

1 COUNT 3: On or about and between January 23, 2008 and January
2 26, 2008, in violation of Section 471 of the Penal Code
3 (FALSIFYING RECORDS), a FELONY, OMAR SHAHID KHAN, with the
4 intent to defraud another, did unlawfully make, forge, and
5 alter an entry in a book of records and an instrument purporting
6 to be a record and return specified in Section 470.

7 COUNT 4: On or about April 17, 2008, in violation of Sections
8 459-460(b) of the Penal Code (SECOND DEGREE BURGLARY), a FELONY,
9 OMAR SHAHID KHAN did unlawfully enter Tesoro High School
10 Guidance Office, a building located at Orange County
11 California, with the intent to commit unlawful access of a
12 computer network, alter a book of records, and alter and falsify
13 a Public Record in violation of Penal Code 502(c)(1), Penal
14 code 471 and Government Code 6201, a felony.

15 COUNT 5: On or about April 17, 2008, in violation of Sections
16 459-460(b) of the Penal Code (SECOND DEGREE BURGLARY), a FELONY,
17 OMAR SHAHID KHAN did unlawfully enter Tesoro High School Office
18 of the Registrar, a building located in Orange County
19 California, with the intent to commit unlawful access of a
20 computer network, alter a book of records, and alter and falsify
21 a Public Record, in violation of Penal Code Section 502(c)(1),
22 Penal Code Section 471 and Government Code Section 6201, a
23 felony.

24 COUNT 6: On or about April 17, 2008, in violation of Section
25 530.5(a) of the Penal Code (IDENTITY THEFT), a FELONY, OMAR
26 SHAHID KHAN did willfully and unlawfully obtain personal
27 identifying information, as defined in Penal Code section 530.55
28 (b), of Tesoro High School Registrar Valerie D., and did
unlawfully use and attempt to use that information for an
unlawful purpose, specifically to wit, to access school computer
network and grade database program, without the consent of
Tesoro High School Registrar Valerie D..

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1 COUNT 7: On or about April 17, 2008, in violation of Section
2 530.5(a) of the Penal Code (IDENTITY THEFT), a FELONY, OMAR
3 SHAHID KHAN did willfully and unlawfully obtain personal
4 identifying information, as defined in Penal Code section 530.55
5 (b), of Tesoro High School Academic Advisor Linda O., and did
6 unlawfully use and attempt to use that information for an
7 unlawful purpose, specifically to wit, to access school
8 districts' computer network and grade database program, without
9 the consent of Tesoro High School Academic Advisor Linda O..

10 COUNT 8: On or about and between January 23, 2008 and May 20,
11 2008, in violation of Section 530.5(a) of the Penal Code
12 (IDENTITY THEFT), a FELONY, OMAR SHAHID KHAN did willfully and
13 unlawfully obtain personal identifying information, as defined
14 in Penal Code section 530.55(b), of TESORO HIGH SCHOOL ADVANCED
15 PLACEMENT (AP) TEACHER KURT B, and did unlawfully use and
16 attempt to use that information for an unlawful purpose,
17 specifically TO ACCESS A COMPUTER AND COMPUTER NETWORK IN
18 VIOLATION OF PENAL CODE SECTION 502(c)(1), AND TO STEAL, REMOVE
19 AND SECRETE A PUBLIC RECORD WITHIN THE MEANING OF GOVERNMENT
20 CODE SECTION 6201, without the consent of TESORO HIGH SCHOOL
21 ADVANCED PLACEMENT (AP) TEACHER KURT B.

