

OCT 30 2020

Sherri R. Carter, Executive Officer/Clerk of Court

By: B. Perez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

1. EDUARDO TORO,
dob 10/16/1982;
2. ANA CECILIA TORO,
dob 05/11/1984;
3. VERONICA ROMERO,
AKA "VERONICA MARQUEZ"
dob 09/27/1985;
4. VERONICA TORO,
dob 09/14/1974;
5. FILIVERTO GOMEZ,
dob 08/13/1982;
6. LETICIA MORA,
dob 08/12/1966;
7. MARIA GIL,
dob 03/28/1973;
8. EMMANUEL LOPEZ,
dob 09/22/1978;
9. GLADYS VELASQUEZ,
dob 01/08/1979;

Defendants.

Case No. BA484212

INDICTMENT

A Special Statewide Grand Jury of the County of Los Angeles, State of California, hereby accuses by this Indictment, the following defendants of committing, in the Counties of Los Angeles, Orange, Riverside, and San Diego, of the following crimes:

1 [12601 SPARWOOD LANE, LA MIRADA, CALIFORNIA 90638]

2 COUNT 1

3 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

4 On or about June 28, 2011, in the County of Los Angeles, the crime of PROCURING OR
5 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
6 a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a
7 false and forged instrument to be filed, registered, and recorded in a public office in California,
8 which instrument, if genuine, might be filed, registered, and recorded under a law of California or
9 the United States, to wit: Ernesto Quiroz Bankruptcy Petition.

10 COUNT 2

11 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

12 On or about June 28, 2011, in the County of Los Angeles, the crime of PROCURING OR
13 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
14 a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a
15 false and forged instrument to be filed, registered, and recorded in a public office in California,
16 which instrument, if genuine, might be filed, registered, and recorded under a law of California or
17 the United States, to wit: Ernesto Quiroz Statement of Social Security Number.

18 COUNT 3

19 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

20 On or about July 27, 2011, in the County of Los Angeles, the crime of PROCURING OR
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
22 a felony, was committed by EDUARDO TORO, VERONICA TORO, and VERONICA
23 ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged
24 instrument to be filed, registered, and recorded in a public office in California, which instrument,
25 if genuine, might be filed, registered, and recorded under a law of California or the United States,
26 to wit: Grant Deed from Roy and Rebecca Putnam to Ernesto Quiroz.

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COUNT 4

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 3, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Ernesto Quiroz Bankruptcy Petition.

COUNT 5

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 3, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Ernesto Quiroz Statement of Social Security Number.

COUNT 6

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 22, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Miguel Sanchez Ortega and Graciela Gomez.

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COUNT 7

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about March 16, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Genoveva Estrada Bankruptcy Petition.

COUNT 8

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about March 16, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Genoveva Estrada Statement of Social Security Number.

COUNT 9

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about March 29, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Genoveva Estrada and Karina Rojas.

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COUNT 10

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about May 31, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, VERONICA TORO, and VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Sergio Delgado and Maria Soto.

COUNT 11

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about July 24, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Maria Soto Bankruptcy Petition.

COUNT 12

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about July 24, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Maria Soto Statement of Social Security Number.

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COUNT 13

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 6, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Maria Soto Bankruptcy Petition.

COUNT 14

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 6, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Maria Soto Statement of Social Security Number.

COUNT 15

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 6, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by MARIA GIL and VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Alberto Soto and Anabel Hernandez.

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COUNT 16

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 11, 2015, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Miguel Sanchez Ortega, Graciela Gomez, and Ernesto Quiroz to Roy and Rebecca Putnam.

COUNT 17

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 23, 2015, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Sergio Delgado, Alberto Soto, and Maria Soto to Roy and Rebecca Putnam.

COUNT 18

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 23, 2015, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Anabel Hernandez, Genoveva Estrada, and Karina Rojas to Roy and Rebecca Putnam.

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COUNT 19

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 1, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Samantha Ruiz Bankruptcy Petition.

COUNT 20

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 1, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Samantha Ruiz Statement of Social Security Number.

COUNT 21

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 4, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Martha Rodriguez and Samantha Ruiz.

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1 **COUNT 22**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about April 29, 2016, in the County of Los Angeles, the crime of PROCURING OR
4 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
5 a felony, was committed by VERONICA TORO, who did unlawfully and knowingly procure and
6 offer a false and forged instrument to be filed, registered, and recorded in a public office in
7 California, which instrument, if genuine, might be filed, registered, and recorded under a law of
8 California or the United States, to wit: Patricia Torres Bankruptcy Petition.

9 **COUNT 23**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about April 29, 2016, in the County of Los Angeles, the crime of PROCURING OR
12 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
13 a felony, was committed by VERONICA TORO, who did unlawfully and knowingly procure and
14 offer a false and forged instrument to be filed, registered, and recorded in a public office in
15 California, which instrument, if genuine, might be filed, registered, and recorded under a law of
16 California or the United States, to wit: Patricia Torres Statement of Social Security Number.

17 **COUNT 24**

18 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

19 On or about May 10, 2016, in the County of Los Angeles, the crime of PROCURING OR
20 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
21 a felony, was committed by VERONICA TORO and ANA TORO, who did unlawfully and
22 knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in
23 a public office in California, which instrument, if genuine, might be filed, registered, and
24 recorded under a law of California or the United States, to wit: Grant Deed from Roy and
25 Rebecca Putnam to Patricia Torres and Yolanda Avalos.

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COUNT 25

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 21, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Nicole Mejia Bankruptcy Petition.

COUNT 26

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 21, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Nicole Mejia Statement of Social Security Number.

COUNT 27

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 24, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Nicole Mejia and Rebecca Herrera.

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COUNT 28

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 18, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Rebecca Herrera Bankruptcy Petition.

COUNT 29

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 18, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Rebecca Herrera Statement of Social Security Number.

COUNT 30

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about October 31, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, EMMANUEL LOPEZ, EDUARDO TORO, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Miguel Barajas Bankruptcy Petition.

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COUNT 31

IDENTITY THEFT (Re: Miguel Barajas)

On or about October 31, 2016, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by VERONICA TORO, EMMANUEL LOPEZ, EDUARDO TORO, and GLADYS VELASQUEZ, who did willfully and unlawfully obtain personal identifying information of Miguel Barajas and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Miguel Barajas, to wit: Miguel Barajas Bankruptcy Petition.

COUNT 32

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about October 31, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, EMMANUEL LOPEZ, EDUARDO TORO, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Miguel Barajas Statement of Social Security Number.

COUNT 33

IDENTITY THEFT (Re: Miguel Barajas)

On or about October 31, 2016, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by VERONICA TORO, EMMANUEL LOPEZ, EDUARDO TORO, and GLADYS VELASQUEZ, who did willfully and unlawfully obtain personal identifying information of Miguel Barajas and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Miguel Barajas, to wit: Miguel Barajas Statement of Social Security Number.

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COUNT 34

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 4, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO and EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Miguel Barajas and Rocio Villa.

COUNT 35

IDENTITY THEFT (Re: Miguel Barajas)

On or about November 4, 2016, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by VERONICA TORO and EMMANUEL LOPEZ, who did willfully and unlawfully obtain personal identifying information of Miguel Barajas and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Miguel Barajas, to wit: Grant Deed from Roy and Rebecca Putnam to Miguel Barajas and Rocio Villa.

COUNT 36

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 9, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Filomena Campos Bankruptcy Petition.

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COUNT 37

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 9, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Filomena Campos Statement of Social Security Number.

COUNT 38

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 3, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Brenda Scott Bankruptcy Petition.

COUNT 39

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 3, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Brenda Scott Statement of Social Security Number.

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COUNT 40

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 5, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Roy and Rebecca Putnam to Brenda Scott and Filomena Campos.

COUNT 41

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about April 19, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Brenda Scott and Filomena Campos to Roy and Rebecca Putnam.

COUNT 42

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about April 19, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, FILIVERTO GOMEZ, EMMANUEL LOPEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Rebecca Herrera, Nicole Mejia, Rocio Villa, and Miguel Barajas to Roy and Rebecca Putnam.

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COUNT 43

IDENTITY THEFT (Re: Miguel Barajas)

On or about April 19, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by VERONICA TORO, FILIVERTO GOMEZ, EMMANUEL LOPEZ, and GLADYS VELASQUEZ, who did willfully and unlawfully obtain personal identifying information of Miguel Barajas and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Miguel Barajas, to wit: Grant Deed from Rebecca Herrera, Nicole Mejia, Rocio Villa, and Miguel Barajas to Roy and Rebecca Putnam.

COUNT 44

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about April 19, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Martha Rodriguez, Samantha Ruiz, Yolanda Avalos, and Patricia Torres to Roy and Rebecca Putnam.

COUNT 45

GRAND THEFT OF PERSONAL PROPERTY (Re: Roy and Rebecca Putnam)

On or about and between June 28, 2011 and April 19, 2017, in the Counties of Los Angeles, Riverside, and San Diego, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, MARIA GILL, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully take personal property of another

1 of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: money from Roy and Rebecca
2 Putnam.

3 **COUNT 46**

4 **GRAND THEFT FROM ELDER OR DEPENDENT ADULT**

5 On or about and between June 28, 2011 and April 19, 2017, in the Counties of Los Angeles,
6 Riverside, and San Diego, the crime of GRAND THEFT FROM ELDER OR DEPENDENT
7 ADULT, in violation of Penal Code section 368(d), a felony, was committed by EDUARDO
8 TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO
9 GOMEZ, MARIA GILL, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did
10 unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the
11 property and personal identifying information of an elder and dependent adult, said property,
12 money, labor, goods, and services taken and obtained having a value exceeding \$950, and knew
13 and reasonably should have known that said person, Rebecca Putnam, was an elder and
14 dependent adult.

15 **COUNT 47**

16 **GRAND THEFT FROM ELDER OR DEPENDENT ADULT**

17 On or about and between June 28, 2011 and April 19, 2017, in the Counties of Los Angeles,
18 Riverside, and San Diego, the crime of GRAND THEFT FROM ELDER OR DEPENDENT
19 ADULT, in violation of Penal Code section 368(d), a felony, was committed by EDUARDO
20 TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO
21 GOMEZ, MARIA GILL, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did
22 unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the
23 property and personal identifying information of an elder and dependent adult, said property,
24 money, labor, goods, and services taken and obtained having a value exceeding \$950, and knew
25 and reasonably should have known that said person, Roy Putnam, was an elder and dependent
26 adult.

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COUNT 48

GRAND THEFT OF REAL PROPERTY

On or about and between June 28, 2011 and April 19, 2017, in the Counties of Los Angeles, Riverside, and San Diego, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, MARIA GILL, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully take certain real property, to wit: a residence located at 12601 Sparwood Lane, La Mirada, California 90638, of a value exceeding Nine Hundred Fifty Dollars (\$950), the property of: Wells Fargo Bank, National Association.

TOLLING OF THE STATUTE OF LIMITATIONS

Statute of Limitations – Discovery Within Four Years (Penal Code, §§ 801.5, 803(c))

It is further alleged, as to Counts 1 to 29 that are subject to Penal Code section 803(c), that the above violation was not discovered until January 8, 2019, by HUD Special Agent Bladimir Alex Daza (“SA Daza”).

It is alleged in counts 1 through 136, that defendants EDUARDO TORO, ANA TORO, VERONICA TORO, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, MARIA GIL, FILIVERTO GOMEZ, LETICIA MORA, and EMMANUEL LOPEZ, (hereinafter collectively referred to as “defendants”), who are listed in this Indictment, Procured or Offered False or Forged Instruments for Record (Penal Code section 115), committed Identity Theft (Penal Code section 530.5(a)), Grand Theft from Elder (Penal Code section 368(d)), Grand Theft (Penal Code section 487(a)), and Conspired (Penal Code section 182) to do the same. It is alleged that these crimes were committed with the intent to defraud homeowners, banks, and the State and Federal Court systems.

On March 21, 2018, SA Daza was present for an investigative interview regarding a loan modification and foreclosure rescue scheme of homeowners named Esteban Corona Morales and Maria Alejandra Navarro (husband and wife). During the interview, Ms. Navarro stated she direct deposited \$700 per month into Eduardo Toro’s bank account. She further stated Eduardo Toro would change the title of the property into various individual’s names. Ms. Navarro showed

1 SA Daza a stack of mail, including Notice of Trustee's Sales, in the name of Sandra Sanchez and
2 Yolanda Avalos. She also provided SA Daza Eduardo Toro's name and a phone number. This
3 was the first time SA Daza learned of Eduardo Toro's name.

4 Between July 6, 2018 and July 31, 2018, SA Daza visited the Orange County Recorder's
5 Office and searched for the names of Sandra Sanchez and Yolanda Avalos. He reviewed the
6 County Recorder's database and noticed that these names were used in grant deeds for several
7 different properties in Orange County. He expanded his search to the Los Angeles, San Diego,
8 Riverside, and San Bernardino Recorder's Offices for these names, and others, and noticed a
9 similar pattern.

10 On August 23, 2018, SA Daza met with Michele Saffari, Paralegal Specialist, Office of the
11 United States Trustee who explained the bankruptcy process and common foreclosure schemes.

12 SA Daza provided bankruptcy petitions for Saffari's review and discovered some bankruptcy
13 petitions were filed by third parties identified as Eduardo Toro and Veronica Romero Marquez.

14 On October 3, 2018, SA Daza served an Inspector General subpoena to Abacus Credit
15 Counseling to obtain credit counseling certificate payment information pertaining to bankruptcies
16 Eduardo Toro and Veronica Romero filed on behalf of bankruptcy debtors. SA Daza discovered
17 that Eduardo Toro and his wife, Ana Toro, paid for numerous credit counseling certificates.

18 On November 20, 2018, SA Daza interviewed Roman Williams, who provided SA Daza
19 with a copy of a letter received from Bell Professional Services ("BPS"). The letter referenced a
20 grant deed notarized by Veronica Romero Marquez. The grant deed prepared to remove the
21 names of people that had a fractional interest in Williams' property. Williams stated he paid BPS
22 \$1,000 per month to save his home from foreclosure. Williams explained BPS deeded partial
23 interest of his property to individuals who had bankruptcy claims pending. This would cloud title
24 and delay the foreclosure of the home.

25 On January 8, 2019, SA Daza received and reviewed Social Security Administration
26 records that were requested about one month prior. Upon receipt and review of those records, he
27 noticed that the social security numbers being used on multiple bankruptcy documents were not
28 assigned to the debtors' names.

1 On August 5, 2019, search warrants were served on Bank of America and Wells Fargo
2 Bank for bank records and signature card information related to Eduardo Toro and Veronica
3 Toro. That same day, search warrants were also served on Oath Holdings, Inc. (formerly Yahoo)
4 and Google, Inc. for related email accounts and on Abacus Credit Counseling. SA Daza
5 subsequently reviewed the search warrant documents.

6 As reflected in this Indictment, defendants continued their crimes and counts are charged
7 through 2019. For the Procuring or Offering a False or Forged Document, Grand Theft from
8 Elder, Grand Theft, and Identity Theft charges, the counts in this Indictment that occurred less
9 than four years ago fall within the statute of limitations based on the date of their commission
10 without reference to tolling due to the date of discovery. For the Conspiracy charges, the counts
11 in this Indictment that have an overt act that occurred within three years of finding this Indictment
12 are within the statute of limitations based on the date of their commission without reference to
13 tolling due to the date of discovery.

14 For Counts 1 to 29 alleged to have occurred before January 8, 2019, it is alleged that no
15 victim of said violation and no law enforcement agency chargeable with the investigation and
16 prosecution of said violation had actual or constructive knowledge of said violation prior to said
17 date because SA Daza had not discovered their names or association with the defendants.

