

1 MATTHEW RODRIQUEZ
Acting Attorney General of California
2 JAMES ROOT
Senior Assistant Attorney General
3 RANDY M. MAILMAN
Supervising Deputy Attorney General
4 ASEIL MOHMOUD
Deputy Attorney General
5 MATTHEW C. TAYLOR
Deputy Attorney General
6 State Bar No. 278245
1300 I Street, Suite 125
7 P.O. Box 944255
Sacramento, CA 94244-2550
8 Telephone: (916) 210-7865
Fax: (916) 322-2368
9 E-mail: Matthew.Taylor@doj.ca.gov
Attorneys for the People of the State of California

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN MATEO
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13
14 **THE PEOPLE OF THE STATE OF
CALIFORNIA,**

15 Plaintiff,

16 v.

Case No. Case No. 20-NF-010944-A; 20-NF-
010944-B; 20-NF-010944-D; 20-NF-010944-
E; 20-NF-012556-A

**FIRST AMENDED
FELONY COMPLAINT**

17 **EDGAR GEOVANY ROBLES MORALES**
18 **31 PRAGUE ST**
SAN FRANCISCO, CA 94112

19 **ISIS F VASQUEZ VILLANUEVA**
20 **31 PRAGUE ST**
SAN FRANCISCO, CA 94112

21 **DANNY LOUIS DRAGO**
22 **916 HASTINGS DRIVE**
CONCORD, CA 94518

23 **MICHELLE RENEE FOWLER**
24 **916 HASTINGS DRIVE**
CONCORD, CA 94518

25 **LORI ANN SMITH**
26 **224 ESCOBAR ST**
MARTINEZ, CA 94553
27 **AKA LORI ANN KADLEC, LORI ANN**
PEREIRA

28 Defendants.

1 The Attorney General of the State of California by this First Amended Complaint accuses
2 Defendants EDGAR GEOVANY ROBLES MORALES, ISIS F VASQUEZ VILLANUEVA,
3 DANNY LOUIS DRAGO, MICHELLE RENEE FOWLER, AND LORI ANN SMITH of the
4 following criminal offenses:

5 **COUNT ONE**
6 **(Conspiracy to Organized Retail Theft)**

7 On or between March 1, 2020, through September 23, 2020, the Defendants EDGAR
8 GEOVANY ROBLES MORALES, ISIS F VASQUEZ VILLANUEVA, DANNY LOUIS
9 DRAGO, MICHELLE RENEE FOWLER, AND LORI ANN SMITH did, in the County of San
10 Mateo, State of California, commit a FELONY, to wit: CONSPIRACY TO COMMIT A CRIME,
11 a violation of section 182, subdivision (a)(1), of the PENAL CODE of California, in that said
12 Defendants did unlawfully conspire together and with another person and persons whose identity
13 is unknown to commit the crime of Organized Retail Theft, a felony, in violation of section 490.4,
14 subdivision (a) of the Penal Code; that pursuant to and for the purpose of carrying out the
15 objectives and purpose of the aforesaid conspiracy, the said Defendants committed the following
16 overt act and acts and in the County of San Mateo:

17 **Overt Act 1**

18 On 3/9/2020 Defendant Robles Morales received stolen over the counter medication. His
19 wife Defendant Villanueva contacted Defendant Drago to facilitate the sale of the stolen
20 medications.

21 **Overt Act 2**

22 On 4/3/2020 Defendant Robles Morales received stolen over the counter medication. His
23 wife Defendant Villanueva contacted Defendant Drago to facilitate the sale of the stolen
24 medications.

25 **Overt Act 3**

26 On 4/27/2020 Defendant Robles Morales asked his wife, Defendant Villanueva to send
27 him a list of medications with photos from Defendant Drago so that he can obtain stolen
28 medications on the street.

1 **Overt Act 4**

2 On 4/30/2020 Defendant Robles Morales spent \$500.00 on stolen medication and sent
3 images of the items to his wife Defendant Villanueva.

