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*Attorneys for the People*

Vs.	)	#1, #2 and #3 WARRANTS
	)	
	)	FELONY COMPLAINT
RONALD VERNON CUPP	)	Section 115.5(a) PC (32 cts)
RANDALL GILBERT HEYDEN	)	470(d) PC (7 cts)
ANGELLE WERTZ	)	368(e) PC
	)	115.5(b) PC (2 cts)
	)	487(a) PC (7 cts)
	)	132 PC
	)	6126(a) BP (M)
	)	8124.2 GC (6 cts)
Defendants	)	

**NOTICE: Conviction for these offenses may require you to provide specimens and samples pursuant to Penal Code Section 296 if you are convicted of a felony offense or have a prior qualifying offense in your criminal background. Willful refusal to provide the specimens and samples is a crime.**

THE UNDERSIGNED, being duly sworn, deposes and says, upon information and belief, that the said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **11<sup>th</sup> day of January, 2011**, violate Section **115.5(a)** of the PENAL

CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed Conveyance) was false or forged.

#### COUNT II

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Count I hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **27<sup>th</sup> day of October, 2011**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement) was false or forged.

#### COUNT III

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-II hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **12<sup>th</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Deed to Real Property located at 15 Echo Ave in Corte Madera California signed as Attorney in Fact for Wells Fargo, knowing the same to be false, altered, forged and counterfeited.

#### COUNT IV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-III hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **12<sup>th</sup> day of March, 2012**, violate Section **368(e)** of the PENAL CODE, a **felony**, in that he being a caretaker, committed theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, goods, and services obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, BEVERLY CUPP, was an elder and dependent adult.

#### COUNT V

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-IV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **13<sup>th</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the

intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Deed to Real Property located at 15 Echo Ave in Corte Madera, California signed as Attorney in Fact for HUD (Housing and Urban Development), knowing the same to be false, altered, forged and counterfeited.

#### COUNT VI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-V hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **14<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee) was false or forged.

#### COUNT VII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **14<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Reconveyance) was false or forged.

#### COUNT VIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **14<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement) was false or forged.

#### COUNT IX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-VIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in

encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee) was false or forged.

#### COUNT X

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-IX hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Substitution of Trust re: Deed to Real Property located at 7493 Mercedes Way in Rohnert Park, California signed as Attorney in Fact for Bell Home Loans, knowing the same to be false, altered, forged and counterfeited.

#### COUNT XI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-X hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee re: Deed to 7493 Mercedes Way in Rohnert Park, California) was false or forged.

#### COUNT XII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Substitution of Trustee re: Deed to 7493 Mercedes Way in Rohnert Park, California signed as Attorney in Fact for Advantage Mortgage Corporation, knowing the same to be false, altered, forged and counterfeited.

#### COUNT XIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property

consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Full Reconveyance re: 7493 Mercedes Way in Rohnert Park, California) was false or forged.

#### COUNT XIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Full Reconveyance re: 7493 Mercedes Way in Rohnert Park, California) was false or forged.

#### COUNT XV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIV hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **23<sup>rd</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Substitution of Trustee re: 65 Mariners Circle in San Rafael, California, knowing the same to be false, altered, forged and counterfeited.

#### COUNT XVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **23<sup>rd</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee re: Deed for 15 Echo Avenue in Corte Madera, California) was false or forged.

#### COUNT XVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **23<sup>rd</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property

consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Full Reconveyance re: Deed for 15 Echo Avenue in Corte Madera, California) was false or forged.

#### COUNT XVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **23<sup>rd</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee re: Deed to 65 Mariners Circle in San Rafael, California) was false or forged.

#### COUNT XIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **23<sup>rd</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee re: Deed to 65 Mariners Circle in San Rafael, California) was false or forged.

#### COUNT XX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XIX hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **26<sup>th</sup> day of March, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Notice of Recission re: Deed to 65 Mariners Circle in San Rafael, California, knowing the same to be false, altered, forged and counterfeited.

#### COUNT XXI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XX hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **27<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property

consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Notice of Rescission re: Deed to 65 Mariners Circle in San Rafael, California) was false or forged.

