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Superior Court of California
County of Los Angeles

OCT 21 2024

SUPERIOR COURT OF THE STATE OF CALIFORNIA Executive Officer/Clerk of Court

COUNTY OF LOS ANGELES

D. Barraza

PEOPLE OF THE STATE OF CALIFORNIA,

Case No. 24CJCF06498

INDICTMENT

Plaintiff,

v.

1. MICHAEL DINO BOITO

[REDACTED]

2. OLIVER SALAZAR

[REDACTED]

3. OSCAR CESAR SALAZAR

[REDACTED]

4. GAVINA ESPINO
aka "GABBY ESPINO"

[REDACTED]

5. SUZANNE AMIRA FILLERUP

[REDACTED]

6. MANUEL EDUARDO ANGULO-TAPIA
aka "MANUEL ANGULO-TAPIA"

[REDACTED]

7. JUAN JOSE GONZALEZ
aka "JAY GONZALEZ"

[REDACTED]

8. ROCIO CORIA

[REDACTED]

9. VALERIA DAYANNA GUERRERO

[REDACTED]

10. JESUS CORREA

[REDACTED]

1 **11. PETER PEREZ**
[REDACTED]

2 **12. CESAR RAMIREZ**
3 [REDACTED]

4 **13. MARIELOS YVONNE HINNAOUI**
5 [REDACTED]

6 **14. JOSE SERRANO**
7 **aka "JOEY SERRANO"**
8 [REDACTED]

Defendants.

9
10 A Special Statewide Grand Jury of the County of Los Angeles, State of California, hereby
11 accuses by this Indictment, the following defendants of committing, in the Counties of Los Angeles,
12 Orange, Riverside, Sacramento, San Bernardino, and San Diego, of the following crimes:

13 **COUNT 1**

14 **MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING**
15 **THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION**
16 **DURING THE MORTGAGE LENDING PROCESS**

17 On or between February 2, 2020 and May 8, 2020, in the Counties of Los Angeles,
18 Riverside, and Sacramento, the crime of MORTGAGE FRAUD, in violation of Penal Code
19 section 532f, subdivision (a)(2), a felony, was committed by MICHAEL DINO BOITO, OLIVER
20 SALAZAR, OSCAR CESAR SALAZAR, and GAVINA ESPINO, who did with the intent to
21 defraud, deliberately use and facilitate the use of a misstatement, misrepresentation, and
22 omission, with the knowledge it contained a misstatement, misrepresentation, and omission,
23 during the mortgage lending process, with the intention that it be relied upon by a mortgage
24 lender, borrower, and other party to the mortgage lending process, in support of a mortgage loan
25 totaling \$237,616.00 for the real property located at [REDACTED] 178th Street in Lancaster, California.

26 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
27 within the meaning of Penal Code section 532f, subdivision(j).

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COUNT 2

MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD

On or about May 8, 2020, in the Counties of Los Angeles, Riverside, and Sacramento, the crime of MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS FROM FRAUD in violation of PENAL CODE SECTION 532f(a)(3), a Felony, was committed by MICHAEL DINO BOITO, who did with the intent to defraud, receive proceeds and other funds in connection with a mortgage loan closing with the knowledge that it resulted from a violation of Penal Code sections 532f(a)(1) and 532f(a)(2).

It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950), within the meaning of Penal Code section 532f(j).

COUNT 3

GRAND THEFT

On or between February 2, 2020 and May 8, 2020, in the Counties of Los Angeles, Riverside, and Sacramento, the crime of GRAND THEFT in violation of Penal Code section 487, subdivision (a), a felony, was committed by MICHAEL DINO BOITO, OLIVER SALAZAR, OSCAR CESAR SALAZAR, and GAVINA ESPINO, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor or real and personal property by fraud from Carrington Mortgage Services, specifically, a \$237,616 mortgage loan, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 4

GRAND THEFT

On or between May 5, 2020, and May 6, 2020, in the Counties of Los Angeles and Orange, the crime of GRAND THEFT in violation of Penal Code section 487, subdivision (a), a felony, was committed by OLIVER SALAZAR, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor or real and personal property by fraud from [REDACTED], specifically, a \$4,700 check, which had a value exceeding nine hundred fifty dollars (\$950).