22 COUNT 9: On or about and between January 23, 2008 and May 20,
23 2008, in violation of Section 530.5(a) of the Penal Code
24 (IDENTITY THEFT), a FELONY, OMAR SHAHID KHAN did willfully and
25 unlawfully obtain personal identifying information, as defined
26 in Penal Code section 530.55(b), of TESORO HIGH SCHOOL ADVANCED
27 PLACEMENT (AP) TEACHER BETTY B, and did unlawfully use and
28 attempt to use that information for an unlawful purpose,
29 specifically TO ACCESS A COMPUTER AND COMPUTER NETWORK IN
30 VIOLATION OF PENAL CODE SECTION 502(c)(1), AND TO STEAL, REMOVE
31 AND SECRETE A PUBLIC RECORD WITHIN THE MEANING OF GOVERNMENT
32 CODE SECTION 6201, without the consent of TESORO HIGH SCHOOL
33 ADVANCED PLACEMENT (AP) TEACHER BETTY B.

34 COUNT 10: On or about April 17, 2008, in violation of Section
35 502(c)(4) of the Penal Code (COMPUTER ACCESS AND FRAUD), a
36 FELONY, OMAR SHAHID KHAN did knowingly and unlawfully access
37 and without permission add, alter, damage, delete, and destroy
38 data, computer software, and programs which reside and exist
internally and externally to a computer, a computer system, and
a computer network belonging to Tesoro High School and
Capistrano Unified School District.

1 COUNT 11: On or about April 17, 2008, in violation of Section
2 502(c)(1) of the Penal Code (COMPUTER ACCESS AND FRAUD), a
3 FELONY, OMAR SHAHID KHAN did knowingly and unlawfully access
4 and without permission alter, damage, delete, destroy, and
5 otherwise use data, a computer, a computer system, and a
6 computer network belonging to Tesoro High School and Capistrano
7 Unified School District, in order to devise and execute a scheme
8 and artifice to defraud, deceive, and extort, and to wrongfully
9 control and obtain money, property, and data.

10 COUNT 12: On or about April 17, 2008, in violation of Section
11 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
12 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
13 and falsify the official permanent grade transcript records of
14 student Katie B., filed and deposited in the Tesoro High School
15 and Capistrano Unified School District, a public office located
16 in Orange County California.

17 COUNT 13: On or about April 17, 2008, in violation of Section
18 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
19 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
20 and falsify alter the official permanent grade and transcript
21 records of student Ryan B., filed and deposited in the Tesoro
22 High School and Capistrano Unified School District, a public
23 office located in Orange County California.

24 COUNT 14: On or about April 17, 2008, in violation of Section
25 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
26 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
27 and falsify alter the official permanent grade and transcript
28 records of student Brent B., filed and deposited in the Tesoro
High School and Capistrano Unified School District, a public
office located in Orange County California.

COUNT 15: On or about April 17, 2008, in violation of Section
6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
and falsify the official permanent grade and transcript records
of student Anthony B., filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

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1 COUNT 16: On or about April 17, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify the official permanent grade and transcript records
5 of student Shoka K., filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

6 COUNT 17: On or about April 17, 2008, in violation of Section
7 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
8 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
9 and falsify the official permanent AP Physics grade and
10 transcript records of Omar Khan, filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

11 COUNT 18: On or about April 17, 2008, in violation of Section
12 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
13 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
14 and falsify the official permanent English IV grade and
15 transcript records of Omar Khan, filed and deposited in the
16 Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

17 COUNT 19: On or about April 17, 2008, in violation of Section
18 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
19 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
20 and falsify the official permanent AP American History grade and
21 transcript records of Omar Khan, filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

22 COUNT 20: On or about April 17, 2008, in violation of Section
23 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
24 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
25 and falsify the official permanent Topics in Calculus grade and
26 transcript records of Omar Khan, filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

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1 COUNT 21: On or about April 17, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify the official permanent Spanish III grade and
5 transcript records of Omar Khan, filed and deposited in the
6 Tesoro High School and Capistrano Unified School District, a
7 public office located in Orange County California.

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9 COUNT 22: On or about April 17, 2008, in violation of Section
10 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
11 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
12 and falsify the official permanent AP American Government/Econ
13 grade and transcript records of Omar Khan, filed and deposited
14 in the Tesoro High School and Capistrano Unified School
15 District, a public office located in Orange County California.