4 **Overt Act 5**

5 On 5/6/2020 Defendant Robles Morales sent images of stolen medications he obtained to
6 his wife Defendant Villanueva.

7 **Overt Act 6**

8 On 5/9/2020 Defendant Robles Morales sent pictures to his wife, Defendant Villanueva,
9 of stolen medications he obtained and she acted as an intermediary with Defendant Drago to
10 facilitate the sale of the stolen medications. Defendant Robles Morales delivered the stolen
11 medications to Defendant Drago.

12 **Overt Act 6**

13 On 9/1/2020, Defendant Robles Morales purchased an item of bait merchandise, including
14 over the counter medications, from investigators in San Mateo County. On 9/7/2020 the bait
15 merchandise was moved to a facility owned by Defendant Drago in 1015 Shary Circle, Concord,
16 California.

17 **Overt Act 7**

18 In 2018, Defendant Drago and Defendant Fowler registered a business called D-Luxe
19 OTC Inc. which they used as a shell company to conceal their criminal activity of receiving and
20 selling stolen medication.

21 **Overt Act 8**

22 From 9/3/2020 to 9/23/2020 Defendant Fowler would open up the warehouse on Shary
23 Circle in Concord every morning to allow a warehouse crew into the property to process stolen
24 medications.

25 **Overt Act 9**

26 On 9/18/2020 Defendant Drago completed stolen property exchanges with Defendant
27 Robles Morales. Defendant Drago then transferred the bags of stolen items to his storage facility
28 on Shary Circle, Concord. He lifted the bags with the assistance of Defendant Fowler.

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Overt Act 9

On 9/30/2020 Defendant Fowler and Defendant Drago were in possession of booster bags used for the storage of stolen property in their residence and paraphernalia showing sales and packaging of stolen over the counter medications and stolen retail merchandise.

Overt Act 10

During all times mentioned, Defendant Smith assisted Defendant Drago and Defendant Fowler in operating their fencing business and worked and processed stolen property at the storage location on 1015 Shary Circle, Concord.

Overt Act 11

Between and 3/22/2021 and 9/28/2021 Defendant Fowler, Defendant Smith, and Defendant Drago sold stolen property through eBay.

Overt Act 12

On 9/30/2020, the storage facility on 1015 Shary Circle, Concord was filled with stolen over the counter retail medications. The storage unit belonged to Defendant Fowler and Defendant Drago. The storage unit was operated by Defendant Fowler, Defendant Drago, and Defendant Smith.

**SPECIAL ALLEGATION 1
(Aggravated White Collar Crime Enhancement)**

As to Count 1 it is further alleged that in the commission of the above offenses the said defendants EDGAR GEOVANY ROBLES MORALES, ISIS F VASQUEZ VILLANUEVA, DANNY LOUIS DRAGO, MICHELLE RENEE FOWLER, AND LORI ANN SMITH violated Penal Code 186.11, subdivision (a)(2), in that the offenses set forth in Count 1 are related felonies, a material element of which is fraud and embezzlement, which involves a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

NOTICE: A finding of this special allegation excludes defendant from a sentence of imprisonment in the county jail pursuant to Penal Code section 1170, subdivision (h).

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COUNT 2
(Organized Retail Theft)

On or about and between August 31, 2019 and March 8, 2020, in the County of San Mateo, the crime of ORGANIZED RETAIL THEFT, in violation of Penal Code section 490.4(a), a felony, was committed by EDGAR GEOVANY ROBLES MORALES AND ISIS F VASQUEZ VILLANUEVA, who did willfully and unlawfully act in concert with one or more person to steal merchandise from one or more merchant's premises or online marketplace with the intent to sell, exchange, or return the merchandise for value, in which the violations are committed on two or more separate occasions within a twelve month period, in which the aggregate value of the merchandise stolen, received, purchased, or possessed, is in excess of Nine Hundred and Fifty Dollars (\$950), to wit, electronics and stolen luxury goods.