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COUNT 5

**MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING
THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION
DURING THE MORTGAGE LENDING PROCESS**

On or between February 24, 2020 and May 28, 2020, in the Counties of Riverside and Sacramento, the crime of MORTGAGE FRAUD, in violation of Penal Code section 532f, subdivision (a)(2), a felony, was committed by MICHAEL DINO BOITO, OLIVER SALAZAR, and GAVINA ESPINO, who did with the intent to defraud, deliberately use and facilitate the use of a misstatement, misrepresentation, and omission, with the knowledge it contained a misstatement, misrepresentation, and omission, during the mortgage lending process, with the intention that it be relied upon by a mortgage lender, borrower, and other party to the mortgage lending process, in support of a mortgage loan totaling \$441,849 for the real property located at [REDACTED] Fernwood Court in Riverside, California.

It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950), within the meaning of Penal Code section 532f, subdivision(j).

COUNT 6

MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD

On or about May 28, 2020, in the Counties of Riverside and Sacramento, the crime of MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS FROM FRAUD in violation of PENAL CODE SECTION 532f(a)(3), a Felony, was committed by MICHAEL DINO BOITO, who did with the intent to defraud, receive proceeds and other funds in connection with a mortgage loan closing with the knowledge that it resulted from a violation of Penal Code sections 532f(a)(1) and 532f(a)(2).

It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950), within the meaning of Penal Code section 532f(j).

COUNT 7

GRAND THEFT

On or between February 24, 2020 and May 28, 2020, in the Counties of Riverside and Sacramento, the crime of GRAND THEFT in violation of Penal Code section 487, subdivision

1 (a), a felony, was committed by MICHAEL DINO BOITO, OLIVER SALAZAR, and GAVINA
2 ESPINO, who did knowingly and designedly, by a false and fraudulent representation and
3 pretense, obtain money, labor or real and personal property by fraud from Carrington Mortgage
4 Services, specifically, a \$441,849 mortgage loan, which had a value exceeding nine hundred fifty
5 dollars (\$950).

6 **COUNT 8**

7 **MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING**
8 **THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION**
9 **DURING THE MORTGAGE LENDING PROCESS**

10 On or between January 25, 2021 and February 11, 2021, in the Counties of Orange and San
11 Bernardino, the crime of MORTGAGE FRAUD, in violation of Penal Code section 532f,
12 subdivision (a)(2), a felony, was committed by SUZANNE AMIRA FILLERUP, JUAN JOSE
13 GONZALEZ, and MANUEL ANGULO-TAPIA, who did with the intent to defraud, deliberately
14 use and facilitate the use of a misstatement, misrepresentation, and omission, with the knowledge
15 it contained a misstatement, misrepresentation, and omission, during the mortgage lending
16 process, with the intention that it be relied upon by a mortgage lender, borrower, and other party
17 to the mortgage lending process, in support of a mortgage loan totaling \$545,570 for the real
18 property located at [REDACTED] Chipmunk Lane in Big Bear Lake, California.

19 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
20 within the meaning of Penal Code section 532f, subdivision(j).

21 **COUNT 9**

22 **MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD**

23 On or about February 11, 2021, in the Counties of Orange and San Bernardino, the crime of
24 MORTGAGE FRAUD, in violation of Penal Code section 532f(a)(3), a felony, was committed
25 by SUZANNE AMIRA FILLERUP and JUAN JOSE GONZALEZ, who did with the intent to
26 defraud, receive proceeds and other funds in connection with a mortgage loan closing with the
27 knowledge that it resulted from a violation of Penal Code sections 532f(a)(1) and 532f(a)(2).

28 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
within the meaning of Penal Code section 532f(j).

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COUNT 10

GRAND THEFT

On or between January 25, 2021 and February 11, 2021, in the Counties of Orange and San Bernardino, the crime of GRAND THEFT in violation of Penal Code section 487, subdivision (a), a felony, was committed by SUZANNE AMIRA FILLERUP, JUAN JOSE GONZALEZ and MANUEL ANGULO-TAPIA, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money, labor or real and personal property by fraud from United Wholesale Mortgage, specifically, a \$545,570 mortgage loan, which had a value exceeding nine hundred fifty dollars (\$950).

