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Superior Court of California  
County of Los Angeles

OCT 27 2023

David W. Slayton, Sheriff/Clerk of Court

**SECRET**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

**PEOPLE OF THE STATE OF CALIFORNIA,**

*Plaintiff,*

v.

**Case No. BA514932**

**INDICTMENT**

**JEFFREY HERTER TAMKIN,**

**[REDACTED]**

*Defendant.*

JEFFREY HERTER TAMKIN is hereby accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the following crimes:

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**COUNT 1**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about September 1, 2011, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to ARLENE FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 2**

**GRAND THEFT**

On or about September 1, 2011, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: ARLENE FORSTER.

**COUNT 3**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about September 1, 2012, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to ARLENE FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 4**

**GRAND THEFT**

On or about September 1, 2012, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: ARLENE FORSTER.



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**COUNT 9**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about March 14, 2017, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to ARLENE FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 10**

**GRAND THEFT**

On or about March 14, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: ARLENE FORSTER.

**COUNT 11**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about November 30, 2017, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to ARLENE FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 12**

**GRAND THEFT**

On or about November 30, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: ARLENE FORSTER.

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**COUNT 13**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about May 31, 2016, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to JOHN FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 14**

**GRAND THEFT**

On or about May 31, 2016, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: JOHN FORSTER.

**COUNT 15**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about March 14, 2017, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to JOHN FORSTER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 16**

**GRAND THEFT**

On or about March 14, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: JOHN FORSTER.

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**COUNT 17**

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

On or about and between May 31, 2016 and March 14, 2017, in the County of Los Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or dependent adult, said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person, JOHN FORSTER, was an elder or dependent adult.

**COUNT 18**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about June 29, 2017, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to GARY TOWNSEND, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 19**

**GRAND THEFT**

On or about June 29, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: GARY TOWNSEND.

**COUNT 20**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about August 13, 2018, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to CATHERINE CAREY, by means of a written

1 or oral communication that included an untrue statement of a material fact or an omission of a  
2 material fact, in violation of Corporations Code section 25401, which is made a felony by  
3 Corporations Code section 25540(b).

4 **COUNT 21**

5 **GRAND THEFT**

6 On or about August 13, 2018, in the County of Los Angeles, the crime of GRAND THEFT,  
7 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: CATHERINE CAREY.

10 **COUNT 22**

11 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

12 On or about July 24, 2019, in the County of Los Angeles, the crime of FRAUD IN THE  
13 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
14 willfully and unlawfully offer or sell a security to GARY TOWNSEND, by means of a written or  
15 oral communication that included an untrue statement of a material fact or an omission of a  
16 material fact, in violation of Corporations Code section 25401, which is made a felony by  
17 Corporations Code section 25540(b).

18 **COUNT 23**

19 **GRAND THEFT**

20 On or about July 24, 2019, in the County of Los Angeles, the crime of GRAND THEFT, in  
21 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
22 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
23 Hundred Fifty Dollars (\$950) from another, to wit: GARY TOWNSEND.

24 **COUNT 24**

25 **GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT**

26 On or about and between June 29, 2017 and July 24, 2019, in the County of Los Angeles,  
27 the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of  
28 Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did

1 unlawfully commit theft and fraud with respect to the property of an elder or dependent adult,  
2 said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars  
3 (\$950), and knew or reasonably should have known that said person, GARY TOWNSEND, was  
4 an elder or dependent adult.

5 **COUNT 25**

6 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

7 On or about March 12, 2015, in the County of Los Angeles, the crime of FRAUD IN THE  
8 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
9 willfully and unlawfully offer or sell a security to MICHAEL ROOS, by means of a written or  
10 oral communication that included an untrue statement of a material fact or an omission of a  
11 material fact, in violation of Corporations Code section 25401, which is made a felony by  
12 Corporations Code section 25540(b).

13 **COUNT 26**

14 **GRAND THEFT**

15 On or about March 12, 2015, in the County of Los Angeles, the crime of GRAND THEFT,  
16 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
17 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
18 Hundred Fifty Dollars (\$950) from another, to wit: MICHAEL ROOS.

19 **COUNT 27**

20 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

21 On or about August 18, 2016, in the County of Los Angeles, the crime of FRAUD IN THE  
22 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
23 willfully and unlawfully offer or sell a security to MICHAEL ROOS, by means of a written or  
24 oral communication that included an untrue statement of a material fact or an omission of a  
25 material fact, in violation of Corporations Code section 25401, which is made a felony by  
26 Corporations Code section 25540(b).

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**COUNT 28**

**GRAND THEFT**

On or about August 18, 2016, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: MICHAEL ROOS.

**COUNT 29**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about November 16, 2017, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to MICHAEL ROOS, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 30**

**GRAND THEFT**

On or about November 16, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: MICHAEL ROOS.

**COUNT 31**

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

On or about and between March 12, 2015 and November 16, 2017, in the County of Los Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or dependent adult, said property, money taken and obtained having a value exceeding Nine

1 Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person,  
2 MICHAEL ROOS, was an elder or dependent adult.

