

1 ROB BONTA
Attorney General of California
2 JENNIFER EULER
Chief Assistant Attorney General
3 JOEL SAMUELS
Deputy Attorney General
4 State Bar No. 234574
Division of Medi-Cal Fraud & Elder Abuse
5 2329 Gateway Oaks Drive, Suite 200
Sacramento, CA 95833-4252
6 Telephone: (916) 621-1822
Fax: (916) 263-0426
7 E-mail: Joel.Samuels@doj.ca.gov
Attorneys for the People of the State of California
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SACRAMENTO**
11
12

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

15 Plaintiff,

16 v.

17 **RICARDO RIVERA (a.k.a. RICK**
18 **RIVERA), LOUIS MASER (a.k.a. LOU**
19 **MASER), CHRISTOPHER JAROMAY,**
20 **GARRY GERARDO, BERNARD**
21 **CAMPILAN, CHRISTELA BALUBAR,**
22 **MATT ROSE, MARINA JAROMAY,**
MERITO JAROMAY, GREGORY
PRITCHARD, JUAN MURILLO, THU
DANG, KRISTEL VILLAR, and NELSON
MANMANO,

Defendants.

Case No.

FELONY COMPLAINT

23 The People of the State of California hereby allege that in the County of Sacramento, State
24 of California and elsewhere, within the State of California, before the making of this criminal
25 complaint, the above-named defendants, RICARDO RIVERA (a.k.a. RICK RIVERA), LOUIS
26 MASER (a.k.a. LOU MASER), CHRISTOPHER JAROMAY, GARRY GERARDO, BERNARD
27 CAMPILAN, CHRISTELA BALUBAR, MATT ROSE, MARINA JAROMAY, MERITO
28

1 JAROMAY, GREGORY PRITCHARD, JUAN MURILLO, THU DANG, KRISTEL VILLAR,
2 and NELSON MANMANO, committed the following criminal offenses:

3 **COUNT 1**
4 **PENAL CODE SECTION 182(a)(4) - FELONY**
5 **16 mos/2yr/3yr (PC 1170(h))**

6 On or about, and between November 13, 2012 and November 19, 2019, in the County of
7 Sacramento and elsewhere, defendants Ricardo Rivera (also known as Rick Rivera), Lou Maser,
8 Christopher Jaromay, Garry Gerardo, Bernard Campilan, Christela Balubar, Matt Rose, Marina
9 Jaromay, Merito Jaromay, Gregory Pritchard, Juan Murillo, Thu Dang, Kristel Villar, and Nelson
10 Manmano, and other persons whose names are unknown to the Attorney General did conspire,
11 aid, abet, and agree with at least one other co-defendant and other persons whose names are
12 unknown to the Attorney General to commit the crime of Conspiracy to Obtain Money or
13 Property by False Pretenses, in violation of Section 182(a)(4) of the California Penal Code, a
14 Felony.

15 **OVERT ACTS**

16 The Attorney General of the State of California further charges that pursuant to the above
17 conspiracy and to carry out the objects thereof, each defendant and co-defendant did, on or about
18 November 13, 2012 to November 30, 2020, in the County of Sacramento, and elsewhere, in the
19 State of California, commit various overt acts including, but not limited to, the following:

20 **OVERT ACT #1:** From December of 2015 to November 30, 2020, defendants Larry Dela
21 Cruz, Rick Rivera, Lou Maser, Christopher Jaromay, Garry Gerardo, Bernard Campilan, Christela
22 Balubar, Matt Rose, Marina Jaromay, Merito Jaromay, Gregory Pritchard, Juan Murillo, Thu
23 Dang, Kristel Villar, and Nelson Manmano, and other co-conspirators offered and sold
24 investments for the financing, construction, and operation of Pagudpud Sands Resort LLC
25 (hereinafter PSR), a “condotel” resort to be built in the Philippines. In the solicitation, offer, and
26 sale of PSR, all defendants relied on and used misrepresentations, omissions of material facts, and
27 a fraudulent scheme to persuade their victims to invest. During this time, PSR’s principal office
28 was first located at 2973 Fulton Avenue, Suite B, Sacramento, California and later moved to 1010
Hurley Way, Sacramento, California.

1 **OVERT ACT #2:** On or about, and between December 1, 2015 and January 12, 2016,
2 Larry Dela Cruz and Christopher Jaromay offered and sold Leilani Bankhardt and Christine
3 Hansen, an investment in PSR. On January 12, 2016, Leilani Bankhardt wrote a check for
4 \$25,000 to Rely On Inc. for the purpose of making an investment in PSR. On or about December
5 8, 2014, Larry Dela Cruz and Ricardo Rivera opened an account at Chase Bank in the name of
6 Rely On Inc. dba Rely On Veterans Benefits with the address of 2975 Fulton Ave., Sacramento,
7 California, 95821. Dela Cruz and Rivera were the only signatories for this account, # 669672987,
8 hereinafter referred to as Rely On account 987.

9 **OVERT ACT #3:** On or about January 14, 2016, Rick Rivera signed checks on Rely On
10 Inc. account 987 with the memo "L [REDACTED]" to pay Christopher Jaromay \$2,000 and to pay Larry
11 Dela Cruz \$250. The payments to Jaromay and Dela Cruz were for their roles in obtaining L [REDACTED]
12 B [REDACTED] and C [REDACTED] H [REDACTED]'s investment. It was part of PSR's operation to pay a
13 "commission" to the individuals who were involved in obtaining investments in PSR.

14 **OVERT ACT #4:** On or about March 15, 2016, Larry Dela Cruz and Ricardo Rivera, as
15 managing members, filed Articles of Organization and registered Pagudpud Sands Resort LLC as
16 a Domestic Limited Liability Company in the State of Nevada. On March 15, 2016, the State of
17 Nevada issued a business license to Pagudpud Sands Resort, LLC. In the following years, there
18 were annual filings for Pagudpud Sands Resort, LLC filed effective March 10, 2017, January 30,
19 2018, January 03, 2019, January 28, 2020, and March 16, 2021. Nelson Manmano was also a co-
20 founder of PSR and worked to offer and sell PSR in Hawaii.

21 **OVERT ACT #5:** On or about, March 4, 2016 and April 4, 2016, Larry Dela Cruz,
22 Ricardo Rivera, Christopher Jaromay, Lou Maser, and Nelson Manmano offered and sold D [REDACTED]
23 T [REDACTED] (DOB [REDACTED]) an investment in PSR. D [REDACTED] T [REDACTED] invested \$95,000 in PSR on or
24 about April 14, 2016.

25 **OVERT ACT #6:** On or about, and between March 15, 2016, Larry Dela Cruz offered and
26 sold R [REDACTED] F [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about March 15, 2016, F [REDACTED]
27 invested \$230,000.

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1 **OVERT ACT #7:** On or about April 4, 2016, Larry Dela Cruz, Rick Rivera, Chris
2 Jaromay, Lou Maser, and Nelson Manmano offered and sold D [REDACTED] T [REDACTED] (DOB [REDACTED])
3 an investment in PSR. On or about April 4, 2016, D [REDACTED] T [REDACTED] invested \$95,000 in PSR.

4 **OVERT ACT #8:** On or about, and between May 4, 2016 and July 31, 2016, Larry Dela
5 Cruz, Rick Rivera, and Christopher Jaromay offered and sold E [REDACTED] M [REDACTED] (DOB [REDACTED]) an
6 investment in PSR. E [REDACTED] M [REDACTED] invested \$110,000 on or about and between May 4, 2016 and
7 July 31, 2016.

8 **OVERT ACT #9:** On May 9, 2016, Rick Rivera signed a check on Rely On account 987
9 for \$500 to cash with a memo "For PSR. LLC".

10 **OVERT ACT #10:** On May 9, 2016, there was a \$500 deposit made at CitiBank to open
11 PSR account number 206566853 with an address of 2973 Fulton Avenue, Suite B, Sacramento,
12 CA 95821.

13 **OVERT ACT #11:** On or about, and from May 9, 2016, Larry Dela Cruz and Ricardo
14 Rivera established and began using at least two bank accounts, opened and maintained at Citibank
15 in Sacramento, California, in the name of Pagudpud Sands Resort, LLC, 2973 Fulton Avenue,
16 Suite B, Sacramento, California (later, 1010 Hurley Way, Sacramento California): Account
17 number 206564536 (hereinafter referred to as PSR account 536) and account number 206566853
18 (hereinafter referred to as PSR account 853).

19 **OVERT ACT #12:** On or about June 8, 2016, checks were issued by Citibank with the
20 remitter "Pagudpud Sands Resort, LLC" and the memo "T [REDACTED]" to Larry Dela Cruz for
21 \$1,391.42, to Rick Rivera for \$1,391.42, and to Nelson Manmano for \$2,782.84.

22 **OVERT ACT #13:** On July 1, 2016 Christopher Jaromay sent an email to Larry Dela Cruz,
23 Rick Rivera and Garry Gerardo with an attachment of a 25-page Power Point presentation entitled
24 "Pagudpud Sand [sic] Process For Submitting Qualified Funds to Entrust." Entrust is a Self-
25 Directed IRA management company. Defendants marketed and sold investments in PSR using the
26 concept of converting retirement funds into self- directed IRA's as a selling point with potential
27 investors.

