

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

**01 YEVGENY SELIVANOV (05/25/1972),
aka EUGENE SELIVANOV, and
02 TATYANA BERKOVICH (02/16/1977)**

Defendant(s).

CASE NO. BA372244

***FELONY COMPLAINT
FOR ARREST WARRANT***

The undersigned is informed and believes that:

COUNT 1

On and between January 1, 2005 and June 30, 2009, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: credit card charges made to Ivy Academia's American Express account.

* * * * *

COUNT 2

On and between January 1, 2005 and June 30, 2009, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who on and between January 1, 2005 and June 30, 2009, and while said defendants was a Director/Officer of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: credit card charges made to Ivy Academia's American Express account.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 3

On and between August 1, 2005 and August 5, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: interest payments on "start-up" loan.

* * * * *

COUNT 4

On and between August 1, 2005 and August 5, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who on and between August 1, 2005 and August 5, 2007, and while said defendants was a Director/Officer of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: interest payments on “start-up” loan.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

* * * * *

COUNT 5

On and between May 1, 2006 and October 30, 2009, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: interest payments on salary.

* * * * *

COUNT 6

On and between May 6, 2006 and October 30, 2009, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who on and between May 6, 2006 and October 30, 2009, and while said defendants was Director/Officer of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: interest payments on salary.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 7

On and between December 1, 2007 and March 31, 2009, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal loan the same, and a portion thereof, made a profit out of, and used the same for a purpose not authorized by law to wit: rent increase in sublease dated July 1, 2007 between Academy Just For Kids and Ivy Academia.

* * * * *

COUNT 8

On and between December 1, 2007 and March 31, 2009, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who on and between December 1, 2007 and March 31, 2009, and while said defendants was Director/Officer of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: rent increase in sublease dated July 1, 2007 between Academy Just For Kids and Ivy Academia.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 9

On and between December 31, 2004 and January 4, 2005, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal loan the same, and a portion thereof, made a profit out of, and used the same for a purpose not authorized by law to wit: \$100,000 transfer from Ivy Academia Charter School to Academy Just For Kids.

* * * * *

COUNT 10

On and between December 31, 2004 and January 4, 2005, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who on and between December 31, 2004 and January 4, 2005, and while said defendants was Director/Officer of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: \$100,000 transfer from Ivy Academia Charter School to Academy Just For Kids.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 11

On and between September 1, 2004 and June 30, 2009, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal knowingly keep a false account, and make a false entry and erasure in an account of and relating to the same. Or fraudulently alter, falsify, conceal, destroy and obliterate such account to wit: Ivy Academia Charter School financial records including general ledger and/or annual audited financial statements and/or bank reconciliations.

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COUNT 12

On or about May 25, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: bank transfers and checks issued from Ivy Academia to E Generation.

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COUNT 13

On or about May 25, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV, who on and while said defendant was a Director of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: check issued from Ivy Academia to E Generation.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 14

On or about May 25, 2007, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value \$30,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: Bank transfers and checks issued from Ivy Academia Charter School to Academy Just For Kids and E Generation, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity to wit: checks issued from Ivy Support Fund to Ivy Academia Charter School to E Generation to defendant, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 15

On or about June 27, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: money transfers from Ivy Academia to E Generation to defendant SELIVANOV.

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COUNT 16

On or about June 27, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV, who on June 27, 2007, and while said defendant was a Director of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: money transfers from Ivy Academia to E Generation to defendant SELIVANOV.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 17

On or about June 27, 2007, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value \$10,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: Money from transfers from Ivy Academia Charter School, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity to wit: money transfers from Ivy Academia Charter School to E Generation to defendant SELIVANOV, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 18

On and between August 21, 2007 and September 30, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: money transferred from Ivy Academia Charter School to E Generation to defendant SELIVANOV.

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COUNT 19

On and between August 21, 2007 and September 30, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV, who on and between August 21, 2007 and September 30, 2007, and while said defendant was a Director of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: money transferred from Ivy Academia Charter School to E Generation to defendant SELIVANOV.

It is further alleged that the said embezzlement and defalcation was of public funds within the meaning of Penal Code Section 514.

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COUNT 20

On and between August 21, 2007 and September 30, 2007, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: money transferred from Ivy Academia Charter School to E Generation to defendant SELIVANOV, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 21

On and between November 19, 2007 and November 30, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: money transfer from Ivy Academia Charter School to E Generation to GE Moneybank.