18 **[3423 SADDLEBACK COURT, SANTA ANA, CALIFORNIA 92704]**

19 **COUNT 49**

20 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

21 On or about August 14, 2013, in the County of San Diego, the crime of PROCURING OR
22 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
23 a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure
24 and offer a false and forged instrument to be filed, registered, and recorded in a public office in
25 California, which instrument, if genuine, might be filed, registered, and recorded under a law of
26 California or the United States, to wit: Maria Torres Bankruptcy Petition.

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COUNT 50

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 14, 2013, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Maria Torres Statement of Social Security Number.

COUNT 51

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 8, 2016, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Lucy Ramirez to Samantha Ruiz.

COUNT 52

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about May 9, 2016, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by VERONICA ROMERO MARQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Lucy Ramirez to Patricia Torres.

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COUNT 53

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 16, 2016, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Lucy Ramirez to Rebecca Herrera.

COUNT 54

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 16, 2016, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Maria Torres and Pablo Torres to Lucy Ramirez.

COUNT 55

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 22, 2016, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Samantha Ruiz, Patricia Torres, and Rebecca Herrera to Lucy Ramirez.

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COUNT 56

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 9, 2017, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Lucy Ramirez to Brenda Scott and Yolanda Avalos.

COUNT 57

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about March 21, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Joann Gonzalez Bankruptcy Petition.

COUNT 58

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about March 21, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO and ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Joann Gonzalez Statement of Social Security Number.

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COUNT 59

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about April 28, 2017, in the County of Orange, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by FILIVERTO GOMEZ and EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Lucy Ramirez to Joann Gonzalez.

COUNT 60

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 29, 2017, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Oliver Garcia Bankruptcy Petition.

COUNT 61

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 29, 2017, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Oliver Garcia Statement of Social Security Number.

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COUNT 62

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 24, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Joann Gonzalez Bankruptcy Petition.

COUNT 63

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about August 24, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by ANA TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Joann Gonzalez Statement of Social Security Number.

COUNT 64

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 19, 2017, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Oliver Garcia Bankruptcy Petition.

COUNT 65

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 19, 2017, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section

1 115(a), a felony, was committed by EDUARDO TORO, who did unlawfully and knowingly
2 procure and offer a false and forged instrument to be filed, registered, and recorded in a public
3 office in California, which instrument, if genuine, might be filed, registered, and recorded under a
4 law of California or the United States, to wit: Oliver Garcia Statement of Social Security Number.

5 **COUNT 66**

6 **GRAND THEFT OF PERSONAL PROPERTY (Re: Luz Ramirez)**

7 On or about and between April 11, 2012 and September 19, 2017, in the Counties of
8 Orange, Riverside, Los Angeles, and San Diego, the crime of GRAND THEFT, in violation of
9 Penal Code section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO,
10 VERONICA TORO, VERONICA ROMERO MARQUEZ, FILIVERTO GOMEZ, and GLADYS
11 VELASQUEZ, who did unlawfully take personal property of another of a value exceeding Nine
12 Hundred Fifty Dollars (\$950), to wit: money from Luz Ramirez.

13 **COUNT 67**

14 **GRAND THEFT OF REAL PROPERTY**

15 On or about and between April 11, 2012 and September 19, 2017, in the Counties of
16 Orange, Riverside, Los Angeles, and San Diego, the crime of GRAND THEFT, in violation of
17 Penal Code section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO,
18 VERONICA TORO, VERONICA ROMERO MARQUEZ, FILIVERTO GOMEZ, and GLADYS
19 VELASQUEZ, who did unlawfully take certain real property, to wit: a residence located at 3423
20 Saddleback Court, Santa Ana, California 92704, of a value exceeding Nine Hundred Fifty Dollars
21 (\$950), the property of: Wells Fargo Bank, National Association.

22 **TOLLING OF THE STATUTE OF LIMITATIONS**

23 **Statute of Limitations – Discovery Within Four Years (Penal Code, §§ 801.5, 803(c))**

24 It is further alleged, as to Counts 49 to 54 that are subject to Penal Code section 803(c), that
25 the above violation was not discovered until January 8, 2019, by HUD Special Agent Bladimir
26 Alex Daza ("SA Daza").

27 It is alleged in counts 1 through 136, that defendants EDUARDO TORO, ANA TORO,
28 VERONICA TORO, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, MARIA

1 GIL, FILIVERTO GOMEZ, LETICIA MORA, and EMMANUEL LOPEZ, (hereinafter
2 collectively referred to as “defendants”), who are listed in this Indictment, Procured or Offered
3 False or Forged Instruments for Record (Penal Code section 115), committed Identity Theft
4 (Penal Code section 530.5(a)), Grand Theft from Elder (Penal Code section 368(d)), Grand Theft
5 (Penal Code section 487(a)), and Conspired (Penal Code section 182) to do the same. It is alleged
6 that these crimes were committed with the intent to defraud homeowners, banks, and the State
7 and Federal Court systems.

8 On March 21, 2018, SA Daza was present for an investigative interview regarding a loan
9 modification and foreclosure rescue scheme of homeowners named Esteban Corona Morales and
10 Maria Alejandra Navarro (husband and wife). During the interview, Ms. Navarro stated she
11 direct deposited \$700 per month into Eduardo Toro’s bank account. She further stated Eduardo
12 Toro would change the title of the property into various individual’s names. Ms. Navarro showed
13 SA Daza a stack of mail, including Notice of Trustee’s Sales, in the name of Sandra Sanchez and
14 Yolanda Avalos. She also provided SA Daza Eduardo Toro’s name and a phone number. This
15 was the first time SA Daza learned of Eduardo Toro’s name.

16 Between July 6, 2018 and July 31, 2018, SA Daza visited the Orange County Recorder’s
17 Office and searched for the names of Sandra Sanchez and Yolanda Avalos. He reviewed the
18 County Recorder’s database and noticed that these names were used in grant deeds for several
19 different properties in Orange County. He expanded his search to the Los Angeles, San Diego,
20 Riverside, and San Bernardino Recorder’s Offices for these names, and others, and noticed a
21 similar pattern.

22 On August 23, 2018, SA Daza met with Michele Saffari, Paralegal Specialist, Office of the
23 United States Trustee who explained the bankruptcy process and common foreclosure schemes.
24 SA Daza provided bankruptcy petitions for Saffari’s review and discovered some bankruptcy
25 petitions were filed by third parties identified as Eduardo Toro and Veronica Romero Marquez.

26 On October 3, 2018, SA Daza served an Inspector General subpoena to Abacus Credit
27 Counseling to obtain credit counseling certificate payment information pertaining to bankruptcies
28

1 Eduardo Toro and Veronica Romero filed on behalf of bankruptcy debtors. SA Daza discovered
2 that Eduardo Toro and his wife, Ana Toro, paid for numerous credit counseling certificates.

3 On November 20, 2018, SA Daza interviewed Roman Williams, who provided SA Daza
4 with a copy of a letter received from Bell Professional Services ("BPS"). The letter referenced a
5 grant deed notarized by Veronica Romero Marquez. The grant deed prepared to remove the
6 names of people that had a fractional interest in Williams' property. Williams stated he paid BPS
7 \$1,000 per month to save his home from foreclosure. Williams explained BPS deeded partial
8 interest of his property to individuals who had bankruptcy claims pending. This would cloud title
9 and delay the foreclosure of the home.

10 On January 8, 2019, SA Daza received and reviewed Social Security Administration
11 records that were requested about one month prior. Upon receipt and review of those records, he
12 noticed that the social security numbers being used on multiple bankruptcy documents were not
13 assigned to the debtors' names.

14 On August 5, 2019, search warrants were served on Bank of America and Wells Fargo
15 Bank for bank records and signature card information related to Eduardo Toro and Veronica
16 Toro. That same day, search warrants were also served on Oath Holdings, Inc. (formerly Yahoo)
17 and Google, Inc. for related email accounts and on Abacus Credit Counseling. SA Daza
18 subsequently reviewed the search warrant documents.

19 As reflected in this Indictment, defendants continued their crimes and counts are charged
20 through 2019. For the Procuring or Offering a False or Forged Document, Grand Theft from
21 Elder, Grand Theft, and Identity Theft charges, the counts in this Indictment that occurred less
22 than four years ago fall within the statute of limitations based on the date of their commission
23 without reference to tolling due to the date of discovery. For the Conspiracy charges, the counts
24 in this Indictment that have an overt act that occurred within three years of finding this Indictment
25 are within the statute of limitations based on the date of their commission without reference to
26 tolling due to the date of discovery.

27 For Counts 49 to 54 alleged to have occurred before January 8, 2019, it is alleged that no
28 victim of said violation and no law enforcement agency chargeable with the investigation and

1 prosecution of said violation had actual or constructive knowledge of said violation prior to said
2 date because SA Daza had not discovered their names or association with the defendants.

3 [9584 OVIEDO STREET, SAN DIEGO, CALIFORNIA 92129]

4 COUNT 68

5 CONSPIRACY (Re: Danny and Zenaida Aquinde)

6 On or about and between July 26, 2010 and May 28, 2019, in the Counties of Orange, Los
7 Angeles, Riverside, and San Diego, the crime of CONSPIRACY, in violation of Penal Code
8 section 182(a)(1), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
9 ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ,
10 and EMMANUEL LOPEZ who did willfully and unlawfully conspire together and with another
11 person or persons whose identity is unidentified to commit the crimes of GRAND THEFT, in
12 violation of Penal Code section 487(a), a felony, pursuant to and for the purposes of carrying out
13 the objects and purposes of the aforesaid conspiracy, said defendants and other co-conspirators
14 committed the following overt act(s):

15 1. On or about July 26, 2010, an unidentified co-conspirator filed a Bankruptcy Petition in
16 the name of Carmen Vargas.

17 2. On or about July 26, 2010, an unidentified co-conspirator filed a Statement of Social
18 Security Number related to the bankruptcy in the name of Carmen Vargas.

19 3. On or about October 14, 2010, FILIVERTO GOMEZ notarized a Grant Deed
20 transferring one percent (1%) of the property located at 9584 Oviedo Street, San Diego, CA
21 92129 from Danny and Zenaida Aquinde to Lakisha Jones.

22 4. On or about October 14, 2010, an unidentified co-conspirator filed a Bankruptcy Petition
23 in the name of Lakisha Jones.

24 5. On or about October 14, 2010, an unidentified co-conspirator filed a Statement of Social
25 Security Number related to the bankruptcy in the name of Lakisha Jones.

26 6. On or about December 14, 2010, FILIVERTO GOMEZ notarized a Grant Deed
27 transferring the property located at 9584 Oviedo Street, San Diego, CA 92129 from Lakisha
28 Jones to Danny and Zenaida Aquinde.

1 7. On or about February 11, 2011, an unidentified co-conspirator filed a Bankruptcy
2 Petition in the name of Panlita Mutukun.

3 8. On or about February 11, 2011, an unidentified co-conspirator filed a Statement of
4 Social Security Number related to the bankruptcy in the name of Panlita Mutukun.

5 9. On or about February 24, 2011, FILIVERTO GOMEZ notarized a Grant Deed
6 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
7 92129 from Danny and Zenaida Aquinde to Panlita Mutukun.

8 10. On or about April 7, 2011, an unidentified co-conspirator filed a Bankruptcy Petition in
9 the name of Sam Marvick.

10 11. On or about April 7, 2011, an unidentified co-conspirator filed a Statement of Social
11 Security Number related to the bankruptcy in the name of Sam Marvick.

12 12. On or about April 27, 2011, FILIVERTO GOMEZ notarized a Grant Deed transferring
13 five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
14 Danny and Zenaida Aquinde to Sam Marvick.

15 13. On or about June 24, 2011, FILIVERTO GOMEZ notarized a Grant Deed transferring
16 five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
17 Danny and Zenaida Aquinde to Ernesto Quiroz.

18 14. On or about June 28, 2011, an unidentified co-conspirator filed a Bankruptcy Petition
19 in the name of Ernesto Quiroz.

20 15. On or about June 28, 2011 an unidentified co-conspirator filed a Statement of Social
21 Security Number related to the bankruptcy in the name of Ernesto Quiroz.

22 16. On or about July 6, 2011, ANA TORO paid for the credit counseling related to the
23 bankruptcy in the name of Ernesto Quiroz.

24 17. On or about August 3, 2011, an unidentified co-conspirator filed a Bankruptcy Petition
25 in the name of Ernesto Quiroz.

26 18. On or about August 3, 2011, an unidentified co-conspirator filed a Statement of Social
27 Security Number related to the bankruptcy in the name of Ernesto Quiroz.

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1 19. On or about January 9, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
2 in the name of Graciela Gomez.

3 20. On or about January 9, 2012, an unidentified co-conspirator filed a Statement of Social
4 Security Number related to the bankruptcy in the name of Graciela Gomez.

5 21. On or about February 14, 2012, FILIVERTO GOMEZ notarized a Grant Deed
6 transferring the property located at 9584 Oviedo Street, San Diego, CA 92129 from Panlita
7 Mutukun, Ernesto Quiroz, and Sam Marvick to Danny and Zenaida Aquinde.

8 22. On or about February 14, 2012, an unidentified co-conspirator filed a Bankruptcy
9 Petition in the name of Graciela Gomez.

10 23. On or about February 14, 2012, an unidentified co-conspirator filed a Statement of
11 Social Security Number related to the bankruptcy in the name of Graciela Gomez.

12 24. On or about February 14, 2012, FILIVERTO GOMEZ notarized a Grant Deed
13 transferring twenty percent (20%) of the property located at 9584 Oviedo Street, San Diego, CA
14 92129 from Danny and Zenaida Aquinde to Graciela Gomez and Genoveva Estrada.

15 25. On or about March 16, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
16 in the name of Genoveva Estrada.

17 26. On or about March 16, 2012, an unidentified co-conspirator filed a Statement of Social
18 Security Number related to the bankruptcy in the name of Genoveva Estrada.

19 27. On or about March 21, 2012, ANA TORO paid for the credit counseling related to the
20 bankruptcy in the name of Genoveva Estrada.

21 28. On or about April 23, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
22 in the name of Xavier Soto.

23 29. On or about April 23, 2012, an unidentified co-conspirator filed a Statement of Social
24 Security Number related to the bankruptcy in the name of Xavier Soto.

25 30. On or about April 27, 2012, FILIVERTO GOMEZ notarized a Grant Deed transferring
26 twenty percent (20%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
27 Danny and Zenaida Aquinde to Xavier Soto and Sergio Delgado.

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1 31. On or about June 1, 2012, an unidentified co-conspirator filed a Bankruptcy Petition in
2 the name of Sergio Delgado.

3 32. On or about June 1, 2012, an unidentified co-conspirator filed a Statement of Social
4 Security Number related to the bankruptcy in the name of Sergio Delgado.

5 33. On or about June 25, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
6 in the name of Xavier Soto.

7 34. On or about June 25, 2012, an unidentified co-conspirator filed a Statement of Social
8 Security Number related to the bankruptcy in the name of Xavier Soto.

9 35. On or about July 24, 2012, an unidentified co-conspirator filed a Bankruptcy Petition in
10 the name of Maria Soto.

11 36. On or about July 24, 2012, an unidentified co-conspirator filed a Statement of Social
12 Security Number in the name of Maria Soto.

13 37. On or about August 5, 2012, EDUARDO TORO paid for the credit counseling related
14 to the bankruptcy in the name of Maria Soto.

15 38. On or about August 6, 2012, FILIVERTO GOMEZ notarized a Grant Deed transferring
16 ten percent (10%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
17 Danny and Zenaida Aquinde to Maria Soto and Alberto Soto.

18 39. On or about August 6, 2012, FILIVERTO GOMEZ notarized a Grant Deed transferring
19 the property located at 9584 Oviedo Street, San Diego, CA 92129 from Genoveva Estrada,
20 Graciela Gomez, and Xavier Soto to Danny and Zenaida Aquinde.

21 40. On or about September 6, 2012, an unidentified co-conspirator filed a Bankruptcy
22 Petition in the name of Maria Soto.