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1 **OVERT ACT #14:** On or about, and between June 28, 2016 and July 21, 2016, in Larry
2 Dela Cruz offered and sold J ■ H ■, an investment in PSR. J ■ H ■ invested \$92,089.19
3 in PSR on July 21, 2016.

4 **OVERT ACT #15:** On or about and between July 11, 2016 and July 31, 2016, Larry Dela
5 Cruz, Ricardo Rivera, Nelson Manmano, and Lou Maser offered and sold E ■ and O ■
6 G ■, an investment in PSR. E ■ G ■ invested \$100,000 in PSR on July 11, 2016.

7 **OVERT ACT #16:** On or about July 19, 2016, Rick Rivera signed checks from PSR
8 account 853 with the memo "G ■" to pay Larry Dela Cruz \$1,700 and Rick Rivera \$1,700.

9 **OVERT ACT #17:** On or about July 19, 2016, Rick Rivera signed a check on PSR account
10 853 with the memo "G ■" to Nelson Manmano for \$2,550.

11 **OVERT ACT #18:** On or about July 19, 2016, Rick Rivera signed a check on PSR account
12 853 with the memo "G ■/C ■" to Lou Maser for \$2,850.

13 **OVERT ACT #19:** On or about July 19, 2016, Rick Rivera signed a check on PSR account
14 853 with the memo "E ■" to pay Lou Maser \$2,000.

15 **OVERT ACT #20:** On or about July 19, 2016, Larry Dela Cruz, Rick Rivera, Lou Maser,
16 and Nelson Manmano offered and sold V ■ B ■ (DOB ■) an investment in
17 PSR. On or about July 19, 2016, B ■ invested \$65,000 in PSR.

18 **OVERT ACT #21:** On or about July 21, 2016, Rick Rivera signed checks on PSR account
19 853 with the memo "E ■" to pay Larry Dela Cruz \$900, Rick Rivera \$900, Lou Maser \$600
20 and Nelson Manmano \$600. Dela Cruz endorsed his check. Rivera endorsed his check. Manmano
21 endorsed his check.

22 **OVERT ACT #22:** On or about July 28, 2016, Ricardo Rivera signed checks on PSR
23 account 853 with the memo "M ■" to pay Christopher Jaromay \$6,000 and Lou Maser
24 \$6,000.

25 **OVERT ACT #23:** On or about July 31, 2016, Larry Dela Cruz as President/CEO and
26 Ricard Rivera as Secretary/Treasurer signed and issued Pagudpud Sands Resort, LLC
27 Membership Certificates to E ■ G ■, IRA, J ■ H ■, D ■ T ■, L ■
28 B ■ [sic], and R ■ F ■ [sic]

1 **OVERT ACT #24:** On or about, and before August 22, 2016, Larry Dela Cruz, Lou Maser,
2 Merito Jaromay, and Marina Jaromay offered and sold L [REDACTED] B [REDACTED] (DOB [REDACTED]) an
3 investment in PSR. B [REDACTED] invested \$105,000 in PSR on or about August 22, 2016.

4 **OVERT ACT #25:** On or about September 9, 2016, Rick Rivera signed a check on PSR
5 account 853 with the memo "B [REDACTED]" to pay Merito Jaromay \$6,000.

6 **OVERT ACT #26:** On or about September 23, 2016, Larry Dela Cruz, Rick Rivera, and
7 Nelson Manmano offered and sold an investment in PSR to D [REDACTED] S [REDACTED] (DOB [REDACTED]).
8 On or about September 23, 2016, S [REDACTED] invested \$110,000 in PSR.

9 **OVERT ACT #27:** On or about September 29, 2016, Rick Rivera signed checks on PSR
10 account 853 with the memo "D. S [REDACTED]" to pay Ricardo Rivera \$1,000 and Nelson Manmano
11 \$1,000. Rivera and Manmano each endorsed his or her individual check.

12 **OVERT ACT #28:** On or about October 18, 2016, Garry Gerardo, Bernard Campilan,
13 Christela Balubar, Larry Dela Cruz, Rick Rivera and Lou Maser offered and sold N [REDACTED]
14 V [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about October 18, 2016, V [REDACTED]
15 invested \$500,000 in PSR.

16 **OVERT ACT #29:** On or about October 19, 2016, Garry Gerardo, Bernard Campilan,
17 Christela Balubar offered and sold an investment in PSR to M [REDACTED] H [REDACTED] ([REDACTED]).
18 H [REDACTED] invested \$50,000 in PSR on or about October 19, 2016.

19 **OVERT ACT #30:** On or about October 20, 2016, Larry Dela Cruz, Rick Rivera, Lou
20 Maser, Christopher Jaromay and Marina Jaromay offered and sold E [REDACTED] B [REDACTED] (DOB
21 [REDACTED]) an investment in PSR. E [REDACTED] B [REDACTED] invested \$100,000 on or about October 20, 2016.
22 Marina Jaromay took B [REDACTED] to the PSR office in Sacramento and Larry Dela Cruz and Rick
23 Rivera presented PSR as an investment opportunity and provided her with a brochure about PSR.

24 **OVERT ACT #31:** On or about October 20, 2016, Christopher Jaromay sent an email to
25 Larry Dela Cruz, Rick Rivera, Lou Maser and Garry Gerardo referring to investments of
26 \$500,000 by N [REDACTED] V [REDACTED] and \$50,000 by M [REDACTED] H [REDACTED] in PSR.

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1 **OVERT ACT #32:** On or about October 20, 2016, Lorenzo M. DelaCruz [sic] as
2 President/CEO and Ricardo D. Rivera as Secretary/Treasurer of PSR signed, approved and
3 accepted M ■ H ■'s Subscription Agreement and investment in PSR.”

4 **OVERT ACT #33:** On or about October 20, 2016 Rick Rivera signed a check on PSR
5 account 853 with the memo “N ■ V. \$500K x 3% = \$15K Advance” to pay Sharp Care Services
6 \$15,000. Sharp Care Services is a company established by Garry Gerardo, Bernard Campilan, and
7 Christela Balubar. The check was endorsed by Christela Balubar.

8 **OVERT ACT #34:** On or about October 21, 2016, Rick Rivera signed a check to PSR
9 account 536 with the memo “W ■ 50K” to pay Sharp Care Services \$3,000. The check is
10 endorsed by Christela Balubar.

11 **OVERT ACT #35:** On or about October 21, 2016, Rick Rivera signed a check on PSR
12 account 536 with the memo “B ■ 100K” to pay Larry Dela Cruz \$1,000. The check was
13 endorsed by Larry Dela Cruz.

14 **OVERT ACT #36:** On or about October 21, 2016, Rick Rivera signed a check on PSR
15 account 536 with the memo “B ■ 100K” to pay Merito Jaromay \$6,000. The check is endorsed
16 by Merito Jaromay.

17 **OVERT ACT #37:** On or about October 21, 2016, Rick Rivera signed a check on PSR
18 account 536 with the memo “B ■ 100K” to pay Ricardo Rivera \$1,000. The check is endorsed
19 by Rick Rivera.

20 **OVERT ACT #38:** On or about October 21, 2016, Rick Rivera signed a check on PSR
21 account 536 with the memo “B ■ 50K” to pay Lou Maser \$2,000.

22 **OVERT ACT #39:** On or about October 21, 2016, Rick Rivera signed a check on PSR
23 account 536 with the memo “W ■ 50K” to pay Larry Dela Cruz \$500. The check is endorsed
24 by Larry Dela Cruz.

25 **OVERT ACT #40:** On or about October 21, 2016, Rick Rivera signed a check on PSR
26 account 536 with the memo “W ■ 50K” to pay Ricardo Rivera \$500. The check is endorsed
27 by Rick Rivera.

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1 **OVERT ACT #41:** On or about October 21, 2016, Rick Rivera signed a check on PSR
2 account 536 with the memo "W [REDACTED] 50K" to pay Lou Maser \$1,000.

3 **OVERT ACT #42:** On or about October 27, 2016, Rick Rivera signed a check on PSR
4 account 853 with the memo "N [REDACTED] V. \$500K x 3% = \$15K Final Commission Pay" to pay
5 Sharp Care Services \$15,000. Sharp Care Services is owned by Garry Gerardo, Bernard,
6 Campilan, and Christela Balubar.

7 **OVERT ACT #43:** On or about October 27, 2016 Rick Rivera signed checks on PSR
8 account 853 with the memo "V [REDACTED] 500K" to pay Ricardo Rivera \$5,000, Larry Dela Cruz
9 \$5,000, and Lou Maser \$10,000.

10 **OVERT ACT #44:** On or about November 3, 2016 E [REDACTED] B [REDACTED] wrote a check for
11 \$50,000 to Pagudpud Sands Resort with a memo "Addl. PSR Initial Deposit". The check was
12 deposited in PSR account 536 on November 3, 2016.

13 **OVERT ACT #45:** On or about November 7, 2016, Rick Rivera signed a check on PSR
14 account 536 with the memo "E. B. B [REDACTED] NQ" to pay Marina Jaromay \$3,000. The check was
15 endorsed by Marina Jaromay.

16 **OVERT ACT #46:** On or about and between December 1, 2016 and March 3, 2017, Rick
17 Rivera, Larry Dela Cruz, and Lou Maser offered and sold A [REDACTED] B [REDACTED] (DOB [REDACTED])
18 investment in PSR. Between December 1, of 2016 and March 3, 2017, A [REDACTED] B [REDACTED] invested
19 \$50,000 in PSR.