3 **COUNT 32**

4 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

5 On or about November 15, 2016, in the County of Los Angeles, the crime of FRAUD IN  
6 THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN,  
7 who did willfully and unlawfully offer or sell a security to DAVID ZASLOW, by means of a  
8 written or oral communication that included an untrue statement of a material fact or an omission  
9 of a material fact, in violation of Corporations Code section 25401, which is made a felony by  
10 Corporations Code section 25540(b).

11 **COUNT 33**

12 **GRAND THEFT**

13 On or about November 15, 2016, in the County of Los Angeles, the crime of GRAND  
14 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
15 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
16 Nine Hundred Fifty Dollars (\$950) from another, to wit: DAVID ZASLOW.

17 **COUNT 34**

18 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

19 On or about June 21, 2017, in the County of Los Angeles, the crime of FRAUD IN THE  
20 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
21 willfully and unlawfully offer or sell a security to DAVID ZASLOW, by means of a written or  
22 oral communication that included an untrue statement of a material fact or an omission of a  
23 material fact, in violation of Corporations Code section 25401, which is made a felony by  
24 Corporations Code section 25540(b).

25 **COUNT 35**

26 **GRAND THEFT**

27 On or about June 21, 2017, in the County of Los Angeles, the crime of GRAND THEFT, in  
28 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER

1 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
2 Hundred Fifty Dollars (\$950) from another, to wit: DAVID ZASLOW.

3 **COUNT 36**

4 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

5 On or about October 2, 2017, in the County of Los Angeles, the crime of FRAUD IN THE  
6 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
7 willfully and unlawfully offer or sell a security to DAVID ZASLOW, by means of a written or  
8 oral communication that included an untrue statement of a material fact or an omission of a  
9 material fact, in violation of Corporations Code section 25401, which is made a felony by  
10 Corporations Code section 25540(b).

11 **COUNT 37**

12 **GRAND THEFT**

13 On or about October 2, 2017, in the County of Los Angeles, the crime of GRAND THEFT,  
14 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
15 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
16 Hundred Fifty Dollars (\$950) from another, to wit: DAVID ZASLOW.

17 **COUNT 38**

18 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

19 On or about April 1, 2018, in the County of Los Angeles, the crime of FRAUD IN THE  
20 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
21 willfully and unlawfully offer or sell a security to DAVID ZASLOW, by means of a written or  
22 oral communication that included an untrue statement of a material fact or an omission of a  
23 material fact, in violation of Corporations Code section 25401, which is made a felony by  
24 Corporations Code section 25540(b).

25 **COUNT 39**

26 **GRAND THEFT**

27 On or about April 1, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in  
28 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER

1 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
2 Hundred Fifty Dollars (\$950) from another, to wit: DAVID ZASLOW.

3 **COUNT 40**

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

5 On or about and between November 15, 2016 and April 1, 2018, in the County of Los  
6 Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in  
7 violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or  
9 dependent adult, said property, money taken and obtained having a value exceeding Nine  
10 Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person,  
11 DAVID ZASLOW, was an elder or dependent adult.

12 **COUNT 41**

13 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

14 On or about April 27, 2015, in the County of Los Angeles, the crime of FRAUD IN THE  
15 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
16 willfully and unlawfully offer or sell a security to CLIFFORD EINSTEIN, by means of a written  
17 or oral communication that included an untrue statement of a material fact or an omission of a  
18 material fact, in violation of Corporations Code section 25401, which is made a felony by  
19 Corporations Code section 25540(b).

20 **COUNT 42**

21 **GRAND THEFT**

22 On or about April 27, 2015, in the County of Los Angeles, the crime of GRAND THEFT,  
23 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
24 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
25 Hundred Fifty Dollars (\$950) from another, to wit: CLIFFORD EINSTEIN.

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1 **COUNT 43**

2 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

3 On or about October 16, 2015, in the County of Los Angeles, the crime of FRAUD IN THE  
4 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
5 willfully and unlawfully offer or sell a security to CLIFFORD EINSTEIN, by means of a written  
6 or oral communication that included an untrue statement of a material fact or an omission of a  
7 material fact, in violation of Corporations Code section 25401, which is made a felony by  
8 Corporations Code section 25540(b).

9 **COUNT 44**

10 **GRAND THEFT**

11 On or about October 16, 2015, in the County of Los Angeles, the crime of GRAND  
12 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
13 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
14 Nine Hundred Fifty Dollars (\$950) from another, to wit: CLIFFORD EINSTEIN.

15 **COUNT 45**

16 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

17 On or about February 22, 2016, in the County of Los Angeles, the crime of FRAUD IN  
18 THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN,  
19 who did willfully and unlawfully offer or sell a security to CLIFFORD EINSTEIN, by means of a  
20 written or oral communication that included an untrue statement of a material fact or an omission  
21 of a material fact, in violation of Corporations Code section 25401, which is made a felony by  
22 Corporations Code section 25540(b).

23 **COUNT 46**

24 **GRAND THEFT**

25 On or about February 22, 2016, in the County of Los Angeles, the crime of GRAND  
26 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
27 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
28 Nine Hundred Fifty Dollars (\$950) from another, to wit: CLIFFORD EINSTEIN.

