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SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF LOS ANGELES

FILED  
SUPERIOR COURT  
EAST LOS ANGELES  
14 FEB -6 PM 4:02

SHERRI R. CARTER  
EXECUTIVE OFFICER  
CLERK

Arraignment Date: March 19, 2014

Case No.: 4CA02503

MISDEMEANOR COMPLAINT

Filed by  
JOHN A. CLARKE,  
Court Administrator

Issued by  
MICHAEL N. FEUER  
City Attorney

By **Original signed by Nick Karno**  
NICK KARNO  
Deputy City Attorney  
ENVIRONMENTAL JUSTICE UNIT

The People of the State of California,  
Plaintiff,

vs.

JOSE GUADALUPE ROMERO  
(M: DOB: 08/28/80)  
dba JGR METALS RECYCLING INC.;  
HERMAN ISTRIN, Trustee  
(M: DOB: 12/25/28)  
Istrin Family Trust and  
Herman & Gertrude Istrin Family Trust.

Defendants,

California Health and Safety Code § 25189.5(b)	(5 Counts)
California Health and Safety Code § 25190	(8 Counts)
California Health and Safety Code § 25250.4(a)	(1 Count)
Los Angeles Municipal Code § 64.70.02.D	(1 Count)

COUNT I

Comes now the undersigned and states that she is informed and believes, and upon such information and belief declares: That on or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of California, a misdemeanor to wit: a violation of California Health and Safety Code section 25189.5(b)

was committed by JOSE GUADALUPE ROMERO  
dba JGR METALS RECYCLING INC.  
HERMAN ISTRIN, Trustee  
Istrin Family Trust and Herman & Gertrude Istrin Family Trust

1 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
2 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
3 Safety Code regarding the disposal of hazardous waste, at the  
4 location of 12278 Branford Street, in the City of Los Angeles, in that it is unlawful for "any person  
5 who knowingly disposes or causes the disposal of any hazardous waste, or who reasonably should have  
6 known that he or she was causing the disposal of hazardous waste at a facility which does not have a  
7 permit issued from the department pursuant to this chapter, or at any point which is not authorized  
8 according to this chapter" to wit: **Illegal Disposal of Cadmium, a hazardous waste.**

9  
10  
11 **COUNT II**  
12

13 For a further, separate and second cause of action, being a different offense belonging to the  
14 same class of crimes and offenses set forth in Count I hereof, affiant complains and says: That on or  
15 about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
16 California, a misdemeanor to wit:

17 a violation of **California Health and Safety Code section 25189.5(b)**

18  
19 was committed by **JOSE GUADALUPE ROMERO**  
20 **dba JGR METALS RECYCLING INC.**  
21 **HERMAN ISTRIN, Trustee**  
**Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

22  
23 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
24 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
25 Safety Code regarding the disposal of hazardous waste, at the  
26 location of 12278 Branford Street, in the City of Los Angeles, in that it is unlawful for "any person  
27 who knowingly disposes or causes the disposal of any hazardous waste, or who reasonably should have  
28 known that he or she was causing the disposal of hazardous waste at a facility which does not have a

1 permit issued from the department pursuant to this chapter, or at any point which is not authorized  
2 according to this chapter" to wit: **Illegal Disposal of Chromium, a hazardous waste.**

3  
4 **COUNT III**

5  
6 For a further, separate and second cause of action, being a different offense belonging to the  
7 same class of crimes and offenses set forth in Counts I-II hereof, affiant complains and says: That on  
8 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
9 California, a misdemeanor to wit:

10 a violation of **California Health and Safety Code section 25189.5(b)**

11 was committed by **JOSE GUADALUPE ROMERO**  
12 **dba JGR METALS RECYCLING INC.**  
13 **HERMAN ISTRIN, Trustee**  
14 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

15 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
16 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
17 Safety Code regarding the disposal of hazardous waste, at the  
18 location of 12278 Branford Street, in the City of Los Angeles, in that it is unlawful for "any person  
19 who knowingly disposes or causes the disposal of any hazardous waste, or who reasonably should have  
20 known that he or she was causing the disposal of hazardous waste at a facility which does not have a  
21 permit issued from the department pursuant to this chapter, or at any point which is not authorized  
22 according to this chapter" to wit: **Illegal Disposal of Lead, a hazardous waste.**