20 **OVERT ACT #47:** On or about December 3, 2016, PSR officers, employees and affiliates,
21 including Larry Dela Cruz, Rick Rivera, Lou Maser, Christopher Jaromay, Garry Gerardo,
22 Bernard Campilan, Nelson Manmano and others, gathered at a celebration at which investments
23 in PSR were discussed and offered to potential and existing customers.

24 **OVERT ACT #48:** On or about January 6, 2017, Rick Rivera wrote a check on PSR
25 account 536 with the memo "Lou Maser- PPM 2nd round" to pay Lou Maser \$2,000. Units in PSR
26 were sold to some investors with documentation that included the use a Private Placement
27 Memorandum (PPM).

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1 **OVERT ACT #49:** On or about January 26, 2017, Larry Dela Cruz, Rick Rivera, Nelson
2 Manmano, Christopher Jaromay, and Lou Maser, offered and sold J [REDACTED] A [REDACTED] (DOB
3 [REDACTED]) an investment in PSR. On or about January 26, 2017, A [REDACTED] invested \$150,000 in
4 PSR.

5 **OVERT ACT #50:** On or about January 26, 2017, in the Larry Dela Cruz, Rick Rivera,
6 Marina Jaromay, Merito Jaromay, Christopher Jaromay and Lou Maser offered and sold F [REDACTED]
7 V [REDACTED] (DOB [REDACTED]) an investment in PSR. Prior to January 26, 2017, V [REDACTED] attended
8 meetings focused on PSR run by Larry Dela Cruz and Rick Rivera. On or about January 26, 2017,
9 V [REDACTED] invested \$50,000 in PSR.

10 **OVERT ACT #51:** On or about February 3, 2017, Rick Rivera signed checks on PSR
11 account 853 with the memo "A [REDACTED]" to pay Ricardo Rivera \$3,000, Nelson Manmano \$3,000,
12 and Christopher Jaromay \$250.

13 **OVERT ACT #52:** On or about February 3, 2017, Rick Rivera signed checks on PSR
14 account 853 with the memo "F. V [REDACTED]" to pay Lou Maser \$1,000, Marina Jaromay \$13,000,
15 and Christopher Jaromay \$250.

16 **OVERT ACT #53:** On or about February 3, 2017, Larry Dela Cruz, Rick Rivera, Marina
17 Jaromay, Merito Jaromay, Lou Maser, Christopher Jaromay, Matt Rose offered and sold I [REDACTED]
18 P [REDACTED] (DOB [REDACTED]) an investment in PSR. On February 3, 2017, P [REDACTED] invested \$195,000 in
19 PSR.

20 **OVERT ACT #54:** On or about February 15, 2017, Rick Rivera sent an email to Matt Rose
21 and Larry Dela Cruz discussing how to design and use the PSR website to obtain potential PSR
22 customers.

23 **OVERT ACT #55:** On or about February 17, 2016, Rick Rivera signed checks on PSR
24 account 853 with the memo "L. P [REDACTED]" to pay Lou Maser \$3,900 and Christopher Jaromay,
25 \$250.

26 **OVERT ACT #56:** On or about February 17, 2016, Rick Rivera signed a check on PSR
27 account 853 with the memo "F. V [REDACTED] Bonus & L. P [REDACTED]" to pay Marina Jaromay \$14,150.

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1 **OVERT ACT #57:** On or about February 28, 2017, Larry Dela Cruz, as President/CEO
2 and Ricardo Rivera as Secretary/Treasurer signed and issued Pagudpud Sands Resort, LLC
3 Membership Certificates to F [REDACTED] M. V [REDACTED], IRA, E [REDACTED] F [REDACTED] B [REDACTED], IRA, L [REDACTED] B.
4 P [REDACTED], IRA, A [REDACTED] B [REDACTED], IRA, and J [REDACTED] [sic] C. A [REDACTED], IRA.

5 **OVERT ACT #58:** On or about and shortly before April 14, 2017, Gregory Pritchard
6 offered and sold an investment in PSR to P [REDACTED] R [REDACTED] (DOB [REDACTED]). R [REDACTED] believed she was
7 allowing Pritchard to move \$65,000 of her retirement funds to help qualify for Veteran's benefits.
8 The money was invested in PSR.

9 **OVERT ACT #59:** On or about April 17, 2017, Lou Maser sent an email to Rick Rivera
10 and Larry Dela Cruz with attached documents related to the sale of investments in PSR. One of
11 the attached documents lists Larry Dela Cruz as President/CEO, Ricardo D. Rivera as
12 Secretary/Treasurer, Lou Maser as Chief Financial Consultant, and Garry Gerardo and Nelson
13 Manmano as members of the Board of Advisors. An attached document also states subscribers
14 can wire direct deposits to CitiBank, Account No. 206566853. An attached document states that
15 PSR's company headquarters are located at 2973 Fulton Ave., Suite B, Sacramento, California.
16 An attached document includes an organization chart showing Rely On, Inc., owned by Rick
17 Rivera and Larry Dela Cruz, as a parent company to PSR. This chart also shows: Rick Rivera as
18 President/CEO and Chairman of the Board; Larry Dela Cruz as Vice President and Board of
19 Director [sic]; and Nelson Manmano as VP Marketing Sales (Hawaii).

20 **OVERT ACT #60:** On or about April 18, 2017, Rick Rivera wrote a check on PSR account
21 853 with the memo "P [REDACTED] R." to pay Greg Pritchard \$3,900.

22 **OVERT ACT #61:** On or about April 18, 2017, Rick Rivera signed a check on PSR
23 account 853 with a memo "P [REDACTED] L. entrust 150K" to pay Lou Maser \$5,000.

24 **OVERT ACT #62:** On or about and between, March 15, 2017 and September 8, 2017,
25 Larry Dela Cruz, Rick Rivera, Marina Jaromay, Lou Maser, and Christopher Jaromay, offered
26 and sold M [REDACTED] M [REDACTED] (DOB [REDACTED]) investments in PSR. Between July 14, 2017 and
27 September 11, 2017, M [REDACTED] M [REDACTED] invested \$100,000 and \$165,000, for a total of \$265,000, on
28 behalf of herself and her husband R [REDACTED] M [REDACTED] (DOB [REDACTED]). R [REDACTED] M [REDACTED], Larry

1 Dela Cruz and Rick Rivera each signed Subscription Agreements for the M [REDACTED]'s investment
2 in PSR on July 14, 2017 for \$100,000 and September 7, 2017 for \$165,000.

3 **OVERT ACT #63:** On or about May 19, 2017, Rick Rivera signed a check on PSR
4 account 853 with the memo "B [REDACTED]/P [REDACTED]" to pay Merito Jaromay \$12,950.

5 **OVERT ACT #64:** On July 31, 2017, Ricardo D. Rivera as Secretary/Treasurer and
6 Lorenzo DelaCruz [sic], President/CEO issued Pagudpud Sands Resort, LLC Membership
7 Certificates to R [REDACTED] M. M [REDACTED] IRA.

8 **OVERT ACT #65:** On or about September 22, 2017, Rick Rivera signed checks on PSR
9 account 853 with the memo "M [REDACTED] 165K" to pay Marina Jaromay \$11,550, Lou Maser
10 \$3,300, and Christopher Jaromay \$250.

11 **OVERT ACT #66:** On or about December 04, 2017, Larry Dela Cruz, Rick Rivera, Lou
12 Maser, Chris Jaromay and Marina Jaromay offered and sold PSR to A [REDACTED] A [REDACTED] (DOB
13 [REDACTED]). On or about December 08, 2017, A [REDACTED] invested \$165,000 in PSR.

14 **OVERT ACT #67:** On or about December 8, 2017, Ricardo Rivera signed a check on PSR
15 account 853 with the memo "A [REDACTED] A." to pay Lou Maser \$3,300.

16 **OVERT ACT #68:** On or about December 9, 2017, Ricardo Rivera signed a check on PSR
17 account 853, with the memo "2017 Bonus & A [REDACTED] A Processing" to pay Christopher Jaromay
18 \$1,500.

19 **OVERT ACT #69:** On or about and between December 8, 2017 to December 19, 2017
20 PSR paid approximately \$12,000 for a celebration for PSR personnel and investors.

21 **OVERT ACT #70:** On or about December 19, 2017, PSR officers, employees, staff and
22 investors attended a "Gala" at which Larry Dela Cruz, Rick Rivera, Lou Maser, and Christopher
23 Jaromay offered and solicited investment in PSR. Also attending were Nelson Manmano, Garry
24 Gerardo, Bernard Campilan, and other co-conspirators and investors.

25 **OVERT ACT #71:** On or about January 2, 2018, Ricardo Rivera signed a check on PSR
26 account 853 with the memo "A [REDACTED] A [REDACTED]" to pay Larry Dela Cruz \$8,250.

27 **OVERT ACT #72:** On or about January 24, 2018, Ricardo Rivera signed a check on PSR
28 account 853 with the memo "P [REDACTED]", to pay Larry Dela Cruz \$4,250.

1 **OVERT ACT #73:** On or about April 06, 2018, Rick Rivera, Juan Murillo, Thu Dang,
2 Kristel Villar and Christopher Jaromay offered and sold F ■ K ■ (DOB ■) an
3 investment in PSR. On April 06, 2018, K ■ invested \$30,000 in PSR.