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COUNT 3
(Receiving Stolen Property)

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On or about and between August 31, 2019 and March 8, 2020, in the County of San Mateo, the crime of RECEIVING STOLEN PROPERTY, in violation of Penal Code section 496(a), a felony, was committed EDGAR GEOVANY ROBLES MORALES AND ISIS F VASQUEZ VILLANUEVA who did willfully and unlawfully did buy ore receive property, exceeding nine hundred fifty dollars (\$950) in value, that had been stolen and/or had been obtained in a manner constituting theft or extortion and conceal sell, withhold, or aid in concealing, selling or withholding property, exceeding nine hundred fifty dollars (\$950) in value, form the owner, specifically, purses and clothing items, knowing the property to be stolen or fraudulently obtained to wit, electronics and stolen luxury goods.

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SPECIAL ALLEGATION 2
(Criminal Profiteering)

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As to Counts 2 through 3, it is further alleged that in the commission of the above offenses the said defendants EDGAR GEOVANY ROBLES MORALES AND ISIS F VASQUEZ VILLANUEVA did violated Penal Code section 186.3 subdivision (a) by engaging in a pattern of

1 criminal profiteering, as defined by Penal Code section 186.3 subdivision (a), in which the acts
2 were committed for financial gain or advantage and as the criminal activity of organized crime.

3 **COUNT 4**
4 **(Organized Retail Theft)**

5 On or about and between August 31, 2019 and March 8, 2020, in the County of San
6 Mateo, the crime of ORGANIZED RETAIL THEFT, in violation of Penal Code section 490.4(a),
7 a felony, was committed by EDGAR GEOVANY ROBLES MORALES, ISIS F VASQUEZ
8 VILLANUEVA, DANNY LOUIS DRAGO, MICHELLE RENEE FOWLER, AND LORI ANN
9 SMITH, who did willfully and unlawfully act in concert with one or more person to steal
10 merchandise from one or more merchant's premises or online marketplace with the intent to sell,
11 exchange, or return the merchandise for value, in which the violations are committed on two or
12 more separate occasions within a twelve month period, in which the aggregate value of the
13 merchandise stolen, received, purchased, or possessed, is in excess of Nine Hundred and Fifty
14 Dollars (\$950), to wit, stolen over the counter pharmaceuticals.

15 **COUNT 5**
16 **(Receiving Stolen Property)**

17 On or about and between August 31, 2019 and March 8, 2020, in the County of San
18 Mateo, the crime of RECEIVING STOLEN PROPERTY, in violation of Penal Code section
19 496(a), a felony, was committed EDGAR GEOVANY ROBLES MORALES, ISIS F VASQUEZ
20 VILLANUEVA, DANNY LOUIS DRAGO, MICHELLE RENEE FOWLER, AND LORI ANN
21 SMITH who did willfully and unlawfully did buy ore receive property, exceeding nine hundred
22 fifty dollars (\$950) in value, that had been stolen and/or had been obtained in a manner
23 constituting theft or extortion and conceal sell, withhold, or aid in concealing, selling or
24 withholding property, exceeding nine hundred fifty dollars (\$950) in value, form the owner,
25 specifically, purses and clothing items, knowing the property to be stolen or fraudulently obtained
26 to wit, electronics and stolen luxury goods, to wit, stolen over the counter pharmaceuticals.

