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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA,
HAYWARD HALL OF JUSTICE

PEOPLE OF THE STATE OF CALIFORNIA

v.

ANGELINE LISA LIZARRAGO

MICHAEL DOUGLAS YOUNG

Defendant(s).

COMPLAINT NO.

429998

PFN: DQV879

CEN: 0465776

True PFN: AWJ861

PFN: DQV881

CEN: 0465780

WALK WARRANT

The Undersigned, being sworn says, on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between June 13, 2008 and February 24, 2009, commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of ANGOLA E. KHANTHAPHENGXAY of Stockton, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately THREE THOUSAND FIFTEEN DOLLARS AND FIFTY CENTS (\$3,015.50).

ENDORSED
FILED
ALAMEDA COUNTY
Dept. No. 502
10 SEP 29 PM 1:47
CLERK OF THE SUPERIOR COURT
BY A. VOGELSANG
DEPUTY

SECOND COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between February 28, 2009 and July 14, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of DONELI LINARES and SILVIA LINARES of Manteca, California, the value of the property taken exceed FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately ONE THOUSAND FIVE HUNDRED AND TWENTY DOLLARS (\$1,520.00).

THIRD COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between February 28, 2009 and July 14, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: DONELI LINARES and SILVIA LINARES of Manteca, California, before fully performing each and every service contracted, or otherwise represented to be performed.

FOURTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between May 6, 2008 and May 6, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of JOSE MEJIA and MARIA MENDOZA of Hayward, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately TWO THOUSAND ONE HUNDRED DOLLARS (\$2,100.00).

FIFTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between May 8, 2007 and May 6, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: JOSE MEJIA and MARIA MENDOZA of Hayward, California, before fully performing each and every service contracted, or otherwise represented to be performed.

SIXTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between June 11, 2008 and August 13, 2008 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of DAVID MAYORGA and ALBA ZELAYA of San Leandro, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately THREE THOUSAND DOLLARS (\$3,000.00).

SEVENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between April 7, 2008 and August 13, 2008 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: DAVID MAYORGA and ALBA ZELAYA of San Leandro, California, before fully performing each and every service contracted, or otherwise represented to be performed.

EIGHTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between January 13, 2009 and December 31, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of SERGIO OCHOA of Dos Palos, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately THREE THOUSAND DOLLARS (\$3,000.00).

NINTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between January 13, 2009 and December 31, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: SERGIO OCHOA of Dos Palos, California, before fully performing each and every service contracted, or otherwise represented to be performed.

TENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between July 15, 2008 and July 15, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of AUGUSTIN ZEPEDA of Oakland, California the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately TWO THOUSAND TWO HUNDRED DOLLARS (\$2,200.00).

ELEVENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between July 15, 2008 and July 15, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: AUGUSTIN ZEPEDA of Stockton, California, before fully performing each and every service contracted, or otherwise represented to be performed.

TWELFTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between October 8, 2008 and November 13, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of KHAMPHA PHIMMASONE and SOUK PHIMMASONE of Sacramento, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately FIVE THOUSAND THREE HUNDRED EIGHTY ONE DOLLARS AND THIRTY SIX CENTS (\$5,381.36).

THIRTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between October 8, 2008 and November 13, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: KHAMPHA PHIMMASONE AND SOUK PHIMMASONE of Sacramento, California, before fully performing each and every service contracted, or otherwise represented to be performed.

FOURTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between November 8, 2008 and December 31, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of DIANA ALDERETE of South San Francisco, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00).

FIFTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between November 8, 2008 and December 31, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: DIANA ALDERETE of South San Francisco, California, before fully performing each and every service contracted, or otherwise represented to be performed.

SIXTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between October 1, 2008 and October 1, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of ROSA VASQUEZ GASCA and SALVADOR GASCA of Oakley, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately ONE THOUSAND DOLLARS (\$1,000.00).

SEVENTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between October 1, 2008 and October 1, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: ROSA VASQUEZ GASCA and SALVADOR GASCA of Oakley, California, before fully performing each and every service contracted, or otherwise represented to be performed.

EIGHTEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, on August 1, 2009 commit a Felony, to wit: NON-SUFFICIENT FUND CHECK SINGLE CHECK (FELONY), a violation of sections 476a(a) of the PENAL CODE, in that said defendants(s) did unlawfully and fraudulently make, draw utter and deliver to SALVADOR GASCA and ROSA VASQUEZ GASCA a check and draft for the payment of \$1,300.00, a drawn upon a bank, to wit: Wells Fargo Bank, Check #1377, knowing at the time of such making, drawing, uttering and delivering, that they had insufficient funds in and credit with, said bank to meet said check.

NINETEENTH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California between May 1, 2009 and October 1, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of GERMAN CARRANZA and BRIGIDA CARRANZA of San Martin, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately ONE THOUSAND SEVEN HUNDRED DOLLARS (\$1,700.00).

TWENTIETH COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO and MICHAEL DOUGLAS YOUNG did, in the County of Alameda, State of California, between May 1, 2009 and October 1, 2009 commit a Felony, to wit: FORECLOSURE CONSULTANT – PROHIBITED ACTS, a violation of sections 2945.4 and 2945.7 of the CIVIL CODE, in that said defendants(s) did willfully and unlawfully, being foreclosure consultants as defined by Civil Code section 2945.1, claim, demand, change, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: GERMAN CARRANZA and BRIGIDA CARRANZA of San Martin, California, before fully performing each and every service contracted, or otherwise represented to be performed.

TWENTY-FIRST COUNT

The Undersigned further deposes and says on Information and belief, that ANGELINE LISA LIZARRAGO did in the County of Alameda, State of California between June 17, 2009 and August 15, 2009 commit a Felony, to wit: GRAND THEFT OF PERSONAL PROPERTY, a violation of section 487(a) of the PENAL CODE of California, in that said defendant(s) did willfully and unlawfully take the personal property of AUDREE ROBINSON, DORTHY ROBINSON, and JHANIYA BONALES, of San Martin, California, the value of the property taken exceeds FOUR HUNDRED DOLLARS, CASH (\$400.00), the sum taken is approximately TWENTY SEVEN THOUSAND DOLLARS (\$27,000.00).

TWENTY-SECOND COUNT

The Undersigned further deposes and says on Information and belief, the ANGELINE LISA LIZARRAGO did, in the County of Alameda, State of California between June 17, 2009 and August 15, 2009 commit a Felony, to wit: MISREPRESENTATION IN SECURITIES SALES, a violation of section 25401 of the CORPORATIONS CODE of California, in that said defendant(s) did willfully and unlawfully offer securities for sale and sell securities to AUDREE ROBINSON, DOROTHY ROBINSON, and JHANIYA BONALES, by means of a written or oral communications which included an untrue statement of a material fact or omitted written or oral communications which included an untrue statement of material fact necessary to make the statements not misleading in light of the circumstances under which they were made. It is further alleged that this offense is punishable as provided under Corporations Code Section 25540(b).

TWENTY-THIRD COUNT

The Undersigned further deposes and says on Information and belief, the ANGELINE LISA LIZARRAGO did, in the County of Alameda, State of California between June 17, 2009 and August 15, 2009 commit a Felony, to wit: THEFT FROM AN ELDER OR DEPENDANT ADULT, a violation of section 368(d) of the PENAL CODE of California, in that said defendant committed theft and embezzlement with respect to the property of elders, AUDREE ROBINSON, DATE OF BIRTH: May 25, 1940 and DORTHY ROBINSON, DATE OF BIRTH: December 14, 1940 and that cash funds exceeding, FOUR HUNDRED DOLLARS (\$400.00) were taken.

FIRST PRIOR CONVICTION AS TO DEFENDANT LIZARRAGO

The undersigned further alleges that before the commission of the offense specified above, said defendant ANGELINE LISA LIZARRAGO, on or about March 19, 1980, was convicted in the Superior Court of the State of California, in and for the County of SANTA CLARA, of the crime of a Felony, to wit: INSUFFICIENT CHECK FUNDS, a violation of section 476(a), of the PENAL CODE of California, and received a sentence of probation therefore.