4 **OVERT ACT #74:** On or about April 11, 2018, Ricardo Rivera signed a check on PSR
5 account 853 with the memo "F ■ K. Qualified" to pay Juan Murillo \$1,500.

6 **OVERT ACT #75:** On or about April 17, 2018, Ricardo Rivera checks on PSR account
7 853 with the memo "K ■, F" to pay Kristel Villar \$150, and Christopher Jaromay \$100 and
8 Thu Dang \$100.

9 **OVERT ACT #76:** On or about April 17, 2018, and April 19, 2018 Larry Dela Cruz, Rick
10 Rivera, Christopher Jaromay, Thu Dang, and Kristel Villar offered and sold K ■ J ■
11 (DOB ■) an investment in PSR. On or about April 17, 2018 J ■ invested \$50,000
12 in PSR and on or about April 19, 2018 J ■ invested \$100,000 in PSR

13 **OVERT ACT #77:** On or about April 27, 2018, Larry Dela Cruz, Rick Rivera, Christopher
14 Jaromay, Lou Maser, and Marina Jaromay offered and sold A ■ B ■ (DOB ■) an
15 investment in PSR. On April 27, 2018, A. B ■ invested \$50,000 in PSR.

16 **OVERT ACT #78:** On or about April 30, 2018, Larry Dela Cruz offered and sold R ■
17 F ■ (DOB ■) an investment in PSR. On or about 4/30/2018, F ■ invested \$20,000 in
18 PSR.

19 **OVERT ACT #79:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR
20 account 853 with the memo "K J ■ / May 2018" to pay Larry Dela Cruz \$11,500.

21 **OVERT ACT #80:** On or about May 1, 2018, Ricardo Rivera signed check 1376 on PSR
22 account 853 with the memo "K J ■ / May 2018" to pay Ricardo Rivera \$11,500.

23 **OVERT ACT #81:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR
24 account 853 with the memo "J ■ / A B ■" to pay Christopher Jaromay \$4,850.

25 **OVERT ACT #82:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR
26 account 853 with the memo "May 2018 & J ■" to pay Kristel Villar \$1,050.

27 **OVERT ACT #83:** On or about May 1, 2018 Ricardo Rivera signed check 1378 on PSR
28 account 853 with the memo "April 2018/J ■" to pay Thu Dang \$1,100.

1 **OVERT ACT #84:** On or about May 8, 2018, Larry Dela Cruz, Rick Rivera, Christopher
2 Jaromay, Lou Maser, Marina Jaromay, Merito Jaromay and Matt Rose offered and sold L [REDACTED]
3 P [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about May 8, L. P [REDACTED] invested \$100,000
4 in PSR.

5 **OVERT ACT #85:** On or about May 22, 2018, K [REDACTED] J [REDACTED] a check with the memo
6 “Additional Investment” to Pagudpud Sands Resort for \$20,000.

7 **OVERT ACT #86:** On or about May 22, 2018, Larry Dela Cruz, Rick Rivera, Juan
8 Murillo, Lou Maser, Christopher Jaromay, Thu Dang, and Kristel Villar offered and sold G [REDACTED]
9 R [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about May 22, 2018, R [REDACTED] invested
10 \$100,000 in PSR.

11 **OVERT ACT #87:** On or about June 5, 2018, Ricardo Rivera signed a check on PSR
12 account 853 with the memo “G [REDACTED] R [REDACTED]” to pay Juan Murillo \$5,000.

13 **OVERT ACT #88:** On or about June 20, 2018, Larry Dela Cruz, Rick Rivera, Lou Maser,
14 and Christopher Jaromay offered and sold C [REDACTED] H [REDACTED] (DOB [REDACTED]) an investment in
15 PSR. On or about June 20, 2018, H [REDACTED] invested \$60,000 in PSR.

16 **OVERT ACT #89:** On or about July 13, 2018, Ricardo Rivera signed checks on PSR
17 account 853 with the memo “G [REDACTED] R [REDACTED]” to pay Christopher Jaromay \$100, Thu Dang \$100,
18 and Kristel Villar \$50.

19 **OVERT ACT #90:** On or about July 16, 2018, Larry Dela Cruz, Rick Rivera, and Chris
20 Jaromay offered and sold J [REDACTED] H [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about July
21 16, 2018, H [REDACTED] invested \$43,000 in PSR.

22 **OVERT ACT #91:** On or about July 23, 2018, Ricardo Rivera signed a check on PSR
23 account 853 with the memo “G R [REDACTED]” to pay Lou Maser \$2,000.

24 **OVERT ACT #92:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR
25 account 853 with the memo “J H [REDACTED] & C. H [REDACTED] [sic]” to pay Ricardo Rivera \$1,750.

26 **OVERT ACT #93:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR
27 account 853 with the memo “J H [REDACTED] [sic] & C. H [REDACTED] [sic]” to pay Larry Dela Cruz \$1,750.

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1 **OVERT ACT #94:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR
2 account 853 with the memo "C. H [REDACTED] [sic]" to pay Christopher Jaromay \$1,750.

3 **OVERT ACT #95:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR
4 account 853 with the memo "C. H [REDACTED] [sic]" to pay Lou Maser \$1,200.

5 **OVERT ACT #96:** On or about September 11, 2018, Larry Dela Cruz, Rick Rivera, Lou
6 Maser, Nelson Manmano, and Christopher Jaromay offered and sold D [REDACTED] T [REDACTED] an investment
7 PSR. On or about September 11, 2018 T [REDACTED] invested \$200,000 in PSR.

8 **OVERT ACT #97:** On or about November 01, 2018, Justin McManus, an attorney
9 representing R [REDACTED] H [REDACTED], the heir to the estate of J [REDACTED] H [REDACTED], met with Larry Deal Cruz,
10 Rick Rivera, and Lou Maser to discuss a refund of J [REDACTED] H [REDACTED]'s investment in PSR. During this
11 meeting, Dela Cruz, Rivera, and Maser made a sales pitch and attempted to convince McManus
12 to keep H [REDACTED]'s investment in PSR and to personally invest in PSR.

13 **OVERT ACT #98:** On or about November 20, 2018, Larry Dela Cruz, Rick Rivera, Lou
14 Maser, Marina Jaromay, and Chris Jaromay, offered and sold E [REDACTED] B [REDACTED] (DOB [REDACTED]) an
15 investment in PSR. On or about November 20, 2018, E [REDACTED] B [REDACTED] invested \$50,000 in PSR.

16 **OVERT ACT #99:** On or about December 21, 2018, Larry Dela Cruz and Rick Rivera
17 offered to create a Limited Liability Company for R [REDACTED] T [REDACTED] (DOB [REDACTED]). On or
18 about December 21, 2018, R. T [REDACTED] provided Dela Cruz and Rivera \$35,000. The \$35,000 was
19 invested in PSR.

20 **OVERT ACT #100:** On or about February 19, 2019, Larry Dela Cruz, Rick Rivera, Lou
21 Maser, Marina Jaromay and Merito Jaromay offered and sold L [REDACTED] B [REDACTED] an investment in
22 PSR. On or about February 19, 2019, B [REDACTED] invested \$50,000 in PSR.

23 **OVERT ACT #101:** On or about February 25, 2019, Larry Dela Cruz, Rick Rivera, Lou
24 Maser, Marina Jaromay, and Christopher Jaromay, offered and sold an investment in PSR to
25 F [REDACTED] V [REDACTED] (DOB [REDACTED]). On or about February 25, 2019, V [REDACTED] invested \$25,000 in
26 PSR.

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1 **OVERT ACT #102:** On or about February 26, 2019, Larry Dela Cruz and Rick Rivera
2 offered and sold C [REDACTED] K [REDACTED] (DOB [REDACTED]) an investment in PSR. On or about
3 February 26, 2019, K [REDACTED] invested \$200,000 in PSR.

4 **OVERT ACT #103:** On or about March 14, 2019, Rick Rivera signed a check on PSR
5 account 853 with the memo "K [REDACTED]" to pay Ricardo Rivera \$6,000. Rivera endorsed the check.

6 **OVERT ACT #104:** On or about March 14, 2019, Rick Rivera signed a check on PSR
7 account 853 with the memo "K [REDACTED]" to pay Larry Dela Cruz \$6,000.

8 **OVERT ACT #105:** On or about March 17, 2019, Larry Dela Cruz, Rick Rivera, and
9 Nelson Manmano offered and sold D [REDACTED] O [REDACTED] (DOB [REDACTED]) an investment in PSR. On or
10 about May 27, 2019, O [REDACTED] invested \$650,000 in PSR.

11 **OVERT ACT #106:** On or about March 26, 2019, Larry Dela Cruz, Rick Rivera, Lou
12 Maser, Marina Jaromay and Christopher Jaromay offered and sold A [REDACTED] A [REDACTED] (DOB
13 [REDACTED]) an investment in PSR. On or about March 26, 2019, A [REDACTED] A [REDACTED] invested \$25,000
14 in PSR.

15 **OVERT ACT #107:** On May 6, 2019, Rick Rivera signed a check on PSR account 853
16 with the memo "O [REDACTED] Manmano & Yamura – travel & alex" to pay Nelson Manmano \$6,504.68.