1 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
2 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *2 years.*

6 **COUNT 7**
7 **(Money Laundering)**

8 On or between March 28, 2018 and April 27, 2018, in the County of San Mateo, the crime
9 of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
10 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
11 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
12 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
13 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
14 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
15 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
16 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

17 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
18 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
19 *2 years.*

20 **COUNT 8**
21 **(Money Laundering)**

22 On or between April 30, 2018 and May 29, 2018, in the County of San Mateo, the crime
23 of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
24 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
25 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
26 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
27 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
28 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing

1 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
2 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *2 years.*

6 **COUNT 9**
7 **(Money Laundering)**

8 On or between May 30, 2018 and June 27, 2018, in the County of San Mateo, the crime of
9 MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed
10 by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
11 attempt to conduct a transaction involving a monetary instrument or instruments of a value
12 exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to
13 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
14 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
15 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
16 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

17 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
18 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
19 *2 years.*

20 **COUNT 10**
21 **(Money Laundering)**

22 On or between July 2, 2018 and August 1, 2018, in the County of San Mateo, the crime of
23 MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed
24 by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
25 attempt to conduct a transaction involving a monetary instrument or instruments of a value
26 exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to
27 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
28 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing

1 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
2 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *2 years.*

6 **COUNT 11**
7 **(Money Laundering)**

8 On or between August 3, 2018 and August 31, 2018, in the County of San Mateo, the
9 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
10 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
11 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
12 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
13 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
14 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
15 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
16 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

17 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
18 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
19 *2 years.*

20 **COUNT 12**
21 **(Money Laundering)**

22 On or between August 3, 2018 and August 31, 2018, in the County of San Mateo, the
23 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
24 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
25 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
26 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
27 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
28 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing

1 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
2 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *2 years.*

6 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
7 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

8 **COUNT 13**
9 **(Money Laundering)**

10 On or between September 4, 2018 and October 3, 2018, in the County of San Mateo, the
11 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
12 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
13 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
14 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
15 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
17 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
18 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

19 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
20 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
21 *2 years.*

22 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
23 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

24 **COUNT 14**
25 **(Money Laundering)**

26 On or between October 4, 2018 and November 2, 2018, in the County of San Mateo, the
27 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
28 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully

1 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
2 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
3 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
4 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
5 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
6 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

7 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
8 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
9 *2 years.*

10 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
11 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

12 **COUNT 15**
13 **(Money Laundering)**

14 On or between November 1, 2018 and November 30, 2018, in the County of San Mateo,
15 the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
16 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
17 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
18 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
19 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
20 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
21 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
22 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4418.

23 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
24 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
25 *2 years.*

26 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
27 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

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COUNT 16
(Money Laundering)

On or between November 5, 2018 and November 30, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4855.

NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000 and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of 3 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 17
(Money Laundering)

On or between November 9, 2018 and December 5, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 3659.

1 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
2 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 4418.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *2 years.*

6 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
7 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

8 **COUNT 20**
9 **(Money Laundering)**

10 On or between December 12, 2018 and January 4, 2019, in the County of San Mateo, the
11 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
12 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
13 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
14 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
15 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
17 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
18 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 3659.

19 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
20 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
21 *2 years.*

22 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
23 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

24 **COUNT 21**
25 **(Money Laundering)**

26 On or between January 2, 2019 and January 31, 2019, in the County of San Mateo, the
27 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
28 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully

1 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
2 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
3 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
4 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
5 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
6 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

7 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
8 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
9 *2 years.*

10 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
11 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

12 **COUNT 22**
13 **(Money Laundering)**

14 On or between February 6, 2019 and March 4, 2019, in the County of San Mateo, the
15 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
16 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
17 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
18 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
19 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
20 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
21 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
22 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

23 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
24 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
25 *2 years.*

26 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
27 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

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COUNT 23
(Money Laundering)

On or between March 6, 2019 and April 3, 2019, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 24
(Money Laundering)

On or between April 8, 2019 and May 2, 2019, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

1 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
2 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
3 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
4 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

5 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
6 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
7 *2 years.*

8 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
9 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

10 **COUNT 27**
11 **(Money Laundering)**

12 On or between July 18, 2019 and August 14, 2019, in the County of San Mateo, the crime
13 of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
14 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
15 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
16 value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the
17 intent to promote, manage, establish, carry on, and facilitate the promotion, management,
18 establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property,
19 and knowing that the monetary instrument represented the proceeds of, and was derived directly
20 or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account
21 ending in 6913.