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17 COUNT 23: On or about April 17, 2008, in violation of Section
18 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
19 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
20 and falsify the official permanent AP Statistics grade and
21 transcript records of Omar Khan, filed and deposited in the
22 Tesoro High School and Capistrano Unified School District, a
23 public office located in Orange County California.

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25 COUNT 24: On or about April 17, 2008, in violation of Section
26 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
27 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
28 and falsify the official permanent AP Calculus grade and
transcript records of Omar Khan, filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

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30 COUNT 25: On or about April 17, 2008, in violation of Section
31 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
32 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
33 and falsify the official permanent grade and transcript records
34 of student Weston K., filed and deposited in the Tesoro High
35 School and Capistrano Unified School District, a public office
36 located in Orange County California.

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1 COUNT 26: On or about April 17, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify the official permanent grade and transcript records
5 of student Matthew K., filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

6 COUNT 27: On or about April 17, 2008, in violation of Section
7 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
8 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
9 and falsify the official permanent grade and transcript records
10 of student Karami ''Dustin'' S., filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located in Orange County California.

11 COUNT 28: On or about April 18, 2008, in violation of Section
12 6201 of the Government Code (STEALING, REMOVING AND SECRETING A
13 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
14 unlawfully steal, remove, and secrete an Advanced Placement
15 (AP) Statistics test, filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

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17 COUNT 29: On or about April 18, 2008, in violation of Section
18 496(a) of the Penal Code (RECEIVING STOLEN PROPERTY), a FELONY,
19 OMAR SHAHID KHAN did unlawfully buy, receive, conceal, sell,
20 withhold, and aid in concealing, selling, and withholding
21 Advanced Placement (AP) Statistics Chapter 11 instructor master
test and answers, property which had been stolen and obtained by
theft and extortion, knowing that the property had been stolen
and obtained by theft and extortion.

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23 COUNT 30: On or about and between April 18, 2008 and April 21,
24 2008, in violation of Sections 459-460(b) of the Penal Code
25 (SECOND DEGREE BURGLARY), a FELONY, OMAR SHAHID KHAN did
26 unlawfully enter a building located at Tesoro High School
Administrative Office of Assistant Principal, with the intent to
steal, remove and secrete a public record, in violation of
Government Code 6201, a felony.

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1 COUNT 31: On or about and between April 18, 2008 and April 21,
2 2008, in violation of Section 6201 of the Government Code
3 (STEALING, REMOVING AND SECRETING PUBLIC RECORD), a FELONY, OMAR
4 SHAHID KHAN did willfully and unlawfully steal, remove, and
5 secrete Advanced Placement (AP) Statistics Chapter 11 instructor
6 master test and answers seized from defendant on April 18, 2008,
7 filed and deposited in the Tesoro High School Administrative
8 Office of the Assistant Principal, a public office located in
9 Orange County California.

10 COUNT 32: On or about April 21, 2008, in violation of Sections
11 459-460(b) of the Penal Code (SECOND DEGREE BURGLARY), a FELONY,
12 OMAR SHAHID KHAN did unlawfully enter a building located at
13 Tesoro High School Guidance Office and Registrar's Office, with
14 the intent to commit larceny and with intent to commit unlawful
15 access of a computer network, alter a book or records, and alter
16 and falsify a Public Record, in violation of Penal Code Section
17 502(c)(1), Penal Code Section 471 and Government Code Section
18 6201, a felony.

19 COUNT 33: On or about April 21, 2008, in violation of Section
20 502(c)(1) of the Penal Code (COMPUTER ACCESS AND FRAUD), a
21 FELONY, OMAR SHAHID KHAN did knowingly and unlawfully access
22 and without permission alter, damage, delete, destroy, and
23 otherwise use data, a computer, a computer system, and a
24 computer network belonging to Tesoro High School and Capistrano
25 Unified School District, in order to devise and execute a scheme
26 and artifice to defraud, deceive, and extort, and to wrongfully
27 control and obtain money, property, and data.