23 41. On or about September 6, 2012, an unidentified co-conspirator filed a Statement of
24 Social Security Number related to the bankruptcy in the name of Maria Soto.

25 42. On or about October 2, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
26 in the name of Alberto Soto.

27 43. On or about October 2, 2012, an unidentified co-conspirator filed a Statement of Social
28 Security Number related to the bankruptcy in the name of Alberto Soto.

1 44. On or about November 16, 2012, an unidentified co-conspirator filed a Bankruptcy
2 Petition in the name of Alberto Soto.

3 45. On or about November 16, 2012, an unidentified co-conspirator filed a Statement of
4 Social Security Number related to the bankruptcy in the name of Alberto Soto.

5 46. On or about January 4, 2013, an unidentified co-conspirator filed a Bankruptcy Petition
6 in the name of Anabel Hernandez.

7 47. On or about January 4, 2013, an unidentified co-conspirator filed a Statement of Social
8 Security Number related to the bankruptcy in the name of Anabel Hernandez.

9 48. On or about February 13, 2013, FILIVERTO GOMEZ notarized a Grant Deed
10 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
11 92129 from Danny and Zenaida Aquinde to Anabel Hernandez and Pablo Torres.

12 49. On or about February 21, 2013, an unidentified co-conspirator filed a Bankruptcy
13 Petition in the name of Anabel Hernandez.

14 50. On or about February 21, 2013, an unidentified co-conspirator filed a Statement of
15 Social Security Number related to the bankruptcy in the name of Anabel Hernandez.

16 51. On or about June 24, 2013, FILIVERTO GOMEZ notarized a Grant Deed transferring
17 five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
18 Danny and Zenaida Aquinde to Maria Torres and Brenda Smith.

19 52. On or about June 26, 2013, an unidentified co-conspirator filed a Bankruptcy Petition
20 in the name of Maria Torres.

21 53. On or about June 26, 2013, an unidentified co-conspirator filed a Statement of Social
22 Security Number related to the bankruptcy in the name of Maria Torres.

23 54. On or about July 2, 2013, ANA TORO paid for the credit counseling related to the
24 bankruptcy in the name of Maria Torres.

25 55. On or about August 14, 2013, FILIVERTO GOMEZ filed a Bankruptcy Petition in the
26 name of Maria Torres.

27 56. On or about August 14, 2013, FILIVERTO GOMEZ filed a Statement of Social
28 Security Number related to the bankruptcy in the name of Maria Torres.

1 57. On or about September 24, 2013, an unidentified co-conspirator filed a Bankruptcy
2 Petition in the name of Brenda Smith.

3 58. On or about September 24, 2013, an unidentified co-conspirator filed a Statement of
4 Social Security Number related to the bankruptcy in the name of Brenda Smith.

5 59. On or about August 14, 2014, GLADYS VELASQUEZ sent an e-mail to EDUARDO
6 TORO asking "let me know if this is ok and do you want me to mail it out of scan it in with your
7 signature and email it back to you?" Attached to the e-mail was a letter dated August 14, 2014,
8 from EDUARDO TORO to Danny and Zenaida Aquinde.

9 60. On or about August 16, 2014, EDUARDO TORO sent an e-mail to Danny and Zenaida
10 Aquinde attached with a letter that stated, "our records so [sic] that you haven't made a payment
11 for the month of July 1, 2014 in the amount of \$1000.00 and also for the month of August 1, 2014
12 in the amount of \$1000.00 which brings your total to \$2000.00. Please check your records and
13 please send out your payment as soon as possible so we can continue services with you."

14 61. On or about February 17, 2015, VERONICA ROMERO MARQUEZ filed a
15 Bankruptcy Petition in the name of Amadeo Gomez.

16 62. On or about February 17, 2015, VERONICA ROMERO MARQUEZ filed a Statement
17 of Social Security Number related to the bankruptcy in the name of Amadeo Gomez.

18 63. On or about February 27, 2015, ANA TORO paid for the credit counseling related to
19 the bankruptcy in the name of Amadeo Gomez.

20 64. On or about April 3, 2015, Marvin Ochoa filed a Bankruptcy Petition in the name of
21 Amadeo Gomez.

22 65. On or about April 3, 2015, Marvin Ochoa filed a Statement of Social Security Number
23 related to the bankruptcy in the name of Amadeo Gomez.

24 66. On or about July 10, 2015, FILIVERTO GOMEZ notarized a Grant Deed transferring
25 five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
26 Danny and Zenaida Aquinde to Amadeo Gomez and Sarah Ruiz.

27 67. On or about July 14, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
28 Petition in the name of Sarah Ruiz.

1 68. On or about July 14, 2015, VERONICA ROMERO MARQUEZ filed a Statement of
2 Social Security Number related to the bankruptcy in the name of Sarah Ruiz.

3 69. On or about August 6, 2015, FILIVERTO GOMEZ notarized a Grant Deed transferring
4 the property located at 9584 Oviedo Street, San Diego, CA 92129 from Brenda Smith, Maria
5 Torres, and Pablo Torres to Danny and Zenaida Aquinde.

6 70. On or about October 7, 2015, FILIVERTO GOMEZ notarized a Grant Deed
7 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
8 92129 from Danny and Zenaida Aquinde to Lorraine Vargas and Samantha Ruiz.

9 71. On or about January 5, 2016, VERONICA ROMERO MARQUEZ filed a Bankruptcy
10 Petition in the name of Yesenia Fuentes.

11 72. On or about January 5, 2016, VERONICA ROMERO MARQUEZ filed a Statement of
12 Social Security Number related to the bankruptcy in the name of Yesenia Fuentes.

13 73. On or about January 7, 2016, FILIVERTO GOMEZ notarized a Grant Deed
14 transferring ten percent (10%) of the property located at 9584 Oviedo Street, San Diego, CA
15 92129 from Danny and Zenaida Aquinde to Yesenia Fuentes and Patricia Torres.

16 74. On or about January 19, 2016, an unidentified co-conspirator filed a Bankruptcy
17 Statements and Schedules in the name of Yesenia Fuentes, listing 9584 Oviedo Street, San Diego,
18 CA 92129 as an asset.

19 75. On or about January 19, 2016, ANA TORO paid for the credit counseling related to the
20 bankruptcy in the name of Yesenia Fuentes.

21 76. On or about February 1, 2016, VERONICA ROMERO MARQUEZ filed a Bankruptcy
22 Petition in the name of Samantha Ruiz.

23 77. On or about February 1, 2016, VERONICA ROMERO MARQUEZ filed a Statement
24 of Social Security Number related to the bankruptcy in the name of Samantha Ruiz.

25 78. On or about February 11, 2016, an unidentified co-conspirator filed a Bankruptcy
26 Statements and Schedules in the name of Samantha Ruiz, listing 9584 Oviedo Street, San Diego,
27 CA 92129 as an asset.

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1 79. On or about February 22, 2016, EDUARDO TORO filed a Bankruptcy Petition in the
2 name of Yesenia Fuentes.

3 80. On or about February 22, 2016, EDUARDO TORO filed a Statement of Social
4 Security Number related to the bankruptcy in the name of Yesenia Fuentes.

5 81. On or about April 29, 2016, VERONICA TORO filed a Bankruptcy Petition in the
6 name of Patricia Torres.

7 82. On or about April 29, 2016, VERONICA TORO filed a Statement of Social Security
8 Number related to the bankruptcy in the name of Patricia Torres.

9 83. On or about June 10, 2016, VERONICA TORO filed a Bankruptcy Petition in the
10 name of Monica Lara.

11 84. On or about June 10, 2016, VERONICA TORO filed a Statement of Social Security
12 Number related to the bankruptcy in the name of Monica Lara.

13 85. On or about June 10, 2016, FILIVERTO GOMEZ notarized a Grant Deed transferring
14 ten percent (10%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
15 Danny and Zenaida Aquinde to Monica Lara and Martha Herrera.

16 86. On or about July 8, 2016, EDUARDO TORO filed a Bankruptcy Petition in the name
17 of Maribel Cruz.

18 87. On or about July 8, 2016, EDUARDO TORO filed a Statement of Social Security
19 Number related to the bankruptcy in the name of Maribel Cruz.

20 88. On or about July 14, 2016, FILIVERTO GOMEZ notarized a Grant Deed transferring
21 ten percent (10%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
22 Danny and Zenaida Aquinde to Maribel Cruz and Paulina Chavez.

23 89. On or about July 22, 2016, an unidentified co-conspirator filed a Bankruptcy
24 Statements and Schedules in the name of Maribel Cruz, listing 9584 Oviedo Street, San Diego,
25 CA 92129 as an asset.

26 90. On or about August 22, 2016, EDUARDO TORO filed a Bankruptcy Petition in the
27 name of Monica Lara.

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1 91. On or about August 22, 2016, EDUARDO TORO filed a Statement of Social Security
2 Number related to the bankruptcy in the name of Monica Lara.

3 92. On or about September 7, 2016, EDUARDO TORO sent an e-mail to A&E
4 Professional Services, titled "Mannys client [sic]," attached with a Master Mailing List containing
5 Jose Buendia's personal information.

6 93. On or about November 10, 2016, VERONICA TORO filed a Bankruptcy Petition in
7 the name of Ernesto Mendoza.

8 94. On or about November 10, 2016, VERONICA TORO filed a Statement of Social
9 Security Number related to the bankruptcy in the name of Ernesto Mendoza.

10 95. On or about November 16, 2016, FILIVERTO GOMEZ notarized a Grant Deed
11 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
12 92129 from Danny and Zenaida Aquinde to Ernesto Mendoza and Yolanda Avalos.

13 96. On or about November 22, 2016, an unidentified co-conspirator filed a Bankruptcy
14 Statements and Schedules in the name of Ernesto Mendoza, listing 9584 Oviedo Street, San
15 Diego, CA 92129 as an asset.

16 97. On or about March 24, 2017, EDUARDO TORO filed a Bankruptcy Petition in the
17 name of Sandra Sanchez.

18 98. On or about March 24, 2017, EDUARDO TORO filed a Statement of Social Security
19 Number related to the bankruptcy in the name of Sandra Sanchez.

20 99. On or about March 27, 2017, EDUARDO TORO paid for the Grant Deed transferring
21 five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA 92129 from
22 Danny and Zenaida Aquinde to Sandra Sanchez and Jessica Morales.

23 100. On or about March 27, 2017, FILIVERTO GOMEZ notarized a Grant Deed
24 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
25 92129 from Danny and Zenaida Aquinde to Sandra Sanchez and Jessica Morales.

26 101. On or about April 5, 2017, EDUARDO TORO paid for the credit counseling related
27 to the bankruptcy in the name of Sandra Sanchez.

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1 102. On or about April 6, 2017, an unidentified co-conspirator filed a Bankruptcy
2 Statements and Schedules in the name of Sandra Sanchez, listing 9584 Oviedo Street, San Diego,
3 CA 92129 as an asset.

4 103. On or about May 4, 2017, Cynthia Ochoa filed a Bankruptcy Petition in the name of
5 Sandra Sanchez.

6 104. On or about May 4, 2017, Cynthia Ochoa filed a Statement of Social Security Number
7 related to the bankruptcy in the name of Sandra Sanchez.

8 105. On or about May 18, 2017, an unidentified co-conspirator filed a Bankruptcy
9 Statements and Schedules in the name of Sandra Sanchez, listing 9584 Oviedo Street, San Diego,
10 CA 92129 as an asset.

11 106. On or about September 8, 2017, EDUARDO TORO filed a Bankruptcy Petition in the
12 name of Jessica Morales.

13 107. On or about September 8, 2017, EDUARDO TORO filed a Statement of Social
14 Security Number related to the bankruptcy in the name of Jessica Morales.

15 108. On or about September 22, 2017, an unidentified co-conspirator filed a Bankruptcy
16 Statements and Schedules in the name of Jessica Morales, listing 9584 Oviedo Street, San Diego,
17 CA 92129 as an asset.

18 109. On or about November 14, 2017, EDUARDO TORO paid for the Grant Deed
19 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
20 92129 from Danny and Zenaida Aquinde to Maria Garcia and Iliana Lopez.

21 110. On or about November 14, 2017, FILIVERTO GOMEZ notarized a Grant Deed
22 transferring five percent (5%) of the property located at 9584 Oviedo Street, San Diego, CA
23 92129 from Danny and Zenaida Aquinde to Maria Garcia and Iliana Lopez.

24 111. On or about November 17, 2017, VERONICA TORO filed a Bankruptcy Petition in
25 the name of Maria Garcia.

26 112. On or about November 17, 2017, VERONICA TORO filed a Statement of Social
27 Security Number related to the bankruptcy in the name of Maria Garcia.

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1 113. On or about November 30, 2017, an unidentified co-conspirator filed a Bankruptcy
2 Statements and Schedules in the name of Maria Garcia, listing 9584 Oviedo Street, San Diego,
3 CA 92129 as an asset.

4 114. On or about November 30, 2017, ANA TORO paid for the credit counseling related to
5 the bankruptcy in the name of Maria Garcia.

6 115. On or about January 10, 2018, EDUARDO TORO paid for the credit counseling
7 related to the bankruptcy in the name of Iliana Lopez.

8 116. On or about February 9, 2018, ANA TORO filed a Bankruptcy Petition in the name of
9 Iliana Lopez.

10 117. On or about February 9, 2018, ANA TORO filed a Statement of Social Security
11 Number related to the bankruptcy in the name of Iliana Lopez.

12 118. On or about September 4, 2018, Cynthia Ochoa filed a Bankruptcy Petition in the
13 name of Aniceto Escobar.

14 119. On or about September 4, 2018, Cynthia Ochoa filed a Statement of Social Security
15 Number related to the bankruptcy in the name of Aniceto Escobar.

16 120. On or about September 12, 2018, FILIVERTO GOMEZ notarized a fraudulent Grant
17 Deed purportedly transferring ten percent (10%) of the property located at 9584 Oviedo Street,
18 San Diego, CA 92129 from Danny and Zenaida Aquinde to Aniceto Escobar and Maria Castillo.

19 121. On or about September 12, 2018, an unidentified co-conspirator sent via fax a
20 fraudulent Grant Deed purportedly transferring ten percent (10%) of the property located at 9584
21 Oviedo Street, San Diego, CA 92129 from Danny and Zenaida Aquinde to Aniceto Escobar and
22 Maria Castillo.

23 122. On or about September 18, 2018, ANA TORO paid for the credit counseling related
24 to the bankruptcy in the name of Aniceto Escobar.

25 123. On or about November 9, 2018, EDUARDO TORO filed a Bankruptcy Petition in the
26 name of Aniceto Escobar.

27 124. On or about November 9, 2018, EDUARDO TORO filed a Statement of Social
28 Security Number related to the bankruptcy in the name of Aniceto Escobar.

1 125. On or about November 20, 2018, an unidentified co-conspirator filed a Bankruptcy
2 Statements and Schedules in the name of Aniceto Escobar, listing 9584 Oviedo Street, San Diego,
3 CA 92129 as an asset.

4 126. On or about February 11, 2019, Hong Yol Kim filed a Bankruptcy Petition in the
5 name of Janet Lee.

6 127. On or about February 11, 2019, Hong Yol Kim filed a Statement of Social Security
7 Number related to the bankruptcy in the name of Janet Lee.

8 128. On or about February 13, 2019, Michael Rodriguez sent via fax a fraudulent Grant
9 Deed purportedly transferring the property located at 9584 Oviedo Street, San Diego, CA 92129
10 from Danny and Zenaida Aquinde to Janet Lee.

11 129. On or about April 3, 2019, an unidentified co-conspirator filed a Bankruptcy Petition
12 in the name of Cindy Diaz.

13 130. On or about April 3, 2019, an unidentified co-conspirator filed a Statement of Social
14 Security Number related to the bankruptcy in the name of Cindy Diaz.