COUNT 11

MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION DURING THE MORTGAGE LENDING PROCESS

On or between April 20, 2021 and June 10, 2021, in the Counties of Orange and Sacramento, the crime of MORTGAGE FRAUD, in violation of Penal Code section 532f, subdivision (a)(2), a felony, was committed by SUZANNE AMIRA FILLERUP, JUAN JOSE GONZALEZ, VALERIA DAYANNA GUERRERO, JESUS CORREA, and ROCIO CORIA, who did with the intent to defraud, deliberately use and facilitate the use of a misstatement, misrepresentation, and omission, with the knowledge it contained a misstatement, misrepresentation, and omission, during the mortgage lending process, with the intention that it be relied upon by a mortgage lender, borrower, and other party to the mortgage lending process, in support of a mortgage loan totaling \$384,000 for the real property located at [REDACTED] Graystone Avenue in Citrus Heights, California.

It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950), within the meaning of Penal Code section 532f, subdivision(j).

COUNT 12

MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD

On or about June 10, 2021, in the Counties of Orange and Sacramento, the crime of MORTGAGE FRAUD, in violation of Penal Code section 532f(a)(3), a felony, was committed

1 by SUZANNE AMIRA FILLERUP and JUAN JOSE GONZALEZ, who did with the intent to
2 defraud, receive proceeds and other funds in connection with a mortgage loan closing with the
3 knowledge that it resulted from a violation of Penal Code sections 532f(a)(1) and 532f(a)(2).

4 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
5 within the meaning of Penal Code section 532f(j).

6 **COUNT 13**

7 **GRAND THEFT**

8 On or between April 20, 2021 and June 10, 2021, in the Counties of Orange and
9 Sacramento, the crime of GRAND THEFT in violation of Penal Code section 487, subdivision
10 (a), a felony, was committed by SUZANNE AMIRA FILLERUP, JUAN JOSE GONZALEZ,
11 VALERIA DAYANNA GUERRERO, JESUS CORREA, and ROCIO CORIA, who did
12 knowingly and designedly, by a false and fraudulent representation and pretense, obtain money,
13 labor or real and personal property by fraud from United Wholesale Mortgage, specifically, a
14 \$384,000 mortgage loan, which had a value exceeding nine hundred fifty dollars (\$950).

15 **COUNT 14**

16 **MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING**
17 **THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION**
18 **DURING THE MORTGAGE LENDING PROCESS**

19 On or between October 4, 2021 and November 17, 2021, in the County of Orange, the
20 crime of MORTGAGE FRAUD, in violation of Penal Code section 532f, subdivision (a)(2), a
21 felony, was committed by SUZANNE AMIRA FILLERUP, MANUEL EDUARDO ANGULO-
22 TAPIA, JUAN JOSE GONZALEZ, and ROCIO CORIA, who did with the intent to defraud,
23 deliberately use and facilitate the use of a misstatement, misrepresentation, and omission, with the
24 knowledge it contained a misstatement, misrepresentation, and omission, during the mortgage
25 lending process, with the intention that it be relied upon by a mortgage lender, borrower, and
26 other party to the mortgage lending process, in support of a mortgage loan totaling \$480,000 for
the real property located at [REDACTED] Jean Street in Anaheim, California.

27 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
28 within the meaning of Penal Code section 532f, subdivision(j).

1 lender, borrower, and other party to the mortgage lending process, in support of a mortgage loan
2 totaling \$642,536 for the real property located at [REDACTED] Quartz Court in San Marcos, California.

3 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
4 within the meaning of Penal Code section 532f, subdivision(j).

5 **COUNT 18**

6 **MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD**

7 On or about April 7, 2021, in the Counties of Orange and San Diego, the crime of
8 MORTGAGE FRAUD, in violation of Penal Code section 532f(a)(3), a felony, was committed
9 by PETER PEREZ, who did with the intent to defraud, receive proceeds and other funds in
10 connection with a mortgage loan closing with the knowledge that it resulted from a violation of
11 Penal Code sections 532f(a)(1) and 532f(a)(2).

12 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
13 within the meaning of Penal Code section 532f(j).

14 **COUNT 19**

15 **GRAND THEFT**

16 On and between April 2, 2021 and April 7, 2021, in the Counties of Orange and San Diego,
17 the crime of GRAND THEFT in violation of Penal Code section 487, subdivision (a), a felony,
18 was committed by OLIVER SALAZAR and PETER PEREZ, who did knowingly and designedly,
19 by a false and fraudulent representation and pretense, obtain money, labor or real and personal
20 property by fraud from Quicken Loans, LLC, specifically, a \$642,536 mortgage loan, which had a
21 value exceeding nine hundred fifty dollars (\$950).