#### COUNT XXII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **27<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (New Deed of Trust to NBTS re: Deed to 7493 Mercedes Way in Rohnert Park, California) was false or forged.

#### COUNT XXIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXII hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **27<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Notice of Rescission re: Deed to 65 Mariners Circle in San Rafael, California) was false or forged.

#### COUNT XXIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **28<sup>th</sup> day of March, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement re: Deed to 65 Mariners Circle in San Rafael, California) was false or forged.

#### COUNT XXV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **6<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or

forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement re: Deed to 33632 Chianti Road in Geyserville, California) was false or forged.

#### COUNT XXVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **9<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee re: Deed to 629 Francisco Street, El Granada, California) was false or forged.

#### COUNT XXVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **9<sup>th</sup> day of April, 2012**, violate Section **470(d)** of the PENAL CODE, a **felony**, in that he did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, Substitution of Trustee re: Deed to Real Property located at 629 Francisco St in El Granada, California signed as Attorney in Fact for Wells Fargo, knowing the same to be false, altered, forged and counterfeited.

#### COUNT XXVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **9<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Full Reconveyance re: Deed to 629 Francisco Street in El Granada, California) was false or forged.



#### COUNT XXIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement re: Deed to 1587 Glenbrook Drive in Santa Rosa, California) was false or forged.

#### COUNT XXX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXIX hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **18<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee and Deed of Full Reconveyance re: Deed to 359 Grove Street in Half Moon Bay, California) was false or forged.

#### COUNT XXXI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXX hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **24<sup>th</sup> day of April, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Trust re: Deed to 15 Echo Avenue in Corte Madera, California) was false or forged.

#### COUNT XXXII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **15<sup>th</sup> day of May, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he did file a false or

forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee and Deed of Full Reconveyance re: Deed to 33632 Chianti Road in Geyserville, California) was false or forged.

#### COUNT XXXIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **17<sup>th</sup> day of May, 2012**, violate Section **115.5(b)** of the PENAL CODE, a **felony**, in that he did make a false sworn statement to a notary public, with knowledge that the statement was false in order to induce the notary public to perform an improper notarial act on the instrument and document affecting title to and placing an encumbrance on real property consisting of a single-family residence containing not more than four dwelling units (Deed re: 359 Grove Street in Half Moon Bay, California).

#### COUNT XXXIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **29<sup>th</sup> day of May, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee and Deed of Full Reconveyance re: Deed to 1578 Glenbrook Drive in Santa Rosa, California) was false or forged.

#### COUNT XXXV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **29<sup>th</sup> day of May, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Trust re: Deed to 359 Grove Street in Half Moon Bay, California) was false or forged.

#### COUNT XXXVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD**

**VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **30<sup>th</sup> day of May, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Trust re: Deed to 629 Francisco Street in El Granada, California) was false or forged.

#### COUNT XXXVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **5<sup>th</sup> day of June, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed of Trust re: Deed to 4640 Arlington Avenue in Santa Rosa, California) was false or forged.

#### COUNT XXXVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **9<sup>th</sup> day of June, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement re: Deed to 8009 Covert Lane in Sebastopol, California) was false or forged.

#### COUNT XXXIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **18<sup>th</sup> day of June, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Substitution of Trustee and Deed of Full Reconveyance re: Deed to 2563 Silver Spur Drive in Santa Rosa, California) was false or forged.

#### COUNT XL

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XXXIX hereof, complainant

further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **18<sup>th</sup> day of July, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (UCC Filing Statement re: 2329 Sundance Street in Santa Rosa, California) was false or forged.

#### COUNT XLI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XL hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **10<sup>th</sup> day of September, 2012**, violate Section **115.5(b)** of the PENAL CODE, a **felony**, in that he did make a false sworn statement to a notary public, with knowledge that the statement was false in order to induce the notary public to perform an improper notarial act on the instrument and document affecting title to and placing an encumbrance on real propert consisting of a single-family residence containing not more than four dwelling units (Deed to 3 Heather Way in Larkspur, California).

#### COUNT XLII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of September, 2012**, violate Section **115.5(a)** of the PENAL CODE, a **felony**, in that he that he did file a false or forged document or instrument with the County Recorder which affects title to, places in encumbrance on, or places an interest secured by a mortgage or deed of trust on, real property consisting of a single family residence containing not more than four dwelling units, with knowledge that the document (Deed to 3 Heather Way in Larkspur, California) was false or forged.

