

1 California, said defendant did then and there assist, abet, solicit and conspire with  
2 another person to knowingly prepare, make or subscribe any writing, with the intent  
3 to present or use the same, or allow it to be presented in support of a false or  
4 fraudulent claim.

5  
6 **COUNT FIFTY-NINE**

7 (as to defendant **DEBBIE TO**)

8 [re 5/5/90 Collision, Incident No. 2]

9 The Grand Jury of the County of Alameda hereby accuses **DEBBIE TO** of a  
10 felony, to wit: a violation of Section 487.1 of the Penal Code of California, in that on  
11 or about May 5, 1990, in the County of Alameda, State of California, said defendant  
12 did unlawfully take and did unlawfully cause to be taken the property of an insurance  
13 company consisting of money of a value in excess of Four Hundred Dollars (\$400.00)  
14 through a false and fraudulent claim for injuries under a contract of insurance.  
15

16 **COUNT SIXTY**

17 (as to defendant **STEWART CHEN**)

18 [re 5/5/90 Collision, Incident No. 2]

19  
20 The Grand Jury of the County of Alameda hereby accuses **STEWART CHEN**  
21 of a felony, to wit: a violation of Section 1871.1(a)(1) of the Insurance Code of  
22 California, in that on or about May 5, 1990, in the County of Alameda, State of  
23 California, said defendant did then and there knowingly present and cause to be  
24 presented a false and fraudulent claim on behalf **TEENA PHAM** for the payment of  
25 a loss under a contract of insurance.  
26

27  
28 ///