17 **OVERT ACT #108:** On or about June 3, 2019, Larry Dela Cruz, Rick Rivera, offered and
18 sold M [REDACTED] and R [REDACTED] M [REDACTED] an investment in PSR. On or about June 3, 2019, M [REDACTED]
19 M [REDACTED] invested \$60,000 in PSR.

20 **OVERT ACT #109:** On or about June 14, 2019, Rick Rivera signed a check on PSR
21 account 853 with a memo "M [REDACTED]" to pay Larry Dela Cruz \$3,000.

22 **OVERT ACT #110:** On or about August 10, 2019, Larry Dela Cruz, Rick Rivera, Matt
23 Rose, and Nelson Manmano offered and sold PSR to D [REDACTED] N [REDACTED] (DOB [REDACTED]). On or
24 about August 10, 2019, N [REDACTED] invested \$300,000 in PSR.

25 **OVERT ACT #111:** On or about August 27, 2019, Rick Rivera signed a check on PSR
26 account 853 with the memo "D [REDACTED] N." to pay Matt Rose \$3,000. The check is endorsed by
27 Matt Rose.

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COUNT 3
PENAL CODE SECTION 368(d)—FELONY
2yr/3yr/4yr (PC 1170(h))

On or about and between the dates of April 17, 2018 and May 22, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG, and KRISTEL VILLAR who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, K [REDACTED] J [REDACTED] was an elder and dependent adult.

COUNT 4
CORPORATIONS CODE SECTION 25110-25540(a) – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of Sacramento, State of California, the crime of SALE OF UNQUALIFIED SECURITY, in violation CORPORATIONS CODE SECTION 25110-25540(a), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG and KRISTEL VILLAR who did knowingly and willingly offer to sell a security in an issuer transaction, to wit: an investment contract, to K [REDACTED] J [REDACTED], without having first qualified the offer and sale with the Department of Corporations for the State of California.

COUNT 5
CORPORATIONS CODE SECTION 25401-25540(a)--FELONY
16mos/2yr/3yr (PC 1170(h))

On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG and KRISTEL VILLAR who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: K [REDACTED] J [REDACTED], by means of communications which include

1 an untrue statement of material fact and omitted to state a material fact necessary in order to make
2 the statements made, in light of the circumstances under which they were made, not misleading.

3 **COUNT 6**
4 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of
7 Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO
8 DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of
9 Corporate Code SECTION 25541(a) was committed by RICK RIVERA, CHRISTOPHER
10 JAROMAY, THU DANG and KRISTEL VILLAR who did sell and offer to sell a security in this
11 state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to
12 another, K [REDACTED] J [REDACTED] by means of a device, scheme, or artifice to defraud in the offer,
13 purchase or sale of said security.

14 **COUNT 7**
15 **PENAL CODE SECTION 487 – FELONY**
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, and between the dates of June 28, 2016 and August 4, 2016, in the County of
18 Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF
19 A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code
20 Section 484-487(a), a Felony, was committed by RICK RIVERA, and LOU MASER who did
21 unlawfully take personal property, \$100,000, of a value exceeding nine hundred and fifty dollars
22 (\$950), the property of J [REDACTED] H [REDACTED].

23 **COUNT 8**
24 **PENAL CODE SECTION 368(d)—FELONY**
25 **2yr/3yr/4yr (PC 1170(h))**

26 On or about and between the dates of June 28, 2016 and August 4, 2016, in the county of
27 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL
28 CODE Section 368(d), a Felony, was committed by RICK RIVERA, and LOU MASER who did
unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the
property and personal identifying information of an elder and dependent adult, said property,
moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew

1 and reasonably should have known that said person, J ■■■ H ■■■, was an elder and dependent
2 adult.

3 **COUNT 9**
4 **CORPORATIONS CODE SECTION 25110-25540(a)--FELONY**
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about and between the dates of June 28, 2016 and August 4, 2016, in the County of
7 Sacramento, State of California, the crime of SALE OF UNQUALIFIED SECURITY, in
8 violation CORPORATIONS CODE SECTION 25110-25540(a), a Felony, was committed by
9 RICK RIVERA, and LOU MASER who did knowingly and willingly offer to sell a security in an
10 issuer transaction, to wit: an investment contract, to J ■■■ H ■■■, without having first qualified
11 the offer and sale with the Department of Corporations for the State of California.

12 **COUNT 10**
13 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
14 **2yr/3yr/5yr (PC 1170(h))**

15 On or about and between the dates of June 28, 2016 and August 4, 2016, in the County of
16 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE
17 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS
18 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, and LOU
19 MASER who did sell and offer to sell a security in this state, as defined in CORPORATIONS
20 CODE SECTION 25109, to wit: an investment contract, to another: J ■■■ H ■■■, by means of
21 communications which include an untrue statement of material fact and omitted to state a material
22 fact necessary in order to make the statements made, in light of the circumstances under which
23 they were made, not misleading.

24 **COUNT 11**
25 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
26 **2yr/3yr/5yr (PC 1170(h))**

27 On or about and between June 28, 2016 and August 4, 2016, in the County of Sacramento,
28 State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD
IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code
SECTION 25541(a) was committed by RICK RIVERA and LOU MASER who did sell and offer
to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an

1 investment contract, to another, J ■■■ H ■■■, by means of a device, scheme, or artifice to defraud
2 in the offer, purchase or sale of said security.

3 **COUNT 12**
4 **PENAL CODE SECTION 487 – FELONY**
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about, and between the dates of March 15, 2016 and October 7, 2019, in the County
7 of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY
8 OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code
9 Section 484-487(a), a Felony, was committed by and RICK RIVERA who did unlawfully take
10 personal property, \$300,000, of a value exceeding nine hundred and fifty dollars (\$950), the
11 property of R ■■■ F ■■■.

12 **COUNT 13**
13 **PENAL CODE SECTION 368(d)—FELONY**
14 **2yr/3yr/4yr (PC 1170(h))**

15 On or about and between the dates of March 15, 2016 and October 7, 2019, in the county of
16 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL
17 CODE Section 368(d), a Felony, was committed by RICK RIVERA who did unlawfully carry out
18 theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal
19 identifying information of an elder and dependent adult, said property, moneys, labor, good and
20 services taken and obtained having a value exceeding \$950, and knew and reasonably should
21 have known that said person, R ■■■ F ■■■ was an elder and dependent adult.

22 **COUNT 14**
23 **PENAL CODE SECTION 487 – FELONY**
24 **16mos/2yr/3yr (PC 1170(h))**

25 On or about, July 16, 2018, in the County of Sacramento, State of California, the crime of
26 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND
27 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by
28 RICK RIVERA, and CHRISTOPHER JAROMAY who did unlawfully take personal property,
\$43,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of J ■■■
H ■■■.

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COUNT 15
PENAL CODE SECTION 368(d)—FELONY
2yr/3yr/4yr (PC 1170(h))

On or about July 16, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, and CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, J [REDACTED] H [REDACTED], was an elder and dependent adult.

COUNT 16
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about July 16, 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: J [REDACTED] H [REDACTED] by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 17
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about July 16, 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment

1 contract, to another, J [REDACTED] H [REDACTED], by means of a device, scheme, or artifice to defraud in the
2 offer, purchase or sale of said security.

3 **COUNT 18**
4 **PENAL CODE SECTION 459/460(a) – FELONY**
5 **2yr/4yr/6yr (PC 1170(h))**

6 On or about, October 18, 2016, in the County of San Francisco, State of California,
7 GARRY GERARDO, BERNARD CAMPILAN, and CHRISTELA BALUBAR, did enter an
8 inhabited dwelling house and inhabited portion of a building occupied by N [REDACTED] V [REDACTED] (DOB
9 [REDACTED]), with the intent to commit larceny and any felony.

10 It is further alleged that the above offense is a violation of Penal Code Section 462(a).

11 It is further alleged that the above offense is a violent felony within the meaning of Penal
12 Code 667.5(c) in that another person, other than an accomplice, was present in the residence
13 during the commission of the above offense.

14 It is further alleged that the above offense is a serious felony within the meaning of Penal
15 Code section 1192.7(c)(18).

16 **COUNT 19**
17 **PENAL CODE SECTION 487 – FELONY**
18 **16mos/2yr/3yr (PC 1170(h))**

19 On or about, October 18, 2016, in the County of Sacramento, State of California, the crime
20 of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED
21 AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was
22 committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, RICK
23 RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully take personal
24 property, \$500,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of
25 N [REDACTED] V [REDACTED] (DOB [REDACTED]).

26 **COUNT 20**
27 **PENAL CODE SECTION 368(d)—FELONY**
28 **2yr/3yr/4yr (PC 1170(h))**

On or about October 18, 2016, in the county of Sacramento, State of California, the crime
of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was
committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, RICK

1 RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully carry out theft,
2 embezzlement, forgery, fraud and identity theft with respect to the property and personal
3 identifying information of an elder and dependent adult, said property, moneys, labor, good and
4 services taken and obtained having a value exceeding \$950, and knew and reasonably should
5 have known that said person, N [REDACTED] V [REDACTED] (DOB [REDACTED]), was an elder and dependent
6 adult.

7 **COUNT 21**
8 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
9 **2yr/3yr/5yr (PC 1170(h))**

10 On or about October 18, 2016, in the County of Sacramento, State of California, the crime
11 of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
12 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
13 Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA
14 BALUBAR, RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and
15 offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to
16 wit: an investment contract, to another: N [REDACTED] V [REDACTED] (DOB [REDACTED]), by means of
17 communications which include an untrue statement of material fact and omitted to state a material
18 fact necessary in order to make the statements made, in light of the circumstances under which
19 they were made, not misleading.