22 **COUNT 20**

23 **MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING**
24 **THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION**
25 **DURING THE MORTGAGE LENDING PROCESS**

26 On or about June 17, 2021, in the County of Riverside, the crime of MORTGAGE FRAUD,
27 in violation of Penal Code section 532f, subdivision (a)(2), a felony, was committed by
28 MARIELOS YVONNE HINNAOUI, CESAR RAMIREZ, and JOSE SERRANO, who did with
the intent to defraud, deliberately use and facilitate the use of a misstatement, misrepresentation,

1 and omission, with the knowledge it contained a misstatement, misrepresentation, and omission,
2 during the mortgage lending process, with the intention that it be relied upon by a mortgage
3 lender, borrower, and other party to the mortgage lending process, to wit: use of
4 misrepresentations regarding the income of [REDACTED] in support of a mortgage
5 loan totaling \$446,100 for the real property located at [REDACTED] Sunset Avenue in Nuevo, California.

6 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
7 within the meaning of Penal Code section 532f, subdivision(j).

8 **COUNT 21**

9 **GRAND THEFT**

10 On or about June 17, 2021, in the County of Riverside, the crime of GRAND THEFT in
11 violation of Penal Code section 487, subdivision (a), a felony, was committed by MARIELOS
12 YVONNE HINNAOUI, CESAR RAMIREZ, and JOSE SERRANO, who did knowingly and
13 designedly, by a false and fraudulent representation and pretense, obtain money, labor or real and
14 personal property by fraud from Quicken Loans, LLC, specifically, a \$446,100 mortgage loan,
15 which had a value exceeding nine hundred fifty dollars (\$950).

16 **COUNT 22**

17 **MORTGAGE FRAUD EXCEEDING \$950: USING OR FACILITATING**
18 **THE USE OF A MISSTATEMENT, MISREPRESENTATION OR OMISSION**
19 **DURING THE MORTGAGE LENDING PROCESS**

20 On or about September 11, 2020, in the County of Riverside, the crime of MORTGAGE
21 FRAUD, in violation of Penal Code section 532f, subdivision (a)(2), a felony, was committed
22 MARIELOS YVONNE HINNAOUI, who did with the intent to defraud, deliberately use and
23 facilitate the use of a misstatement, misrepresentation, and omission, with the knowledge it
24 contained a misstatement, misrepresentation, and omission, during the mortgage lending process,
25 with the intention that it be relied upon by a mortgage lender, borrower, and other party to the
26 mortgage lending process, to wit: use of misrepresentations regarding her income in support of a
27 mortgage refinance loan totaling \$510,440 for the real property located at [REDACTED] Sanctuary Drive
in Corona, California.

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1 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
2 within the meaning of Penal Code section 532f, subdivision(j).

3 **COUNT 23**

4 **MORTGAGE FRAUD EXCEEDING \$950: RECEIVING PROCEEDS OF FRAUD**

5 On or about September 16, 2020, in the County of Riverside, the crime of MORTGAGE
6 FRAUD EXCEEDING \$950: RECEIVING PROCEEDS FROM FRAUD in violation of PENAL
7 CODE SECTION 532f(a)(3), a Felony, was committed by MARIELOS YVONNE HINNAOUI,
8 who did with the intent to defraud, receive proceeds and other funds in connection with a
9 mortgage loan closing with the knowledge that it resulted from a violation of Penal Code sections
10 532f(a)(1) and 532f(a)(2).

11 It is further alleged that the value of the fraud exceeds nine hundred fifty dollars (\$950),
12 within the meaning of Penal Code section 532f(j).

13 **COUNT 24**

14 **GRAND THEFT**

15 On or about September 11, 2020, in the County of Riverside, the crime of GRAND THEFT
16 in violation of Penal Code section 487, subdivision (a), a felony, was committed by MARIELOS
17 YVONNE HINNAOUI, who did knowingly and designedly, by a false and fraudulent
18 representation and pretense, obtain money, labor or real and personal property by fraud from
19 Carrington Mortgage Services, specifically, a \$510,440 mortgage loan, which had a value
20 exceeding nine hundred fifty dollars (\$950).