SECOND PRIOR CONVICTION AS TO DEFENDANT LIZARRAGO

The undersigned further alleges that before the commission of the offense specified above, said defendant ANGELINE LISA LIZARRAGO, on or about March 29, 1982, was convicted in the Superior Court of the State of California, in and for the County of SANTA CLARA, of the crimes of two Felony violations, to wit: INSUFFICIENT CHECK FUNDS, a violation of section 476(a), of the PENAL CODE of California, and GRAND THEFT, a violation of section 487 of the PENAL CODE of California, and received a prison term therefore.

THIRD PRIOR CONVICTION AS TO DEFENDANT LIZARRAGO

The undersigned further alleges that before the commission of the offense specified above, said defendant ANGELINE LISA LIZARRAGO, on or about February 15, 1991, was convicted in the Superior Court of the State of California, in and for the County of SANTA CLARA, of the crime of a Felony, to wit: INSUFFICIENT CHECK FUNDS, a violation of section 476(a), of the PENAL CODE of California, and received a prison term therefore.

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FOURTH PRIOR CONVICTION AS TO DEFENDANT LIZARRAGO

The undersigned further alleges that before the commission of the offense specified above, said defendant ANGELINE LISA LIZARRAGO, on or about February 15, 2009, was convicted in the Superior Court of the State of California, in and for the County of MADERA, of the crime of a Felony, to wit: GRAND THEFT, a violation of section 487, of the PENAL CODE of California, and received a prison term therefore.

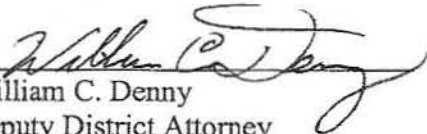
SPECIAL ALLEGATION-OFFENSE WHILE ON BAIL OR O.R. – PENAL CODE SECTION 12022.1

It is further alleged that at the time of commission of the above offenses, ANGELINE LISA LIZARRAGO was released from custody or bail in Madera County Criminal Docket No. MCR024372.

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by Penal Code Section 1054.3.

Complainant therefore prays that a warrant issue and that said defendant(s) be dealt with according to law.


Subscribed and sworn to before me,
Tuesday, September 28, 2010



William C. Denny
Deputy District Attorney
State Bar #108970 ra
Alameda County, California



Inspector Pat Johnson #953
Alameda County District Attorney's Office
CEPD – 08FRE0696



Ronald D. Smetana
Senior Assistant Attorney General
State of California
State Bar #62818

Defendant's Name: Angeline Lisa Lizarrago
PFN: DQV879
CEN: 0465776
CEPD REPORT #: 08FRE0696

DECLARATION IN SUPPORT OF PROBABLE CAUSE

THE UNDERSIGNED HEREBY DECLARES:

1. That he is an INSPECTOR of the, Alameda County District Attorney's Office, Oakland, California.
2. That the contents of this declaration provides probable cause to believe the above-named defendant committed the following offenses:

- | | |
|--|--|
| a.) Eleven counts of Penal Code § 487(a) | d.) One count of Corporations Code § 25401 |
| b.) Nine counts of Civil Code § 2945.4 | e.) One count of Penal Code § 368(d) |
| c.) One counts of Penal Code § 476(a) | |

3. I declare under information and belief that the following is true and correct:

Avemos Financial Group, Inc. ("Avemos") was a loan modification and foreclosure consultant business that was located at 5018 Mowry Avenue in Fremont. According to public records the business was incorporated on May 13, 2005. The principal and agent for service of process is Angeline Lisa Lizarrago ("Lizarrago"). According to the Secretary of State, the corporate status of Avemos was suspended on or about October 1, 2007, at the request of the Franchise Tax Board.

Lizarrago and Michael Douglas Young (a licensed real estate broker) are associated with the company. Young is the broker for Aries Realty, shares office space with Avemos and has business cards that show him to be the "General Manager" of Avemos. Young is also a signatory on Avemos bank accounts.

All of the victims interviewed reported that Lizarrago took up front fees for loan modifications and to assist them in avoiding foreclosure. Lizarrago promised the victims that she would save their homes from foreclosure. She also promised that she would negotiate with their lenders to lower their interest rate and lower their loan balance to current market value. Avemos entered into written contracts with its clients; the contracts offered a money back guarantee if Avemos fails to perform as promised. The victims reported that Avemos failed to refund their money when they did not get their loan modification. Many of the victims lost their homes to foreclosure. The victims provided receipts, contracts, and other Avemos related documents.