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**COUNT 47**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about November 14, 2018, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to CLIFFORD EINSTEIN, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 48**

**GRAND THEFT**

On or about November 14, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: CLIFFORD EINSTEIN.

**COUNT 49**

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

On or about and between April 27, 2015 and November 14, 2018, in the County of Los Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or dependent adult, said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person, CLIFFORD EINSTEIN, was an elder or dependent adult.

**COUNT 50**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about June 30, 2016, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to KENNETH ZIFFREN, by means of a written or

1 oral communication that included an untrue statement of a material fact or an omission of a  
2 material fact, in violation of Corporations Code section 25401, which is made a felony by  
3 Corporations Code section 25540(b).

4 **COUNT 51**

5 **GRAND THEFT**

6 On or about June 30, 2016, in the County of Los Angeles, the crime of GRAND THEFT, in  
7 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: KENNETH ZIFFREN.

10 **COUNT 52**

11 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

12 On or about February 21, 2017, in the County of Los Angeles, the crime of FRAUD IN  
13 THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN,  
14 who did willfully and unlawfully offer or sell a security to KENNETH ZIFFREN, by means of a  
15 written or oral communication that included an untrue statement of a material fact or an omission  
16 of a material fact, in violation of Corporations Code section 25401, which is made a felony by  
17 Corporations Code section 25540(b).

18 **COUNT 53**

19 **GRAND THEFT**

20 On or about February 21, 2017, in the County of Los Angeles, the crime of GRAND  
21 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
22 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
23 Nine Hundred Fifty Dollars (\$950) from another, to wit: KENNETH ZIFFREN.

24 **COUNT 54**

25 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

26 On or about August 17, 2017, in the County of Los Angeles, the crime of FRAUD IN THE  
27 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
28 willfully and unlawfully offer or sell a security to KENNETH ZIFFREN, by means of a written or

1 oral communication that included an untrue statement of a material fact or an omission of a  
2 material fact, in violation of Corporations Code section 25401, which is made a felony by  
3 Corporations Code section 25540(b).

4 **COUNT 55**

5 **GRAND THEFT**

6 On or about August 17, 2017, in the County of Los Angeles, the crime of GRAND THEFT,  
7 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: KENNETH ZIFFREN.

10 **COUNT 56**

11 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

12 On or about February 20, 2018, in the County of Los Angeles, the crime of FRAUD IN  
13 THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN,  
14 who did willfully and unlawfully offer or sell a security to KENNETH ZIFFREN, by means of a  
15 written or oral communication that included an untrue statement of a material fact or an omission  
16 of a material fact, in violation of Corporations Code section 25401, which is made a felony by  
17 Corporations Code section 25540(b).

18 **COUNT 57**

19 **GRAND THEFT**

20 On or about February 20, 2018, in the County of Los Angeles, the crime of GRAND  
21 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
22 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
23 Nine Hundred Fifty Dollars (\$950) from another, to wit: KENNETH ZIFFREN.

24 **COUNT 58**

25 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

26 On or about May 24, 2018, in the County of Los Angeles, the crime of FRAUD IN THE  
27 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
28 willfully and unlawfully offer or sell a security to KENNETH ZIFFREN, by means of a written or



1 oral communication that included an untrue statement of a material fact or an omission of a  
2 material fact, in violation of Corporations Code section 25401, which is made a felony by  
3 Corporations Code section 25540(b).

4 **COUNT 59**

5 **GRAND THEFT**

6 On or about May 24, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in  
7 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: KENNETH ZIFFREN.

10 **COUNT 60**

11 **GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT**

12 On or about and between June 30, 2016 and May 24, 2018, in the County of Los Angeles,  
13 the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of  
14 Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did  
15 unlawfully commit theft and fraud with respect to the property of an elder or dependent adult,  
16 said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars  
17 (\$950), and knew or reasonably should have known that said person, KENNETH ZIFFREN, was  
18 an elder or dependent adult.

19 **COUNT 61**

20 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

21 On or about July 28, 2018, in the County of Los Angeles, the crime of FRAUD IN THE  
22 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
23 willfully and unlawfully offer or sell a security to MICHAEL SOFFER, by means of a written or  
24 oral communication that included an untrue statement of a material fact or an omission of a  
25 material fact, in violation of Corporations Code section 25401, which is made a felony by  
26 Corporations Code section 25540(b).

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**COUNT 62**

**GRAND THEFT**

On or about July 28, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: MICHAEL SOFFER.

**COUNT 63**

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

On or about July 28, 2018, in the County of Los Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or dependent adult, said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person, MICHAEL SOFFER, was an elder or dependent adult.

**COUNT 64**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about July 28, 2018, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to DAVID SOFFER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 65**

**GRAND THEFT**

On or about July 28, 2018, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: DAVID SOFFER.

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**COUNT 66**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about October 1, 2010, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to PAUL GIENGER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 67**

**GRAND THEFT**

On or about October 1, 2010, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: PAUL GIENGER.