15 131. On or about April 4, 2019, EDUARDO TORO sent via fax a fraudulent Grant Deed
16 purportedly transferring the property located at 9584 Oviedo Street, San Diego, CA 92129 from
17 Danny and Zenaida Aquinde to Cindy Diaz.

18 132. On or about May 23, 2019, an unidentified co-conspirator filed a Bankruptcy Petition
19 in the name of Alfonso Velasco.

20 133. On or about May 23, 2019, an unidentified co-conspirator filed a Statement of Social
21 Security Number related to the bankruptcy in the name of Alfonso Velasco.

22 134. On or about May 28, 2019, EDUARDO TORO sent via fax a fraudulent Grant Deed
23 purportedly transferring fifteen percent (15%) of the property located at 9584 Oviedo Street, San
24 Diego, CA 92129 from Danny and Zenaida Aquinde to Alfonso Velasco.

25 **COUNT 69**

26 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

27 On or about November 10, 2016, in the County of Orange, the crime of PROCURING OR
28 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),

1 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
2 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and
3 EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged
4 instrument to be filed, registered, and recorded in a public office in California, which instrument,
5 if genuine, might be filed, registered, and recorded under a law of California or the United States,
6 to wit: Ernesto Mendoza Bankruptcy Petition.

7 **COUNT 70**

8 **IDENTITY THEFT (Re: Ernesto Mendoza)**

9 On or about November 10, 2016, in the County of Orange, the crime of IDENTITY
10 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO
11 TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO
12 GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did willfully and
13 unlawfully obtain personal identifying information of Ernesto Mendoza and used that information
14 for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property,
15 and medical information without the consent of Ernesto Mendoza, to wit: Ernesto Mendoza
16 Bankruptcy Petition.

17 **COUNT 71**

18 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

19 On or about November 10, 2016, in the County of Orange, the crime of PROCURING OR
20 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
21 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
22 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and
23 EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged
24 instrument to be filed, registered, and recorded in a public office in California, which instrument,
25 if genuine, might be filed, registered, and recorded under a law of California or the United States,
26 to wit: Ernesto Mendoza Statement of Social Security Number.

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COUNT 72

IDENTITY THEFT (Re: Ernesto Mendoza)

On or about November 10, 2016, in the County of Orange, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did willfully and unlawfully obtain personal identifying information of Ernesto Mendoza and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Ernesto Mendoza, to wit: Ernesto Mendoza Statement of Social Security Number.

COUNT 73

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 16, 2016, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Danny G. Aquinde and Zenaida E. Aquinde to Ernesto Mendoza and Yolanda Avalos.

COUNT 74

IDENTITY THEFT (Re: Ernesto Mendoza)

On or about November 16, 2016, in the County of San Diego, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did willfully and unlawfully obtain personal identifying information of Ernesto Mendoza and used that information

1 for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property,
2 and medical information without the consent of Ernesto Mendoza, to wit: Grant Deed from
3 Danny G. Aquinde and Zenaida E. Aquinde to Ernesto Mendoza and Yolanda Avalos.

4 **COUNT 75**

5 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

6 On or about March 24, 2017, in the County of Los Angeles, the crime of PROCURING OR
7 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
8 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
9 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
10 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
11 and recorded in a public office in California, which instrument, if genuine, might be filed,
12 registered, and recorded under a law of California or the United States, to wit: Sandra Sanchez
13 Bankruptcy Petition.

14 **COUNT 76**

15 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

16 On or about March 24, 2017, in the County of Los Angeles, the crime of PROCURING OR
17 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
18 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
19 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
20 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
21 and recorded in a public office in California, which instrument, if genuine, might be filed,
22 registered, and recorded under a law of California or the United States, to wit: Sandra Sanchez
23 Statement of Social Security Number.

24 **COUNT 77**

25 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

26 On or about March 27, 2017, in the County of San Diego, the crime of PROCURING OR
27 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
28 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO

1 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
2 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
3 and recorded in a public office in California, which instrument, if genuine, might be filed,
4 registered, and recorded under a law of California or the United States, to wit: Grant Deed from
5 Danny G. Aquinde and Zenaida E. Aquinde to Sandra Sanchez and Jessica Morales.

6 **COUNT 78**

7 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

8 On or about May 4, 2017, in the County of Los Angeles, the crime of PROCURING OR
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
10 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
11 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did

12 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
13 and recorded in a public office in California, which instrument, if genuine, might be filed,
14 registered, and recorded under a law of California or the United States, to wit: Sandra Sanchez
15 Bankruptcy Petition.

16 **COUNT 79**

17 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

18 On or about May 4, 2017, in the County of Los Angeles, the crime of PROCURING OR
19 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
20 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
21 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
22 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
23 and recorded in a public office in California, which instrument, if genuine, might be filed,
24 registered, and recorded under a law of California or the United States, to wit: Sandra Sanchez
25 Statement of Social Security Number.

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COUNT 80

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 8, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Jessica Morales Bankruptcy Petition.

COUNT 81

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about September 8, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Jessica Morales Statement of Social Security Number.

COUNT 82

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about November 14, 2017, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed,

1 registered, and recorded under a law of California or the United States, to wit: Grant Deed from
2 Danny G. Aquinde and Zenaida E. Aquinde to Maria Garcia and Iliana Lopez.

3 **COUNT 83**

4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

5 On or about November 17, 2017, in the County of Los Angeles, the crime of PROCURING
6 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
7 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
8 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
9 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
10 and recorded in a public office in California, which instrument, if genuine, might be filed,
11 registered, and recorded under a law of California or the United States, to wit: Maria Garcia

12 Bankruptcy Petition.

13 **COUNT 84**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about November 17, 2017, in the County of Los Angeles, the crime of PROCURING
16 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
17 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
18 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
19 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
20 and recorded in a public office in California, which instrument, if genuine, might be filed,
21 registered, and recorded under a law of California or the United States, to wit: Maria Garcia
22 Statement of Social Security Number.

23 **COUNT 85**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about February 9, 2018, in the County of Los Angeles, the crime of PROCURING
26 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
27 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
28 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did

1 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
2 and recorded in a public office in California, which instrument, if genuine, might be filed,
3 registered, and recorded under a law of California or the United States, to wit: Iliana Lopez
4 Bankruptcy Petition.

5 **COUNT 86**

6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

7 On or about February 9, 2018, in the County of Los Angeles, the crime of PROCURING
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
9 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
10 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
11 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
12 and recorded in a public office in California, which instrument, if genuine, might be filed,
13 registered, and recorded under a law of California or the United States, to wit: Iliana Lopez
14 Statement of Social Security Number.

15 **COUNT 87**

16 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

17 On or about September 4, 2018, in the County of Los Angeles, the crime of PROCURING
18 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
19 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
20 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
21 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
22 and recorded in a public office in California, which instrument, if genuine, might be filed,
23 registered, and recorded under a law of California or the United States, to wit: Aniceto Escobar
24 Bankruptcy Petition.

25 **COUNT 88**

26 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

27 On or about September 4, 2018, in the County of Los Angeles, the crime of PROCURING
28 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section

1 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
2 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
3 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
4 and recorded in a public office in California, which instrument, if genuine, might be filed,
5 registered, and recorded under a law of California or the United States, to wit: Aniceto Escobar
6 Statement of Social Security Number.

7 **COUNT 89**

8 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

9 On or about November 9, 2018, in the County of Los Angeles, the crime of PROCURING
10 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
11 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
12 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
13 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
14 and recorded in a public office in California, which instrument, if genuine, might be filed,
15 registered, and recorded under a law of California or the United States, to wit: Aniceto Escobar
16 Bankruptcy Petition.

17 **COUNT 90**

18 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

19 On or about November 9, 2018, in the County of Los Angeles, the crime of PROCURING
20 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
21 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
22 MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, and GLADYS VELASQUEZ, who did
23 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
24 and recorded in a public office in California, which instrument, if genuine, might be filed,
25 registered, and recorded under a law of California or the United States, to wit: Aniceto Escobar
26 Statement of Social Security Number.

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1 **COUNT 91**

2 **GRAND THEFT OF PERSONAL PROPERTY (Re: Danny and Zenaida Aquinde)**

3 On or about and between July 26, 2010 and May 28, 2019, in the Counties of Orange, Los
4 Angeles, Riverside, and San Diego, the crime of GRAND THEFT, in violation of Penal Code
5 section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
6 ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ,
7 and EMMANUEL LOPEZ, who did unlawfully take personal property of another of a value
8 exceeding Nine Hundred Fifty Dollars (\$950), to wit: money from Danny G. Aquinde and
9 Zenaida E. Aquinde.

10 **COUNT 92**

11 **GRAND THEFT OF REAL PROPERTY**

12 On or about and between July 26, 2010 and May 28, 2019, in the Counties of Orange, Los
13 Angeles, Riverside, and San Diego, the crime of GRAND THEFT, in violation of Penal Code
14 section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
15 ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ,
16 and EMMANUEL LOPEZ, who did unlawfully take certain real property, to wit: a residence
17 located at 9584 Oviedo Street, San Diego, California 92129, of a value exceeding Nine Hundred
18 Fifty Dollars (\$950), the property of: HSBC Bank USA, National Association, as Trustee for
19 Fieldstone Mortgage Investment Trust, Series 2005-3.

20 **[4473 METTLER AVENUE, LOS ANGELES, CALIFORNIA 90011]**

21 **COUNT 93**

22 **CONSPIRACY**

23 On or about and between May 27, 2010 and February 19, 2019, in the Counties of Los
24 Angeles, San Diego, and Riverside, the crime of CONSPIRACY, in violation of Penal Code
25 section 182(a)(1), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
26 ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ,
27 and EMMANUEL LOPEZ, who did willfully and unlawfully conspire together and with another
28 person or persons whose identity is unidentified to commit the crimes of GRAND THEFT, in

1 violation of Penal Code section 487(a), a felony, pursuant to and for the purposes of carrying out
2 the objects and purposes of the aforesaid conspiracy, said defendants and other conspirators
3 committed the following overt act(s):

4 1. On or about May 27, 2010, an unidentified co-conspirator filed a Bankruptcy Petition in
5 the name of Diane Rivera.

6 2. On or about May 27, 2010, an unidentified co-conspirator filed a Statement of Social
7 Security Number related to the bankruptcy in the name of Diane Rivera.

8 3. On or about June 4, 2010, EDUARDO TORO sent an e-mail to VERONICA ROMERO
9 MARQUEZ stating "Deed for Angel, Isaac, and me...Have u [sic] got your book yet?? Ill [sic]
10 pick up the ones from Riverside tomorrow and can u [sic] file mines [sic] on Monday or
11 Tuesday?" EDUARDO TORO attached with that email three blank grand deeds, and one
12 transferred five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
13 California 90011 from EDUARDO TORO to Diane Rivera.

14 4. On or about June 7, 2010, VERONICA ROMERO MARQUEZ notarized a Grant Deed
15 transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
16 California 90011 from EDUARDO TORO to Diane Rivera.

17 5. On or about June 30, 2010, an unidentified co-conspirator filed a Bankruptcy Petition in
18 the name of Diane Rivera.

19 6. On or about July 12, 2010, ANA TORO's assistant, Viridiana, paid for the credit
20 counseling related to the bankruptcy in the name of Diane Rivera.

21 7. On or about November 30, 2010, EDUARDO TORO sent an e-mail to VERONICA
22 ROMERO MARQUEZ asking her to "file the following deeds," including a Grant Deed
23 transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
24 California 90011 from EDUARDO TORO to Otoniel Cermeno.

25 8. On or about December 1, 2010, VERONICA ROMERO MARQUEZ notarized a Grant
26 Deed transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
27 California 90011 from EDUARDO TORO to Otoniel Cermeno.

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1 9. On or about December 2, 2010, an unidentified co-conspirator filed a Bankruptcy
2 Petition in the name of Otoniel Cermeno.

3 10. On or about December 2, 2010, an unidentified co-conspirator filed a Statement of
4 Social Security Number related to the bankruptcy in the name of Otoniel Cermeno.

5 11. On or about December 13, 2010, FILIVERTO GOMEZ notarized a Grant Deed
6 transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
7 Diane Rivera to EDUARDO TORO.

8 12. On or about March 23, 2011, FILIVERTO GOMEZ notarized a Grant Deed
9 transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
10 Otoniel Cermeno to EDUARDO TORO.

11 13. On or about April 7, 2011, an unidentified co-conspirator filed a Bankruptcy Petition in
12 the name of Sam Marvick.

13 14. On or about April 7, 2011, an unidentified co-conspirator filed a Statement of Social
14 Security Number related to the bankruptcy in the name of Sam Marvick.

15 15. On or about April 12, 2011, VERONICA ROMERO MARQUEZ notarized a Grant
16 Deed transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
17 California 90011 from EDUARDO TORO to Sam Marvick.

18 16. On or about November 10, 2011, Martha Corona filed a Bankruptcy Petition in the
19 name of Miguel Sanchez Ortega.

20 17. On or about November 10, 2011, Martha Corona filed a Statement of Social Security
21 Number related to the bankruptcy in the name of Miguel Sanchez Ortega.

22 18. On or about November 18, 2011, FILIVERTO GOMEZ notarized a Grant Deed
23 transferring ten percent (10%) of the property located at 4473 Mettler Avenue, Los Angeles,
24 California 90011 from EDUARDO TORO to Miguel Sanchez and Graciela Gomez.

25 19. On or about November 23, 2011, EDUARDO TORO's brother, Gabriel Toro, paid for
26 the credit counseling related to the bankruptcy in the name of Miguel Sanchez Ortega.

27 20. On or about January 9, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
28 in the name of Graciela Gomez.

1 21. On or about January 9, 2012, an unidentified co-conspirator filed a Statement of Social
2 Security Number related to the bankruptcy in the name of Graciela Gomez.

3 22. On or about April 23, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
4 in the name of Xavier Soto.

5 23. On or about April 23, 2012, an unidentified co-conspirator filed a Statement of Social
6 Security Number related to the bankruptcy in the name of Xavier Soto.

7 24. On or about April 23, 2012, FILIVERTO GOMEZ notarized and VERONICA TORO
8 signed a Grant Deed transferring five percent (5%) of the property located at 4473 Mettler
9 Avenue, Los Angeles, California 90011 from EDUARDO TORO to Xavier Soto and Sergio
10 Delgado.

11 25. On or about June 1, 2012, an unidentified co-conspirator filed a Bankruptcy Petition in
12 the name of Sergio Delgado.

13 26. On or about June 1, 2012, an unidentified co-conspirator filed a Statement of Social
14 Security Number related to the bankruptcy in the name of Sergio Delgado.

15 27. On or about October 30, 2012, EDUARDO TORO sent an e-mail to VERONICA
16 ROMERO MARQUEZ entitled "my reversals" and stating "can u [sic] also file these with
17 Vasquez[?]" Two blank Grant Deeds were attached with the email, and one transferred the
18 property located at 4473 Mettler Avenue, Los Angeles, California 90011 from Miguel Sanchez
19 and Graciela Gomez to EDUARDO TORO.

20 28. On or about November 1, 2012, VERONICA ROMERO MARQUEZ notarized a Grant
21 Deed transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011
22 from Miguel Sanchez and Graciela Gomez to EDUARDO TORO.

23 29. On or about January 18, 2014, an unidentified co-conspirator filed a Bankruptcy
24 Petition in the name of Juan Gil and MARIA GIL.

25 30. On or about January 18, 2014, an unidentified co-conspirator filed a Statement of
26 Social Security Number related to the bankruptcy in the name of Juan Gil and MARIA GIL.

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1 31. On or about March 28, 2014, FILIVERTO GOMEZ notarized a Grant Deed
2 transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
3 Xavier Soto and Sergio Delgado to EDUARDO TORO.