* * * * *

COUNT 22

On and between November 19, 2007 and November 30, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV, who on and between November 19, 2007 and November 30, 2007, and while said defendant was a Director of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: money transfer from Ivy Academia Charter School to E Generation to GE Moneybank.

* * * * *

COUNT 23

On and between November 19, 2007 and November 30, 2007, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value \$20,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: money transfer from Ivy Academia Charter School to E Generation to GE Moneybank, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 24

On and between December 14, 2007 and December 31, 2007, in the County of Los Angeles, the crime of MISAPPROPRIATION OF PUBLIC FUNDS, in violation of PENAL CODE SECTION 424(a), a Felony, was committed by YEVGENY SELIVANOV, who being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal without authority of law, appropriate the same, and a portion thereof, to personal use and the use of another to wit: money transfer from Ivy Academia Charter School to E Generation.

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COUNT 25

On and between December 14, 2007 and December 31, 2007, in the County of Los Angeles, the crime of EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER, in violation of PENAL CODE SECTION 504, a Felony, was committed by YEVGENY SELIVANOV, who on and between December 14, 2007 and December 31, 2007, and while said defendant was a Director of Ivy Academia Charter School, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his/her trust, property which he/she had in his/her possession and under his/her control by virtue of his/her trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400) to wit: money transfer from Ivy Academia Charter School to E Generation.

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COUNT 26

On and between December 14, 2007 and December 31, 2007, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value \$20,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: money transfer from Ivy Academia Charter School to E Generation to Mark Shinder, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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COUNT 27

On or about May 15, 2005, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully subscribe to and file a false tax return to wit: 2004 California Personal Income Tax Return.

* * * * *

COUNT 28

On and between December 13, 2006 and December 15, 2006, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully subscribe to and file a false tax return to wit: 2005 California Personal Income Tax Return.

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COUNT 29

On or about October 9, 2007, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully subscribe to and file a false tax return to wit: 2006 California Personal Income Tax Return.

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COUNT 30

On or about October 15, 2008, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully subscribe to and file a false tax return to wit: 2007 California Personal Income Tax Return.

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COUNT 31

On and between September 1, 2009 and October 15, 2009, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully subscribe to and file a false tax return to wit: 2008 California Personal Income Tax Return.

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COUNT 32

On or about May 15, 2005, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully subscribe to and file a false tax return to wit: 2004 California Limited Liability Company Income Tax Return for Academy Just For Kids.

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COUNT 33

On or about October 15, 2006, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully subscribe to and file a false tax return to wit: 2005 California Limited Liability Company Income Tax Return for E Generation.

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COUNT 34

On or about October 9, 2007, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully subscribe to and file a false tax return to wit: 2006 California Limited Liability Company Income Tax Return for E Generation.

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COUNT 35

On or about October 15, 2008, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully subscribe to and file a false tax return to wit: 2007 California Limited Liability Company Income Tax Return for E Generation.

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COUNT 36

On or about September 15, 2009, in the County of Los Angeles, the crime of FILING FALSE TAX RETURN, in violation of REVENUE & TAXATION CODE SECTION 19705(a), a Felony, was committed by YEVGENY SELIVANOV, who did unlawfully subscribe to and file a false tax return to wit: 2008 California Limited Liability Company Income Tax Return for E Generation.

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COUNT 37

On and between January 1, 2008 and December 31, 2009, in the County of Los Angeles, the crime of WILLFULLY VIOLATE PROVISIONS OF TITLE, in violation of GOVERNMENT CODE SECTIONS 87203 and 91000(a), a Misdemeanor, was committed by YEVGENY SELIVANOV and TATYANA BERKOVICH, who did unlawfully fail to file Form 700 Statement of Economic Interests for 2008.

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COUNT 38

On or about September 25, 2008, in the County of Los Angeles, the crime of CONFLICT OF INTEREST, in violation of GOVERNMENT CODE SECTIONS 87100 and 91000, a Misdemeanor, was committed by TATYANA BERKOVICH, who did unlawfully, while a public official, make, participate in making, and attempt to use her official position to influence a governmental decision in which the defendant knew and had reason to know she had a financial interest to wit: lease of 6601 Valley Circle Blvd. West Hills, California.