**COUNT 68**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about November 11, 2014, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to PAUL GIENGER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 69**

**GRAND THEFT**

On or about November 11, 2014, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: PAUL GIENGER.

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**COUNT 70**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about July 2, 2015, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to PAUL GIENGER, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 71**

**GRAND THEFT**

On or about July 2, 2015, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: PAUL GIENGER.

**COUNT 72**

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

On or about and between October 1, 2010 and July 2, 2015, in the County of Los Angeles, the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and fraud with respect to the property of an elder or dependent adult, said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars (\$950), and knew or reasonably should have known that said person, PAUL GIENGER, was an elder or dependent adult.

**COUNT 73**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about January 1, 2019, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to PAUL KOHNER, by means of a written or oral

1 communication that included an untrue statement of a material fact or an omission of a material  
2 fact, in violation of Corporations Code section 25401, which is made a felony by Corporations  
3 Code section 25540(b).

4 **COUNT 74**

5 **GRAND THEFT**

6 On or about January 1, 2019, in the County of Los Angeles, the crime of GRAND THEFT,  
7 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: PAUL KOHNER.

10 **COUNT 75**

11 **GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT**

12 On or about January 1, 2019, in the County of Los Angeles, the crime of GRAND THEFT  
13 FROM AN ELDER OR DEPENDENT ADULT, in violation of Penal Code section 368(d), a  
14 felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully commit theft and  
15 fraud with respect to the property of an elder or dependent adult, said property, money taken and  
16 obtained having a value exceeding Nine Hundred Fifty Dollars (\$950), and knew or reasonably  
17 should have known that said person, PAUL KOHNER, was an elder or dependent adult.

18 **COUNT 76**

19 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

20 On or about April 18, 2011, in the County of Los Angeles, the crime of FRAUD IN THE  
21 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
22 willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by  
23 means of a written or oral communication that included an untrue statement of a material fact or  
24 an omission of a material fact, in violation of Corporations Code section 25401, which is made a  
25 felony by Corporations Code section 25540(b).

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**COUNT 77**

**GRAND THEFT**

On or about April 18, 2011, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

**COUNT 78**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about August 10, 2012, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 79**

**GRAND THEFT**

On or about August 10, 2012, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

**COUNT 80**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about January 31, 2013, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

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**COUNT 81**

**GRAND THEFT**

On or about January 31, 2013, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

**COUNT 82**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about October 9, 2014, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by means of a written or oral communication that included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401, which is made a felony by Corporations Code section 25540(b).

**COUNT 83**

**GRAND THEFT**

On or about October 9, 2014, in the County of Los Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

**COUNT 84**

**FRAUD IN THE OFFER OR SALE OF A SECURITY**

On or about June 16, 2015, in the County of Los Angeles, the crime of FRAUD IN THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by means of a written or oral communication that included an untrue statement of a material fact or

1 an omission of a material fact, in violation of Corporations Code section 25401, which is made a  
2 felony by Corporations Code section 25540(b).

3 **COUNT 85**

4 **GRAND THEFT**

5 On or about June 16, 2015, in the County of Los Angeles, the crime of GRAND THEFT, in  
6 violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
7 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
8 Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

9 **COUNT 86**

10 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

11 On or about September 18, 2015, in the County of Los Angeles, the crime of FRAUD IN  
12 THE OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN,  
13 who did willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE  
14 SOKOL, by means of a written or oral communication that included an untrue statement of a  
15 material fact or an omission of a material fact, in violation of Corporations Code section 25401,  
16 which is made a felony by Corporations Code section 25540(b).

17 **COUNT 87**

18 **GRAND THEFT**

19 On or about September 18, 2015, in the County of Los Angeles, the crime of GRAND  
20 THEFT, in violation of Penal Code section 487(a), a felony, was committed by JEFFREY  
21 HERTER TAMKIN, who did unlawfully take money and personal property of a value exceeding  
22 Nine Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE  
23 SOKOL.

24 **COUNT 88**

25 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

26 On or about March 9, 2018, in the County of Los Angeles, the crime of FRAUD IN THE  
27 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
28 willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by



1 means of a written or oral communication that included an untrue statement of a material fact or  
2 an omission of a material fact, in violation of Corporations Code section 25401, which is made a  
3 felony by Corporations Code section 25540(b).

4 **COUNT 89**

5 **GRAND THEFT**

6 On or about March 9, 2018, in the County of Los Angeles, the crime of GRAND THEFT,  
7 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
8 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
9 Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

10 **COUNT 90**

11 **FRAUD IN THE OFFER OR SALE OF A SECURITY**

12 On or about August 1, 2019, in the County of Los Angeles, the crime of FRAUD IN THE  
13 OFFER OR SALE OF A SECURITY was committed by JEFFREY HERTER TAMKIN, who did  
14 willfully and unlawfully offer or sell a security to THOMAS SOKOL and LENORE SOKOL, by  
15 means of a written or oral communication that included an untrue statement of a material fact or  
16 an omission of a material fact, in violation of Corporations Code section 25401, which is made a  
17 felony by Corporations Code section 25540(b).