23  
24 **COUNT IV**

25  
26 For a further, separate and second cause of action, being a different offense belonging to the  
27 same class of crimes and offenses set forth in Counts I- III hereof, affiant complains and says: That on  
28

1 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
2 California, a misdemeanor to wit:

3 a violation of **California Health and Safety Code section 25189.5(b)**

4  
5 was committed by **JOSE GUADALUPE ROMERO**  
6 **dba JGR METALS RECYCLING INC.**  
7 **HERMAN ISTRIN, Trustee**  
8 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

9 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
10 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
11 Safety Code regarding the disposal of hazardous waste, at the  
12 location of 12278 Branford Street, in the City of Los Angeles, in that it is unlawful for "any person  
13 who knowingly disposes or causes the disposal of any hazardous waste, or who reasonably should have  
14 known that he or she was causing the disposal of hazardous waste at a facility which does not have a  
15 permit issued from the department pursuant to this chapter, or at any point which is not authorized  
16 according to this chapter" to wit: **Illegal Disposal of Zinc, a hazardous waste.**

17  
18 **COUNT V**

19  
20 For a further, separate and second cause of action, being a different offense belonging to the  
21 same class of crimes and offenses set forth in Counts I-IV hereof, affiant complains and says: That on  
22 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
23 California, a misdemeanor to wit:

24 a violation of **California Health and Safety Code section 25189.5(b)**

25 was committed by **JOSE GUADALUPE ROMERO**  
26 **dba JGR METALS RECYCLING INC.**  
27 **HERMAN ISTRIN, Trustee**  
28 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

1 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
2 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
3 Safety Code regarding the disposal of hazardous waste, at the  
4 location of 12278 Branford Street, in the City of Los Angeles, in that it is unlawful for "any person  
5 who knowingly disposes or causes the disposal of any hazardous waste, or who reasonably should have  
6 known that he or she was causing the disposal of hazardous waste at a facility which does not have a  
7 permit issued from the department pursuant to this chapter, or at any point which is not authorized  
8 according to this chapter" to wit: **Illegal Disposal of Barium, a hazardous waste.**

9  
10 **COUNT VI**

11  
12 For a further, separate and second cause of action being a different offense belonging to the  
13 same class of crimes and offenses set forth in Counts I-V hereof, affiant complains and says: That on  
14 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
15 California, a misdemeanor to wit:  
16 a violation of **California Health and Safety Code section 25190**

17  
18 was committed by **JOSE GUADALUPE ROMERO**  
19 **dba JGR METALS RECYCLING INC.**  
20 **HERMAN ISTRIN, Trustee**  
**Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

21  
22 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully  
23 violate a provision of Chapter 6.5 of the California Health and Safety Code, or any permit, rule,  
24 regulation, standard, or requirement issued or adopted pursuant to this chapter, namely **Title 22,**  
25 **California Code of Regulations 66262.34(f)** in that "generators who accumulate hazardous waste on-  
26 site without a permit or grant of interim status shall comply with the following requirements: (1) the  
27 date upon which each period of accumulation begins shall be clearly marked and visible for inspection  
28 on each container and portable tank; (2) the date the applicable accumulation period specified in

1 subsection (a) or (d) of this section begins, for purposes of subsections (a) and (b) of this section, shall  
2 be clearly marked and visible for inspection on each container and tank; and (3) each container and  
3 tank used for on-site accumulation of hazardous waste shall be labeled or marked clearly with the  
4 words, "hazardous waste." Additionally, all containers and portable tanks shall be labeled with the  
5 following information: (A) composition and physical state of the wastes; (B) statement or statements  
6 which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);  
7 (C) name and address of the person producing the waste," to wit: **Failure to properly label**  
8 **hazardous waste containers.**

9  
10 **COUNT VII**

11 For a further, separate and third second cause of action, being a different offense belonging to  
12 the same class of crimes and offenses set forth in Counts I-VI hereof, affiant That on or about February  
13 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of California, a  
14 misdemeanor to wit:  
15 a violation of **California Health and Safety Code section 25190**

16  
17 was committed by **JOSE GUADALUPE ROMERO**  
18 **dba JGR METALS RECYCLING INC.**  
19 **HERMAN ISTRIN, Trustee**  
20 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