4 32. On or about March 28, 2014, FILIVERTO GOMEZ notarized a Grant Deed
5 transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
6 Sam Marvick and Paul Moreno to EDUARDO TORO.

7 33. On or about June 3, 2014, GLADYS VELASQUEZ sent an e-mail to FILIVERTO
8 GOMEZ attached with several documents, including a blank Grant Deed transferring five percent
9 (5%) of the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
10 EDUARDO TORO to Madison Velasquez and Melissa Rojas.

11 34. On or about June 4, 2014, FILIVERTO GOMEZ notarized a Grant Deed transferring
12 five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles, California 90011
13 from EDUARDO TORO to Madison Velasquez and Melissa Rojas.

14 35. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
15 Petition in the name of Madison Velasquez.

16 36. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
17 Social Security Number related to the bankruptcy in the name of Madison Velasquez.

18 37. On or about June 23, 2014, ANA TORO paid for the credit counseling related to the
19 bankruptcy in the name of Madison Velasquez.

20 38. On or about July 29, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
21 Petition in the name of Melissa Rojas.

22 39. On or about July 29, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
23 Social Security Number related to the bankruptcy in the name of Melissa Rojas.

24 40. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
25 Bankruptcy Petition in the name of Juan Salazar Velasquez.

26 41. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
27 Statement of Social Security Number related to the bankruptcy in the name of Juan Salazar
28 Velasquez.

1 42. On or about September 26, 2014, ANA TORO paid for the credit counseling related to
2 the bankruptcy of Juan Salazar Velasquez.

3 43. On or about October 22, 2014, VERONICA ROMERO MARQUEZ notarized a Grant
4 Deed transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
5 California 90011 from EDUARDO TORO to Juan Salazar and Mark Daffin.

6 44. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
7 Petition in the name of Juan Salazar Velasquez.

8 45. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Statement
9 of Social Security Number related to the bankruptcy in the name of Juan Salazar Velasquez.

10 46. On or about December 11, 2014, GLADYS VELASQUEZ sent an e-mail to
11 VERONICA ROMERO MARQUEZ stating, "Here is the new deed" attached with an unsigned

12 Grant Deed transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los
13 Angeles, California 90011 from EDUARDO TORO to Juan Salazar and Mark Daffin.

14 47. On or about December 17, 2014, VERONICA ROMERO MARQUEZ sent an e-mail
15 to GLADYS VELASQUEZ stating, "I made a mistake in the amended sch[edule] for Salazar [sic]
16 I didn't [sic] know they were doing a reversal or something of that nature so the mortgage would
17 go on Schedule D and the property they lost on Schedule A. Go ahead and make the changes
18 [sic] send as soon as possible and we'll file by Friday."

19 48. On or about December 18, 2014, GLADYS VELASQUEZ responded to VERONICA
20 ROMERO MARQUEZ and stated, "I just talked with Eduardo Ill [sic] try to fix so we can have it
21 filed tomorrow."

22 49. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
23 Petition in the name of Mark Daffin.

24 50. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Statement
25 of Social Security Number related to the bankruptcy in the name of Mark Daffin.

26 51. On or about January 29, 2015, ANA TORO paid for the credit counseling related to the
27 bankruptcy of Mark Daffin.

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1 52. On or about March 23, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
2 Deed transferring five percent (5%) of the property located at 4473 Mettler Avenue, Los Angeles,
3 California 90011 from EDUARDO TORO to Mario Martin and Anastasia Morales.

4 53. On or about April 22, 2015, VERONICA ROMERO MARQUEZ notarized a
5 fraudulent Grant Deed purportedly transferring five percent (5%) of the property located at 4473
6 Mettler Avenue, Los Angeles, California 90011 from EDUARDO TORO to MARIA GIL.

7 54. On or about April 24, 2015, an unidentified co-conspirator sent via fax a fraudulent
8 Grant Deed purportedly transferring five percent (5%) of the property located at 4473 Mettler
9 Avenue, Los Angeles, California 90011 from EDUARDO TORO to MARIA GIL.

10 55. On or about April 27, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
11 Petition in the name of Mario Martin.

12 56. On or about April 27, 2015, VERONICA ROMERO MARQUEZ filed a Statement of
13 Social Security Number related to the bankruptcy in the name of Mario Martin.

14 57. On or about April 27, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
15 Deed transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011
16 from Juan Salazar Velasquez and Mark Daffin to EDUARDO TORO.

17 58. On or about April 27, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
18 Deed transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011
19 from Madison Velasquez and Melissa Rojas to EDUARDO TORO.

20 59. On or about October 10, 2016, GLADYS VELASQUEZ sent an e-mail to
21 EMMANUEL LOPEZ and Alma Lopez attached with a blank Statement of Social Security
22 Number related to the bankruptcy in the name of Tomas Cruz.

23 60. On or about October 11, 2016, EDUARDO TORO filed a Bankruptcy Petition in the
24 name of Tomas Cruz.

25 61. On or about October 11, 2016, EDUARDO TORO filed a Statement of Social Security
26 Number related to the bankruptcy in the name of Tomas Cruz.

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1 62. On or about October 11, 2016, GLADYS VELASQUEZ sent an e-mail to
2 EMMANUEL LOPEZ and Alma Lopez attached with a Notice of Bankruptcy Case Filing
3 confirmation in the name of Tomas Cruz.

4 63. On or about October 21, 2016, ANA TORO paid for the credit counseling related to the
5 bankruptcy of Tomas Cruz.

6 64. On or about February 14, 2017, VERONICA TORO filed a Bankruptcy Petition in the
7 name of Tomas Cruz.

8 65. On or about February 14, 2017, VERONICA TORO filed a Statement of Social
9 Security Number related to the bankruptcy in the name of Tomas Cruz.

10 66. On or about February 14, 2017, VERONICA TORO sent an e-mail to ANA TORO
11 stating, "I had to type documents again so I did not include all forms you sent me," attached with
12 bankruptcy documents in the name of Tomas Cruz.

13 67. On or about December 28, 2017, FILIVERTO GOMEZ notarized a Grant Deed
14 transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from
15 Mario Martin to EDUARDO TORO.

16 68. On or about September 27, 2018, an unidentified co-conspirator filed a Bankruptcy
17 Petition in the name of Tamera Cruz.

18 69. On or about September 27, 2018, an unidentified co-conspirator filed a Statement of
19 Social Security Number related to the bankruptcy in the name of Tamera Cruz.

20 70. On or about September 28, 2018, FILIVERTO GOMEZ notarized a fraudulent Grant
21 Deed purportedly transferring the property located at 4473 Mettler Avenue, Los Angeles,
22 California 90011 from EDUARDO TORO to Tamera Cruz.

23 71. On or about September 28, 2018, Michael Rodriguez sent via fax a fraudulent Grant
24 Deed purportedly transferring the property located at 4473 Mettler Avenue, Los Angeles,
25 California 90011 from EDUARDO TORO to Tamera Cruz.

26 72. On or about February 15, 2019, Lamont Douglas filed a Bankruptcy Petition in the
27 name of Lamar Douglas.

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73. On or about February 15, 2019, Lamont Douglas filed a Statement of Social Security Number related to the bankruptcy in the name of Lamar Douglas.

74. On or about February 19, 2019, EDUARDO TORO sent via fax a fraudulent Grant Deed purportedly transferring the property located at 4473 Mettler Avenue, Los Angeles, California 90011 from EDUARDO TORO to EDUARDO TORO and Lamar Douglas.

COUNT 94

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 14, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Tomas Cruz Bankruptcy Petition.

COUNT 95

IDENTITY THEFT (Re: Tomas Cruz)

On or about February 14, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did willfully and unlawfully obtain personal identifying information of Tomas Cruz and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Tomas Cruz, to wit: Tomas Cruz Bankruptcy Petition.

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COUNT 96

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 14, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Tomas Cruz Statement of Social Security Number.

COUNT 97

IDENTITY THEFT (Re: Tomas Cruz)

On or about February 14, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did willfully and unlawfully obtain personal identifying information of Tomas Cruz and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Tomas Cruz, to wit: Tomas Cruz Statement of Social Security Number.

COUNT 98

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 28, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ, and EMMANUEL LOPEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument,

1 if genuine, might be filed, registered, and recorded under a law of California or the United States,
2 to wit: Grant Deed from Mario Martin to EDUARDO TORO.

3 **COUNT 99**

4 **GRAND THEFT OF REAL PROPERTY**

5 On or about and between May 27, 2010 and February 19, 2019, in the Counties of Los
6 Angeles, San Diego, and Riverside, the crime of GRAND THEFT, in violation of Penal Code
7 section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
8 ROMERO MARQUEZ, VERONICA TORO, FILIVERTO GOMEZ, GLADYS VELASQUEZ,
9 and EMMANUEL LOPEZ, who did unlawfully take certain real property, to wit: a residence
10 located at 4473 Mettler Avenue, Los Angeles, California 90011, of a value exceeding Nine
11 Hundred Fifty Dollars (\$950), the property of: U.S. Bank, National Association, as Trustee for
12 Citigroup Mortgage Loan Trust, Inc.

13 **[5805 WHITNALL HIGHWAY, NORTH HOLLYWOOD, CALIFORNIA 91601]**

14 **COUNT 100**

15 **CONSPIRACY**

16 On or about and between September 15, 2014 and December 13, 2018, in the Counties of
17 Los Angeles and Riverside, the crime of CONSPIRACY, in violation of Penal Code section
18 182(a)(1), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
19 ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who
20 did willfully and unlawfully conspire together and with another person or persons whose identity
21 is unidentified to commit the crimes of GRAND THEFT, in violation of Penal Code section
22 487(a), a felony, pursuant to and for the purposes of carrying out the objects and purposes of the
23 aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

24 1. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
25 Bankruptcy Petition in the name of Juan Salazar Velasquez.

26 2. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a Statement
27 of Social Security Number related to the bankruptcy in the name of Juan Salazar Velasquez.

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1 3. On or about September 26, 2014, ANA TORO paid for the credit counseling related to
2 the bankruptcy in the name of Juan Salazar Velasquez.

3 4. On or about October 6, 2014, VERONICA ROMERO MARQUEZ notarized a Grant
4 Deed transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
5 Hollywood, CA 91601 from Jose Tobar to Melissa Rojas and Juan Salazar.

6 5. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
7 Petition in the name of Juan Salazar Velasquez.

8 6. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
9 Social Security Number related to the bankruptcy in the name of Juan Salazar Velasquez.

10 7. On or about December 9, 2014, VERONICA TORO sent an e-mail to GLADYS
11 VELASQUEZ asking, "Do you have Jose Tobar on the sale list for 12/11/2014."

12 8. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
13 Petition in the name of Mark Daffin.

14 9. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Statement of
15 Social Security Number related to the bankruptcy in the name of Mark Daffin.

16 10. On or about January 29, 2015, ANA TORO paid for the credit counseling related to the
17 bankruptcy in the name of Mark Daffin.

18 11. On or about February 11, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
19 Deed transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
20 Hollywood, CA 91601 from Jose Tobar to Mark Daffin and Mario Martin.

21 12. On or about March 10, 2015, MARIA GIL responded to a message sent from Mercy
22 Montalvo stating, "Sorry for the delay. I am sending you the receipt for payment for the month of
23 March. Sign and return via email or fax as soon as possible. The new sale date regarding your
24 property is pending. We will notify you immediately. In case we need your signature to
25 postpone the sale."

26 13. On or about April 1, 2015, VERONICA TORO sent an e-mail to ANA TORO asking,
27 "Can you check if the sale for him [Jose Tobar] will be postponed. He says select portfolio
28 calledhim [sic] stating the sale is for tomorrow. Check if bk [bankruptcy] is active ect [sic]."

1 That same day, ANA TORO responded stating, "Yes, I just spoke with the trustee sale has been
2 cancelled!!"

3 14. On or about April 27, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
4 Petition in the name of Mario Martin.

5 15. On or about April 27, 2015, VERONICA ROMERO MARQUEZ filed a Statement of
6 Social Security Number related to the bankruptcy in the name of Mario Martin.

7 16. On or about May 8, 2015, MARIA GIL sent an e-mail to Mercy Montalvo, attached
8 with an unsigned receipt, asking for the receipt to be signed and stating, "At present it seems there
9 is only one sale planned in the coming days. We will keep you informed as soon as we have
10 information. We will check next Monday."

11 17. On or about April 28, 2016, ANA TORO sent an e-mail to VERONICA TORO stating,
12 "Here is the new deed requested or [sic] Mr Tobar." Attached to the message was a Grant Deed
13 transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
14 Hollywood, CA 91601 from Jose Tobar to Patricia Torres and Maribel Cruz.

15 18. On or about April 29, 2016, VERONICA TORO filed a Bankruptcy Petition in the
16 name of Patricia Torres.

17 19. On or about April 29, 2016, VERONICA TORO filed a Statement of Social Security
18 Number related to the bankruptcy in the name of Patricia Torres.

19 20. On or about May 3, 2016, VERONICA TORO notarized a Grant Deed transferring ten
20 percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA 91601
21 from Jose Tobar to Patricia Torres and Maribel Cruz.

22 21. On or about May 3, 2016, VERONICA TORO paid for the Grant Deed transferring ten
23 percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA 91601
24 from Jose Tobar to Patricia Torres and Maribel Cruz.

25 22. On or about July 8, 2016, EDUARDO TORO filed a Bankruptcy Petition in the name
26 of Maribel Cruz.

27 23. On or about July 8, 2016, EDUARDO TORO filed a Statement of Social Security
28 Number related to the bankruptcy in the name of Maribel Cruz.

1 24. On or about July 19, 2016, VERONICA TORO sent an e-mail to GLADYS
2 VELASQUEZ stating, "Clients want to know if they need to sign a new deed for upcoming sale."
3 The following day, GLADYS VELASQUEZ replied, "We have good names for both your clients,
4 no new deeds needed!!"

5 25. On or about July 21, 2016, ANA TORO paid for the credit counseling related to the
6 bankruptcy in the name of Maribel Cruz.

7 26. On or about July 22, 2016, an unidentified co-conspirator filed a Bankruptcy
8 Statements and Schedules in the name of Maribel Cruz.

9 27. On or about September 13, 2016, MARIA GIL sent an e-mail to GLADYS
10 VELASQUEZ stating, "I checked property status for the above which shows cancelled sale date
11 as of July. However, client recently advised that there is a pending sale. Let me know if he needs
12 to come in for notary asap." That same day, GLADYS VELASQUEZ replied, "he just got a new
13 sale date for 9/29 [sic] I will send his new deed to next week."

14 28. On or about September 28, 2016, VERONICA TORO sent an e-mail to GLADYS
15 VELASQUEZ attached with a Grant Deed transferring ten percent (10%) of the property located
16 at 5805 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to Esmeralda Pacheco
17 and Sandra Sanchez, and a Bankruptcy Petition and Statement of Social Security Number in the
18 name of Esmeralda Pacheco.

19 29. On or about September 28, 2016, VERONICA TORO notarized a Grant Deed
20 transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
21 Hollywood, CA 91601 from Jose Tobar to Esmeralda Pacheco and Sandra Sanchez.

22 30. On or about September 28, 2016, VERONICA TORO paid for a Grant Deed
23 transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
24 Hollywood, CA 91601 from Jose Tobar to Esmeralda Pacheco and Sandra Sanchez.

25 31. On or about September 28, 2016, VERONICA TORO filed a Bankruptcy Petition in
26 the name of Esmeralda Pacheco.

27 32. On or about September 28, 2016, VERONICA TORO filed a Statement of Social
28 Security Number related to the bankruptcy in the name of Esmeralda Pacheco.

1 33. On or about October 11, 2016, ANA TORO paid for the credit counseling related to the
2 bankruptcy in the name of Esmeralda Pacheco.

3 34. On or about December 7, 2016, VERONICA TORO filed a Bankruptcy Petition in the
4 name of Esmeralda Pacheco.

