

F I L E D
Clerk of the Superior Court

SEP 08 2025

By: E. Lopez, Deputy

1 **ROB BONTA**
Attorney General of California
2 **JENNIFER EULER**
Chief Assistant Attorney General
3 **MEGHAN ANDERSON**
Supervising Deputy Attorney General
4 **JASON TORRES**
Deputy Attorney General
5 State Bar No. 285997
Division of Medi-Cal Fraud & Elder Abuse
6 303 North Glenoaks Blvd, Suite 900
Burbank, CA 91502
7 Telephone: (818) 288-9853
Fax: (818) 556-2939
8 E-mail: Jason.Torres@doj.ca.gov
Attorneys for the People of the State of California

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SAN DIEGO – CENTRAL DIVISION**

12
13 **PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. CD309478

14 Plaintiff,

FELONY COMPLAINT

15 v.

Count I – P.C. § 368(b)(1)

Count II – P.C. § 368(b)(1)

Count III – P.C. § 368(c)

Count IV – P.C. § 368(c)

16 **MARIA EROLINA DELGADO,**

17 Defendant,

[AG Docket No.: SD2021304404]

18
19
20
21
22 The People of the State of California hereby allege, upon information and belief, that in
23 the County of San Diego and other Counties of the State of California, and before the making or
24 filing of this complaint, Defendant Maria Erolina Delgado (DOB 6/17/1963) did commit the
25 following crimes:

26 /////

27 /////

1 **COUNT I**

2 **Penal Code § 368(b)(1) – a Felony**

3 **Elder or Dependent Adult Abuse – Likely to Produce GBI**

4 (Felony four year maximum)

5 On or about and between, January 1, 2020 and October 9, 2020, in the County of San
6 Diego, State of California, Defendant MARIA EROLINA DELGADO, did, under circumstances
7 and conditions likely to produce great bodily harm and death, knowingly and willfully cause and
8 permit the Gloria Caro, an elder and dependent adult, to suffer, and inflicted thereon, unjustifiable
9 physical pain and mental suffering and, having the cause and custody of said victim, willfully
10 caused and permitted her to be placed in a situation in which her health was endangered, and
11 knew and reasonably should have known that said person, Gloria Caro, was an elder and
12 dependent adult.

13 NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in
14 state prison pursuant to Penal Code section 1170.

15 **COUNT II**

16 **Penal Code § 368(b)(1) – a Felony**

17 **Elder or Dependent Adult Abuse – Likely to Produce GBI**

18 (Felony four year maximum)

19 On or about and between, January 1, 2020 and October 27, 2020, in the County of San
20 Diego, State of California, Defendant MARIA EROLINA DELGADO, did, under circumstances
21 and conditions likely to produce great bodily harm and death, knowingly and willfully cause and
22 permit the victim, Ona Price, an elder and dependent adult, to suffer, and inflicted thereon,
23 unjustifiable physical pain and mental suffering and, having the cause and custody of said victim,
24 willfully caused and permitted her to be placed in a situation in which her health was endangered,
25 and knew and reasonably should have known that said person, Ona Price, was an elder and
26 dependent adult.

27 NOTICE: Upon a felony conviction for the above offense, prison custody time is to be served in
28 state prison pursuant to Penal Code section 1170.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT III

Penal Code § 368(c) – a Misdemeanor

Elder or Dependent Adult Abuse – Other than likely to Produce GBI

(Misdemeanor six months maximum)

On or about and between, January 1, 2020 and November 30, 2020, in the County of San Diego, State of California, Defendant MARIA EROLINA DELGADO, did, under circumstances other than those likely to produce great bodily harm and death, knowingly and willfully cause and permit the victim, Marcia Braun, an elder and dependent adult, to suffer, and inflicted thereon, unjustifiable physical pain and mental suffering and, having the cause and custody of said victim, willfully caused and permitted Marcia Braun to be placed in a situation in which her health was endangered, and knew or reasonably should have known that said person, Marcia Braun, was an elder and dependent adult.

COUNT IV

Penal Code § 368(c) – a Misdemeanor

Elder or Dependent Adult Abuse – Other than likely to Produce GBI

(Misdemeanor six months maximum)

On or about and between, January 1, 2020 and November 5, 2020, in the County of San Diego, State of California, Defendant MARIA EROLINA DELGADO, did, under circumstances other than those likely to produce great bodily harm and death, knowingly and willfully cause and permit the victim, Elizabeth Steele, an elder and dependent adult, to suffer, and inflicted thereon, unjustifiable physical pain and mental suffering and, having the cause and custody of said victim, willfully caused and permitted Elizabeth Steele to be placed in a situation in which her health was endangered, and knew or reasonably should have known that said person, Elizabeth Steele, was an elder and dependent adult.

It is further alleged as to count(s) 1 and 2 that the victim(s) of the above offense(s) was particularly vulnerable, within the meaning of California Rules of Court Rule 4.421(a)(3).

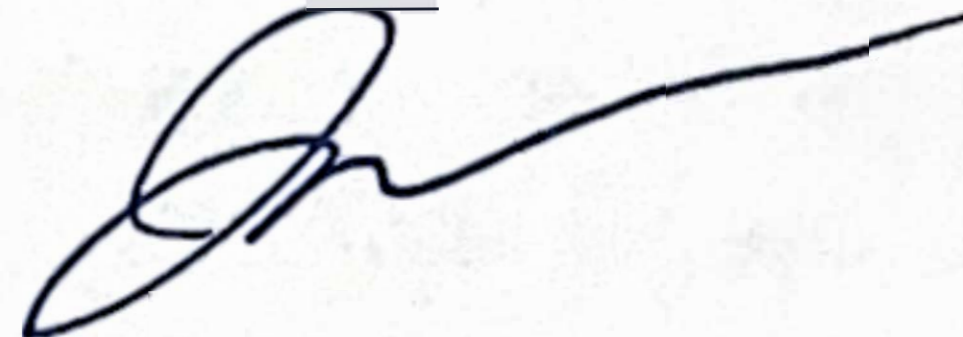
1 It is further alleged that as to count(s) 1 and 2 that the Defendant MARIA EROLINA
2 DELGADO took advantage of a position of trust and confidence to commit the above offense(s),
3 within the meaning of California Rules of Court Rule 4.421(a)(11).
4

5 I declare under penalty of perjury, on information and belief, pursuant to the laws of the
6 State of California, that the foregoing is true and correct.

7 Executed this 2nd day of September 2025, at San Diego, California.

8 Respectfully Submitted,

9
10 ROB BONTA
Attorney General of California

11 

12
13 JASON TORRES
14 Deputy Attorney General
Attorneys for the People of the State of
15 California

16 (SD2021304404)
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

REQUEST FOR DISCOVERY

Pursuant to Penal Code section 1054.5(b), the People request from defendants and defense counsel all materials and information required to be disclosed to the prosecution by the defense under the authority of Penal Code section 1054.3.

This is a continuing request for the above-referenced information. If the information becomes available at a future time, the prosecution asks, through this request, that it be immediately disclosed to the prosecution.