28 COUNT 34: On or about April 21, 2008, in violation of Section
471 of the Penal Code (FALSIFYING RECORDS), a FELONY, OMAR
SHAHID KHAN, with the intent to defraud another, did unlawfully
make, forge, and alter an entry in a book of records and an
instrument purporting to be a record and return specified in
Section 470.

COUNT 35: On or about April 21, 2008, in violation of Section
6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
and falsify the official permanent grade and transcript records
of student Allison S., filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

1 COUNT 36: On or about April 21, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD,
3 a FELONY), OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify the official permanent disciplinary and attendance
5 records of Omar Khan, filed and deposited in the Tesoro High
School and Capistrano Unified School District, a public office
located in Orange County California.

6 COUNT 37: On or about April 21, 2008, in violation of Section
7 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
8 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
9 and falsify from 'D' to 'A' in Spanish III the official
10 permanent grade and transcript records of Omar Khan, filed and
11 deposited in the Tesoro High School and Capistrano Unified
School District, a public office located in Orange County
California.

12 COUNT 38: On or about April 21, 2008, in violation of Section
13 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
14 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
15 and falsify from 'D' to 'B+' in Topics in Calculus the
16 official permanent grade and transcript records of Omar Khan,
17 filed and deposited in the Tesoro High School and Capistrano
Unified School District, a public office located in Orange
County California.

18 COUNT 39: On or about April 21, 2008, in violation of Section
19 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
20 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
21 and falsify from 'C' to 'A' in English IV the official
22 permanent grade and transcript records of Omar Khan, filed and
23 deposited in the Tesoro High School and Capistrano Unified
School District, a public office located in Orange County
California.

24 COUNT 40: On or about April 21, 2008, in violation of Section
25 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
26 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
27 and falsify from 'C' to 'A-' in AP American Government/Econ
28 the official permanent grade and transcript records of Omar
Khan, filed and deposited in the Tesoro High School and
Capistrano Unified School District, a public office located in
Orange County California.

1 COUNT 41: On or about April 21, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify from 'C' to 'B+' in AP Calculus the official
5 permanent grade and transcript records of Omar Khan, filed and
6 deposited in the Tesoro High School and Capistrano Unified
7 School District, a public office located in Orange County
8 California.

7 COUNT 42: On or about April 21, 2008, in violation of Section
8 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
9 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
10 and falsify from 'C' to 'A-' in AP Statistics the official
11 permanent grade and transcript records of Omar Khan, filed and
12 deposited in the Tesoro High School and Capistrano Unified
13 School District, a public office located in Orange County
14 California.

13 COUNT 43: On or about April 21, 2008, in violation of Section
14 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
15 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
16 and falsify the official permanent grade and transcript records
17 of student Christopher S., filed and deposited in the Tesoro
18 High School and Capistrano Unified School District, a public
19 office located in Orange County California.

18 COUNT 44: On or about April 21, 2008, in violation of Section
19 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
20 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
21 and falsify from 'F' to 'A' in AP Physics the official
22 permanent grade and transcript records of Omar Khan, filed and
23 deposited in the Tesoro High School and Capistrano Unified
24 School District, a public office located in Orange County
25 California.

24 COUNT 45: On or about April 21, 2008, in violation of Section
25 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
26 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
27 and falsify from 'C' to 'A-' in AP American Government/Econ
28 the current semester 'work in progress' grade record of Omar
Khan, filed and deposited in the Tesoro High School and
Capistrano Unified School District, a public office located in
Orange County California.

1 COUNT 46: On or about April 21, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify from 'C+' to 'A-' in AP Statistics the current
5 semester 'work in progress' grade record of Omar Khan, filed
6 and deposited in the Tesoro High School and Capistrano Unified
School District, a public office located in Orange County
California.

7 COUNT 47: On or about April 21, 2008, in violation of Section
8 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
9 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
10 and falsify from 'C+' to 'A-' in English IV the current
11 semester 'work in progress' grade record of Omar Khan, filed
12 and deposited in the Tesoro High School and Capistrano Unified
School District, a public office located in Orange County
California.