Pursuant to Civil Code section 2945.4 and 2945.7, where the owner-occupant of a residential (one to four units) property is in foreclosure due to the issuance of a notice of default, it is a felony/misdemeanor to "(a) Claim, demand, charge, collect, or receive any compensation until after the foreclosure consultant has fully performed each and every service the foreclosure consultant contracted to perform or represented that he or she would perform," or to "(e) Acquire any interest in a residence in foreclosure from an owner with whom the foreclosure consultant has contracted."

By taking fees in advance from those in foreclosure as set forth below, Lizarrago and Young have violated Civil Code sections 2945.4 and 2945.7. Lizarrago and Young have violated California Penal Code section 487(a) Grand Theft, when they received money from the victims and failed to provide the services that they promised and failed to refund their money. Lizarrago and Young violated Penal Code section 476 (a) when Lizarrago

issued a check with insufficient funds to one of the victims.

Pursuant to California Corporations Code Section 25401, it is unlawful for any person to offer or sell a security in this state or buy or offer to buy a security in this state by means of any written or oral communication which includes an untrue statement of material fact or omits to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading.

Lizarrago violated California Corporations Code 25401, and California Penal Code sections 368(d)-Elder Financial Fraud and 487(a) Grand Theft, when she convinced an 89 year old man and his wife to invest \$25,000. Lizarrago lied to the victims and said that she worked with a group of investors that would find the victims a foreclosed home to live in. Lizarrago never found the victims a home and kept their money. Lizarrago and the victims signed two different Investor Agreement contracts that had an Avemos corporate seal stamped on it.

The following is a summary of all the victims listed in the complaint:

Angola Khanthaphengxay (Count 1)

Angola Khanthaphengxay owned the property located at 4225 Mist Trail Drive in Stockton. From June 2008 through February 2009, she paid Lizarrago \$3,016.50. She did not get her loan modified and she lost the home to foreclosure.

Doneli and Silvia Linares (Counts 2-3)

Domeli and Silvia Linares received a Notice of Default from their lender on or about March 3, 2009 for their property located at 1683 Daniels Street in Manteca. On March 18, 2009, they made a \$1,520 payment to Lizarrago. They did not get their loan modified.

Jose Mejia and Maria Mendoza (Counts 4-5)

Jose and Maria Mendoza received a Notice of Default from their lender on or about November 8, 2007 for their property located at 840 Paradise Blvd. in Hayward. From May 2008 through September 2008, they paid Lizarrago \$2,100. They did not get their loan modified.

David Mayorga and Alba Zelaya (Counts 6-7)

David Mayorga and Alba Zelaya received a Notice of Default from their lender on or about April 7, 2008 for their property located at 15047 Costella Street in San Leandro. From June 2008 through December 2008, they paid Lizarrago \$3,000. They did not get their loan modified and they lost their home to foreclosure.

Sergio Ochoa (Counts 8-9)

Sergio Ochoa owned the home located at 21690 S. Cooper Ave. in Dos Palos. From January through April 2009, Ochoa paid Lizarrago \$4,520. Ochoa received a Notice of Default for his property on or about February 26, 2009. Ochoa made his last two \$500 payments to Lizarrago after he received the Notice of Default. Ochoa did not get his loan modified and lost his home to foreclosure.

Augustin Zepeda (Counts 10-11)

Augustin Zepeda received a Notice of Default from his lender on or about July 15, 2008 for his property located at 2342 Maywood Ave. in Oakland. From April through December 2008, Zepeda paid Lizarrago \$2,016. He did not get his loan modified.

Khampa and Souk Phimmasone (Count 12-13)

Khampa and Souk Phimmasone owned the properties located at 929 Silvano Street and 2742 Norwood Ave. in Sacramento. They received a Notice of Default from their lender on the Norwood Ave. home on April 9, 2009. From October through May 2009, they paid Lizarrago \$5,381 for loan modifications on both properties. Their

final two payments were made on April 15, 2009 and May 7, 2009, after they received the Notice of Default.

