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By J. Jackson, Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Case No. 19GJ00001

Plaintiff,

v.

INDICTMENT

- 1. **STEVEN JOSEPH ROGERS,**
; xref 5277225
- 2. **ROBERT WAYNE SEDLAR,**
; xref 5277224
- 3. **AUDREY GRACE GAN;**
; xref 5277226

Defendants.

A Special Statewide Grand Jury of the County of Sacramento, State of California, hereby accuses STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN by this Indictment, of the following crimes committed in the Counties of San Diego, San Mateo, Alameda, Contra Costa, San Joaquin, Placer, Solano, Mendocino, San Francisco, El Dorado, and Sacramento:

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COUNT ONE
(Conspiracy)

On or about and between April 4, 2015 and May 1, 2019, in the Counties of San Diego, San Mateo, Alameda, Contra Costa, San Joaquin, Placer, Solano, Mendocino, San Francisco, El Dorado, Sacramento, and Santa Barbara, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did willfully and unlawfully conspire together and with another person or persons whose identity is unknown to commit the crimes of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section 2945.4, a felony pursuant to Civil Code section 2945.7, PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, GRAND THEFT BY FALSE PRETENSES, in violation of Penal Code section 487, a felony, and ELDER ABUSE, in violation of Penal Code section 368(d), a felony, pursuant to and for the purposes of carrying out the objects and purposes of the aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

- a. On or between April 4, 2015 and May 1, 2019, Steven Rogers, Roger Sedlar, and Audrey Gan operated Grand View Financial, LLC.
- b. On or about May 4, 2018, Steven Rogers filed a Statement of Information on behalf of Grand View Financial, LLC with the California Secretary of State.
- c. Steven Rogers and Robert Sedlar promised homeowners that they could save their home from foreclosure and deed it back to the homeowners free and clear of any liens.
- d. Steven Rogers and Robert Sedlar told distressed homeowners that the Grand View Financial "program" was backed by the Department of Justice.
- e. Grand View Financial, LLC required homeowners to deed over their house and pay rent to Grand view Financial, LLC in order to be in their program.

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- f. Audrey Gan provided homeowners with legal paperwork to sign-up for the “program” and assisted in processing payments for Grand View Financial, LLC.
- g. Steven Rogers created entities named Sharp Financial, LLC, North Park Investments, LLC, Upscaled Financial, LLC, Premium Capital, LLC, Beneficial Financial Services, LLC, and Refreshing Resources, LLC.
- h. Through those entities, Grand View Financial, LLC recorded fraudulent deeds of trust clouding title on the homeowners’ property.
- i. Grand View Financial, LLC filed unlawful detainer actions against the people that signed up for their program.

COUNT TWO
(Prohibited Act by a Foreclosure Consultant)

On or about August 17, 2016, in the County of San Diego, the crime of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the foreclosure consultant has contracted with before they had fully performed each and every service that they were contracted to perform or represented that they would perform, to wit: received a grant deed from Robert Borbonus conveying title in 2015 Cedar Street, Ramona, California to Grand View Financial, LLC.

COUNT THREE
(Prohibited Act by a Foreclosure Consultant)

On and between August 2016 and June 2017 in the County of San Diego, the crime of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who

1 did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
2 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
3 whom the foreclosure consultant has contracted with before they had fully performed each and
4 every service that they were contracted to perform or represented that they would perform, to wit:
5 received payments in the amount of \$12,730.65 from Robert Borbonus.

6 **COUNT FOUR**
7 **(Offering a False or Forged Instrument)**

8 On or about August 17, 2016, in the County of San Diego, the crime of PROCURING OR
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
10 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
11 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
12 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
13 genuine, might be filed, registered, or recorded under a law of California or the United States, to
14 wit: a grant deed from Robert Borbonus to Grand View Financial, LLC conveying title to real
15 property located at 2015 Cedar Street, Ramona, CA 92065.