#### COUNT XLIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **3<sup>rd</sup> day of February, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$8,300.00) the property of Kristine Lisper by false pretense.

#### COUNT XLIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD**

**VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **25<sup>th</sup> day of March, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$7,500.00) the property of Norma Carranza by False Pretense.

#### COUNT XLV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIV hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **12<sup>th</sup> day of April, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$7,500.00) the property of Ellis Joseph Foster by False Pretense.

#### COUNT XLVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLV hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **18<sup>th</sup> day of May, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$1,000.00) the property of Derek Baum by False Pretense.

#### COUNT XLVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVI hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **16<sup>th</sup> day of June, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$2,500.00) the property of Jesse Narvaez by False Pretense.

#### COUNT XLVIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVII hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **1<sup>st</sup> day of July, 2012 through the 31<sup>st</sup> day of July, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$2,500.00) the property of Jeffrey and Erin Stammer by False Pretense.

#### COUNT XLIX

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLVIII hereof, complainant further complains and says upon further information and belief, that said defendant, **RANDALL**

**GILBERT HEYDEN**, did, in the County of Sonoma, State of California, on or about the **20<sup>th</sup> day of June, 2012**, violate Section **132** of the PENAL CODE, a **felony**, in that he offered as true at a trial, proceeding, inquiry and investigation whatever, authorized by law, a book, paper, document, record and instrument in writing, knowing the same to have been forged, fraudulently altered, and ante-dated.

#### COUNT L

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-XLIX hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **26<sup>th</sup> day of June, 2012**, violate Section **487(a)** of the PENAL CODE, a **felony**, in that he did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit Money (\$2,500.00) the property of Gerry and Melissa Hardiman by False Pretense.

#### COUNT LI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-L hereof, complainant further complains and says upon further information and belief, that said defendant, **RONALD VERNON CUPP**, did, in the County of Sonoma, State of California, on or about the **1<sup>st</sup> day of January, 2012 through the 31<sup>st</sup> day of December, 2012**, violate Section **6126(a)** of the BUSINESS & PROFESSIONS CODE, a **misdemeanor**, in that he was a person who was not an active member of the State Bar of the State of California and who was not otherwise authorized pursuant to a statute or court rule who did unlawfully advertise himself as practicing and entitled to practice law.

#### COUNT LII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LI hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **12<sup>th</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false statements or is forged.

#### COUNT LIII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LII hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **12<sup>th</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false

statements or is forged.

#### COUNT LIV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LIII hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **13<sup>th</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false statements or is forged.

#### COUNT LV

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LIV hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **13<sup>th</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false statements or is forged.

#### COUNT LVI

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LV hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **22<sup>nd</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false statements or is forged.

#### COUNT LVII

As and for a further and separate cause of action, being a different offense from but connected in its commission with the crime set forth in Counts I-LVI hereof, complainant further complains and says upon further information and belief, that said defendant, **ANGELLE WERTZ**, did, in the County of Sonoma, State of California, on or about the **22<sup>nd</sup> day of March, 2012**, violate Section **8214** of the GOVERNMENT CODE, a **felony**, in that she, as a Notary Public, did knowingly and willfully, with intent to defraud, perform notarial act(s) in relation to a deed of trust on real property consisting of a single-family residence containing not more than four dwelling units, with knowledge that the deed of trust contains, in whole or in part, any false statements or is forged.

## MARSY'S LAW

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the State of California Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be safe and free from intimidation, harassment, and abuse. The defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) is admonished not to use any information contained in the reports to locate or harass any victim or the victim(s)'s family and to not disclose any information that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of Penal Code Section 1054.2a(3) to disclose the address and telephone number of a victim or witness to a defendant, defendant's family member, or anyone else. Note exceptions provided in Penal Code Section 1054.2a(1) and (2).

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

  
DEPUTY DISTRICT ATTORNEY

Subscribed and sworn to before me this 23 Day of January, 2013

Clerk of the Superior Court

1/08/2013  
ABA/mm  
SRO 125760  
DAR-660879  
ECR Offer: None yet.