21 **FIRST SPECIAL ALLEGATION**

22 **THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045(A))**

23 It is further alleged that MICHAEL DINO BOITO, OLIVER SALAZAR, OSCAR CESAR
24 SALAZAR, GAVINA ESPINO, SUZANNE AMIRA FILLERUP, MANUEL EDUARDO
25 ANGULO-TAPIA, JUAN JOSE GONZALEZ, ROCIO CORIA, VALERIA DAYANNA
26 GUERRERO, JESUS CORREA, PETER PEREZ, CESAR RAMIREZ, MARIELOS YVONNE
27 HINNAOUI, and JOSE SERRANO, in the commission of the Grand Theft counts alleged against
28 them in this Indictment, with the intent to do so, took funds of a value exceeding one hundred

1 thousand dollars (\$100,000) and are ineligible for probation within the meaning of Penal Code
2 section 1203.045.

3 **SECOND SPECIAL ALLEGATION**

4 **EXCESSIVE LOSS OVER \$500,000 (PENAL CODE SECTION 186.11(A)(2))**

5 It is further alleged, pursuant to Penal Code section 186.11(a)(2), MICHAEL DINO
6 BOITO, OLIVER SALAZAR, GAVINA ESPINO, SUZANNE AMIRA FILLERUP, MANUEL
7 EDUARDO ANGULO-TAPIA, JUAN JOSE GONZALEZ, ROCIO CORIA, and MARIELOS
8 YVONNE HINNAOUI, committed two or more related felonies to wit: the counts alleged against
9 each of them in this Indictment, a material element of which is fraud, involving a pattern of
10 related felony conduct and the taking of, or resulted in the loss by another person or entity of
11 more than five hundred thousand dollars (\$500,000).

12 **THIRD SPECIAL ALLEGATION**

13 **EXCESSIVE LOSS OVER \$100,000 (PENAL CODE SECTION 186.11(A)(3))**

14 It is further alleged, pursuant to Penal Code section 186.11(a)(3), MICHAEL DINO
15 BOITO, OLIVER SALAZAR, GAVINA ESPINO, SUZANNE AMIRA FILLERUP, MANUEL
16 EDUARDO ANGULO-TAPIA, JUAN JOSE GONZALEZ, ROCIO CORIA, and MARIELOS
17 YVONNE HINNAOUI, committed two or more related felonies to wit: the counts alleged against
18 each of them in this Indictment, a material element of which is fraud, involving a pattern of
19 related felony conduct and the taking of, or resulted in the loss by another person or entity of
20 more than one hundred thousand dollars (\$100,000).

21 **TOLLING OF THE STATUTE OF LIMITATIONS**

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

23 **I. Counts 1-3, 5-7**

24 It is further alleged as to Counts 1-3 and 5-7, which are offenses described within Penal
25 Code section 803(c), that the aforementioned violations were not discovered any earlier than
26 October 7, 2020, and that no victim of said violations, and no law enforcement agency chargeable
27 with the investigation and prosecution of said violations, had actual or constructive knowledge of
28 the violations prior to said date. (Pen. Code, § 801.5.)

1 As detailed below, law enforcement and any victims, “discovered” the crimes alleged above
2 within four years of the commencement of the prosecution of the prosecution of the offenses in
3 Counts 1-3 and 5-7. (Pen. Code, §§ 801.5; 803(c).)

4 It is further alleged that the statute of limitations period for the offenses in Counts 1-3 and
5 5-7 have been tolled since July 16, 2024. (Pen. Code, §§ 803(b); 804(d).)

6 A. Date of Discovery

7 On October 7, 2020, Freddie Mac investigator [REDACTED] informed Special Agent [REDACTED]
8 [REDACTED] of the U.S. Department of Housing and Urban Development, Office of Inspector
9 General (HUD-OIG) that MICHAEL DINO BOITO and First Republic Mortgage may have
10 originated Federal Housing Administration (FHA)-backed loans by submitting false information.
11 HUD is responsible for insuring loans made by FHA-approved lenders, and HUD-OIG is tasked
12 with investigation any fraud allegations as to those loans. The two loans underlying Counts 1-3
13 and 5-8 are FHA-insured loans. Thus, HUD-OIG first learned of the offenses charged here on
14 October 7, 2020.