16 **COUNT FIVE**
17 **(Offering a False or Forged Instrument)**

18 On or about September 2, 2016, in the County of San Diego, the crime of PROCURING
19 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
20 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
21 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
22 forged instrument to be filed, registered, or recorded in a public office in California, which
23 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
24 United States, to wit: a deed of trust from Grand View Financial, LLC to Sharp Financial, LLC
25 securing a loan in the amount of \$75,000 with real property located at 2015 Cedar Street,
26 Ramona, California.

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COUNT SIX
(Offering a False or Forged Instrument)

On or about December 16, 2016, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments, LLC securing a loan in the amount of \$80,000 with real property located at 2015 Cedar Street, Ramona, California.

COUNT SEVEN
(Offering a False or Forged Instrument)

On or about February 14, 2017, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan in the amount of \$80,000 with real property located at 2015 Cedar Street, Ramona, California.

COUNT EIGHT
(Offering a False or Forged Instrument)

On or about November 22, 2016, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or

1 forged instrument to be filed, registered, or recorded in a public office in California, which
2 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
3 United States, to wit: unlawful detainer complaint filed in Superior Court in San Diego County,
4 California for real property located at 2015 Cedar Street, Ramona, California, case number 37-
5 2016-00035501-CL-UD-CTL.

6 **COUNT NINE**
7 **(Grand Theft by False Pretenses)**

8 On and between August 2016 and June 2017, in the County of San Diego, the crime of
9 GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by
10 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
11 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
12 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
13 (\$950), to wit: \$12,730.65 from Robert Borbonus.

14 **COUNT TEN**
15 **(Grand Theft by False Pretenses)**

16 On or about August 17, 2016, in the County of San Diego, the crime of GRAND THEFT,
17 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
18 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
19 designedly, by a false and fraudulent representation and pretense, obtained money, real and
20 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
21 wit: received a grant deed from Robert Borbonus conveying title in 2015 Cedar Street, Ramona,
22 California to Grand View Financial, LLC.

23 **COUNT ELEVEN**
24 **(Prohibited Act by a Foreclosure Consultant)**

25 On or about July 27, 2016 in the County of Alameda, the crime of ENGAGING IN A
26 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
27 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
28 ROGERS, ROBERT WAYNE SEDLAR, AND AUDREY GRACE GAN, who did unlawfully

1 and knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
2 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
3 foreclosure consultant has contracted with before they had fully performed each and every service
4 that they were contracted to perform or represented that they would perform to wit: received a
5 grant deed from Frankie and May Cheung conveying title in 1765 Valdez Way, Fremont,
6 California to Grand View Financial, LLC.

7 **COUNT TWELVE**
8 **(Prohibited Act by a Foreclosure Consultant)**

9 On and between July 2016 and February 2017, in the County of Alameda, the crime of
10 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of
11 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
12 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, AND AUDREY GRACE GAN,
13 who did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation
14 as a foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner
15 with whom the foreclosure consultant has contracted with before they had fully performed each
16 and every service that they were contracted to perform or represented that they would perform to
17 wit: received payments in the amount of \$17,202.43 from Frankie and May Cheung.

18 **COUNT THIRTEEN**
19 **(Offering a False or Forged Instrument)**

20 On or about July 27, 2016, in the County of Alameda, the crime of PROCURING OR
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
22 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
23 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
24 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
25 genuine, might be filed, registered, or recorded under a law of California or the United States, to
26 wit: a grant deed from Frankie and May Cheung conveying title in 1765 Valdez Way, Fremont,
27 California.

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COUNT FOURTEEN
(Offering a False or Forged Instrument)

On or about August 1, 2016, in the County of Alameda, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Premium Capital, LLC securing a loan in the amount of \$75,000 with real property located at 1765 Valdez Way, Fremont, California.

COUNT FIFTEEN
(Offering a False or Forged Instrument)

On or about August 1, 2016, in the County of Alameda, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Sharp Financial, LLC securing a loan in the amount of \$75,000 with real property located at 1765 Valdez Way, Fremont, California.