22 *NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000*
23 *and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of*
24 *3 years.*

25 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
26 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

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COUNT 28
(Money Laundering)

On or between September 27, 2019 and October 23, 2019, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 29
(Money Laundering)

On or between October 29, 2019 and November 27, 2019, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

1 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
2 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
3 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
4 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

5 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
6 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
7 *2 years.*

8 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
9 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

10 **COUNT 32**
11 **(Money Laundering)**

12 On or between January 30, 2020 and February 27, 2020, in the County of San Mateo, the
13 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
14 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
15 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
16 value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the
17 intent to promote, manage, establish, carry on, and facilitate the promotion, management,
18 establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property,
19 and knowing that the monetary instrument represented the proceeds of, and was derived directly
20 or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account
21 ending in 6913.

22 *NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000*
23 *and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of*
24 *3 years.*

25 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
26 *conducted or series of transactions conducted shall constitute a separate punishable offense.*
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COUNT 33
(Money Laundering)

On or between March 2, 2020 and March 31, 2020, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000 and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of 3 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 34
(Money Laundering)

On or between April 1, 2020 and April 28, 2020, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

1 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
2 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
3 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
4 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

5 *NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000*
6 *and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of*
7 *3 years.*

8 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
9 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

10 **COUNT 37**
11 **(Money Laundering)**

12 On or between July 2, 2020 and July 31, 2020, in the County of San Mateo, the crime of
13 MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed
14 by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
15 attempt to conduct a transaction involving a monetary instrument or instruments of a value
16 exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the intent to
17 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
18 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
19 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
20 from the proceeds of, criminal activity, to wit, out of Bank of America account ending in 6913.

21 *NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000*
22 *and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of*
23 *3 years.*

24 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
25 *conducted or series of transactions conducted shall constitute a separate punishable offense.*
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1 from the proceeds of, criminal activity, to wit, out of Provident Credit Union account ending in
2 4608.

3 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
4 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
5 *1 year.*

6 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
7 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

8 **COUNT 40**
9 **(Money Laundering)**

10 On or between February 28, 2020 and March 5, 2020, in the County of San Mateo, the
11 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
12 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
13 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
14 value exceeding \$25,000 over a 30 day period through a financial institution with the intent to
15 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
17 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
18 from the proceeds of, criminal activity, to wit, out of Provident Credit Union account ending in
19 4608.

20 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
21 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

22 **COUNT 41**
23 **(Money Laundering)**

24 On or between May 22, 2020 and June 10, 2020, in the County of San Mateo, the crime of
25 MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed
26 by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
27 attempt to conduct a transaction involving a monetary instrument or instruments of a value
28 exceeding \$50,000 and less than \$150,000 through a financial institution with the intent to

1 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
2 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
3 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
4 from the proceeds of, criminal activity, to wit, out of Provident Credit Union account ending in
5 4608.

6 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
7 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
8 *1 year.*

9 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
10 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

11 **COUNT 42**
12 **(Money Laundering)**

13 On or between August 25, 2020 and September 8, 2020, in the County of San Mateo, the
14 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
15 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
16 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
17 value exceeding \$25,000 over a 30 day period through a financial institution with the intent to
18 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
19 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
20 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
21 from the proceeds of, criminal activity, to wit, out of Provident Credit Union account ending in
22 4608.

23 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
24 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

25 **COUNT 43**
26 **(Money Laundering)**

27 On or between February 5, 2019 and February 20, 2019, in the County of San Mateo, the
28 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was

1 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
2 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
3 value exceeding \$50,000 and less than \$150,000 through a financial institution with the intent to
4 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
5 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
6 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
7 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 5947.

8 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
9 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
10 *1 year.*

11 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
12 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

13 **COUNT 44**
14 **(Money Laundering)**

15 On or between October 15, 2019, in the County of San Mateo, the crime of MONEY
16 LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by
17 DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
18 attempt to conduct a transaction involving a monetary instrument or instruments of a value
19 exceeding \$5,000 through a financial institution with the intent to promote, manage, establish,
20 carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal
21 activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument
22 represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal
23 activity, to wit, out of Wells Fargo Bank account ending in 5947.