18 **COUNT 91**

19 **GRAND THEFT**

20 On or about August 1, 2019, in the County of Los Angeles, the crime of GRAND THEFT,  
21 in violation of Penal Code section 487(a), a felony, was committed by JEFFREY HERTER  
22 TAMKIN, who did unlawfully take money and personal property of a value exceeding Nine  
23 Hundred Fifty Dollars (\$950) from another, to wit: THOMAS SOKOL and LENORE SOKOL.

24 **COUNT 92**

25 **GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT**

26 On or about and between March 9, 2018 and August 1, 2019, in the County of Los Angeles,  
27 the crime of GRAND THEFT FROM AN ELDER OR DEPENDENT ADULT, in violation of  
28 Penal Code section 368(d), a felony, was committed by JEFFREY HERTER TAMKIN, who did

1 unlawfully commit theft and fraud with respect to the property of an elder or dependent adult,  
2 said property, money taken and obtained having a value exceeding Nine Hundred Fifty Dollars  
3 (\$950), and knew or reasonably should have known that said person, THOMAS SOKOL and  
4 LENORE SOKOL, was an elder or dependent adult.

5 **COUNT 93**

6 **MONEY LAUNDERING**

7 On or about and between July 3, 2015 and July 13, 2015, in the County of Los Angeles, the  
8 crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was  
9 committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct  
10 a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial  
11 institution with the intent to promote, manage, establish, carry on, or facilitate the promotion,  
12 management, establishment, or carrying on of criminal activity, or, knowing that the monetary  
13 instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of,  
14 criminal activity, to wit: \$106,000 TOTAL THROUGH AT LEAST TWO TRANSACTIONS,  
15 AS DETAILED IN THE TABLE BELOW.

16 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(A), that the value of the  
17 transactions exceeded fifty thousand dollars (\$50,000) but was less than one hundred fifty  
18 thousand dollars (\$150,000).

19 <b>DATE</b>	<b>AMOUNT</b>	<b>TRANSACTION</b>
20 07/03/2015	\$100,000	Wire No. 590022 into CIT Bank -0227
21 07/13/2015	\$6,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"

22 **COUNT 94**

23 **MONEY LAUNDERING**

24 On or about and between September 25, 2015 and October 1, 2015, in the County of Los  
25 Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a  
26 felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt  
27 to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a  
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1 financial institution with the intent to promote, manage, establish, carry on, or facilitate the  
 2 promotion, management, establishment, or carrying on of criminal activity, or, knowing that the  
 3 monetary instrument represented the proceeds of, or was derived directly or indirectly from the  
 4 proceeds of, criminal activity, to wit: \$37,900 TOTAL THROUGH AT LEAST TWO  
 5 TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

DATE	AMOUNT	TRANSACTION
09/25/2015	\$19,400	Wire No. 290125 to Ali Reza Verastehpour, Bank Account No. - 2972, for "Rent Payment"
10/01/2015	\$18,500	Wire No. 290693 to Ali Reza Verastehpour, Bank Account No. - 2972, for "Rent Payment"

9 **COUNT 95**

10 **MONEY LAUNDERING**

11 On or about and between February 22, 2016 and February 26, 2016, in the County of Los  
 12 Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a  
 13 felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt  
 14 to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a  
 15 financial institution with the intent to promote, manage, establish, carry on, or facilitate the  
 16 promotion, management, establishment, or carrying on of criminal activity, or, knowing that the  
 17 monetary instrument represented the proceeds of, or was derived directly or indirectly from the  
 18 proceeds of, criminal activity, to wit: \$455,208.33 TOTAL THROUGH AT LEAST TWO  
 19 TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

20 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
 21 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
 22 million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
02/22/2016	\$300,000	Wire No. 18540774 into CIT Bank -0227
02/26/2016	\$155,208.33	Wire No. 301801 to Gordon and Pauline Freshman, Bank Account No. -2781, for "Business Project"

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**COUNT 96**

**MONEY LAUNDERING**

On or about and between July 1, 2016 and July 29, 2016, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$166,000 TOTAL THROUGH AT LEAST TWO TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
07/01/2016	\$150,000	Wire No. 20077057 into CIT Bank -0227
07/29/2016	\$16,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"

**COUNT 97**

**MONEY LAUNDERING**

On or about September 19, 2016, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal

1 activity, to wit: \$50,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
2 DETAILED IN THE TABLE BELOW.

3 DATE	AMOUNT	TRANSACTION
4 09/19/2016	\$50,000	Wire No. 20997139 into CIT Bank -0227

5 **COUNT 98**

6 **MONEY LAUNDERING**

7 On or about February 23, 2017, in the County of Los Angeles, the crime of MONEY  
8 LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by  
9 JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction  
10 involving a monetary instrument of a value exceeding \$25,000 through a financial institution with  
11 the intent to promote, manage, establish, carry on, or facilitate the promotion, management,  
12 establishment, or carrying on of criminal activity, or, knowing that the monetary instrument  
13 represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal  
14 activity, to wit: \$200,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
15 DETAILED IN THE TABLE BELOW.