COUNT SIXTEEN
(Offering a False or Forged Instrument)

On or about August 1, 2016, in the County of Alameda, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to

1 wit: a deed of trust from Grand View Financial, LLC to Beneficial Financial Services, LLC
2 securing a loan in the amount of \$75,000 with real property located at 1765 Valdez Way,
3 Fremont, California.

4 **COUNT SEVENTEEN**
5 **(Offering a False or Forged Instrument)**

6 On or about February 16, 2017, in the County of Alameda, the crime of PROCURING OR
7 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
8 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
9 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
10 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
11 genuine, might be filed, registered, or recorded under a law of California or the United States, to
12 wit: a deed of trust from Grand View Financial, LLC to North Park Investments, LLC securing a
13 loan in the amount of \$80,000 with real property located at 1765 Valdez Way, Fremont,
14 California.

15 **COUNT EIGHTEEN**
16 **(Offering a False or Forged Instrument)**

17 On or about February 16, 2017, in the County of Alameda, the crime of PROCURING OR
18 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
19 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
20 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
21 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
22 genuine, might be filed, registered, or recorded under a law of California or the United States, to
23 wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan
24 in the amount of \$80,000 with real property located at 1765 Valdez Way, Fremont, California.

25 **COUNT NINETEEN**
26 **(Offering a False or Forged Instrument)**

27 On or about January 18, 2017, in the County of Alameda, the crime of PROCURING OR
28 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),

1 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
2 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
3 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
4 genuine, might be filed, registered, or recorded under a law of California or the United States, to
5 wit: unlawful detainer complaint filed in Superior Court in Alameda County, California for real
6 property located at 1765 Valdez Way, Fremont, California, case number HG16839883.

7 **COUNT TWENTY**
8 **(Grand Theft by False Pretenses)**

9 On and between July 2016 and February 2017, in the County of Alameda, the crime of
10 GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by
11 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
12 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
13 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
14 (\$950), to wit: \$17,202.43 from Frankie and May Cheung.

15 **COUNT TWENTY ONE**
16 **(Offering a False or Forged Instrument)**

17 On or about July 27, 2016, in the County of Alameda, the crime of PROCURING OR
18 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
19 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
20 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
21 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
22 genuine, might be filed, registered, or recorded under a law of California or the United States, to
23 wit: a grant deed from Frankie and May Cheung to Grand View Financial, LLC conveying title in
24 real property located at 1765 Valdez Way, Fremont, California.

25 **COUNT TWENTY TWO**
26 **(Prohibited Act by a Foreclosure Consultant)**

27 On or between June 2016 and July 2017 in the County of Contra Costa, the crime of
28 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of

1 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
2 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, AND AUDREY GRACE GAN,
3 who did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation
4 as a foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner
5 with whom the foreclosure consultant has contracted with before they had fully performed each
6 and every service that they were contracted to perform or represented that they would perform to
7 wit: received a grant deed from Ellen and Clyde Davenport conveying title in 5555 Thayer Lane
8 San Ramon, California to Grand View Financial, LLC.

9 **COUNT TWENTY THREE**
10 **(Prohibited Act by a Foreclosure Consultant)**

11 On and between June 2016 and July 2017 in the County of Contra Costa, the crime of
12 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of
13 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
14 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, AND AUDREY GRACE GAN,
15 who did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation
16 as a foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner
17 with whom the foreclosure consultant has contracted with before they had fully performed each
18 and every service that they were contracted to perform or represented that they would perform to
19 wit: received payments in the amount of \$5,800.00 from Ellen and Clyde Davenport.

20 **COUNT TWENTY FOUR**
21 **(Offering a False or Forged Instrument)**

22 On or about June 15, 2016, in the County of Contra Costa, the crime of PROCURING OR
23 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
24 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
25 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
26 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
27 genuine, might be filed, registered, or recorded under a law of California or the United States, to
28

1 wit: a grant deed from Ellen and Clyde Davenport to Grand View Financial, LLC conveying title
2 to real property located at 5555 Thayer Lane San Ramon, California.