24 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
25 *conducted or series of transactions conducted shall constitute a separate punishable offense.*
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COUNT 45
(Money Laundering)

On or between July 31, 2020, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$5,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 5947.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

COUNT 46
(Money Laundering)

On or between March 9, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 0144.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

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COUNT 47
(Money Laundering)

On or between March 9, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 0144.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense

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COUNT 48
(Money Laundering)

On or between June 25, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$50,000 and less than \$150,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 0144.

1 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
2 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
3 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 4528.

4 *NOTICE: A finding that the total amount of taking under this section \$50,000 and less*
5 *than \$150,000 exposes the defendant(s) to an additional term of imprisonment of 1 year.*

6 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
7 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

8 **COUNT 51**
9 **(Money Laundering)**

10 On or between January 24, 2019, in the County of San Mateo, the crime of MONEY
11 LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by
12 DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
13 attempt to conduct a transaction involving a monetary instrument or instruments of a value
14 exceeding \$50,000 and less than \$150,000 through a financial institution with the intent to
15 promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
17 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
18 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 4528.

19 *NOTICE: A finding that the total amount of taking under this section \$50,000 and less*
20 *than \$150,000 exposes the defendant(s) to an additional term of imprisonment of 1 year.*

21 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
22 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

23 **COUNT 52**
24 **(Money Laundering)**

25 On or between June 3, 2019, in the County of San Mateo, the crime of MONEY
26 LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by
27 DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
28 attempt to conduct a transaction involving a monetary instrument or instruments of a value

1 exceeding \$5,000 through a financial institution with the intent to promote, manage, establish,
2 carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal
3 activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument
4 represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal
5 activity, to wit, out of Wells Fargo Bank account ending in 4528.

6 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
7 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

8 **COUNT 53**
9 **(Money Laundering)**

10 On or between July 9, 2019 and July 17, 2019, in the County of San Mateo, the crime of
11 MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed
12 by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and
13 attempt to conduct a transaction involving a monetary instrument or instruments of a value
14 exceeding \$5,000 or \$25,000, over a 30 day period, through a financial institution with the intent
15 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
16 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
17 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
18 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 4528.

19 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
20 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

21 **COUNT 54**
22 **(Money Laundering)**

23 On or between September 30, 2019 and October 10, 2019, in the County of San Mateo,
24 the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
25 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
26 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
27 value exceeding \$5,000 or \$25,000, over a 30 day period, through a financial institution with the
28 intent to promote, manage, establish, carry on, and facilitate the promotion, management,

1 establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property,
2 and knowing that the monetary instrument represented the proceeds of, and was derived directly
3 or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account
4 ending in 4528.

5 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
6 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

7 **COUNT 55**
8 **(Money Laundering)**

9 On or between January 2, 2020 and January 21, 2020, in the County of San Mateo, the
10 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
11 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
12 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
13 value exceeding \$5,000 or \$25,000, over a 30 day period, through a financial institution with the
14 intent to promote, manage, establish, carry on, and facilitate the promotion, management,
15 establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property,
16 and knowing that the monetary instrument represented the proceeds of, and was derived directly
17 or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account
18 ending in 4528.

19 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
20 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

21 **COUNT 56**
22 **(Money Laundering)**

23 On or between February 20, 2018 and March 19, 2018, in the County of San Mateo, the
24 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
25 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
26 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
27 value exceeding \$1,000,000 and less than \$2,500,000 through a financial institution with the
28 intent to promote, manage, establish, carry on, and facilitate the promotion, management,

1 establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property,
2 and knowing that the monetary instrument represented the proceeds of, and was derived directly
3 or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account
4 ending in 6520.