21 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully  
22 violate a provision of Chapter 6.5 of the California Health and Safety Code, or any permit, rule,  
23 regulation, standard, or requirement issued or adopted pursuant to this chapter, namely **Title 22,**  
24 **California Code of Regulations 66262.173(a)** in that "a container holding hazardous waste shall  
25 always be closed during transfer and storage, except when it is necessary to add or remove waste.," to  
26 **wit: Failure to close hazardous waste containers.**

27 ///

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2  
3 **COUNT VIII**

4 For a further, separate and fourth cause of action, being a different offense belonging to the  
5 same class of crimes and offenses set forth in Counts I-VII hereof, affiant That on or about February  
6 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of California, a  
7 misdemeanor to wit:

8 a violation of **California Health and Safety Code section 25190**

9 was committed by **JOSE GUADALUPE ROMERO**  
10 **dba JGR METALS RECYCLING INC.**  
11 **HERMAN ISTRIN, Trustee**  
12 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

13 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
14 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
15 Safety Code regarding the management of hazardous waste, at the location of 1709 East 24<sup>th</sup> Street, in  
16 the City of Los Angeles, to wit: **Title 22 of the California Code of Regulations, section 66262.11** in  
17 that "a generator of hazardous waste shall determine if the waste is hazardous by: first determining if  
18 the waste is excluded under the Health and Safety Code, second, determine if the waste is listed as a  
19 hazardous waste in either article 4 of chapter 11 or in Appendix X of this division, and third, by testing  
20 the waste according to the methods set forth in article 3 of chapter 11 of this division, or utilizing an  
21 equivalent method approved by the Department" to wit: **Failure to make a hazardous waste**  
22 **determination.**

23  
24 **COUNT IX**

25  
26 For a further, separate and fifth cause of action, being a different offense belonging to the same  
27 class of crimes and offenses set forth in Counts I-VIII hereof, affiant complains and says: That on or  
28

1 about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
2 California, a misdemeanor to wit:

3 a violation of **California Health and Safety Code section 25190**

4  
5 was committed by **JOSE GUADALUPE ROMERO**  
6 **dba JGR METALS RECYCLING INC.**  
7 **HERMAN ISTRIN, Trustee**  
8 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

9 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully  
10 violate a provision of Chapter 6.5 of the California Health and Safety Code, or any permit, rule,  
11 regulation, standard, or requirement issued or adopted pursuant to this chapter, namely **Title 22,**  
12 **California Code of Regulations 66262.34(f)** in that "generators who accumulate hazardous waste on-  
13 site without a permit or grant of interim status shall comply with the following requirements: (1) the  
14 date upon which each period of accumulation begins shall be clearly marked and visible for inspection  
15 on each container and portable tank; (2) the date the applicable accumulation period specified in  
16 subsection (a) or (d) of this section begins, for purposes of subsections (a) and (b) of this section, shall  
17 be clearly marked and visible for inspection on each container and tank; and (3) each container and  
18 tank used for on-site accumulation of hazardous waste shall be labeled or marked clearly with the  
19 words, "hazardous waste." Additionally, all containers and portable tanks shall be labeled with the  
20 following information: (A) composition and physical state of the wastes; (B) statement or statements  
21 which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);  
22 (C) name and address of the person producing the waste," to wit: **Failure to properly label**  
23 **hazardous waste containers.**

24  
25 **COUNT X**

26  
27 For a further, separate and sixth cause of action, being a different offense belonging to the same  
28 class of crimes and offenses set forth in Counts I-IX hereof, affiant complains and says: That on or

1 about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
2 California, a misdemeanor to wit:

3 a violation of **California Health and Safety Code section 25190**

4  
5 was committed by **JOSE GUADALUPE ROMERO**  
6 **dba JGR METALS RECYCLING INC.**  
7 **HERMAN ISTRIN, Trustee**  
8 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

9 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
10 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
11 Safety Code regarding the management of hazardous waste, at the location of 1709 East 24<sup>th</sup> Street, in  
12 the City of Los Angeles, whose true names to affiant are unknown) who at the time and place last  
13 aforesaid did unlawfully fail to comply with a rule or regulation adopted pursuant to this chapter  
14 regarding the management of hazardous waste, to wit: **Title 22, California Code of Regulations,**  
15 **Sections 66262.34(a) through (d),** in that "as a small quantity generator" as defined by **Title 22,**  
16 **California Code of Regulations, Section (C)(1)** "that does not generate more than 100 kilograms of  
17 hazardous waste") cannot accumulate hazardous waste for 180 days or less without obtaining a permit  
18 or grant of interim status from the Department of Toxic Substances Control ("DTSC") pursuant to  
19 **Title 22, California Code of Regulations, Sections 66262.34 (3)(f),** to wit: **Failure to obtain interim**  
20 **status or permit from DTSC for hazardous waste accumulated at the facility for over 180 days.**