3 **COUNT TWENTY FIVE**
4 **(Offering a False or Forged Instrument)**

5 On or about February 16, 2017, in the County of Contra Costa, the crime of PROCURING
6 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
7 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
8 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
9 forged instrument to be filed, registered, or recorded in a public office in California, which
10 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
11 United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments,
12 LLC securing a loan in the amount of \$80,000 with real property located at 5555 Thayer Lane
13 San Ramon, California.

14 **COUNT TWENTY SIX**
15 **(Offering a False or Forged Instrument)**

16 On or about June 16, 2016, in the County of Contra Costa, the crime of PROCURING OR
17 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
18 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
19 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
20 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
21 genuine, might be filed, registered, or recorded under a law of California or the United States, to
22 wit: a deed of trust from Grand View Financial, LLC to Beneficial Financial Services LLC,
23 Upscale Financial, LLC, Sharp Financial, LLC, and Premium Capital, LLC and securing a loan in
24 the amount of \$505,000 with real property located at 5555 Thayer Lane San Ramon, California.

25 **COUNT TWENTY SEVEN**
26 **(Grand Theft by False Pretenses)**

27 On and between June 2016 and July 2017, in the County of Contra Costa, the crime of
28 GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by

1 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
2 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
3 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
4 (\$950), to wit: \$5,800.00 from Ellen and Clyde Davenport.

5 **COUNT TWENTY EIGHT**
6 **(Grand Theft by False Pretenses)**

7 On or about June 1, 2016, in the County of Contra Costa, the crime of GRAND THEFT,
8 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
9 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
10 designedly, by a false and fraudulent representation and pretense, obtained money, real and
11 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
12 wit: a grant deed from Ellen and Clyde Davenport to Grand View Financial, LLC conveying title
13 to real property located at 5555 Thayer Lane San Ramon, California.

14 **COUNT TWENTY NINE**
15 **(Prohibited Act by a Foreclosure Consultant)**

16 On and between October 7, 2016 and December 2018, in the County of San Joaquin, the
17 crime of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in
18 violation of Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was
19 committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY
20 GRACE GAN, who did unlawfully and knowingly claim, demand, charge, collect and/or receive
21 compensation as a foreclosure consultant and/or acquire an interest in a residence in foreclosure
22 from an owner with whom the foreclosure consultant has contracted with before they had fully
23 performed each and every service that they were contracted to perform or represented that they
24 would perform to wit: received payments in the amount of \$15,319.00 from Shirley Hanes.

25 **COUNT THIRTY**
26 **(Offering a False or Forged Instrument)**

27 On or about October 6, 2016 in the County of San Joaquin, the crime of PROCURING
28 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section

1 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
2 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
3 forged instrument to be filed, registered, or recorded in a public office in California, which
4 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
5 United States, to wit: a grant deed from Shirley Hanes to Grand View Financial, LLC conveying
6 title to real property located at 1130 North Edison Street Stockton, California.

7 **COUNT THIRTY ONE**
8 **(Offering a False or Forged Instrument)**

9 On or about June 15, 2017, in the County of San Joaquin, the crime of PROCURING OR
10 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
11 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
12 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
13 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
14 genuine, might be filed, registered, or recorded under a law of California or the United States, to
15 wit: a deed of trust from Grand View Financial, LLC to Refreshing Resources, LLC securing a
16 loan in the amount of \$50,000 with real property located at 1130 North Edison Street Stockton,
17 California.

18 **COUNT THIRTY TWO**
19 **(Offering a False or Forged Instrument)**

20 On or about December 12, 2016, in the County of San Joaquin, the crime of
21 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
22 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
23 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
24 offer a false or forged instrument to be filed, registered, or recorded in a public office in
25 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
26 California or the United States, to wit: a deed of trust from Grand View Financial, LLC to North
27 Park Investments, LLC securing a loan in the amount of \$80,000 with real property located at
28 1130 North Edison Street Stockton, California.