20 **COUNT 22**
21 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
22 **2yr/3yr/5yr (PC 1170(h))**

23 On or about October 18, 2016, in the County of Sacramento, State of California, the crime
24 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,
25 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)
26 was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR,
27 RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and offer to sell
28 a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an
investment contract, to another, N [REDACTED] V [REDACTED] (DOB [REDACTED]), by means of a device,
scheme, or artifice to defraud in the offer, purchase or sale of said security.

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COUNT 23
PENAL CODE SECTION 459/460(a) – FELONY
2yr/4yr/6yr (PC 1170(h))

On or about, October 19, 2016, in the County of San Joaquin, State of California, GARRY GERARDO, BERNARD CAMPILAN, and CHRISTELA BALUBAR, did enter an inhabited dwelling house and inhabited portion of a building occupied by M [REDACTED] H [REDACTED] (DOB [REDACTED]), with the intent to commit larceny and any felony.

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code 667.5(c) in that another person, other than an accomplice, was present in the residence during the commission of the above offense.

COUNT 24
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, October 19, 2016, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, and RICK RIVERA, who did unlawfully take personal property, \$43,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of M [REDACTED] H [REDACTED] (DOB [REDACTED]).

COUNT 25
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about October 19, 2016, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, and RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: M [REDACTED] H [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue

1 statement of material fact and omitted to state a material fact necessary in order to make the
2 statements made, in light of the circumstances under which they were made, not misleading.

3 **COUNT 26**
4 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about October 19, 2016, in the County of Sacramento, State of California, the crime
7 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,
8 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)
9 was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR,
10 and RICK RIVERA, who did sell and offer to sell a security in this state as defined in
11 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, M [REDACTED]
12 H [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the
13 offer, purchase or sale of said security.

14 **COUNT 27**
15 **PENAL CODE SECTION 487 – FELONY**
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, July 19, 2016, in the County of Sacramento, State of California, the crime of
18 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND
19 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by
20 RICK RIVERA, LOU MASER, and NELSON MANMANO, who did unlawfully take personal
21 property, \$65,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of
22 V [REDACTED] B [REDACTED] (DOB [REDACTED]).

23 **COUNT 28**
24 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
25 **2yr/3yr/5yr (PC 1170(h))**

26 On or about July 19, 2016, in the County of Sacramento, State of California, the crime of
27 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
28 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
29 Felony, was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did
30 sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION
31 25109, to wit: an investment contract, to another: V [REDACTED] B [REDACTED] (DOB [REDACTED]), by means

1 of communications which include an untrue statement of material fact and omitted to state a
2 material fact necessary in order to make the statements made, in light of the circumstances under
3 which they were made, not misleading.

4 **COUNT 29**
5 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about July 19, 2016, in the County of Sacramento, State of California, the crime of
8 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,
9 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed
10 by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did sell and offer to sell a
11 security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an
12 investment contract, to another, V [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of a device,
13 scheme, or artifice to defraud in the offer, purchase or sale of said security.

14 **COUNT 30**
15 **PENAL CODE SECTION 487 – FELONY**
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, January 12, 2016 and June 20, 2018, in the County of Sacramento, State of
18 California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER
19 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a
20 Felony, was committed by RICK RIVERA, LOU MASER and CHRISTOPHER JAROMAY
21 who did unlawfully take personal property, \$85,000, of a value exceeding nine hundred and fifty
22 dollars (\$950), the property of C [REDACTED] H [REDACTED] (DOB [REDACTED]) and L [REDACTED] B [REDACTED] (DOB
23 [REDACTED]).

24 **COUNT 31**
25 **PENAL CODE SECTION 368(d)—FELONY**
26 **2yr/3yr/4yr (PC 1170(h))**

27 On or about January 12, 2016 and June 20, 2018, in the county of Sacramento, State of
28 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section
368(d), a Felony, was committed by RICK RIVERA, LOU MASER and CHRISTOPHER
JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft
with respect to the property and personal identifying information of an elder and dependent adult,

1 said property, moneys, labor, good and services taken and obtained having a value exceeding
2 \$950, and knew and reasonably should have known that said person, C [REDACTED] H [REDACTED] (DOB
3 [REDACTED]) and I [REDACTED] E [REDACTED] (DOB [REDACTED]), was an elder and dependent adult.

4 **COUNT 32**
5 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about January 12, 2016 and June 20, 2018, in the County of Sacramento, State of
8 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND
9 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION
10 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER and
11 CHRISTOPHER JAROMAY who did sell and offer to sell a security in this state, as defined in
12 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: C [REDACTED]
13 H [REDACTED] (DOB [REDACTED]) and I [REDACTED] E [REDACTED] (DOB [REDACTED]), by means of
14 communications which include an untrue statement of material fact and omitted to state a material
15 fact necessary in order to make the statements made, in light of the circumstances under which
16 they were made, not misleading.

17 **COUNT 33**
18 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
19 **2yr/3yr/5yr (PC 1170(h))**

20 On or about January 12, 2016 and June 20, 2018, in the County of Sacramento, State of
21 California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE
22 OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION
23 25541(a) was committed by RICK RIVERA, LOU MASER and CHRISTOPHER JAROMAY,
24 who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE
25 SECTION 25109, to wit: an investment contract, to another, C [REDACTED] H [REDACTED] (DOB [REDACTED])
26 and I [REDACTED] E [REDACTED] (DOB [REDACTED]) C [REDACTED] H [REDACTED] (DOB [REDACTED]) and I [REDACTED]
27 B [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer,
28 purchase or sale of said security.

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COUNT 34
PENAL CODE SECTION 459 – FELONY
2yr/4yr/6yr (PC 1170(h))

On or about, October 18, 2016, in the County of Yolo, State of California, CHRISTOPHER JAROMAY, did enter an inhabited dwelling house and inhabited portion of a building occupied by E ■■■ M ■■■ (DOB ■■■■■■■■■■), with the intent to commit larceny and any felony.

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code 667.5(c) in that another person, other than an accomplice, was present in the residence during the commission of the above offense.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code section 1192.7(c)(18).

COUNT 35
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, May 4, 2016, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully take personal property, \$110,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of E ■■■ M ■■■ (DOB ■■■■■■■■■■).

COUNT 36
PENAL CODE SECTION 368(d)—FELONY
2yr/3yr/4yr (PC 1170(h))

On or about May 4, 2016, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew

1 and reasonably should have known that said person, E [REDACTED] M [REDACTED] (DOB [REDACTED]), was an
2 elder and dependent adult.

3 **COUNT 37**
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about May 4, 2016, in the County of Sacramento, State of California, the crime of
7 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
8 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
9 Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY,
10 who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE
11 SECTION 25109, to wit: an investment contract, to another: E [REDACTED] M [REDACTED] (DOB [REDACTED]), by
12 means of communications which include an untrue statement of material fact and omitted to state
13 a material fact necessary in order to make the statements made, in light of the circumstances
14 under which they were made, not misleading.

15 **COUNT 38**
16 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
17 **2yr/3yr/5yr (PC 1170(h))**

18 On or about May 4, 2016, in the County of Sacramento, State of California, the crime of
19 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,
20 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed
21 by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and offer to
22 sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an
23 investment contract, to another, E [REDACTED] M [REDACTED] (DOB [REDACTED]), by means of a device, scheme,
24 or artifice to defraud in the offer, purchase or sale of said security.

25 **COUNT 39**
26 **PENAL CODE SECTION 487 – FELONY**
27 **16mos/2yr/3yr (PC 1170(h))**

28 On or about, April 4, 2016, September 11, 2018, and October 18, 2019, in the County of
Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF
A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code
Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON

1 MANMANO and CHRISTOPHER JAROMAY, who did unlawfully take personal property,
2 \$395,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of D [REDACTED]
3 T [REDACTED] (DOB [REDACTED]).

4 **COUNT 40**
5 **PENAL CODE SECTION 368(d)—FELONY**
6 **2yr/3yr/4yr (PC 1170(h))**

7 On or about April 4, 2016, September 11, 2018, and October 18, 2019, in the county of
8 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL
9 CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON
10 MANMANO and CHRISTOPHER JAROMAY who did unlawfully carry out theft,
11 embezzlement, forgery, fraud and identity theft with respect to the property and personal
12 identifying information of an elder and dependent adult, said property, moneys, labor, good and
13 services taken and obtained having a value exceeding \$950, and knew and reasonably should
14 have known that said person, D [REDACTED] T [REDACTED] (DOB [REDACTED]), was an elder and dependent
15 adult.

16 **COUNT 41**
17 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about April 4, 2016, September 11, 2018, and October 18, 2019, in the County of
20 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE
21 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS
22 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA; LOU MASER,
23 NELSON MANMANO and CHRISTOPHER JAROMAY who did sell and offer to sell a security
24 in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment
25 contract, to another: D [REDACTED] T [REDACTED] (DOB [REDACTED]), by means of communications which
26 include an untrue statement of material fact and omitted to state a material fact necessary in order
27 to make the statements made, in light of the circumstances under which they were made, not
28 misleading.

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1 and reasonably should have known that said person, L [REDACTED] P [REDACTED] DOB ([REDACTED]), was an elder
2 and dependent adult.