13 COUNT 48: On or about April 21, 2008, in violation of Sections
14 459-460(b) of the Penal Code (SECOND DEGREE BURGLARY), a FELONY,
15 OMAR SHAHID KHAN did unlawfully enter Tesoro High School
16 Guidance Office and Registrar's Office, a building located at
17 Orange County California, with the intent to commit unlawful
18 access of a computer network, alter a book of records, and alter
and falsify a Public Record in violation of Penal Code section
502(c)(1), Penal Code section 471 and Government Code section
6201, a felony.

19 COUNT 49: On or about April 21, 2008, in violation of Section
20 502(c)(1) of the Penal Code (COMPUTER ACCESS AND FRAUD), a
21 FELONY, OMAR SHAHID KHAN did knowingly and unlawfully access
22 and without permission alter, damage, delete, destroy, and
23 otherwise use data, a computer, a computer system, and a
24 computer network belonging to Tesoro High School and Capistrano
25 Unified School District, in order to devise and execute a scheme
and artifice to defraud, deceive, and extort, and to wrongfully
control and obtain money, property, and data.

26 COUNT 50: On or about April 21, 2008, in violation of Section
27 471 of the Penal Code (FALSIFYING RECORDS), a FELONY, OMAR
28 SHAHID KHAN, with the intent to defraud another, did unlawfully
make, forge, and alter an entry in a book of records and an
instrument purporting to be a record and return specified in
Section 470.

1 COUNT 51: On or about April 21, 2008, in violation of Section
2 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
3 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
4 and falsify from 'B+' to 'A' in AP Calculus the official
5 permanent grade and transcript records of Omar Khan, filed and
6 deposited in the Tesoro High School and Capistrano Unified
7 School District, a public office located in Orange County
8 California.

7 COUNT 52: On or about April 21, 2008, in violation of Section
8 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
9 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
10 and falsify from 'B+' to 'A' in Topics Calculus the official
11 permanent grade and transcript recors of Omar Khan, filed and
12 deposited in the Tesoro High School and Capistrano Unified
13 School District, a public office located in Orange County
14 California.

13 COUNT 53: On or about April 22, 2008, in violation of Section
14 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
15 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
16 and falsify the official permanent grade and transcript records
17 of student Chase J., filed and deposited in the Tesoro High
18 School and Capistrano Unified School District, a public office
19 located in Orange County California.

18 COUNT 54: On or about April 22, 2008, in violation of Section
19 6201 of the Government Code (ALTER AND FALSIFY A PUBLIC RECORD),
20 a FELONY, OMAR SHAHID KHAN did willfully and unlawfully alter
21 and falsify the official permanent grade and transcript records
22 of student Tyler J., filed and deposited in the Tesoro High
23 School and Capistrano Unified School District, a public office
24 located in Orange County California.

23 COUNT 55: On or about April 22, 2008, in violation of Section
24 502(c)(1) of the Penal Code (COMPUTER ACCESS AND FRAUD), a
25 FELONY, OMAR SHAHID KHAN did knowingly and unlawfully access
26 and without permission alter, damage, delete, destroy, and
27 otherwise use data, a computer, a computer system, and a
28 computer network belonging to Tesoro High School and Capistrano
Unified School District, in order to devise and execute a scheme
and artifice to defraud, deceive, and extort, and to wrongfully
control and obtain money, property, and data.

1 COUNT 56: On or about May 19, 2008, in violation of Section 182
2 (a)(1) of the Penal Code (CONSPIRACY TO COMMIT A CRIME), a
3 FELONY, OMAR SHAHID KHAN and TANVIR SINGH did unlawfully
4 conspire together and with another person, and persons, whose
5 identity is unknown, to commit the crime of BURGLARY, COMPUTER
6 ACCESS AND FRAUD, REMOVING AND STEALING, REMOVING & SECRETING A
7 PUBLIC RECORD, in violation of Sections 459-460(b) , 502(c)(1),
8 and 6201 of the Penal and Government Code.