1 **COUNT THIRTY THREE**
2 **(Offering a False or Forged Instrument)**

3 On or about November 14, 2016, in the County of San Joaquin, the crime of
4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal
5 Code section 115(a), a felony, was committed by **STEVEN JOSEPH ROGERS, ROBERT**
6 **WAYNE SEDLAR, and AUDREY GRACE GAN**, who did unlawfully and knowingly procure or
7 offer a false or forged instrument to be filed, registered, or recorded in a public office in
8 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
9 California or the United States, to wit: unlawful detainer complaint filed in Superior Court in San
10 Joaquin County, California for real property located at 2015 1130 North Edison Street Stockton,
11 California, case number STK-CV-LUDR-2016-11483.

12 **COUNT THIRTY FOUR**
13 **(Elder Abuse)**

14 On and between October 2016 and December 2018, in the County of San Joaquin, the
15 crime of **ELDER ABUSE**, in violation of Penal Code section 368(d), a felony, was committed by
16 **STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN**, who
17 did willfully and unlawfully commit theft, embezzlement, or fraud, with respect to the property of
18 an elder adult, said property, moneys taken and obtained having a value exceeding Nine Hundred
19 Fifty Dollars (\$950), when he knew or reasonably should have known that said person was an
20 elder adult, to wit: \$15,319.00 from Shirley Hanes.

21 **COUNT THIRTY FIVE**
22 **(Elder Abuse)**

23 On or about October 7, 2016, in the County of San Joaquin, the crime of **ELDER ABUSE**,
24 in violation of Penal Code section 368(d), a felony, was committed by **STEVEN JOSEPH**
25 **ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN**, who did willfully and
26 unlawfully commit theft, embezzlement, or fraud, with respect to the property of an elder adult,
27 said property, moneys taken and obtained having a value exceeding Nine Hundred Fifty Dollars
28 (\$950), when he knew or reasonably should have known that said person was an elder adult, to

1 wit: a grant deed from Shirley Hanes to Grand View Financial, LLC conveying title to real
2 property located at 1130 North Edison Street Stockton, California.

3 **COUNT THIRTY SIX**
4 **(Prohibited Act by a Foreclosure Consultant)**

5 On or about December 17, 2018, in the County of Contra Costa, the crime of ENGAGING
6 IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code
7 section 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN
8 JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did
9 unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
10 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
11 whom the foreclosure consultant has contracted with before they had fully performed each and
12 every service that they were contracted to perform or represented that they would perform to wit:
13 received a grant deed from Kevin Hunter conveying title in 1020 Ridge Park Drive Concord,
14 California to Grand View Financial, LLC.

15 **COUNT THIRTY SEVEN**
16 **(Offering a False or Forged Instrument)**

17 On or about December 17, 2018, in the County of Contra Costa, the crime of
18 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
19 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
20 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
21 offer a false or forged instrument to be filed, registered, or recorded in a public office in
22 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
23 California or the United States, to wit: a grant deed from Kevin Hunter to Grand View Financial,
24 LLC conveying title to real property located at 1020 Ridge Park Drive Concord, California.

25 **COUNT THIRTY EIGHT**
26 **(Grand Theft by False Pretenses)**

27 On and around December 17, 2018, in the County of Contra Costa, the crime of GRAND
28 THEFT, in violation of Penal Code section 487(a), a felony, was committed by STEVEN

1 JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
2 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
3 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
4 (\$950), to wit: a grant deed from Kevin Hunter to Grand View Financial, LLC conveying title in
5 1020 Ridge Park Drive Concord, California.

6 **COUNT THIRTY NINE**
7 **(Offering a False or Forged Instrument)**

8 On or about February 23, 2017, in the County of Placer, the crime of PROCURING OR
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
10 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
11 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
12 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
13 genuine, might be filed, registered, or recorded under a law of California or the United States, to
14 wit: a grant deed from Danna and Darren Ladd to Grand View Financial, LLC conveying title to
15 real property located at 38303 Kearsarge Mill Road Alta, California.

16 **COUNT FORTY**
17 **(Grand Theft by False Pretenses)**

18 On and between March 2017 and June 2018, in the Placer, the crime of GRAND THEFT,
19 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
20 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
21 designedly, by a false and fraudulent representation and pretense, obtained money, real and
22 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
23 wit: \$20,821.94 from Danna and Darren Ladd.