21  
22 **COUNT XI**

23  
24 For a further, separate and seventh cause of action, being a different offense belonging to the  
25 same class of crimes and offenses set forth in Counts I-X hereof, affiant complains and says: That on  
26 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
27 California, a misdemeanor to wit:

28 a violation of **California Health and Safety Code section 25190**

1 was committed by **JOSE GUADALUPE ROMERO**  
2 **dba JGR METALS RECYCLING INC.**  
3 **HERMAN ISTRIN, Trustee**  
4 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

5 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
6 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
7 Safety Code regarding the management of hazardous waste, at the location of 1709 East 24<sup>th</sup> Street, in  
8 the City of Los Angeles in the City of Los Angeles, to wit: **Title 22 of the California Code of**  
9 **Regulations, section 66265.31** in that "facilities shall be maintained and operated to minimize the  
10 possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or  
11 hazardous waste constituents to air, soil, or surface water which could threaten human health or the  
12 environment, to wit: **Failure to maintain the facility to minimize threat to human health and the**  
13 **environment.**

14  
15 **COUNT XII**

16  
17 For a further, separate and eighth cause of action, being a different offense belonging to the  
18 same class of crimes and offenses set forth in Counts I-XI hereof, affiant complains and says: That on  
19 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
20 California, a misdemeanor to wit:  
21 a violation of **California Health and Safety Code section 25190**

22 was committed by **JOSE GUADALUPE ROMERO**  
23 **dba JGR METALS RECYCLING INC.**  
24 **HERMAN ISTRIN, Trustee**  
25 **Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

26 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
27 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
28 Safety Code regarding the management of hazardous waste, at the location of 1709 East 24<sup>th</sup> Street, in

1 the City of Los Angeles, to wit: **Title 22 of the California Code of Regulations, section 66265.174** in  
2 that “the owner or operator shall inspect areas used for container storage or transfer, at least weekly,  
3 looking for leaking containers and for deterioration of containers and the containment system caused  
4 by corrosion or other factors”, to wit: **Failure to provide logs documenting weekly inspection of**  
5 **facility.**

6  
7 **COUNT XIII**  
8

9 For a further, separate and ninth cause of action, being a different offense belonging to the  
10 same class of crimes and offenses set forth in Counts I-XII hereof, affiant complains and says: That on  
11 or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of  
12 California, a misdemeanor to wit:

13 a violation of **California Health and Safety Code section 25190**

14  
15 was committed by **JOSE GUADALUPE ROMERO**  
16 **dba JGR METALS RECYCLING INC.**  
17 **HERMAN ISTRIN, Trustee**  
**Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

18  
19 (whose true names to affiant are unknown) who at the time and place last aforesaid did unlawfully fail  
20 to comply with a rule or regulation adopted pursuant to the Chapter 6.5 of the California Health and  
21 Safety Code regarding the management of hazardous waste, at the location of 1709 East 24<sup>th</sup> Street , in  
22 the City of Los Angeles, to wit: **Title 22 of the California Code of Regulations, section 66265.16** in  
23 that “the owner or operator of the facility shall ensure that personnel shall successfully complete a  
24 program of classroom instruction or on-the-job training that teaches them to perform their duties in a  
25 way that ensures that the facility is in compliance with this chapter, and this program shall be directed  
26 by a person trained in hazardous waste management procedures (including contingency plan  
27 implementation) relevant to the positions in which they are employed”, to wit: **Failure to provide**  
28 **personnel training.**

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**COUNT XIV**

For a further, separate and tenth cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts I-XIII hereof, affiant complains and says: That on or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of California, a misdemeanor to wit:

a violation of **California Health and Safety Code section 25250.4(a)**

was committed by **JOSE GUADALUPE ROMERO**  
**dba JGR METALS RECYCLING INC.**  
**HERMAN ISTRIN, Trustee**  
**Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