3 **COUNT 45**
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about February 3, 2017, April 18, 2017, and May 8, 2018, in the County of
7 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE
8 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS
9 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER,
10 CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE,
11 who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE
12 SECTION 25109, to wit: an investment contract, to another: I [REDACTED] P [REDACTED] DOB ([REDACTED]), by
13 means of communications which include an untrue statement of material fact and omitted to state
14 a material fact necessary in order to make the statements made, in light of the circumstances
15 under which they were made, not misleading.

16 **COUNT 46**
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about February 3, 2017, April 18, 2017, and May 8, 2018, in the County of
20 Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO
21 DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of
22 Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER,
23 CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE,
24 who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE
25 SECTION 25109, to wit: an investment contract, to another, L [REDACTED] P [REDACTED] DOB ([REDACTED]), by
26 means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

27 **COUNT 47**
28 **PENAL CODE SECTION 487 – FELONY**
16mos/2yr/3yr (PC 1170(h))

On or about, January 26, 2017 and February 25, 2019, in the County of Sacramento, State
of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER

1 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a
2 Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY,
3 MARINA JAROMAY, and MERITO JAROMAY who did unlawfully take personal property,
4 \$75,000 of a value exceeding nine hundred and fifty dollars (\$950), the property of F [REDACTED]
5 V [REDACTED] (DOB [REDACTED]).

6 **COUNT 48**
7 **PENAL CODE SECTION 368(d)—FELONY**
8 **2yr/3yr/4yr (PC 1170(h))**

9 On or about January 26, 2017 and February 25, 2019, in the county of Sacramento, State of
10 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section
11 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER
12 JAROMAY, MARINA JAROMAY, and MERITO JAROMAY who did unlawfully carry out
13 theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal
14 identifying information of an elder and dependent adult, said property, moneys, labor, good and
15 services taken and obtained having a value exceeding \$950, and knew and reasonably should
16 have known that said person, F [REDACTED] V [REDACTED] (DOB [REDACTED]), was an elder and dependent
17 adult.

18 **COUNT 49**
19 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
20 **2yr/3yr/5yr (PC 1170(h))**

21 On or about January 26, 2017 and February 25, 2019, in the County of Sacramento, State of
22 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND
23 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION
24 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER
25 JAROMAY, MARINA JAROMAY, and MERITO JAROMAY, who did sell and offer to sell a
26 security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an
27 investment contract, to another: F [REDACTED] V [REDACTED] (DOB [REDACTED]), by means of communications
28 which include an untrue statement of material fact and omitted to state a material fact necessary
in order to make the statements made, in light of the circumstances under which they were made,
not misleading.

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COUNT 50
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about January 26, 2017 and February 25, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY, MARINA JAROMAY, and MERITO JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, F [REDACTED] V [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

COUNT 51
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, October 20, 2016, November 3, 2016, March 16, 2017, and November 20, 2018, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY who did unlawfully take personal property, \$250,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of E [REDACTED] B [REDACTED] (DOB [REDACTED]).

COUNT 52
PENAL CODE SECTION 368(d)—FELONY
2yr/3yr/4yr (PC 1170(h))

On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and

1 services taken and obtained having a value exceeding \$950, and knew and reasonably should
2 have known that said person, E [REDACTED] B [REDACTED] (DOB [REDACTED]), was an elder and dependent adult.

3 **COUNT 53**

4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20,
7 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS
8 CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in
9 violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by
10 RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY, who
11 did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE
12 SECTION 25109, to wit: an investment contract, to another: E [REDACTED] B [REDACTED] (DOB [REDACTED]), by
13 means of communications which include an untrue statement of material fact and omitted to state
14 a material fact necessary in order to make the statements made, in light of the circumstances
15 under which they were made, not misleading.

16 **COUNT 54**

17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20,
20 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE,
21 SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A
22 SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK
23 RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY, who did sell
24 and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109,
25 to wit: an investment contract, to another, E [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of a device,
26 scheme, or artifice to defraud in the offer, purchase or sale of said security.

27 **COUNT 55**

28 **PENAL CODE SECTION 487 – FELONY**
16mos/2yr/3yr (PC 1170(h))

On or about, December 4, 2017 and March 26, 2019, in the County of Sacramento, State of
California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER

1 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a
2 Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY and
3 CHRISTOPHER JAROMAY who did unlawfully take personal property, \$190,000, of a value
4 exceeding nine hundred and fifty dollars (\$950), the property of A [REDACTED] A [REDACTED] (DOB [REDACTED]).

5 **COUNT 56**
6 **PENAL CODE SECTION 368(d)—FELONY**
7 **2yr/3yr/4yr (PC 1170(h))**

8 On or about December 4, 2017 and March 26, 2019, in the county of Sacramento, State of
9 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section
10 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY and
11 CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud
12 and identity theft with respect to the property and personal identifying information of an elder and
13 dependent adult, said property, moneys, labor, good and services taken and obtained having a
14 value exceeding \$950, and knew and reasonably should have known that said person, A [REDACTED]
15 A [REDACTED] (DOB [REDACTED]), was an elder and dependent adult.

16 **COUNT 57**
17 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about December 4, 2017 and March 26, 2019, in the County of Sacramento, State of
20 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND
21 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION
22 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA
23 JAROMAY and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this
24 state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to
25 another: A [REDACTED] A [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue
26 statement of material fact and omitted to state a material fact necessary in order to make the
27 statements made, in light of the circumstances under which they were made, not misleading.

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COUNT 61
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about August 22, 2016 and February 2, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: L [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 62
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about August 22, 2016 and February 2, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, L [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

COUNT 63
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, January 26, 2017, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and CHRISTOPHER

1 JAROMAY who did unlawfully take personal property, \$150,000, of a value exceeding nine
2 hundred and fifty dollars (\$950), the property of J [REDACTED] A [REDACTED] (DOB [REDACTED]).

3 **COUNT 64**
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about January 26, 2017, in the County of Sacramento, State of California, the crime
7 of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
8 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
9 Felony, was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and
10 CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state, as defined in
11 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: J [REDACTED]
12 A [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of
13 material fact and omitted to state a material fact necessary in order to make the statements made,
14 in light of the circumstances under which they were made, not misleading.

15 **COUNT 65**
16 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
17 **2yr/3yr/5yr (PC 1170(h))**

18 On or about January 26, 2017, in the County of Sacramento, State of California, the crime
19 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,
20 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)
21 was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and
22 CHRISTOPHER JAROMAY; who did sell and offer to sell a security in this state as defined in
23 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, J [REDACTED]
24 A [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer,
25 purchase or sale of said security.

26 **COUNT 66**
27 **PENAL CODE SECTION 487 – FELONY**
28 **16mos/2yr/3yr (PC 1170(h))**

On or about, September 23, 2016, in the County of Sacramento, State of California, the
crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE
HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony,

1 was committed by RICK RIVERA, and NELSON MANMANO, who did unlawfully take
2 personal property, \$110,000, of a value exceeding nine hundred and fifty dollars (\$950), the
3 property of D ■■■ S ■■■ (DOB ■■■).

4 **COUNT 67**
5 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about July 16, 2018, in the County of Sacramento, State of California, the crime of
8 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
9 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
10 Felony, was committed by RICK RIVERA, and NELSON MANMANO, who did sell and offer
11 to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit:
12 an investment contract, to another: D ■■■ S ■■■ (DOB ■■■), by means of
13 communications which include an untrue statement of material fact and omitted to state a material
14 fact necessary in order to make the statements made, in light of the circumstances under which
15 they were made, not misleading.

16 **COUNT 68**
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about July 16, 2018, in the County of Sacramento, State of California, the crime of
20 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,
21 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed
22 by RICK RIVERA, and NELSON MANMANO, who did sell and offer to sell a security in this
23 state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to
24 another, D ■■■ S ■■■ (DOB ■■■), by means of a device, scheme, or artifice to defraud
25 in the offer, purchase or sale of said security.

26 **COUNT 69**
27 **PENAL CODE SECTION 487 – FELONY**
28 **16mos/2yr/3yr (PC 1170(h))**

On or about, May 22, 2018, in the County of Sacramento, State of California, the crime of
GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND
FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by

1 A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code
2 Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA
3 JAROMAY, and CHRISTOPHER JAROMAY, who did unlawfully take personal property,
4 \$325,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of R [REDACTED]
5 M [REDACTED] (DOB [REDACTED]) and M [REDACTED] M [REDACTED] (DOB [REDACTED]).

6 **COUNT 73**
7 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
8 **2yr/3yr/5yr (PC 1170(h))**

9 On or about July 14, 2017, September 8, 2017, and June 3, 2019, in the County of
10 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE
11 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS
12 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER,
13 MARINA JAROMAY, and CHRISTOPHER JAROMAY, who did sell and offer to sell a
14 security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an
15 investment contract, to another: R [REDACTED] M [REDACTED] (DOB [REDACTED]) and M [REDACTED] M [REDACTED] (DOB
16 [REDACTED]), by means of communications which include an untrue statement of material fact and
17 omitted to state a material fact necessary in order to make the statements made, in light of the
18 circumstances under which they were made, not misleading.