16 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
17 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
18 million dollars (\$1,000,000).

19 DATE	AMOUNT	TRANSACTION
20 02/23/2017	\$200,000	Wire No. 22879698 into CIT Bank -0227

21 **COUNT 99**

22 **MONEY LAUNDERING**

23 On or about and between June 28, 2017 and July 6, 2017, in the County of Los Angeles, the  
24 crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was  
25 committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct  
26 a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial  
27 institution with the intent to promote, manage, establish, carry on, or facilitate the promotion,  
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1 management, establishment, or carrying on of criminal activity, or, knowing that the monetary  
2 instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of,  
3 criminal activity, to wit: \$150,000 TOTAL THROUGH AT LEAST TWO TRANSACTIONS,  
4 AS DETAILED IN THE TABLE BELOW.

5 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
6 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
7 million dollars (\$1,000,000).

8 DATE	AMOUNT	TRANSACTION
9 06/28/2017	\$50,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"
10 07/06/2017	\$100,000	Wire No. 24571373 into CIT Bank -0227

11 **COUNT 100**

12 **MONEY LAUNDERING**

13 On or about and between August 1, 2017 and August 25, 2017, in the County of Los  
14 Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a  
15 felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt  
16 to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a  
17 financial institution with the intent to promote, manage, establish, carry on, or facilitate the  
18 promotion, management, establishment, or carrying on of criminal activity, or, knowing that the  
19 monetary instrument represented the proceeds of, or was derived directly or indirectly from the  
20 proceeds of, criminal activity, to wit: \$168,000 TOTAL THROUGH AT LEAST THREE  
21 TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

22 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
23 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
24 million dollars (\$1,000,000).

25 DATE	AMOUNT	TRANSACTION
26 08/01/2017	\$18,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"
27 08/22/2017	\$100,000	Wire No. 25195100 into CIT Bank -0227

08/25/2017	\$50,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"
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**COUNT 101**

**MONEY LAUNDERING**

On or about and between November 22, 2017 and December 1, 2017, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$110,000 TOTAL THROUGH AT LEAST TWO TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

It is further alleged, pursuant to Penal Code section 186.10(c)(1)(A), that the value of the transactions exceeded fifty thousand dollars (\$50,000) but was less than one hundred fifty thousand dollars (\$150,000).

<b>DATE</b>	<b>AMOUNT</b>	<b>TRANSACTION</b>
11/22/2017	\$75,000	Wire No. 26428639 into CIT Bank -0227
12/01/2017	\$35,000	Web Transfer to CIT Bank -0553, for "LAREDO MORTGAGE"

**COUNT 102**

**MONEY LAUNDERING**

On or about January 5, 2018, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal

1 activity, to wit: \$100,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
2 DETAILED IN THE TABLE BELOW.

3 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(A), that the value of the  
4 transactions exceeded fifty thousand dollars (\$50,000) but was less than one hundred fifty  
5 thousand dollars (\$150,000).

6 DATE	AMOUNT	TRANSACTION
7 01/05/2018	\$100,000	Wire No. 27096283 into CIT Bank -0227

8 **COUNT 103**

9 **MONEY LAUNDERING**

10 On or about and between February 5, 2018 and February 23, 2018, in the County of Los  
11 Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a  
12 felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt  
13 to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a  
14 financial institution with the intent to promote, manage, establish, carry on, or facilitate the  
15 promotion, management, establishment, or carrying on of criminal activity, or, knowing that the  
16 monetary instrument represented the proceeds of, or was derived directly or indirectly from the  
17 proceeds of, criminal activity, to wit: \$150,000 TOTAL THROUGH AT LEAST TWO  
18 TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

19 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
20 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
21 million dollars (\$1,000,000).

22 DATE	AMOUNT	TRANSACTION
23 02/05/2018	\$50,000	Wire No. 27514224 into CIT Bank -0227
24 02/23/2018	\$100,000	Wire No. 27756008 into CIT Bank -0227

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1 **COUNT 104**

2 **MONEY LAUNDERING**

3 On or about April 16, 2018, in the County of Los Angeles, the crime of MONEY  
4 LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by  
5 JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction  
6 involving a monetary instrument of a value exceeding \$5,000 through a financial institution with  
7 the intent to promote, manage, establish, carry on, or facilitate the promotion, management,  
8 establishment, or carrying on of criminal activity, or, knowing that the monetary instrument  
9 represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal  
10 activity, to wit: \$16,384.60 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
11 DETAILED IN THE TABLE BELOW.

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DATE	AMOUNT	TRANSACTION
04/16/2018	\$16,384.60	BMO Harris Payment

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14 **COUNT 105**

15 **MONEY LAUNDERING**

16 On or about May 30, 2018, in the County of Los Angeles, the crime of MONEY  
17 LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by  
18 JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction  
19 involving a monetary instrument of a value exceeding \$25,000 through a financial institution with  
20 the intent to promote, manage, establish, carry on, or facilitate the promotion, management,  
21 establishment, or carrying on of criminal activity, or, knowing that the monetary instrument  
22 represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal  
23 activity, to wit: \$200,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
24 DETAILED IN THE TABLE BELOW.