5 35. On or about December 7, 2016, VERONICA TORO filed a Statement of Social
6 Security Number related to the bankruptcy in the name of Esmeralda Pacheco.

7 36. On or about January 3, 2017, ANA TORO sent an e-mail to VERONICA TORO
8 stating, "Here is the new deed for Rebecca Putnam, sale is scheduled for 1/6/17." That same day,
9 VERONICA TORO replied stating, "Can you tell me if Jose Tobar needs to sign a deed. He will
10 be living out of town."

11 37. On or about February 10, 2017, CYNTHIA OCHOA filed a Bankruptcy Petition in the
12 name of Rocio Villa.

13 38. On or about February 10, 2017, CYNTHIA OCHOA filed a Statement of Social
14 Security Number related to the bankruptcy in the name of Rocio Villa.

15 39. On or about February 23, 2017, ANA TORO paid for the credit counseling related to
16 the bankruptcy in the name of Rocio Villa.

17 40. On or about March 10, 2017, MARIA GIL sent an e-mail to GLADYS VELASQUEZ
18 asking, "Is there any document that the client must sign before the pending sale date?" On or
19 about March 13, 2017, GLADYS VELASQUEZ replied, "Here is Tobars [sic] deed. Sale date is
20 3/16." Attached with that email was a blank Grant Deed transferring ten percent (10%) of the
21 property located at 5805 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to
22 Rocio Villa and Yolanda Avalos.

23 41. On or about March 15, 2017, VERONICA TORO notarized a Grant Deed transferring
24 ten percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA
25 91601 from Jose Tobar to Rocio Villa and Yolanda Avalos.

26 42. On or about March 15, 2017, VERONICA TORO paid for the Grant Deed transferring
27 ten percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA
28 91601 from Jose Tobar to Rocio Villa and Yolanda Avalos.

1 43. On or about June 19, 2017, EDUARDO TORO filed a Bankruptcy Petition in the name
2 of Yolanda Avalos.

3 44. On or about June 19, 2017, EDUARDO TORO filed a Statement of Social Security
4 Number related to the bankruptcy in the name of Yolanda Avalos.

5 45. On or about September 8, 2017, EDUARDO TORO filed a Bankruptcy Petition in the
6 name of Jessica Morales.

7 46. On or about September 8, 2017, EDUARDO TORO filed a Statement of Social
8 Security Number related to the bankruptcy in the name of Jessica Morales.

9 47. On or about September 8, 2017, ANA TORO responded to a message from
10 VERONICA TORO approximately one week prior stating, "Here is Jose Tobar's new deed. Sale
11 date is 9/14." Attached to the message was a Grant Deed transferring ten percent (10%) of the
12 property located at 5805 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to
13 Jessica Morales and Carmen Savala.

14 48. On or about September 15, 2017, VERONICA TORO notarized a Grant Deed
15 transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
16 Hollywood, CA 91601 from Jose Tobar to Jessica Morales and Carmen Savala.

17 49. On or about October 19, 2017, EDUARDO TORO filed a Bankruptcy Petition in the
18 name of Carmen Savala.

19 50. On or about October 19, 2017, EDUARDO TORO filed a Statement of Social Security
20 Number related to the bankruptcy in the name of Carmen Savala.

21 51. On or about November 2, 2017, an unidentified co-conspirator filed a Bankruptcy
22 Statements and Schedules in the name of Carmen Savala.

23 52. On or about December 28, 2017, VERONICA TORO notarized a Grant Deed
24 transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North
25 Hollywood, CA 91601 from Jose Tobar to Iliana Lopez and Paulina Chavez.

26 53. On or about December 28, 2017, ANA TORO filed a Bankruptcy Petition in the name
27 of Iliana Lopez.

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1 54. On or about December 28, 2017, ANA TORO filed a Statement of Social Security
2 Number related to the bankruptcy in the name of Iliana Lopez.

3 55. On or about January 10, 2018, EDUARDO TORO paid for the credit counseling
4 related to the bankruptcy in the name of Iliana Lopez.

5 56. On or about March 14, 2018, VERONICA TORO sent an e-mail to Mercy Montalvo
6 stating, "Could you notify Jose we can charge the card. Everything is all right with the house, the
7 sale is canceled."

8 57. On or about May 7, 2018, EDUARDO TORO sent an e-mail to VERONICA TORO
9 with a copy of a Grant Deed transferring ten percent (10%) of the property located at 5805
10 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to Maria Lopez and Grace
11 Mendez.

12 58. On or about May 14, 2018, VERONICA TORO notarized a Grant Deed transferring
13 ten percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA
14 91601 from Jose Tobar to Maria Lopez and Grace Mendez.

15 59. On or about June 18, 2018, EDUARDO TORO filed a Bankruptcy Petition in the name
16 of Maria Lopez.

17 60. On or about June 18, 2018, EDUARDO TORO filed a Statement of Social Security
18 Number related to the bankruptcy in the name of Maria Lopez.

19 61. On or about July 10, 2018, VERONICA TORO sent an e-mail to EDUARDO TORO
20 stating, "Any paperwork required for Mr. Tobar to sign prior to sale date currently scheduled for
21 7/19/2018?"

22 62. On or about July 19, 2018, Cynthia Ochoa filed a Bankruptcy Petition in the name of
23 Grace Mendez.

24 63. On or about July 19, 2018, Cynthia Ochoa filed a Statement of Social Security Number
25 related to the bankruptcy in the name of Grace Mendez.

26 64. On or about July 31, 2018, ANA TORO paid for the credit counseling related to the
27 bankruptcy in the name of Grace Mendez.

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65. On or about August 30, 2018, Jose Alba filed a Bankruptcy Petition in the name of Esther Gonzalez.

66. On or about August 30, 2018, Jose Alba filed a Statement of Social Security Number related to the bankruptcy in the name of Esther Gonzalez.

67. On or about October 5, 2018, Jose Alba filed a Bankruptcy Petition in the name of Esther Gonzalez.

68. On or about October 5, 2018, Jose Alba filed a Statement of Social Security Number related to the bankruptcy in the name of Esther Gonzalez.

69. On or about October 29, 2018, VERONICA TORO notarized a fraudulent Grant Deed purportedly transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to Esther Gonzalez.

70. On or about October 29, 2018, an unidentified co-conspirator sent via fax a fraudulent Grant Deed purportedly transferring ten percent (10%) of the property located at 5805 Whitnall Highway, North Hollywood, CA 91601 from Jose Tobar to Esther Gonzalez.

71. On or about December 13, 2018, VERONICA TORO sent an e-mail to Mercy Montalvo stating, "Could you tell Jose Tobar that everything is all right with the property. Date canceled. Also let him know if we can charge on the card."

COUNT 101

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 7, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Esmeralda Pacheco Bankruptcy Petition.

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COUNT 102

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 7, 2016, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Esmeralda Pacheco Statement of Social Security Number.

COUNT 103

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 10, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Rocio Villa Bankruptcy Petition.

COUNT 104

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 10, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed,

1 registered, and recorded under a law of California or the United States, to wit: Rocio Villa
2 Statement of Social Security Number.

3 **COUNT 105**

4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

5 On or about March 15, 2017, in the County of Los Angeles, the crime of PROCURING OR
6 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
7 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
8 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
9 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
10 and recorded in a public office in California, which instrument, if genuine, might be filed,
11 registered, and recorded under a law of California or the United States, to wit: Grant Deed from
12 Jose Tobar to Rocio Villa and Yolanda Avalos.

13 **COUNT 106**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about June 19, 2017, in the County of Los Angeles, the crime of PROCURING OR
16 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
17 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
18 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
19 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
20 and recorded in a public office in California, which instrument, if genuine, might be filed,
21 registered, and recorded under a law of California or the United States, to wit: Yolanda Avalos
22 Bankruptcy Petition.

23 **COUNT 107**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about June 19, 2017, in the County of Los Angeles, the crime of PROCURING OR
26 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
27 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
28 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did

1 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
2 and recorded in a public office in California, which instrument, if genuine, might be filed,
3 registered, and recorded under a law of California or the United States, to wit: Yolanda Avalos
4 Statement of Social Security Number.

5 **COUNT 108**

6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

7 On or about September 15, 2017, in the County of Los Angeles, the crime of PROCURING
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
9 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
10 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
11 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
12 and recorded in a public office in California, which instrument, if genuine, might be filed,
13 registered, and recorded under a law of California or the United States, to wit: Grant Deed from
14 Jose Tobar to Jessica Morales and Carmen Savala.

15 **COUNT 109**

16 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

17 On or about October 19, 2017, in the County of Los Angeles, the crime of PROCURING
18 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
19 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
20 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
21 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
22 and recorded in a public office in California, which instrument, if genuine, might be filed,
23 registered, and recorded under a law of California or the United States, to wit: Carmen Savala
24 Bankruptcy Petition.

25 **COUNT 110**

26 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

27 On or about October 19, 2017, in the County of Los Angeles, the crime of PROCURING
28 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section

1 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
2 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
3 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
4 and recorded in a public office in California, which instrument, if genuine, might be filed,
5 registered, and recorded under a law of California or the United States, to wit: Carmen Savala
6 Statement of Social Security Number.

7 **COUNT 111**

8 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

9 On or about December 28, 2017, in the County of Los Angeles, the crime of PROCURING
10 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
11 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
12 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
13 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
14 and recorded in a public office in California, which instrument, if genuine, might be filed,
15 registered, and recorded under a law of California or the United States, to wit: Grant Deed from
16 Jose Tobar to Iliana Lopez and Paulina Chavez.

17 **COUNT 112**

18 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

19 On or about December 28, 2017, in the County of Los Angeles, the crime of PROCURING
20 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
21 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
22 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
23 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
24 and recorded in a public office in California, which instrument, if genuine, might be filed,
25 registered, and recorded under a law of California or the United States, to wit: Iliana Lopez
26 Bankruptcy Petition.

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COUNT 113

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 28, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Iliana Lopez Statement of Social Security Number.

COUNT 114

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about May 14, 2018, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed, registered, and recorded under a law of California or the United States, to wit: Grant Deed from Jose Tobar to Maria Lopez and Grace Mendez.

COUNT 115

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about June 18, 2018, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be filed,

1 registered, and recorded under a law of California or the United States, to wit: Maria Lopez
2 Bankruptcy Petition.

3 **COUNT 116**

4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

5 On or about June 18, 2018, in the County of Los Angeles, the crime of PROCURING OR
6 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
7 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
8 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
9 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
10 and recorded in a public office in California, which instrument, if genuine, might be filed,
11 registered, and recorded under a law of California or the United States, to wit: Maria Lopez
12 Statement of Social Security Number.

13 **COUNT 117**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about July 19, 2018, in the County of Los Angeles, the crime of PROCURING OR
16 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
17 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
18 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
19 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
20 and recorded in a public office in California, which instrument, if genuine, might be filed,
21 registered, and recorded under a law of California or the United States, to wit: Grace Mendez
22 Bankruptcy Petition.

23 **COUNT 118**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about July 19, 2018, in the County of Los Angeles, the crime of PROCURING OR
26 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
27 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
28 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did

1 unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered,
2 and recorded in a public office in California, which instrument, if genuine, might be filed,
3 registered, and recorded under a law of California or the United States, to wit: Grace Mendez
4 Statement of Social Security Number.

5 **COUNT 119**

6 **GRAND THEFT OF PERSONAL PROPERTY (Re: Jose Tobar)**

7 On or about and between September 15, 2014 and December 13, 2018, in the Counties of
8 Los Angeles and Riverside, the crime of GRAND THEFT, in violation of Penal Code section
9 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
10 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
11 unlawfully take personal property of another of a value exceeding Nine Hundred Fifty Dollars
12 (\$950), to wit: money from Jose Tobar.

13 **COUNT 120**

14 **GRAND THEFT OF REAL PROPERTY**

15 On or about and between September 15, 2014 and December 13, 2018, in the Counties of
16 Los Angeles and Riverside, the crime of GRAND THEFT, in violation of Penal Code section
17 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA ROMERO
18 MARQUEZ, VERONICA TORO, MARIA GILL, and GLADYS VELASQUEZ, who did
19 unlawfully take certain real property, to wit: a residence located at 5805 Whitnall Highway, North
20 Hollywood, California 91601, of a value exceeding Nine Hundred Fifty Dollars (\$950), the
21 property of: U.S. Bank, National Association, as Trustee for Home Equity Asset Trust 2006-7
22 Home Equity Pass-Through Certificates, Series 2006-7.

23 **[5621 LOCKHAVEN DRIVE, BUENA PARK, CALIFORNIA 90621]**

24 **COUNT 121**

25 **CONSPIRACY**

26 On or about and between March 30, 2011 and September 4, 2018, in the Counties of
27 Orange, Los Angeles, San Diego, and Riverside, the crime of CONSPIRACY, in violation of
28 Penal Code section 182(a)(1), a felony, was committed by EMMANUEL LOPEZ, EDUARDO

1 TORO, ANA TORO, VERONICA ROMERO MARQUEZ, and FILIVERTO GOMEZ, who did
2 willfully and unlawfully conspire together and with another person or persons whose identity is
3 unidentified to commit the crimes of GRAND THEFT, in violation of Penal Code section 487(a),
4 a felony, pursuant to and for the purposes of carrying out the objects and purposes of the
5 aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

6 1. On or about March 30, 2011, an unidentified co-conspirator filed a Bankruptcy Petition
7 in the name of EMMANUEL LOPEZ and Alma Lopez.

8 2. On or about March 30, 2011, EDUARDO TORO's brother, Gabriel Toro, paid for the
9 credit counseling related to the bankruptcy in the name of EMMANUEL LOPEZ and Alma
10 Lopez.

11 3. On or about June 7, 2011, EMMANUEL LOPEZ sent an e-mail to EDUARDO TORO
12 with a copy of the Notice of Stay of Proceedings filed in May 2011. In the message,
13 EMMANUEL LOPEZ stated, "Review this documents [sic] and give me a call back."

14 4. On or about September 2, 2011, an unidentified co-conspirator filed a Bankruptcy
15 Petition in the name of EMMANUEL LOPEZ and Alma Lopez.

16 5. On or about November 18, 2011, EMMANUEL LOPEZ sent an e-mail to EDUARDO
17 TORO with a copy of their "Proof of Claim – Auroroa Loan Services" for filing with the United
18 States Bankruptcy Court. In the message, EMMANUEL LOPEZ stated, "Call me when you
19 review this documents [sic]."

20 6. On or about January 6, 2012, FILIVERTO GOMEZ notarized a Grant Deed transferring
21 five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA 90621 from
22 EMMANUEL LOPEZ to Genoveva Estrada and Graciela Gomez.

23 7. On or about January 9, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
24 in the name of Graciela Gomez.

25 8. On or about January 9, 2012, an unidentified co-conspirator filed a Statement of Social
26 Security Number related to the bankruptcy in the name of Graciela Gomez.

27 9. On or about February 14, 2012, an unidentified co-conspirator filed a Bankruptcy
28 Petition in the name of Graciela Gomez.

1 10. On or about February 14, 2012, an unidentified co-conspirator filed a Statement of
2 Social Security Number related to the bankruptcy in the name of Graciela Gomez.

3 11. On or about March 16, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
4 in the name of Genoveva Estrada.

5 12. On or about March 16, 2012, an unidentified co-conspirator filed a Statement of Social
6 Security Number related to the bankruptcy in the name of Genoveva Estrada.

7 13. On or about March 21, 2012, ANA TORO paid for the credit counseling related to the
8 bankruptcy in the name of Genoveva Estrada.

9 14. On or about July 9, 2012, Dayana Rivera filed a Bankruptcy Petition in the name of
10 Tania Aboulhson.

11 15. On or about July 9, 2012, Dayana Rivera filed a Statement of Social Security Number
12 related to the bankruptcy in the name of Tania Aboulhson.