24 **COUNT FORTY ONE**
25 **(Grand Theft by False Pretenses)**

26 On or about February 23, 2017, in the County of Placer, the crime of GRAND THEFT, in
27 violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
28 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and

1 designedly, by a false and fraudulent representation and pretense, obtained money, real and
2 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
3 wit: a grant deed from Danna and Darren Ladd to Grand View Financial, LLC conveying title in
4 38303 Kearsarge Mill Road Alta, California.

5 **COUNT FORTY TWO**
6 **(Prohibited Act by a Foreclosure Consultant)**

7 On or about June 10, 2016, in the County of Contra Costa, the crime of ENGAGING IN A
8 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
9 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
10 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
11 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
12 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
13 foreclosure consultant has contracted with before they had fully performed each and every service
14 that they were contracted to perform or represented that they would perform to wit: received a
15 grant deed from Angela Leung-Kithing and Samuel Ng conveying title in 3217 Acalanes Avenue
16 Lafayette, California to Grand View Financial, LLC.

17 **COUNT FORTY THREE**
18 **(Prohibited Act by a Foreclosure Consultant)**

19 On and between June 10, 2016 and December 16, 2017, in the County of Contra Costa,
20 the crime of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in
21 violation of Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was
22 committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY
23 GRACE GAN, who did unlawfully and knowingly claim, demand, charge, collect and/or receive
24 compensation as a foreclosure consultant and/or acquire an interest in a residence in foreclosure
25 from an owner with whom the foreclosure consultant has contracted with before they had fully
26 performed each and every service that they were contracted to perform or represented that they
27 would perform to wit: received payments in the amount of \$7,600.00 from Angela Leung-Kithing
28 and Samuel Ng.

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COUNT FORTY FOUR
(Offering a False or Forged Instrument)

On or about June 10, 2016, in the County of Contra Costa, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a grant deed from Angela Leung-Kithing and Samuel Ng to Grand View Financial, LLC conveying title to real property located at 3217 Acalanes Avenue Lafayette, California.

COUNT FORTY FIVE
(Offering a False or Forged Instrument)

On or about January 24, 2017, in the County of Contra Costa, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments, LLC securing a loan in the amount of \$80,000 with real property located at 3217 Acalanes Avenue Lafayette, California.

COUNT FORTY SIX
(Offering a False or Forged Instrument)

On or about June 17, 2016, in the County of Contra Costa, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if

1 genuine, might be filed, registered, or recorded under a law of California or the United States, to
2 wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan
3 in the amount of \$330,000 with real property located at 3217 Acalanes Avenue Lafayette,
4 California.

5 **COUNT FORTY SEVEN**
6 **(Offering a False or Forged Instrument)**

7 On or about September 21, 2016, in the County of Contra Costa, the crime of
8 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal
9 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
10 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
11 offer a false or forged instrument to be filed, registered, or recorded in a public office in
12 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
13 California or the United States, to wit: unlawful detainer complaint filed in Superior Court in
14 Contra Costa County, California for real property located at 3217 Acalanes Avenue Lafayette,
15 California, case number MS160606.

16 **COUNT FORTY EIGHT**
17 **(Grand Theft by False Pretenses)**

18 On or between June 2016 and December 2017, in the County of Contra Costa, the crime
19 of **GRAND THEFT**, in violation of Penal Code section 487(a), a felony, was committed by
20 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
21 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
22 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
23 (\$950), to wit: \$7,600.00 from Angela Leung-Kithing and Samuel Ng.

24 **COUNT FORTY NINE**
25 **(Grand Theft by False Pretenses)**

26 On or about June 10, 2016, in the County of Contra Costa, the crime of **GRAND THEFT**,
27 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
28 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and

1 designedly, by a false and fraudulent representation and pretense, obtained money, real and
2 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
3 wit: a grant deed from Angela Leung-Kithing and Samuel Ng to Grand View Financial, LLC
4 conveying title in 3217 Acalanes Avenue Lafayette, California.