19 **COUNT 74**
20 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
21 **2yr/3yr/5yr (PC 1170(h))**

22 On or about July 14, 2017, September 8, 2017, and June 3, 2019, State of California, the
23 crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,
24 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)
25 was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER
26 JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS
27 CODE SECTION 25109, to wit: an investment contract, to another, R [REDACTED] M [REDACTED] (DOB
28 [REDACTED]) and M [REDACTED] M [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to
defraud in the offer, purchase or sale of said security.

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COUNT 75
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, April 14, 2017, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and GREGORY PRITCHARD who did unlawfully take personal property, \$65,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of P [REDACTED] R [REDACTED] (DOB [REDACTED]).

COUNT 76
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about April 14, 2017, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA and GREGORY PRITCHARD, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: P [REDACTED] R [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 77
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about December 21, 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA and GREGORY PRITCHARD, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, P [REDACTED] R [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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COUNT 78
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, who did unlawfully take personal property, \$35,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of R [REDACTED] T [REDACTED] (DOB [REDACTED]).

COUNT 79
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: R [REDACTED] T [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 80
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, R [REDACTED] T [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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COUNT 81
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, February 26, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA who did unlawfully take personal property, \$200,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of C [REDACTED] K [REDACTED] (DOB [REDACTED]).

COUNT 82
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about February 26, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: C [REDACTED] K [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 83
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about February 26, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by and RICK RIVERA, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, C [REDACTED] K [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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COUNT 84
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, March 17, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and NELSON MANMANO, who did unlawfully take personal property, \$650,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of D [REDACTED] O [REDACTED] (DOB [REDACTED]).

COUNT 85
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about March 17, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA and NELSON MANMANO, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CO/DE SECTION 25109, to wit: an investment contract, to another: D [REDACTED] O [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 86
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about March 17, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA and NELSON MANMANO, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, D [REDACTED] O [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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COUNT 87
PENAL CODE SECTION 487 – FELONY
16mos/2yr/3yr (PC 1170(h))

On or about, August 10, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and NELSON MANMANO, and MATT ROSE, who did unlawfully take personal property, \$300,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of D [REDACTED] N [REDACTED] (DOB [REDACTED]).

COUNT 88
CORPORATIONS CODE SECTION 25401-25540(b)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about August 10, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, NELSON MANMANO, and MATT ROSE, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: D [REDACTED] N [REDACTED] (DOB [REDACTED]), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

COUNT 89
CORPORATIONS CODE SECTION 25541(a)--FELONY
2yr/3yr/5yr (PC 1170(h))

On or about August 10, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, NELSON MANMANO, and MATT ROSE, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, D [REDACTED] N [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

1 **COUNT 90**
2 **PENAL CODE SECTION 487 – FELONY**
3 **16mos/2yr/3yr (PC 1170(h))**

4 On or about, July 11, 2016, in the County of Sacramento, State of California, the crime of
5 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND
6 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by
7 RICK RIVERA, LOU MASER, and NELSON MANMANO, who did unlawfully take personal
8 property, \$100,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of
9 E ■■■ G ■■■■ (DOB ■■■■) and O ■■■ G ■■■■ (■■■■).

10 **COUNT 91**
11 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
12 **2yr/3yr/5yr (PC 1170(h))**

13 On or about July 11, 2016, in the County of Sacramento, State of California, the crime of
14 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
15 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
16 Felony, was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did
17 sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION
18 25109, to wit: an investment contract, to another: E ■■■ G ■■■■ (DOB ■■■■) and O ■■■
19 G ■■■■ (■■■■), by means of communications which include an untrue statement of
20 material fact and omitted to state a material fact necessary in order to make the statements made,
21 in light of the circumstances under which they were made, not misleading.

22 **COUNT 92**
23 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
24 **2yr/3yr/5yr (PC 1170(h))**

25 On or about July 11, 2016, in the County of Sacramento, State of California, the crime of
26 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,
27 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed
28 by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did sell and offer to sell a
security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an
investment contract, to another, E ■■■ G ■■■■ (DOB ■■■■) and O ■■■ G ■■■■

1 ([REDACTED]), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of
2 said security.

3 **COUNT 93**
4 **PENAL CODE SECTION 487 – FELONY**
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of
7 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND
8 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by
9 RICK RIVERA, JUAN MURILLO, CHRISTOPHER JAROMAY, THU DANG, and KRISTEL
10 VILLAR, who did unlawfully take personal property, \$30,000, of a value exceeding nine hundred
11 and fifty dollars (\$950), the property of F [REDACTED] K [REDACTED] (DOB [REDACTED]).

12 **COUNT 94**
13 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
14 **2yr/3yr/5yr (PC 1170(h))**

15 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of
16 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF
17 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a
18 Felony, was committed by RICK RIVERA, and JUAN MURILLO, CHRISTOPHER
19 JAROMAY, THU DANG, and KRISTEL VILLAR, who did sell and offer to sell a security in
20 this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment
21 contract, to another: F [REDACTED] K [REDACTED] (DOB [REDACTED]), by means of communications which include
22 an untrue statement of material fact and omitted to state a material fact necessary in order to make
23 the statements made, in light of the circumstances under which they were made, not misleading.

24 **COUNT 95**
25 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
26 **2yr/3yr/5yr (PC 1170(h))**

27 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of
28 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,
OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed
by RICK RIVERA, JUAN MURILLO, CHRISTOPHER JAROMAY, THU DANG, and
KRISTEL VILLAR, who did sell and offer to sell a security in this state as defined in

1 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, F [REDACTED]
2 K [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the offer,
3 purchase or sale of said security.

4 **COUNT 96**
5 **PENAL CODE SECTION 487 – FELONY**
6 **16mos/2yr/3yr (PC 1170(h))**

7 On or about, March 3, 2017 and April 27, 2018, in the County of Sacramento, State of
8 California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER
9 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a
10 Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and
11 CHRISTOPHER JAROMAY, who did unlawfully take personal property, \$100,000, of a value
12 exceeding nine hundred and fifty dollars (\$950), the property of A [REDACTED] B [REDACTED] (DOB
13 [REDACTED]).

14 **COUNT 97**
15 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**
16 **2yr/3yr/5yr (PC 1170(h))**

17 On or about March 3, 2017, and April 27, 2018, in the County of Sacramento, State of
18 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND
19 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION
20 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA
21 JAROMAY, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this
22 state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to
23 another: A [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of communications which include an
24 untrue statement of material fact and omitted to state a material fact necessary in order to make
25 the statements made, in light of the circumstances under which they were made, not misleading.

26 **COUNT 98**
27 **CORPORATIONS CODE SECTION 25541(a)--FELONY**
28 **2yr/3yr/5yr (PC 1170(h))**

On or about March 3, 2017, and April 27, 2018, in the County of Sacramento, State of
California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE
OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION

1 25541(a) was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and
2 CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in
3 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another,
4 A [REDACTED] B [REDACTED] (DOB [REDACTED]), by means of a device, scheme, or artifice to defraud in the
5 offer, purchase or sale of said security.

6 **SPECIAL ALLEGATIONS**
7 **Extended Statute of Limitations – Penal Code Sections 801.5/803(c)**

8 It is further alleged pursuant to Penal Code section 803(c) (Statute of Limitations Tolled)
9 that the offenses charged in Counts 1 through and including 101 above are felonies, and no
10 victims of the offenses and no law enforcement agencies chargeable with the investigation and
11 prosecution of the offenses had actual or constructive knowledge of the offenses prior to the date
12 of July 29, 2019, when representatives of the California Department of Justice, Division of Medi-
13 Cal Fraud and Elder Abuse were informed of the existence and identity of the conspiracy to
14 illegally and fraudulently sell and offer investments in Pagudpud Sands Resort. These offenses
15 were not discovered earlier because the defendants and others made false statements to the buyers
16 and investors in the securities, as to the true nature of the transactions and their legality under the
17 laws of the State of California.

18 **PROBATION LIMITATION**

19 It is further alleged that the offenses set forth in Counts 1 through and including 101 are
20 thefts of over \$100,000 within the meaning of Penal Code section 1203.045(a).

21 **AGGRAVATED WHITE COLLAR CRIME –LOSS GREATER THAN \$100,000**

22 It is further alleged, pursuant to Penal Code section 186.11(a) that the offenses set forth in
23 Counts 1 through 101 are related felonies, a material element of which is fraud and
24 embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony
25 conduct involves the taking of an aggregate amount of more than One Hundred Thousand Dollars
26 (\$100,000).

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PENAL CODE SECTION 12022.6
To January 1, 2018

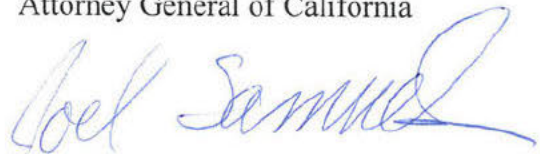
It is further alleged, pursuant to Penal Code section 12022.6 and *People v. Medeiros* (2021) 46 Cal.App 5th 1142, that the offenses in counts 1, 7, 8, 9, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 72, 73, 74, 75, 7,6 ,77, 90, 91, 92, 96, 97, and 98 took place prior to January 1, 2018 and are subject to the enhanced penalties of this section for a taking in an amount greater than \$3,200,000.

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

Dated: May 20, 2021

Respectfully Submitted,

ROB BONTA
Attorney General of California



JOEL SAMUELS
Deputy Attorney General
Attorneys for the People of the State of California