13 16. On or about July 16, 2012, FILIVERTO GOMEZ notarized a Grant Deed transferring
14 five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA 90621 from
15 EMMANUEL LOPEZ to Tania Aboulhson and Maria Soto.

16 17. On or about July 24, 2012, an unidentified co-conspirator filed a Bankruptcy Petition in
17 the name of Maria Soto.

18 18. On or about July 24, 2012, an unidentified co-conspirator filed a Statement of Social
19 Security Number related to the bankruptcy in the name of Maria Soto.

20 19. On or about August 5, 2012, EDUARDO TORO paid for the credit counseling related
21 to the bankruptcy in the name of Maria Soto.

22 20. On or about August 22, 2012, an unidentified co-conspirator filed a Bankruptcy
23 Petition in the name of Tania Aboulhson.

24 21. On or about August 22, 2012, an unidentified co-conspirator filed a Statement of Social
25 Security Number related to the bankruptcy in the name of Tania Aboulhson.

26 22. On or about September 6, 2012, an unidentified co-conspirator filed a Bankruptcy
27 Petition in the name of Maria Soto.

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1 23. On or about September 6, 2012, an unidentified co-conspirator filed a Statement of
2 Social Security Number related to the bankruptcy in the name of Maria Soto.

3 24. On or about October 2, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
4 in the name of Alberto Soto.

5 25. On or about October 2, 2012, an unidentified co-conspirator filed a Statement of Social
6 Security Number related to the bankruptcy in the name of Alberto Soto.

7 26. On or about November 16, 2012, an unidentified co-conspirator filed a Bankruptcy
8 Petition in the name of Alberto Soto.

9 27. On or about November 16, 2012, an unidentified co-conspirator filed a Statement of
10 Social Security Number related to the bankruptcy in the name of Alberto Soto.

11 28. On or about November 28, 2012, FILIVERTO GOMEZ notarized a Grant Deed
12 transferring five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA
13 90621 from EMMANUEL LOPEZ to Alberto Soto and Anabel Hernandez.

14 29. On or about December 16, 2012, EMMANUEL LOPEZ and Alma Lopez sent an e-
15 mail to EDUARDO TORO with a copy of their bankruptcy petition and credit report. In the
16 message, EMMANUEL LOPEZ and Alma Lopez stated, "just file [sic] Emergency, let me know
17 amount and account number a.s.a.p."

18 30. On or about January 4, 2013, an unidentified co-conspirator filed a Bankruptcy Petition
19 in the name of Anabel Hernandez.

20 31. On or about January 4, 2013, an unidentified co-conspirator filed a Statement of Social
21 Security Number related to the bankruptcy in the name of Anabel Hernandez.

22 32. On or about February 21, 2013, an unidentified co-conspirator filed a Bankruptcy
23 Petition in the name of Anabel Hernandez.

24 33. On or about February 21, 2013, an unidentified co-conspirator filed a Statement of
25 Social Security Number related to the bankruptcy in the name of Anabel Hernandez.

26 34. On or about December 9, 2013, VERONICA ROMERO MARQUEZ and Anna Elamin
27 filed a Bankruptcy Petition in the name of Anna Elamin.

28 ///

1 35. On or about December 9, 2013, VERONICA ROMERO MARQUEZ and Anna Elamin
2 filed a Statement of Social Security Number related to the bankruptcy in the name of Anna
3 Elamin.

4 36. On or about December 27, 2013, FILIVERTO GOMEZ notarized a Grant Deed
5 transferring five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA
6 90621 from EMMANUEL LOPEZ to Anna Elamin and Madison Velasquez.

7 37. On or about January 22, 2014, Alma Lopez requested a recording of an Affidavit of
8 Successor Trustee for the property located at 5621 Lockhaven Drive, Buena Park, CA 90621.

9 38. On or about January 22, 2014, EMMANUEL LOPEZ requested a recording of a
10 Substitute of Trustee and Full Reconveyance for the property located at 5621 Lockhaven Drive,
11 Buena Park, CA 90621.

12 39. On or about January 27, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
13 Petition in the name of Anna Elamin.

14 40. On or about January 27, 2014, VERONICA ROMERO MARQUEZ filed a Statement
15 of Social Security Number related to the bankruptcy in the name of Anna Elamin.

16 41. On or about May 1, 2014, EDUARDO TORO sent an e-mail to FILIVERTO GOMEZ
17 with a copy of a blank Grant Deed transferring five percent (5%) of the property located at 5621
18 Lockhaven Drive, Buena Park, CA 90621 from EMMANUEL LOPEZ to Kathleen Michaels and
19 Melissa Rojas.

20 42. On or about May 2, 2014, FILIVERTO GOMEZ notarized a Grant Deed transferring
21 five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA 90621 from
22 EMMANUEL LOPEZ to Kathleen Michaels and Melissa Rojas.

23 43. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
24 Petition in the name of Madison Velasquez.

25 44. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
26 Social Security Number related to the bankruptcy in the name of Madison Velasquez.

27 45. On or about June 23, 2014, ANA TORO paid for the credit counseling related to the
28 bankruptcy in the name of Madison Velasquez.

1 46. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
2 Bankruptcy Petition in the name of Juan Salazar Velasquez.

3 47. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
4 Statement of Social Security Number related to the bankruptcy in the name of Juan Salazar
5 Velasquez.

6 48. On or about September 26, 2014, ANA TORO paid for the credit counseling related to
7 the bankruptcy in the name of Juan Salazar Velasquez.

8 49. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
9 Petition in the name of Juan Salazar Velasquez.

10 50. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Statement
11 of Social Security Number related to the bankruptcy in the name of Juan Salazar Velasquez.

12 51. On or about November 27, 2014, EDUARDO TORO sent an e-mail to FILIVERTO
13 GOMEZ attached with a blank Grant Deed transferring five percent (5%) of the property located
14 at 5621 Lockhaven Drive, Buena Park, CA 90621 from EMMANUEL LOPEZ to Juan Salazar
15 and Mark Daffin, and stated "mannys [sic] deed."

16 52. On or about December 1, 2014, FILIVERTO GOMEZ notarized a Grant Deed
17 transferring five percent (5%) of the property located at 5621 Lockhaven Drive, Buena Park, CA
18 90621 from Emmanuel Lopez to Juan Salazar and Mark Daffin.

19 53. On or about December 1, 2014, FILIVERTO GOMEZ sent an e-mail to ANA TORO
20 attached with a complete Grant Deed transferring five percent (5%) of the property located at
21 5621 Lockhaven Drive, Buena Park, CA 90621 from EMMANUEL LOPEZ to Juan Salazar and
22 Mark Daffin.

23 54. On or about December 8, 2014, VERONICA ROMERO MARQUEZ filed a
24 Bankruptcy Petition in the name of Melissa Rojas.

25 55. On or about December 8, 2014, VERONICA ROMERO MARQUEZ filed a Statement
26 of Social Security Number related to the bankruptcy in the name of Melissa Rojas.

27 56. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
28 Petition in the name of Mark Daffin.

57. On or about January 20, 2015, VERONICA ROMERO MARQUEZ filed a Statement of Social Security Number related to the bankruptcy in the name of Mark Daffin.

58. On or about January 29, 2015, ANA TORO paid for the credit counseling related to the bankruptcy in the name of Mark Daffin.

59. On or about November 6, 2015, an unidentified co-conspirator filed a Bankruptcy Petition in the name of EMMANUEL LOPEZ and Alma Lopez.

60. On or about March 26, 2018, an unidentified co-conspirator filed a Bankruptcy Petition in the name of EMMANUEL LOPEZ.

61. On or about April 30, 2018, an unidentified co-conspirator filed a Bankruptcy Petition in the name of EMMANUEL LOPEZ.

62. On or about June 12, 2018, an unidentified co-conspirator filed a Bankruptcy Petition in the name of Alma Lopez.

63. On or about September 4, 2018, an unidentified co-conspirator filed a Bankruptcy Petition in the name of Alma Lopez.

COUNT 122

GRAND THEFT OF REAL PROPERTY

On or about and between March 30, 2011 and September 4, 2018, in the Counties of Orange, Los Angeles, San Diego, and Riverside, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by EMMANUEL LOPEZ, EDUARDO TORO, ANA TORO, VERONICA ROMERO MARQUEZ, and FILIVERTO GOMEZ, who did unlawfully take certain real property, to wit: a residence located at 5621 Lockhaven Drive, Buena Park, California 90621, of a value exceeding Nine Hundred Fifty Dollars (\$950), the property of: Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc, Mortgage-Backed Pass-Through Certificates, Series 2007-QO2.

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III

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1 [10113 WALNUT AVENUE, SOUTH GATE, CALIFORNIA 90280]

2 COUNT 123

3 CONSPIRACY

4 On or about and between August 13, 2010 and May 23, 2019, in the Counties of Los
5 Angeles, San Diego, and Riverside, the crime of CONSPIRACY, in violation of Penal Code
6 section 182(a)(1), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA
7 TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ,
8 and LETICIA MORA, who did willfully and unlawfully conspire together and with another
9 person or persons whose identity is unidentified to commit the crimes of GRAND THEFT, in
10 violation of Penal Code section 487(a), a felony, pursuant to and for the purposes of carrying out
11 the objects and purposes of the aforesaid conspiracy, said defendants and other conspirators

12 committed the following overt act(s):

13 1. On or about August 13, 2010, an unidentified co-conspirator filed a Bankruptcy Petition
14 in the name of Kathleen Clark.

15 2. On or about August 13, 2010, an unidentified co-conspirator filed a Statement of Social
16 Security Number related to the bankruptcy in the name of Kathleen Clark.

17 3. On or about August 25, 2010, VERONICA ROMERO MARQUEZ notarized a
18 Quitclaim Deed transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280
19 from Marina Haro to Kathleen Clark.

20 4. On or about October 7, 2010, EDUARDO TORO sent an e-mail to Angel Haro and
21 "Jorge" stating, "Here are two deeds, one is to return the property back to your mom. On this one
22 Kathleen signs the deed, Im [sic] also attaching her signature. File this one first then You [sic]
23 file the one from marina haro giving 1% to Paul Moreno. Sale still shows 10/8...Let me know if
24 you have any ??"

25 5. On or about October 8, 2010, VERONICA ROMERO MARQUEZ notarized a Grant
26 Deed transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280 from
27 Kathleen Clark to Marina Haro.

28 ///

1 6. On or about April 7, 2011, an unidentified co-conspirator filed a Bankruptcy Petition in
2 the name of Sam Marvick.

3 7. On or about April 7, 2011, an unidentified co-conspirator filed a Statement of Social
4 Security Number related to the bankruptcy in the name of Sam Marvick.

5 8. On or about April 22, 2011, EDUARDO TORO sent an e-mail to VERONICA
6 ROMERO MARQUEZ stating, "Here is the new deed along with the signature. [C]an you also
7 file one for my mom." Attached to the message were three Grant Deeds, including a blank Grant
8 Deed transferring one percent (1%) of the property located at 10113 Walnut Avenue, Southgate,
9 CA 90280 from Marina Haro to Sam Marvick, and a complete Grant Deed transferring one
10 percent (1%) of the same property from Marina Haro to Rita Aguilera.

11 9. On or about April 25, 2011, VERONICA ROMERO MARQUEZ notarized a Grant
12 Deed transferring one percent (1%) of the property located at 10113 Walnut Avenue, Southgate,
13 CA 90280 from Marina Haro to Sam Marvick.

14 10. On or about June 24, 2011, VERONICA ROMERO MARQUEZ notarized a Grant
15 Deed transferring one percent (1%) of the property located at 10113 Walnut Avenue, Southgate,
16 CA 90280 from Marina Haro to Ernesto Quiroz.

17 11. On or about June 28, 2011, an unidentified co-conspirator filed a Bankruptcy Petition
18 in the name of Ernesto Quiroz.

19 12. On or about June 28, 2011, an unidentified co-conspirator filed a Statement of Social
20 Security Number related to the bankruptcy in the name of Ernesto Quiroz.

21 13. On or about July 6, 2011, ANA TORO paid for the credit counseling related to the
22 bankruptcy in the name of Ernesto Quiroz.

23 14. On or about August 3, 2011, an unidentified co-conspirator filed a Bankruptcy Petition
24 in the name of Ernesto Quiroz.

25 15. On or about August 3, 2011, an unidentified co-conspirator filed a Statement of Social
26 Security Number related to the bankruptcy in the name of Ernesto Quiroz.

27 16. On or about September 30, 2011, EDUARDO TORO's brother, Gabriel Toro, paid for
28 the credit counseling related to the bankruptcy of Jamal Fisher.

1 17. On or about November 28, 2011, EDUARDO TORO filed a Bankruptcy Petition in the
2 name of Jamal Fisher.

3 18. On or about November 28, 2011, EDUARDO TORO filed a Statement of Social
4 Security Number related to the bankruptcy in the name of Jamal Fisher.

5 19. On or about December 14, 2011, FILIVERTO GOMEZ notarized a Grant Deed
6 transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate, CA
7 90280 from Marina Haro to Jamal Fisher and Genoveva Estrada.

8 20. On or about March 16, 2012, an unidentified co-conspirator filed a Bankruptcy Petition
9 in the name of Genoveva Estrada.

10 21. On or about March 16, 2012, an unidentified co-conspirator filed a Statement of Social
11 Security Number related to the bankruptcy in the name of Genoveva Estrada.

12 22. On or about March 21, 2012, ANA TORO paid for the credit counseling related to the
13 bankruptcy in the name of Genoveva Estrada.

14 23. On or about December 7, 2012, ANA TORO sent an e-mail to EDUARDO TORO
15 stating "...these are the sales for next week that might need deeds...12/11/12 Latoya Despain
16 (Sergio/Maria)...12/12/12 Kathy Thomas (Sergio/Maria)...12/13/12 Angel Haro
17 (Eduardo/Maria)...12/14/12 Luz Villanueva (Maria/Sergio)."

18 24. On or about March 27, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
19 Petition in the name of Kathleen Michaels.

20 25. On or about March 27, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
21 Social Security Number related to the bankruptcy in the name of Kathleen Michaels.

22 26. On or about June 3, 2014, GLADYS VELASQUEZ sent an e-mail to FILIVERTO
23 GOMEZ attached with several documents, including a blank Grant Deed transferring five percent
24 (5%) of the property located at 10113 Walnut Avenue, Southgate, CA 90280 from Marina Haro
25 to Madison Velasquez and Kathleen Michaels.

26 27. On or about June 4, 2014, FILIVERTO GOMEZ notarized a Grant Deed transferring
27 five percent (5%) of the property located at 10113 Walnut Avenue, Southgate, CA 90280 from
28 Marina Haro to Madison Velasquez and Kathleen Michaels.

1 28. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
2 Petition in the name of Madison Velasquez.

3 29. On or about June 13, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
4 Social Security Number related to the bankruptcy in the name of Madison Velasquez.

5 30. On or about June 23, 2014, ANA TORO paid for the credit counseling related to the
6 bankruptcy in the name of Madison Velasquez.

7 31. On or about July 29, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
8 Petition in the name of Melissa Rojas.

9 32. On or about July 29, 2014, VERONICA ROMERO MARQUEZ filed a Statement of
10 Social Security Number related to the bankruptcy in the name of Melissa Rojas.

11 33. On or about July 29, 2014, GLADYS VELASQUEZ sent an e-mail to VERONICA
12 TORO stating "please file this as soon as possible." Attached to the message was a blank Grant
13 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
14 CA 90280 from Marina Haro to Melissa Rojas and Juan Salazar, and a complete Grant Deed
15 transferring five percent (5%) of the same property from Marina Haro to Madison Velasquez and
16 Kathleen Michaels.

17 34. On or about July 30, 2014, VERONICA ROMERO MARQUEZ notarized a Grant
18 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
19 CA 90280 from Marina Haro to Melissa Rojas and Juan Salazar.