9 It is further alleged that pursuant to and for the purpose of
10 carrying out the objects and purposes of the conspiracy, one and
11 more of the conspirators committed the following overt acts:

12 OVERT ACT 1

13 Tanvir Singh sent phone text message to Omar Khan on May 19,
14 2008 at 4:00pm: "Hey wana go to the school tonight."

15 OVERT ACT 2

16 Tanvir Singh sent phone text message to Omar Khan on May 19,
17 2008 at 4:02pm: "come haha I need someone with balls there with
18 me."

19 OVERT ACT 3

20 Tanvir Singh sent phone text message to Omar Khan on May 19,
21 2008 at 4:04pm: " go into disomma I have a huge test on a book
22 tomorrow I haven't read and its not on spark notes."

23 OVERT ACT 4

24 Omar Khan sent phone text message to Tanvir Singh on May 19,
25 2008 at 4:11pm: "some pussies did a senior prank last night so
26 its gonna b really risky."

27 OVERT ACT 5

28 Tanvir Singh sent phone text message to Omar Khan on May 19,
29 2008 at 4:12pm: "we will go at like 7 so its not shady. Such a
30 gay prank. Haha wow."

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OVERT ACT 6

Omar Khan sent phone text message to Tanvir Singh on May 19, 2008 at 4:24pm: "Ya wow. call me when you want to go."

OVERT ACT 7

Omar Khan sent phone text message to Tanvir Singh on May 19, 2008 at 8:46pm: "You coming?"

OVERT ACT 8

Tanvir Singh sent phone text message to Omar Khan on May 19, 2008 at 8:46pm: "Yeah"

COUNT 57: On or about May 19, 2008, in violation of Sections 459-460(b) of the Penal Code (SECOND DEGREE BURGLARY), a FELONY, OMAR SHAHID KHAN and TANVIR SINGH did unlawfully enter a building located at English Teacher DiSomma's Classroom 309 at Tesoro High School, with the intent to commit larceny and unlawfull access of a computer network and steal, remove and secrete a public record, in violation of Penal Code section 502 (c) (1) and Government Code section 6201, a felony.

COUNT 58: On or about May 19, 2008, in violation of Section 502 (c) (1) of the Penal Code (COMPUTER ACCESS AND FRAUD), a FELONY, OMAR SHAHID KHAN and TANVIR SINGH did knowingly and unlawfully access and without permission alter, damage, delete, destroy, and otherwise use data, a computer, a computer system, and a computer network belonging to Tesoro High School, English Teacher DiSomma's Computer and Capistrano Unified School District, in order to devise and execute a scheme and artifice to defraud, deceive, and extort, and to wrongfully control and obtain money, property, and data.

COUNT 59: On or about May 19, 2008, in violation of Section 664-6201 of the Government Code (ATTEMPTED-]STEALING, REMOVING AND SECRETING A PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN and TANVIR SINGH did willfully and unlawfully attempt to steal, remove, and secrete an English IV test, filed and deposited in the Tesoro High School and Capistrano Unified School District, a public office located at in Orange County California.

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1 COUNT 60: On or about May 20, 2008, in violation of Section 6201
2 of the Government Code (STEALING, REMOVING AND SECRETING A
3 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
4 unlawfully steal, remove, and secrete an altered official grade
5 transcript of Omar Khan from the Tesoro High School and
6 Capistrano Unified School District, a public office located in
7 Orange County California.

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9 COUNT 61: On or about May 20, 2008, in violation of Section 6201
10 of the Government Code (STEALING, REMOVING AND SECRETING A
11 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
12 unlawfully steal, remove, and secrete the original Scantron
13 master test/answer key for Advanced Placement (AP) American
14 Government/Econ Test Unit IV, filed and deposited the Tesoro
15 High School and Capistrano Unified School District, a public
16 office located in Orange County California.

17
18 COUNT 62: On or about May 20, 2008, in violation of Section 6201
19 of the Government Code (STEALING, REMOVING AND SECRETING A
20 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
21 unlawfully steal, remove, and secrete the original Scantron
22 master test/answer key for Advanced Placement (AP) American
23 Government/Econ Test Unit V, filed and deposited the Tesoro High
24 School and Capistrano Unified School District, a public office
25 located in Orange County California.