(whose true names to affiant are unknown) who at the time and place last aforesaid did<sup>d</sup> unlawfully violate a provision of Chapter 6.5 of the California Health and Safety Code, or any permit, rule, regulation, standard, or requirement issued or adopted pursuant to this chapter, in that "used oil shall be managed as a hazardous waste", to wit: **Failure to properly manage used oil as a hazardous waste.**

**COUNT XV**

For a further, separate and eleventh cause of action, being a different offense belonging to the same class of crimes and offenses set forth in Counts I-XIV hereof, affiant complains and says: That on or about February 12, 2013, at and in the Los Angeles City, in the County of Los Angeles, State of California, a misdemeanor to wit:

a violation of **Los Angeles Municipal Code Section 64.70.02. D**

was committed by **JOSE GUADALUPE ROMERO**  
**dba JGR METALS RECYCLING INC.**  
**HERMAN ISTRIN, Trustee**  
**Istrin Family Trust and Herman & Gertrude Istrin Family Trust**

1 (whose true names to affiant are unknown) who as owner or operator engaged in activities or  
2 operations listed as in the Critical Sources Categories, Section III of the Board's Rules and Regulations  
3 and failed to implement Best Management Practices ("BMPs") designed to prevent, control, and  
4 reduce storm water pollutants by allowing oil spills and contamination around waste oil storage area,  
5 contaminated absorbent material scattered throughout the facility, and uncovered e-waste, to wit:

6 **Failure to Implement BMPS.**

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1 All of which is contrary to the law and against the peace and dignity of the People of the State of  
2 California. Declarant and complainant therefore prays that a warrant may be issued for the arrest  
3 of said defendant(s) and that they may be dealt with according to law.

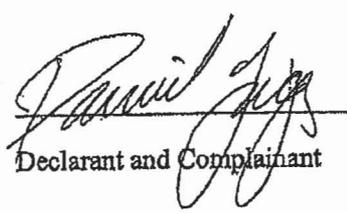
4  
5 Attached hereto and incorporated by reference in support of the issuance of an arrest warrant as  
6 though fully set forth are written statements and reports, consisting of numerous pages, which  
7 constitute the basis upon which I make the within allegations.

8  
9 A declaration in Support of the Issuance of Such Warrant is Submitted.

10  
11 Executed at Los Angeles, California on \_\_\_\_\_

12  
13 I declare under penalty of perjury that the foregoing is true and correct.

14  
15 Voluntary Appearance  
16 Los Angeles Superior Court  
17 Dept. 2  
3/19 . 2014 8:30 a.m.

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21 Declarant and Complainant  
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SUPERIOR COURT OF LOS ANGELES  
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA  
  
Plaintiff,  
  
vs.  
  
Jose Guadalupe Romero  
dba JGR Metals Recycling Inc.  
  
Defendant

No.: 4CA02503A  
  
DECLARATION MADE UNDER  
SECTION 2015.5 C.C.P. IN SUPPORT  
OF ARREST WARRANT

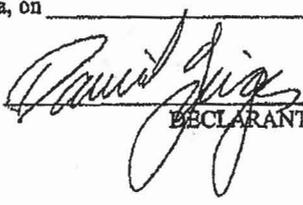
The undersigned hereby declares:  
  
That he is currently employed as an Inspector for the LACOFD/HHM  
of Los Angeles, California and has been so employed throughout this investigation.

That pursuant to his employment, he was assigned to investigate allegation that Jose G. Romero  
did violate H25189.5 (b)

That pursuant to this assignment, the undersigned contacted witnesses, obtained oral statements concerning  
said alleged crime(s) and received written report(s) and statement(s) prepared by persons who the undersigned upon  
information and belief states the law enforcement officers, which written report(s) and statement(s) are included in a  
report, which is attached hereto as Exhibit 1 and incorporated herein by reference as though fully set forth.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California, on \_\_\_\_\_

  
DECLARANT

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SUPERIOR COURT OF LOS ANGELES  
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA

Plaintiff,

vs.  
Herman Istrin, Trustee  
Istrin Family Trust  
Herman & Gertrude  
Istrin Family Trust

Defendant

No.: 4CA02503B

DECLARATION MADE UNDER  
SECTION 2015.5 C.C.P. IN SUPPORT  
OF ARREST WARRANT

The undersigned hereby declares:

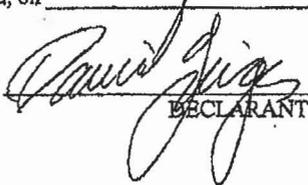
That he is currently employed as an Inspector for the LACOFD/HHM  
of Los Angeles, California and has been so employed throughout this investigation.