20 35. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
21 Bankruptcy Petition in the name of Juan Salazar Velasquez.

22 36. On or about September 15, 2014, VERONICA ROMERO MARQUEZ filed a
23 Statement of Social Security Number related to the bankruptcy in the name of Juan Salazar
24 Velasquez.

25 37. On or about September 26, 2014, ANA TORO paid for the credit counseling related to
26 the bankruptcy of Juan Salazar Velasquez.

27 38. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Bankruptcy
28 Petition in the name of Juan Salazar Velasquez.

1 39. On or about October 30, 2014, VERONICA ROMERO MARQUEZ filed a Statement
2 of Social Security Number related to the bankruptcy in the name of Juan Salazar Velasquez.

3 40. On or about April 3, 2015, Marvin Ochoa filed a Bankruptcy Petition in the name of
4 Amadeo Gomez.

5 41. On or about April 3, 2015, Marvin Ochoa filed a Statement of Social Security Number
6 related to the bankruptcy in the name of Amadeo Gomez.

7 42. On or about April 10, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
8 Deed transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280 from Rita
9 Aguilera, Ernesto Quiroz, and Sam Marvick to Marina Haro.

10 43. On or about April 10, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
11 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
12 CA 90280 from Marina Haro to Amadeo Gomez and Anastasia Morales.

13 44. On or about June 2, 2015, VERONICA ROMERO MARQUEZ filed a Bankruptcy
14 Petition in the name of Anastasia Morales.

15 45. On or about June 2, 2015, VERONICA ROMERO MARQUEZ filed a Statement of
16 Social Security Number related to the bankruptcy in the name of Anastasia Morales.

17 46. On or about June 15, 2015, ANA TORO paid for the credit counseling related to the
18 bankruptcy of Anastasia Morales.

19 47. On or about September 21, 2015, VERONICA ROMERO MARQUEZ filed a
20 Bankruptcy Petition in the name of Lorraine Vargas.

21 48. On or about September 21, 2015, VERONICA ROMERO MARQUEZ filed a
22 Statement of Social Security Number related to the bankruptcy in the name of Lorraine Vargas.

23 49. On or about October 5, 2015, ANA TORO sent an e-mail to VERONICA TORO
24 stating, "Here is the Deed for Cesar Gavia set for Wednesday and Marina Haro set for Thursday.
25 I am faxing you the preliminary change of ownership in a few minutes." Attached to the message
26 were two Grant Deeds, including a Grant Deed transferring five percent (5%) of the property
27 located at 10113 Walnut Avenue, Southgate, CA 90280 from Marina Haro to Lorraine Vargas
28 and Samantha Ruiz.

1 50. On or about October 7, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
2 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
3 CA 90280 from Marina Haro to Lorraine Vargas and Samantha Ruiz.

4 51. On or about October 7, 2015, VERONICA ROMERO MARQUEZ paid for the Grant
5 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
6 CA 90280 from Marina Haro to Lorraine Vargas and Samantha Ruiz.

7 52. On or about November 5, 2015, VERONICA ROMERO MARQUEZ filed a
8 Bankruptcy Petition in the name of Stephanie Uribe.

9 53. On or about November 5, 2015, VERONICA ROMERO MARQUEZ filed a Statement
10 of Social Security Number related to the bankruptcy in the name of Stephanie Uribe.

11 54. On or about November 18, 2015, ANA TORO paid for the credit counseling related to
12 the bankruptcy of Stephanie Uribe.

13 55. On or about December 3, 2015, ANA TORO sent an e-mail VERONICA TORO
14 stating, "I need a bk filed tomorrow along with some deeds that have sales for next week. I'm
15 having trouble printing so I need help with the preliminary change of ownership if you girls can
16 do it for me please." Attached to the message were several documents, including a blank Grant
17 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
18 CA 90280 from Marina Haro to Stephanie Uribe and Yesenia Fuentes.

19 56. On or about December 7, 2015, VERONICA ROMERO MARQUEZ notarized a Grant
20 Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue, Southgate,
21 CA 90280 from Marina Haro to Stephanie Uribe and Yesenia Fuentes.

22 57. On or about December 7, 2015, VERONICA ROMERO MARQUEZ paid for the
23 Grant Deed transferring five percent (5%) of the property located at 10113 Walnut Avenue,
24 Southgate, CA 90280 from Marina Haro to Stephanie Uribe and Yesenia Fuentes.

25 58. On or about January 5, 2016, VERONICA ROMERO MARQUEZ filed a Bankruptcy
26 Petition in the name of Yesenia Fuentes.

27 59. On or about January 5, 2016, VERONICA ROMERO MARQUEZ filed a Statement of
28 Social Security Number related to the bankruptcy in the name of Yesenia Fuentes.

1 60. On or about January 19, 2016, ANA TORO paid for the credit counseling related to the
2 bankruptcy in the name of Yesenia Fuentes.

3 61. On or about May 30, 2017, EDUARDO TORO sent an e-mail to LETICIA MORA
4 stating, "Here are the signature pages, [sic] Also don't [sic] forget about the credit counseling
5 course its very [sic] important." Attached to the message was a Statement of Social Security
6 Number and related Bankruptcy documentation in the name of Patricia Robles.

7 62. On or about May 31, 2017, EDUARDO TORO filed a Bankruptcy Petition in the name
8 of Patricia Robles.

9 63. On or about May 31, 2017, EDUARDO TORO filed a Statement of Social Security
10 Number related to the bankruptcy in the name of Patricia Robles.

11 64. On or about July 20, 2017, LETICIA MORA sent an e-mail to EDUARDO TORO
12 stating, "I am going to make deposit in 30 minutes." That same day, EDUARDO TORO replied,
13 "Here are the signature pages." Attached to the message were two copies of the Bankruptcy
14 Petition and Statements of Social Security Numbers in the names of Dennis Smith and Gabriel
15 Gomez.

16 65. On or about July 25, 2017, LETICIA MORA sent an e-mail to EDUARDO TORO with
17 documentation related to the Bankruptcy filing in the name of Dennis Smith.

18 66. On or about July 26, 2017, EDUARDO TORO filed a Bankruptcy Petition in the name
19 of Dennis Smith.

20 67. On or about July 26, 2017, EDUARDO TORO filed a Statement of Social Security
21 Number related to the bankruptcy in the name of Dennis Smith.

22 68. On or about March 8, 2018, EDUARDO TORO filed a Bankruptcy Petition in the
23 name of Dennis Smith.

24 69. On or about March 8, 2018, EDUARDO TORO filed a Statement of Social Security
25 Number related to the bankruptcy in the name of Dennis Smith.

26 70. On or about January 29, 2019, Mike Zadikian filed a Bankruptcy Petition in the name
27 of Keith Chase.

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71. On or about January 29, 2019, Mike Zadikian filed a Statement of Social Security Number related to the bankruptcy in the name of Keith Chase.

72. On or about January 31, 2019, Michael Rodriguez sent via fax a fraudulent Grant Deed purportedly transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280 from Marina Haro to Marina Haro and Keith Chase.

73. On or about April 23, 2019, an unidentified co-conspirator filed a Bankruptcy Petition in the name of Luis Garcia.

74. On or about April 23, 2019, an unidentified co-conspirator filed a Statement of Social Security Number related to the bankruptcy in the name of Luis Garcia.

75. On or about April 24, 2019, an unidentified co-conspirator sent via fax a fraudulent Grant Deed purportedly transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280 from Marina Haro to Luis Garcia.

76. On or about May 22, 2019, an unidentified co-conspirator filed a Bankruptcy Petition in the name of Ashley Lynn Auburn.

77. On or about May 22, 2019, an unidentified co-conspirator filed a Statement of Social Security Number related to the bankruptcy in the name of Ashley Lynn Auburn.

78. On or about May 23, 2019, EDUARDO TORO sent via fax a fraudulent Grant Deed purportedly transferring the property located at 10113 Walnut Avenue, Southgate, CA 90280 from Marina Haro to Ashley Lynn Auburn.

COUNT 124

PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about May 31, 2017, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA, who did unlawfully and knowingly procure and offer a false and forged instrument to be filed, registered, and recorded in a public office in California, which instrument, if genuine, might be

1 filed, registered, and recorded under a law of California or the United States, to wit: Patricia
2 Robles Bankruptcy Petition.

3 **COUNT 125**

4 **IDENTITY THEFT (Re: Patricia Robles)**

5 On or about May 31, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT,
6 in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO,
7 ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ,
8 GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully obtain
9 personal identifying information of Patricia Robles and used that information for an unlawful
10 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
11 information without the consent of Patricia Robles, to wit: Patricia Robles Bankruptcy Petition.

12 **COUNT 126**

13 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

14 On or about May 31, 2017, in the County of Los Angeles, the crime of PROCURING OR
15 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
16 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO
17 GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA,
18 who did unlawfully and knowingly procure and offer a false and forged instrument to be filed,
19 registered, and recorded in a public office in California, which instrument, if genuine, might be
20 filed, registered, and recorded under a law of California or the United States, to wit: Patricia
21 Robles Statement of Social Security Number.

22 **COUNT 127**

23 **IDENTITY THEFT (Re: Patricia Robles)**

24 On or about May 31, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT,
25 in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO,
26 ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ,
27 GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully obtain
28 personal identifying information of Patricia Robles and used that information for an unlawful

1 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
2 information without the consent of Patricia Robles, to wit: Patricia Robles Statement of Social
3 Security Number.

4 **COUNT 128**

5 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

6 On or about July 26, 2017, in the County of Los Angeles, the crime of PROCURING OR
7 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
8 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO
9 GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA,
10 who did unlawfully and knowingly procure and offer a false and forged instrument to be filed,
11 registered, and recorded in a public office in California, which instrument, if genuine, might be
12 filed, registered, and recorded under a law of California or the United States, to wit: Dennis Smith
13 Bankruptcy Petition.

14 **COUNT 129**

15 **IDENTITY THEFT (Re: Dennis Smith)**

16 On or about July 26, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT,
17 in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO,
18 ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ,
19 GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully obtain
20 personal identifying information of Dennis Smith and used that information for an unlawful
21 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
22 information without the consent of Dennis Smith, to wit: Dennis Smith Bankruptcy Petition.

23 **COUNT 130**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about July 26, 2017, in the County of Los Angeles, the crime of PROCURING OR
26 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
27 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO
28 GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA,

1 who did unlawfully and knowingly procure and offer a false and forged instrument to be filed,
2 registered, and recorded in a public office in California, which instrument, if genuine, might be
3 filed, registered, and recorded under a law of California or the United States, to wit: Dennis Smith
4 Statement of Social Security Number.

5 **COUNT 131**

6 **IDENTITY THEFT (Re: Dennis Smith)**

7 On or about July 26, 2017, in the County of Los Angeles, the crime of IDENTITY THEFT,
8 in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO TORO,
9 ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ,
10 GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully obtain
11 personal identifying information of Dennis Smith and used that information for an unlawful
12 purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical
13 information without the consent of Dennis Smith, to wit: Dennis Smith Statement of Social
14 Security Number.

15 **COUNT 132**

16 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

17 On or about March 8, 2018, in the County of Los Angeles, the crime of PROCURING OR
18 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
19 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO
20 GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA,
21 who did unlawfully and knowingly procure and offer a false and forged instrument to be filed,
22 registered, and recorded in a public office in California, which instrument, if genuine, might be
23 filed, registered, and recorded under a law of California or the United States, to wit: Dennis Smith
24 Bankruptcy Petition.

25 **COUNT 133**

26 **IDENTITY THEFT (Re: Dennis Smith)**

27 On or about March 8, 2018, in the County of Los Angeles, the crime of IDENTITY
28 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO

1 TORO, ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO
2 MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully
3 obtain personal identifying information of Dennis Smith and used that information for an
4 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
5 medical information without the consent of Dennis Smith, to wit: Dennis Smith Bankruptcy
6 Petition.

7 **COUNT 134**

8 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

9 On or about March 8, 2018, in the County of Los Angeles, the crime of PROCURING OR
10 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
11 a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO
12 GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA,
13 who did unlawfully and knowingly procure and offer a false and forged instrument to be filed,
14 registered, and recorded in a public office in California, which instrument, if genuine, might be
15 filed, registered, and recorded under a law of California or the United States, to wit: Dennis Smith
16 Statement of Social Security Number.

17 **COUNT 135**

18 **IDENTITY THEFT (Re: Dennis Smith)**

19 On or about March 8, 2018, in the County of Los Angeles, the crime of IDENTITY
20 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by EDUARDO
21 TORO, ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO
22 MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA, who did willfully and unlawfully
23 obtain personal identifying information of Dennis Smith and used that information for an
24 unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and
25 medical information without the consent of Dennis Smith, to wit: Dennis Smith Statement of
26 Social Security Number.

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COUNT 136

GRAND THEFT OF REAL PROPERTY

On or about and between August 13, 2010 and May 23, 2019, in the Counties of Los Angeles, San Diego, and Riverside, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by EDUARDO TORO, ANA TORO, VERONICA TORO, FILIVERTO GOMEZ, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, and LETICIA MORA, who did unlawfully take certain real property, to wit: a residence located at 10113 Walnut Avenue, South Gate, California 90280, of a value exceeding Nine Hundred Fifty Dollars (\$950), the property of: MTGLQ Investors, L.P.

FIRST SPECIAL ALLEGATION

[THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045)]

It is further alleged that EDUARDO TORO, ANA TORO, VERONICA TORO, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, MARIA GIL, FILIVERTO GOMEZ, LETICIA MORA, and EMMANUEL LOPEZ, in the commission of the Grand Theft counts alleged against them in this Indictment, with the intent to do so, took funds of a value exceeding one hundred thousand dollars (\$100,000) within the meaning of Penal Code section 1203.045.

SECOND SPECIAL ALLEGATION

[EXCESSIVE LOSS OVER \$500,000]

It is further alleged pursuant to Penal Code section 186.11(a)(2), that EDUARDO TORO, ANA TORO, VERONICA TORO, VERONICA ROMERO MARQUEZ, GLADYS VELASQUEZ, MARIA GIL, FILIVERTO GOMEZ, and EMMANUEL LOPEZ, committed two or more related felonies to wit: the counts alleged against each of them in this Indictment, a material element of which is fraud, involving a pattern of related felony conduct and the taking of, or resulted in the loss by another person or entity of, more than five hundred thousand dollars (\$500,000).

A TRUE BILL, and with a finding that the requirements of Penal Code section 923(c) have been satisfied.

Claudia Pinter 16
Foreperson of the Grand Jury Juror #
Dated: 10/30/20

**THE FOLLOWING WITNESSES APPEARED BEFORE THE GRAND JURY IN THE
ABOVE-CAPTIONED MATTER:**

1. Herminia Neblina
2. Bladimir Daza
3. Angelica Aguilar
4. Jonathan Ramos
5. Rebecca Putnam
6. Luz Ramirez
7. Danny Aquinde
8. Zenaida Aquinde
9. Erick Tinoco
10. Ariana Valencia
11. Reyna Refugio Dominguez
12. Jose Tobar
13. Mercy Montalvo
14. Marina Haro
15. Angel Haro
16. Dayana Rivera
17. Cynthia Ochoa
18. Miguel Barajas
19. Panlita Mutukun
20. Amadeo Gomez
21. Ernesto Mendoza
22. Jose Buendia
23. Otoniel Cermeno
24. Tania Aboulhosn
25. Patricia Robles
26. Dennis Smith
27. Kellie Smith

1 28. PattiAnn Brundige
2 29. Edward Treder
3 30. Steven Silverstein
4 31. Claire Buxton
5 32. KaJay Williams
6 33. JaVonne Phillips
7 34. Simon C. Ward Brown
8 35. Aimee Lopez
9 36. Fred Winters
10 37. Tomas Cruz
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