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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 REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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]

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 REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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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 REIMBURSMENT 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]

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

COUNT 29

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 4 and writing, to wit, HUD CLAIM 1. [16/2/3]

COUNT 30

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 29 hereof, the Criminal Grand Jury of the 8 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, deposition, and certification is permitted by law under penalty of perjury, to wit, HUD CLAIM 1, 13 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT 14 15 THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison]

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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 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 20 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, authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher 24 25 and writing, to wit, HUD CLAIM 2. [16/2/3]

COUNT 31

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 committed a violation of Penal Code section 118, a felony, in that on or about 10/25/2022, in the 31 County of Riverside, State of California, the defendant being a person who testified, declared, 32 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 REIMBURSMENT 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]

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COUNT 34

For a further and separate cause of action, being different offense from but connected in its 13 commission with the charge set forth in Counts 1 through 33 hereof, the Criminal Grand Jury of the 14 15 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 16 County of Riverside, State of California, the defendant being a person who testified, declared, 17 deposed, and certified under penalty of perjury in a case in which such testimony, declaration, 18 deposition, and certification is permitted by law under penalty of perjury, to wit, HUD CLAIM 3, 19 20 did willfully state as true a material matter which the defendant knew to be false, to wit: THAT THE REIMBURSMENT AMOUNT WAS TRUE AND CORRECT. [16/2/3 prison] 21

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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 25 26 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 27 County of Riverside, State of California, the defendant did willfully and unlawfully, with the intent 28 to defraud, present for payment to a state board, state officer, county board, and county officer, 29 30 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]

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COUNT 36

For a further and separate cause of action, being different offense from but connected in its 34 commission with the charge set forth in Counts 1 through 35 hereof, the Criminal Grand Jury of the 35 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 36

committed a violation of Penal Code section 72, a felony, in that on or about 1/17/2023, 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 5. [16/2/3]

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 committed a violation of Penal Code section 487, subdivision (a), a felony, in that on or about 11 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]

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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]

COUNT 38

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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2 For a further and separate cause of action, being different offense from but connected in its 3 commission with the charge set forth in Counts 1 through 39 hereof, the Criminal Grand Jury of the 4 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 5 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 6 7 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]

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COUNT 41

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 40 hereof, the Criminal Grand Jury of the 13 14 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 15 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 16 17 to defraud, present for payment to a state board, state officer, county board, and county officer, 18 authorized to allow and pay the same if genuine, a false and fraudulent claim, bill, account, voucher 19 and writing, to wit, PALM SPRINGS INVOICE 6. [16/2/3]

COUNT 42

22 For a further and separate cause of action, being different offense from but connected in its 23 commission with the charge set forth in Counts 1 through 41 hereof, the Criminal Grand Jury of the 24 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 25 committed a violation of Penal Code section 424, subdivision (a)(1), a felony, in that on or about 26 10/14/2022, through and including 2/7/2023, in the County of Riverside, State of California, while 27 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 28 29 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] 30

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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 42 hereof, the Criminal Grand Jury of the 34 35 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 36 committed a violation of Penal Code section 504, a felony, in that on or about 10/14/2022, through

COUNT 43

and including 2/7/2023, in the County of Riverside, State of California, the defendant did willfully
and unlawfully, being an officer of this state and any county and city and municipal corporation and
subdivision thereof, and a deputy, clerk and servant of that officer, and an officer, director, trustee,
clerk servant and agent of an association, society and corporation did fraudulently appropriate and
use for any purpose not in the due and lawful execution of that person's trust, property in their
possession and under their control by virtue of that trust and secrete it with a fraudulent intent to
appropriate it to that use and purpose. [16/2/3]

COUNT 44

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 43 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY committed a violation of Section 550, subdivision (a)(1) of the Penal Code, a felony, in that on or about 4/26/2023, in the County of Riverside, State of California, the defendant did knowingly present and cause to be presented a false and fraudulent claim for payment of a loss under a contract of insurance. [2/3/5]

COUNT 45

19 For a further and separate cause of action, being different offense from but connected in its 20 commission with the charge set forth in Counts 1 through 44 hereof, the Criminal Grand Jury of the County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 21 22 committed a violation of Section 550, subdivision (a)(5) of the Penal Code, a felony, in that on or 23 about 7/17/2023, in the County of Riverside, State of California, the defendant did knowingly 24 prepare, make or subscribe any writing, with the intent to present or use it, or to allow it to be 25 presented in support of any false or fraudulent claim for payment of a loss under a contract of 26 insurance. [2/3/5]

COUNT 46

29 For a further and separate cause of action, being different offense from but connected in its 30 commission with the charge set forth in Counts 1 through 45 hereof, the Criminal Grand Jury of the 31 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 32 committed a violation of Penal Code section 470, subdivision (d), a felony, in that on or about 33 7/17/2023, in the County of Riverside, State of California, the defendant did willfully and unlawfully, falsely make, alter, forge, and counterfeit a SETTLEMENT AGREEMENT, and did 34 35 utter, publish, pass, and attempt and offer to pass the same as true and genuine, knowing the same to be false, altered, forged, and counterfeited, with the intent to defraud. [16/2/3]36

MICHAEL A. HESTRIN DISTRICT ATTORNEY County of Riverside State of California

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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

15 For a further and separate cause of action, being different offense from but connected in its 16 commission with the charge set forth in Counts 1 through 47 hereof, the Criminal Grand Jury of the 17 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 18 committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 19 10/25/2022 through 10/31/2022, in the County of Riverside, State of California, the defendant did 20 willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total 21 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 22 23 knowing that the monetary instrument is derived directly or indirectly from criminal activity. 24 [16/2/3]

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COUNT 49

27 For a further and separate cause of action, being different offense from but connected in its 28 commission with the charge set forth in Counts 1 through 48 hereof, the Criminal Grand Jury of the 29 County of Riverside by this indictment hereby accuses JACOB JOSEPH AARON ROSTOVSKY 30 committed a violation of Penal Code section 186.10, subdivision (a), a felony, in that on or about 31 10/31/2022 through 11/1/2022, in the County of Riverside, State of California, the defendant did 32 willfully, knowingly and unlawfully conduct a transaction involving monetary instruments of a total 33 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 34 35 knowing that the monetary instrument is derived directly or indirectly from criminal activity.

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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.

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 52

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

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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			
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.		
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13	of Penal Code section 186.11, subdivision (a)(2). [2/3/5 prison]		
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15	October <u>(10</u> , 2024 MICHAEL A. HESTRIN		
10	District Attorney		
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20	VINCENT A. FABRIZIO		
21	Chief Deputy District Attorney		
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:		
34 35			
33 36	Foreperson of the Criminal Grand Jury		
50 MICHAEL A. HESTRIN DISTRICT ATTORNEY County of Riverside State of California	17		
1	I Contraction of the second		