5 **COUNT FIFTY**
6 **(Prohibited Act by a Foreclosure Consultant)**

7 On or about October 7, 2016, in the County of Solano, the crime of ENGAGING IN A
8 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
9 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
10 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
11 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
12 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
13 foreclosure consultant has contracted with before they had fully performed each and every service
14 that they were contracted to perform or represented that they would perform to wit: received a
15 grant deed from Gary and Johanna Lohse, conveying title in 7394 North Meridian Road
16 Vacaville, California to Grand View Financial, LLC.

17 **COUNT FIFTY ONE**
18 **(Prohibited Act by a Foreclosure Consultant)**

19 On or between October 2016 and January 2018, in the County of Solano, the crime of
20 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of
21 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
22 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
23 did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
24 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
25 whom the foreclosure consultant has contracted with before they had fully performed each and
26 every service that they were contracted to perform or represented that they would perform to wit:
27 received payments in the amount of \$18,195.00 from Gary and Johanna Lohse.

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COUNT FIFTY TWO
(Offering a False or Forged Instrument)

On or about October 7, 2016, in the County of Solano, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a grant deed from Gary and Johanna Lohse to Grand View Financial, LLC conveying title to real property located at 7394 North Meridian Road Vacaville, California.

COUNT FIFTY THREE
(Offering a False or Forged Instrument)

On or about June 28, 2017, in the County of Solano, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Sharp Financial, LLC securing a loan in the amount of \$75,000 with real property located at 7394 North Meridian Road Vacaville, California.

COUNT FIFTY FOUR
(Offering a False or Forged Instrument)

On or about June 15, 2017, in the County of Solano, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if

1 genuine, might be filed, registered, or recorded under a law of California or the United States, to
2 wit: a deed of trust from Grand View Financial, LLC to Refreshing Resources, LLC securing a
3 loan in the amount of \$50,000 with real property located at 7394 North Meridian Road Vacaville,
4 California.

5 **COUNT FIFTY FIVE**
6 **(Offering a False or Forged Instrument)**

7 On or about December 17, 2016, in the County of Solano, the crime of PROCURING OR
8 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
9 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
10 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
11 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
12 genuine, might be filed, registered, or recorded under a law of California or the United States, to
13 wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan
14 in the amount of \$80,000 with real property located at 7394 North Meridian Road Vacaville,
15 California.

16 **COUNT FIFTY SIX**
17 **(Offering a False or Forged Instrument)**

18 On or about December 31, 2016, in the County of Solano, the crime of PROCURING OR
19 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
20 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
21 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
22 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
23 genuine, might be filed, registered, or recorded under a law of California or the United States, to
24 wit: a deed of trust from Grand View Financial, LLC to North Park Investments, LLC securing a
25 loan in the amount of \$80,000 with real property located at 7394 North Meridian Road Vacaville,
26 California.

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COUNT FIFTY SEVEV
(Offering a False or Forged Instrument)

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On or about October 11, 2016, in the County of Solano, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Premium Capital, LLC securing a loan in the amount of \$75,000 with real property located at 7394 North Meridian Road Vacaville, California.

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COUNT FIFTY EIGHT
(Offering a False or Forged Instrument)

On or about January 18, 2017, in the County of Solano, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: unlawful detainer complaint filed in Superior Court in Solano County, California for real property located at 7394 North Meridian Road Vacaville, California, case number FCM 152435.

COUNT FIFTY NINE
(Elder Abuse)

On and between October 2016 and January 2018, in the County of Solano, the crime of ELDER ABUSE, in violation of Penal Code section 368(d), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did willfully and unlawfully commit theft, embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys taken and obtained having a value exceeding Nine Hundred

1 Fifty Dollars (\$950), when he knew or reasonably should have known that said person was an
2 elder adult, to wit: \$18,195.00 from Gary and Johanna Lohse.