Diana Alderete (Counts 14-15)

Diana Alderete received a Notice of Default from her lender on or about October 2008 for her property located at 532 Railroad Ave. in South San Francisco. From November through December 2008, Alderete paid Lizarrago \$2,520. Alderete did not get her loan modified.

Rosa and Salvador Gasca (Counts 16-18)

Rosa and Salvador Gasca lived at the property located at 4871 Oak Forest Ave. in Oakley. The mortgage was in Rosa's name. Rosa received a Notice of Default from her lender on or about May 13, 2008. From October through November 2008, Rosa paid Lizarrago \$1,300. Rosa lost the home to foreclosure. Salvador went to Avemos and asked for a refund. On August 1, 2009, Lizarrago issued Salvador Wells Fargo Bank check #1377 in the amount of \$1,300. The check did not clear due to insufficient funds.

German and Brigida Carranza (Count 19-20)

German and Brigida received a Notice of Default from their lender on or about June 11, 2009 for their property located at 14865 Foothill Ave. in San Martin. From May through September 2009, they paid Lizarrago \$2,235. Their final two payments were made on August 25, 2009 and September 25, 2009, after they received the Notice of Default. They did not get their loan modified.

Audrey Robinson Counts (21-23)

Audrey and Dorothy Robinson were frightened to continue living in Stockton. They saved \$25,000 in their Wells Fargo Bank account and decided to move to the East Bay. A friend of theirs referred them to Lizarrago. They were told that Lizarrago claimed to own over 51 properties in the East Bay. Many of the properties had been foreclosed.

On or about June 17, 2009, the Robinsons met with Lizarrago at Avemos. Lizarrago promised that she would find them a foreclosed home. Lizarrago explained that the Robinsons could retain her realtor services, however; she worked for a group of investors who insisted upon an up front cash payment of \$5,000.

Lizarrago accepted a \$5,000 cash payment from the Robinsons. Lizarrago signed an Investor agreement document dated July 17, 2009, that had a corporate seal on it. The document promised a \$7,500 return on investment. The payments would begin on July 1, 2009.

Lizarrago said that she had a large number of foreclosed homes in the Fremont area. Lizarrago said that she would need an additional \$20,000 in cash before she could get the Robinsons into a home. On June 18, 2009, the Robinsons returned to Avemos and gave Lizarrago \$20,000 in cash. Lizarrago promised that if the investment company were unable to find the Robinsons a home, they would have their money returned.

Lizarrago signed another Investor Agreement contract that promised a \$30,000 return on the Robinsons \$20,000 investment. This document also had a corporate seal on it. The payments were to begin on June 18, 2009.

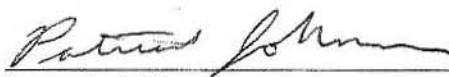
On or about July 9, 2009, Lizarrago wrote a check in the amount of \$1,000 to Audrey that had insufficient funds. On or about October 9, 2009, Lizarrago deposited \$2,000 into the Robinsons' Wells Fargo Bank account. About 2 weeks later, Lizarrago was somehow able to take the \$2,000 back out of the Robinsons' account.

Lizarrago did not return any of the Robinsons' money and she never found them a home to live in.

PRIOR CRIMINAL HISTORY

I have determined that Lizarrago, born July 13, 1942, has a substantial criminal record dating back to the 1980's and that she has used more than 20 different names. Under the name Angie Terrasas in 1982 she was sentenced to prison out of Santa Clara County for violations of Penal Code section 476a (NSF checks). In 1983 she was sentenced to prison for the same offense out of Fresno County. She was sentenced to prison again for NSF checks issued in Santa Clara County in 1991. Most recently, on September 30, 2009, Lizarrago was sentenced to state prison for two years from Madera County for six counts of grand theft based on her commission of an advance fee scheme – she was charging people to get them home loans but failed to do so. Additionally, in the mid 1980's, under the name Evangelina Areola Terrasas, Lizarrago was convicted by the United States of alien smuggling.

Dated: September 28, 2010 at Oakland, California


Inspector's Signature

Inspector Patrick Johnson #953

CERTIFICATE OF PROBABLE CAUSE

The Court, upon the review of this declaration, hereby

☐ Finds

☐ Does not Find

good cause to detain the above-named individual.

Date: _____

Time: _____

Magistrate of the Superior Court