25 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
26 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
27 million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
05/30/2018	\$200,000	Wire No. 29083826 into CIT Bank -0227

**COUNT 106**

**MONEY LAUNDERING**

On or about and between July 30, 2018 and August 13, 2018, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$400,000 TOTAL THROUGH AT LEAST THREE TRANSACTIONS, AS DETAILED IN THE TABLE BELOW.

It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one million dollars (\$1,000,000).

DATE	AMOUNT	TRANSACTION
07/30/2018	\$100,000	Wire No. 29960747 into CIT Bank -0227
07/30/2018	\$200,000	Wire No. 29955986 into CIT Bank -0227
08/13/2018	\$100,000	Wire No. 30168768 into CIT Bank -0227

**COUNT 107**

**MONEY LAUNDERING**

On or about November 15, 2018, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management,

1 establishment, or carrying on of criminal activity, or, knowing that the monetary instrument  
2 represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal  
3 activity, to wit: \$150,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
4 DETAILED IN THE TABLE BELOW.

5 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
6 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
7 million dollars (\$1,000,000).

8 DATE	AMOUNT	TRANSACTION
9 11/15/2018	\$150,000	Wire No. 31489670 into CIT Bank -0227

10 **COUNT 108**

11 **MONEY LAUNDERING**

12 On or about January 8, 2019, in the County of Los Angeles, the crime of MONEY  
13 LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by  
14 JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction  
15 involving a monetary instrument of a value exceeding \$25,000 through a financial institution with  
16 the intent to promote, manage, establish, carry on, or facilitate the promotion, management,  
17 establishment, or carrying on of criminal activity, or, knowing that the monetary instrument  
18 represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal  
19 activity, to wit: \$200,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS  
20 DETAILED IN THE TABLE BELOW.

21 It is further alleged, pursuant to Penal Code section 186.10(c)(1)(B), that the value of the  
22 transactions exceeded one hundred fifty thousand dollars (\$150,000) but was less than one  
23 million dollars (\$1,000,000).

24 DATE	AMOUNT	TRANSACTION
25 01/08/2019	\$200,000	Wire No. 32203390 into CIT Bank -0227

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**COUNT 109**

**MONEY LAUNDERING**

On or about July 25, 2019, in the County of Los Angeles, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a), a felony, was committed by JEFFREY HERTER TAMKIN, who did unlawfully conduct or attempt to conduct a transaction involving a monetary instrument of a value exceeding \$25,000 through a financial institution with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of criminal activity, or, knowing that the monetary instrument represented the proceeds of, or was derived directly or indirectly from the proceeds of, criminal activity, to wit: \$70,000 TOTAL THROUGH AT LEAST ONE TRANSACTION, AS DETAILED IN THE TABLE BELOW.

It is further alleged, pursuant to Penal Code section 186.10(c)(1)(A), that the value of the transactions exceeded fifty thousand dollars (\$50,000) but was less than one hundred fifty thousand dollars (\$150,000).

DATE	AMOUNT	TRANSACTION
07/25/2019	\$70,000	Wire No. 35095507 into CIT Bank -0227

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**TOLLING OF THE STATUTE OF LIMITATIONS**

**DISCOVERY WITHIN FOUR YEARS**

It is further alleged as to Counts 93 to 109, within the meaning of Penal Code sections 801.5 and 803(c), that the offenses were not discovered until September 12, 2022, by Jim Thiede, Investigative Auditor for the California Department of Justice, when he received bank records obtained via search warrant, and upon review, noticed bank wires and transfers associated with TAMKIN's bank accounts.

On or about August 17, 2022, the California Department of Justice obtained a search warrant for bank and email records from CIT Bank, Banc of California, Chase Bank, and Intermedia Cloud Communications, for records related to JEFFREY HERTER TAMKIN and his business entities, TAMKIN DEVELOPMENT CORPORATION and PUBLIC FACILITIES

1 INVESTMENT CORPORATION. The warrant was served on August 18, 2022 by Investigative  
2 Auditor Connie Chen. Investigative Auditor Jim Thiede of the California Department of Justice  
3 was hired with the DOJ on August 29, 2022, and he began working on the TAMKIN case on  
4 September 12, 2022. By October 11, 2022, all records were received by the California  
5 Department of Justice, and the warrant return was filed on October 13, 2022.

6 On February 1, 2023, the California Department of Justice obtained a supplemental search  
7 warrant to obtain bank records for CIT Bank, for a separate TAMKIN business entity:  
8 CROSSETT DEVELOPMENT I, LLC. The warrant was served on the same day, and the  
9 warrant return was filed on February 27, 2023.

10 On May 2, 2023, the California Department of Justice obtained another supplemental  
11 search warrant for bank records from the Bank of Idaho. The warrant was served the same day,  
12 and the warrant return was filed on May 18, 2023.