5 *NOTICE: A finding that the total amount of taking under this section exceeds \$1,000,000*
6 *and is less than \$2,500,000.00 exposes the defendant(s) to an additional term of imprisonment of*
7 *3 years.*

8 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
9 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

10 **COUNT 57**
11 **(Money Laundering)**

12 On or between March 20, 2018 and April 18, 2018, in the County of San Mateo, the crime
13 of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
14 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
15 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
16 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
17 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
18 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
19 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
20 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

21 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
22 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
23 *2 years.*

24 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
25 *conducted or series of transactions conducted shall constitute a separate punishable offense.*
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COUNT 58
(Money Laundering)

On or between April 20, 2018 and May 18, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 59
(Money Laundering)

On or between May 21, 2018 and June 19, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

1 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
2 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
3 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
4 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

5 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
6 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
7 *2 years.*

8 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
9 *conducted or series of transactions conducted shall constitute a separate punishable offense.*

10 **COUNT 62**
11 **(Money Laundering)**

12 On or between August 20, 2018 and September 19, 2018, in the County of San Mateo, the
13 crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was
14 committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully
15 conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a
16 value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent
17 to promote, manage, establish, carry on, and facilitate the promotion, management, establishment,
18 and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing
19 that the monetary instrument represented the proceeds of, and was derived directly or indirectly
20 from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

21 *NOTICE: A finding that the total amount of taking under this section exceeds \$150,000*
22 *and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of*
23 *2 years.*

24 *NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction*
25 *conducted or series of transactions conducted shall constitute a separate punishable offense.*
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COUNT 63
(Money Laundering)

On or between September 20, 2018 and October 19, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

NOTICE: A finding that the total amount of taking under this section exceeds \$150,000 and is less than \$1,000,000.00 exposes the defendant(s) to an additional term of imprisonment of 2 years.

NOTICE: Pursuant to Penal Code section 186.10(b) each individual transaction conducted or series of transactions conducted shall constitute a separate punishable offense.

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COUNT 64
(Money Laundering)

On or between October 22, 2018 and November 2, 2018, in the County of San Mateo, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by DANNY LOUIS DRAGO AND MICHELLE RENEE FOWLER did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding \$150,000 and less than \$1,000,000 through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of a criminal activity, to wit, buying and receiving stolen property, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit, out of Wells Fargo Bank account ending in 6520.

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: People of the State of California v. Edgar Geovany Robles Morales, et al.
Case No.: 20-NF-010944-ABDE; 20-NF-012556-A

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On March 23, 2021, I served the attached **FIRST AMENDED FELONY COMPLAINT** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Francoise C. Espinoza
Law Offices of Francoise Espinoza
688 Main St
Redwood City, CA 94063
Attorney for Defendant Isis F. Vasquez Villanueva

Daniel O'Malley
O'Connor, Runckel & O'Malley LLP
1196 Boulevard Way Ste 20
Walnut Creek, CA 94595-1167
Attorney for Defendant Michelle Renee Fowler

Derek R. Ewin
Law Office of Derek R. Ewin
201 North Civic Drive, Suite 225
Walnut Creek, CA 94596
Attorney for Defendant Lori Ann Smith

Ross Green
The Law Offices of Ross Green
702 Marshall Street, Suite 300
Redwood City, CA 94063
Attorney for Defendant Jose Rolando Villatorro

Christopher F. Morales
Morales Law Firm
1388 Sutter Street, Suite 805
San Francisco, CA 94109
Attorney for Defendant Edgar Geovany Robles Morales

Jose Marin
160 Haslemere Ct
Lafayette, CA 94549-2000
Attorney for Drago and Fowler (Forfeiture Claim)

Thomas F. McKenna
Law Office of Thomas F. McKenna
201 North Civic Drive, Suite 225
Walnut Creek, California 94596
Attorney for Defendant Daniel Louis Drago

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 23, 2021, at Sacramento, California.

M. Soria

Declarant



Signature

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