That pursuant to his employment, he was assigned to investigate allegation that Herman Istrin  
did violate H25189.5 (b)

That pursuant to this assignment, the undersigned contacted witnesses, obtained oral statements concerning  
said alleged crime(s) and received written report(s) and statement(s) prepared by persons who the undersigned upon  
information and belief states the law enforcement officers, which written report(s) and statement(s) are included in a  
report, which is attached hereto as Exhibit 1 and incorporated herein by reference as though fully set forth.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California, on \_\_\_\_\_

  
DECLARANT



**OFFICE OF THE CITY ATTORNEY**  
MICHAEL N. FEUER  
CITY ATTORNEY

February 6, 2014

Jose Guadalupe Romero  
dba JGR Metals Recycling Inc.  
475 West maple Street  
Glendale, CA 91204

Case Number: 4CA02503A

Dear Jose Guadalupe Romero:

Please be advised that a criminal complaint has been filed charging you with a violation of California Health and Safety Code Section 25189.5(b), commonly known as illegal disposal of hazardous waste. There may be other charges included in the complaint, which are not listed here. If you are on probation in any other case, a probation violation also may have been filed.

You are notified to appear for arraignment in Department 2 of the Superior Court of California, County of Los Angeles, located at 4848 East Civic Center Way, East Los Angeles, CA 90022 at 8:30 a.m. on March 19, 2014.

Failure to appear at the date and the time indicated may result in the issuance of a warrant for your arrest.

Please bring this letter with you to court.

Sincerely,

Original signed by Nicholas J. Karno

Nichols J. Karno  
Deputy City Attorney  
Environmental Justice and Protection Unit



**OFFICE OF THE CITY ATTORNEY**  
MICHAEL N. FEUER  
CITY ATTORNEY

February 6, 2014

Herman Istrin  
706 North Camden Drive  
Beverly Hills, CA 90210

Case Number: 4CA02503B

Dear Herman Istrin:

Please be advised that a criminal complaint has been filed charging you with a violation of California Health and Safety Code Section 25189.5(b), commonly known as illegal disposal of hazardous waste. There may be other charges included in the complaint, which are not listed here. If you are on probation in any other case, a probation violation also may have been filed.

You are notified to appear for arraignment in Department 2 of the Superior Court of California, County of Los Angeles, located at 4848 East Civic Center Way, East Los Angeles, CA 90022 at 8:30 a.m. on March 19, 2014.

Failure to appear at the date and the time indicated may result in the issuance of a warrant for your arrest.

Please bring this letter with you to court.

Sincerely,

Original signed by Nicholas J. Karno

Nicholas J. Karno  
Deputy City Attorney  
Environmental Justice and Protection Unit

**DISCOVERY INFORMATION  
AND PEOPLE'S REQUEST FOR DISCOVERY**

**YOU ARE HEREBY NOTIFIED** that discovery in this matter is available for inspection and copying in the Environmental Justice and Protection Unit of the Los Angeles City Attorney's Office.

Pursuant to Penal Code Sections 1054.3 and 1054.5, the People hereby request informal discovery from the defense. You are further notified that if complete disclosure is not made within 15 days of this request, the People will seek-on or before the next court date, or as soon as practicable thereafter -a court order enforcing the provisions of Penal Code section 1054.5, subdivisions (b) and (c). This is an ongoing request for any of the listed items which become known to the defendant(s) and his or her attorney(s) after the date of compliance.

The written statements and reports hereto constitute discoverable materials designated in Penal Code section 1054.1. Any additional material discoverable pursuant to Penal Code section 1054.1 that become known to the plaintiff will be provided to the defense.

If, prior to or during trial, as a result of this request plaintiff obtains additional evidence or material subject to disclosure under a previous defense request or court order pursuant to Penal Code section 1054.1, plaintiff will disclose the existence of that evidence or material within a reasonable time.

**DISCOVERY MATERIALS OR REQUESTS SHOULD BE DELIVERED TO THE ENVIRONMENTAL JUSTICE AND PROTECTION UNIT OF THE LOS ANGELES CITY ATTORNEY'S OFFICE OR TO A DEPUTY CITY ATTORNEY IN MASTER CALENDAR COURT.**

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