13 Upon receipt of the bank records, Investigative Auditor Jim Thiede reviewed and analyzed  
14 the records. He located several bank wires and web transfers between TAMKIN's multiple bank  
15 accounts as well as wires and transfers to and from other third-party accounts or victims' bank  
16 accounts.

17 No victim, and no law enforcement agency chargeable with the investigation and  
18 prosecution of said violation had actual and constructive knowledge of said violation prior to  
19 September 12, 2022, because the California Department of Justice and victims did not have  
20 possession of TAMKIN's bank accounts, statements, or records, and as such, no victim or law  
21 enforcement agency was aware of the bank wires or web transfers before September 12, 2022.

22 **COUNT 110**

23 **FRAUDULENT SECURITIES SCHEME**

24 On or about and between October 1, 2010 and July 24, 2019, in the County of Los Angeles,  
25 the crime of FRAUDULENT SECURITIES SCHEME, in violation of Corporations Code section  
26 25541, a felony, was committed by JEFFREY HERTER TAMKIN, who did willfully and  
27 unlawfully employ, directly or indirectly, any device, scheme, or artifice to defraud in connection  
28 with the offer, purchase, or sale of any security, or engage, directly or indirectly, in any act,

1 practice, or course of business which operates or would operate as a fraud or deceit upon any  
2 person in connection with the offer, purchase, or sale of any security, to wit: ARLENE  
3 FORSTER, JOHN FORSTER, GARY TOWNSEND, CATHERINE CAREY, MICHAEL  
4 ROOS, DAVID ZASLOW, CLIFFORD EINSTEIN, KENNETH ZIFFREN, MICHAEL  
5 SOFFER, DAVID SOFFER, PAUL GIENGER, PAUL KOHNER, THOMAS SOKOL,  
6 LENORE SOKOL, and others who invested in JEFFREY HERTER TAMKIN.

7 **TOLLING OF THE STATUTE OF LIMITATIONS**

8 **DISCOVERY WITHIN FOUR YEARS**

9 It is further alleged as to Counts 1 to 92, and 110, within the meaning of Penal Code  
10 sections 801.5 and 803(c), that the offenses were not discovered until December 1, 2019, by the  
11 earliest victim to discover the fraud, when JEFFREY HERTER TAMKIN said he was going to  
12 suspend quarterly interest payments. All other victims discovered the fraud after December 1,  
13 2019.

14 On November 11, 2021, Tamara Droubi, an attorney representing THOMAS SOKOL,  
15 LENORE SOKOL, MICHAEL SOFFER, and DAVID SOFFER, emailed the California  
16 Department of Justice. In that email, Ms. Droubi alerted the DOJ about TAMKIN and said  
17 TAMKIN was potentially operating a "Ponzi scheme." Ms. Droubi summarized TAMKIN's  
18 potential involvement, the companies he utilized for his scheme, and other details of the fraud.  
19 This email was forwarded to Robin Ross, an Investigator with the DOJ.

20 The earliest victim to discover the fraud was unaware that he was the victim of a crime until  
21 December 1, 2019, when TAMKIN said he was going to suspend quarterly interest payments.  
22 All other victims discovered the fraud after December 1, 2019, and all crimes charged within this  
23 Indictment were charged within four years of discovery. No law enforcement agency chargeable  
24 with the investigation and prosecution of said violation had actual and constructive knowledge of  
25 said violation prior to November 11, 2021, because the California Department of Justice was  
26 unaware of the existence of TAMKIN, his investments, businesses, or companies, prior to the  
27 initial referral on November 11, 2021.

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**FIRST SPECIAL ALLEGATION**

**AGGRAVATED WHITE-COLLAR CRIME IN EXCESS OF \$500,000**

It is further alleged as to Counts 1 to 110, that JEFFREY HERTER TAMKIN committed two or more related felonies, a material element of which is fraud, involving a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, or resulted in the loss by another person or entity of, more than Five Hundred Thousand Dollars (\$500,000), thus subjecting JEFFREY HERTER TAMKIN to the additional punishment provided for in Penal Code section 186.11(a)(2).

**SECOND SPECIAL ALLEGATION**

**THEFT OF AMOUNT OVER \$100,000**

It is further alleged as to Counts 1 to 110, that JEFFREY HERTER TAMKIN committed crimes of theft, of a value exceeding One Hundred Thousand Dollars (\$100,000), within the meaning of Penal Code section 1203.045.

**THIRD SPECIAL ALLEGATION**

**CIRCUMSTANCES IN AGGRAVATION**


It is further alleged as to Counts 1 to 110, and as to JEFFREY HERTER TAMKIN, under Penal Code section 1170(b)(2) and within the meaning of California Rule of Court 4.421(a), that there exists circumstances in aggravation including the following factors:

- (1) The manner in which the crime was carried out indicates planning, sophistication, or professionalism;
- (2) The crime involved an attempted or actual taking or damage of great monetary value;
- (3) The victim was particularly vulnerable; and
- (4) The defendant took advantage of a position of trust or confidence to commit the offense.

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A TRUE BILL

  
\_\_\_\_\_  
Foreperson of the Grand Jury

Dated: \_\_\_\_\_

10/27/23

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



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