26
27 COUNT 63: On or about May 20, 2008, in violation of Section 6201
28 of the Government Code (STEALING, REMOVING AND SECRETING A
PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
unlawfully steal, remove, and secrete the original Scantron
master test/answer key for Advanced Placement (AP) American
Government/Econ Test Unit VI, filed and deposited the Tesoro
High School and Capistrano Unified School District, a public
office located in Orange County California.

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31 COUNT 64: On or about May 20, 2008, in violation of Section 6201
32 of the Government Code (STEALING, REMOVING AND SECRETING A
33 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
34 unlawfully steal, remove, and secrete the test for Advanced
35 Placement (AP) American Government/Econ Chapter 12 teacher quiz,
36 filed and deposited in the Tesoro High School and Capistrano
37 Unified School District, a public office located in Orange
38 County California.

1 COUNT 65: On or about May 20, 2008, in violation of Section 6201
2 of the Government Code (STEALING, REMOVING AND SECRETING A
3 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
4 unlawfully steal, remove, and secrete the test for Advanced
5 Placement (AP) American Government/Econ Chapter 14 teacher quiz,
6 filed and deposited in the Tesoro High School and Capistrano
Unified School District, a public office located in Orange
County California.

7 COUNT 66: On or about May 20, 2008, in violation of Section 6201
8 of the Government Code (STEALING, REMOVING AND SECRETING A
9 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
10 unlawfully steal, remove, and secrete Advanced Placement (AP)
11 Statistics test 5 completed/graded student tests, filed and
12 deposited in the Tesoro High School and Capistrano Unified
School District, a public office located in Orange County
California.

13 COUNT 67: On or about May 20, 2008, in violation of Section 6201
14 of the Government Code (STEALING, REMOVING AND SECRETING A
15 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
16 unlawfully steal, remove, and secrete Advanced Placement (AP)
17 Statistics test Chapter 7-8 completed/graded student tests,
18 filed and deposited in the Tesoro High School and Capistrano
Unified School District, a public office located in Orange
County California.

19 COUNT 68: On or about May 20, 2008, in violation of Section 6201
20 of the Government Code (STEALING, REMOVING AND SECRETING A
21 PUBLIC RECORD), a FELONY, OMAR SHAHID KHAN did willfully and
22 unlawfully steal, remove, and secrete Advanced Placement (AP)
23 Statistics Final Exam (Chapters 1-8), filed and deposited in the
Tesoro High School and Capistrano Unified School District, a
public office located at in Orange County California.

24 COUNT 69: On or about May 20, 2008, in violation of Section 496
25 (a) of the Penal Code (RECEIVING STOLEN PROPERTY), a FELONY,
26 OMAR SHAHID KHAN did unlawfully buy, receive, conceal, sell,
27 withhold, and aid in concealing, selling, and withholding AP
28 Physics extra credit stamps, stolen from AP Physics instructor
Gilpin's classroom, property which had been stolen and obtained
by theft and extortion, knowing that the property had been
stolen and obtained by theft and extortion.

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I declare under penalty of perjury, on information and belief,
that the foregoing is true and correct.

Dated 06/17/08 at Orange County, California.
CL/MC 08F04361

TONY RACKAUCKAS, DISTRICT ATTORNEY

by _____ Deputy
Complainant

RESTITUTION CLAIMED

- None
- \$ _____
- To be determined

NOTICES:

The People request that defendant and counsel disclose, within 15 days, all of the materials and information described in Penal Code section 1054.3, and continue to provide any later-acquired materials and information subject to disclosure, and without further request or order.

Pursuant to Penal Code Section 296.1, defendant, OMAR SHAHID KHAN , is required to provide DNA samples and thumb and palm prints.

Pursuant to Penal Code Section 296.1, defendant, TANVIR SINGH , is required to provide DNA samples and thumb and palm prints.