15 Accordingly, the date the law enforcement agency responsible for investigating the charged
16 offenses in Counts 1-3 and 5-7 discovered the crimes on October 7, 2020.

17 B. Tolling of the Statute of Limitations

18 On July 16, 2024, an arrest warrant was issued in Riverside County Superior Court case
19 number RIF2403575 for defendants MICHAEL DINO BOITO, OLIVER SALAZAR, OSCAR
20 CESAR SALAZAR, and GAVINA ESPINO. Thus, under Penal Code sections 803(b) and
21 804(d), the prosecution had commenced for the aforementioned Defendants for their scheme to
22 obtain home mortgage loans from Carrington Mortgage Services through misrepresentations, and
23 the statute of limitations has tolled as of that date.

24 II. Count 4

25 It is further alleged as to Count 4, which is an offense described within Penal Code section
26 803(c), that the aforementioned violation was not discovered any earlier than August 9, 2021, and
27 that no victim of said violations, and no law enforcement agency chargeable with the
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1 investigation and prosecution of said violations, had actual or constructive knowledge of the
2 violations prior to said date. (Pen. Code, § 801.5.)

3 As detailed below, law enforcement and any victims, “discovered” the crime alleged above
4 within four years of the filing of this Indictment. (Pen. Code, §§ 801.5; 803(c).)

5 A. Date of Discovery

6 As noted above, HUD-OIG—the law enforcement agency chargeable with investigating
7 fraud pertaining to FHA loans—first learned about potential fraud regarding the home mortgage
8 loan obtained by [REDACTED] on October 7, 2020. At that point, however, it was not possible
9 for HUD-OIG to know about the conduct underlying the grand theft charge in Count 4, as the
10 theft was separate and distinct from the fraudulently obtained mortgage.

11 On August 9, 2021, HUD-OIG Special Agent [REDACTED] and FHFA Special Agent
12 [REDACTED] interviewed victim [REDACTED] about her home mortgage loan. At that
13 interview, [REDACTED] told the investigators that the notary had asked her to pay an additional \$4,000
14 in closing costs. This was the first time that HUD-OIG heard about the request from the notary.

15 Law enforcement did not have actual or constructive knowledge of the theft prior to this
16 date, because there was no indication in the loan file that the theft had occurred. The only
17 documentary evidence that the theft had occurred was within the bank records of Real Estate
18 Acquisition LLC, the company for OLIVER SALAZAR. Those records, obtained from Wells
19 Fargo, were not received until March 29, 2023. Other than speaking to victim [REDACTED] prior
20 to receiving the bank records, law enforcement would have been unaware of the \$4,700 check.

21 B. Tolling of the Statute of Limitations

22 On September 19, 2024, the People filed a First Amended Complaint in Riverside County
23 Case number RIF2403575, alleging the conduct involving Count 4. On that same date of
24 September 19, 2024, OLIVER SALAZAR was arraigned on the First Amended Complaint. Thus,
25 under Penal Code sections 803(b) and 804(c), the prosecution had commenced for OLIVER
26 SALAZAR for the conduct of grand theft in Count 4, and the statute of limitations has tolled as of
27 that date.

28 III. Counts 22-24

1 A. Completion of Offense Date

2 It is further alleged as to Counts 22-24, which are offenses described within Penal Code
3 section 803(c), that the prosecution commenced within four years of the completion of the
4 offense. (Pen. Code, § 801.5.) The mortgage fraud and grand theft conduct in Counts 22-24 were
5 completed on September 11, 2020, when the refinance closed for the property of [REDACTED] Sanctuary
6 Drive in Corona, California.

7 B. Tolling of the Statute of Limitations

8 On August 28, 2024, an arrest warrant was issued for MARIELOS YVONNE HINNAOUI
9 in Riverside County Superior Court case number RIF2404459. Thus, under Penal Code sections
10 803(b) and 804(d), the prosecution had commenced for MARIELOS YVONNE HINNAOUI for
11 the conduct in Counts 22-24, and the statute of limitations has tolled as of that date.

12 * * * * *

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

15 [REDACTED]
16 **Foreperson of the Grand Jury** 23
Juror #

17 **Dated:** 10/21/2024

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[REDACTED]