* * * * *

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25 and 26 that in the commission of the above offense(s) the said defendant(s), TATYANA BERKOVICH and YEVGENY SELIVANOV, with the intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code section 12022.6(a)(1).

* * * * *

It is further alleged as to counts 1,2,3,4,5,6,9,10 and 11 that the offenses were not discovered until after June 13, 2006. The Los Angeles Unified School District Office of the Inspector General (OIG) commenced an audit of Ivy Academia Charter School on June 13, 2006. The school was selected by the LAUSD Charter Division as one of several charter schools to be audited by the OIG under a charter school auditing program established by the Charter Schools Division and the OIG. During the audit, LAUSD auditor Corazon Cenon identified several areas which appeared to involve commingling of public with private funds and failure to accurately report financial transactions in the school's accounting records. Cenon's audit was completed and the case was referred to the LAUSD Office of Investigations on August 15, 2006. The investigation was assigned to OIG Investigator Amy Prenovitz and later, Michael Atkinson. On May 22, 2008, OIG Investigator Atkinson referred the case to the Los Angeles County District Attorney's Office Public Integrity Division.

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* 2007 U.S. LEXIS 1324.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) YEVGENY SELIVANOV and TATYANA BERKOVICH for the above-listed crimes. Wherefore, a warrant of arrest is requested for YEVGENY SELIVANOV and TATYANA BERKOVICH.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA372244, CONSISTS OF 38 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on June 10, 2010.

MARY CENOVICH
DECLARANT AND COMPLAINANT

.....
STEVE COOLEY,
DISTRICT ATTORNEY

BY: _____
SANDI ROTH,
DEPUTY DISTRICT ATTORNEY

AGENCY: LACO D.A. I/O: MARY CENOVICH ID NO.: 13 PHONE : (213) 974-2003
 BUREAU OF
 INVESTIGATION
DR NO.: P080313 OPERATOR: RG PRELIM. TIME EST.: 5 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
SELIVANOV, YEVGENY		5/25/1972		\$200,000	
BERKOVICH, TATYANA		2/16/1977		\$85,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

YEVGENY SELIVANOV

BAIL: \$ _____

TATYANA BERKOVICH

BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
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FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

YEVGENY SELIVANOV

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
2	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
3	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
4	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
5	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
6	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
7	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
8	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
9	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
10	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
11	PC 424(a)	2-3-4		
12	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
13	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
14	PC 186.10(a)	16-2-3	PC 12022.6(a)(1)	+1 YR
15	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
16	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
17	PC 186.10(a)	16-2-3	PC 12022.6(a)(1)	+1 YR
18	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
19	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
20	PC 186.10(a)	16-2-3	PC 12022.6(a)(1)	+1 YR
21	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
22	PC 504	16-2-3	PC 12022.6(a)(1)	+1 YR
23	PC 186.10(a)	16-2-3	PC 12022.6(a)(1)	+1 YR
24	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
25	PC 504	16-2-3	PC 12022.6(a)(1)	+1 YR
26	PC 186.10(a)	16-2-3	PC 12022.6(a)(1)	+1 YR
27	RT 19705(a)	16-2-3		
28	RT 19705(a)	16-2-3		
29	RT 19705(a)	16-2-3		
30	RT 19705(a)	16-2-3		
31	RT 19705(a)	16-2-3		
32	RT 19705(a)	16-2-3		
33	RT 19705(a)	16-2-3		
34	RT 19705(a)	16-2-3		
35	RT 19705(a)	16-2-3		
36	RT 19705(a)	16-2-3		
37	GC 91000(a)			

TATYANA BERKOVICH

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
2	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
3	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
4	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
5	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
6	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
7	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
8	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
9	PC 424(a)	2-3-4	PC 12022.6(a)(1)	+1 YR
10	PC 504	16-2-3	PC 12022.6(a)(1) PC 514	+1 YR 16-2-3
27	RT 19705(a)	16-2-3		
28	RT 19705(a)	16-2-3		
29	RT 19705(a)	16-2-3		
30	RT 19705(a)	16-2-3		
31	RT 19705(a)	16-2-3		
37	GC 91000(a)			
38	GC 87100	6 Mo.		

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

YEVGENY SELIVANOV _____ Dollars

TATYANA BERKOVICH _____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

YEVGENY SELIVANOV _____ in Dept _____

TATYANA BERKOVICH _____ in Dept _____

at: _____ A.M.

Date: _____
_____ *Committing Magistrate*