3 **COUNT SIXTY**
4 **(Elder Abuse)**

5 On or about October 2016, in the County of Solano, the crime of ELDER ABUSE, in
6 violation of Penal Code section 368(d), a felony, was committed by STEVEN JOSEPH
7 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did willfully and
8 unlawfully commit theft, embezzlement, or fraud, with respect to the property of an elder adult,
9 said property, moneys taken and obtained having a value exceeding Nine Hundred Fifty Dollars
10 (\$950), when he knew or reasonably should have known that said person was an elder adult, to
11 wit: a grant deed from Gary and Johanna Lohse to Grand View Financial, LLC conveying title to
12 real property located at 7394 North Meridian Road Vacaville, California.

13 **COUNT SIXTY ONE**
14 **(Prohibited Act by a Foreclosure Consultant)**

15 On or about April 14, 2015, in the County of San Diego, the crime of ENGAGING IN A
16 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
17 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
18 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
19 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
20 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
21 foreclosure consultant has contracted with before they had fully performed each and every service
22 that they were contracted to perform or represented that they would perform to wit: received a
23 grant deed from Wilfredo Quiroz conveying title in 2443 Spring Oak Way San Diego, California
24 to Grand View Financial, LLC.

25 **COUNT SIXTY TWO**
26 **(Prohibited Act by a Foreclosure Consultant)**

27 On or about April 14, 2015, in the County of San Diego, the crime of ENGAGING IN A
28 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section

1 2945.4, a felony pursuant to civil code section 2945.7, was committed by ~~STEVEN~~ JOSEPH
2 ~~ROGERS~~, ROBERT WAYNE SEDLAR, and AUDREY ~~GRACE~~ GAN, who did unlawfully and
3 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
4 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
5 foreclosure consultant has contracted with before they had fully performed each and every service
6 that they were contracted to perform or represented that they would perform to wit: received
7 payments in the amount of \$1,200.00 from Wilfredo Quiroz.

8 **COUNT SIXTY THREE**
9 **(Offering a False or Forged Instrument)**

10 On or about April 14, 2015, in the County of San Diego, the crime of PROCURING OR
11 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
12 a felony, was committed by ~~STEVEN~~ JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
13 AUDREY ~~GRACE~~ GAN, who did unlawfully and knowingly procure or offer a false or forged
14 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
15 genuine, might be filed, registered, or recorded under a law of California or the United States, to
16 wit: a quit claim deed from Wilfredo Quiroz to Grand View Financial, LLC conveying title to real
17 property located at 2443 Spring Oak Way San Diego, California.

18 **COUNT SIXTY FOUR**
19 **(Elder Abuse)**

20 On or about April 14, 2015, in the County of San Diego, the crime of ELDER ABUSE, in
21 violation of Penal Code section 368(d), a felony, was committed by ~~STEVEN~~ JOSEPH
22 ~~ROGERS~~, ROBERT WAYNE SEDLAR, and AUDREY ~~GRACE~~ GAN, who did willfully and
23 unlawfully commit theft, embezzlement, or fraud, with respect to the property of an elder adult,
24 said property, moneys taken and obtained having a value exceeding Nine Hundred Fifty Dollars
25 (\$950), when he knew or reasonably should have known that said person was an elder adult, to
26 wit: \$1,200.00 from Wilfredo Quiroz.

1 **COUNT SIXTY FIVE**
2 **(Elder Abuse)**

3 On or about April 14, 2015, in the County of San Diego, the crime of ELDER ABUSE, in
4 violation of Penal Code section 368(d), a felony, was committed by STEVEN JOSEPH
5 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did willfully and
6 unlawfully commit theft, embezzlement, or fraud, with respect to the property of an elder adult,
7 said property, moneys taken and obtained having a value exceeding Nine Hundred Fifty Dollars
8 (\$950), when he knew or reasonably should have known that said person was an elder adult, to
9 wit: a grant deed from Wilfredo Quiroz to Grand View Financial, LLC conveying title to real
10 property located at 2443 Spring Oak Way San Diego, California.

11 **COUNT SIXTY SIX**
12 **(Prohibited Act by a Foreclosure Consultant)**

13 On or about August 4, 2016, in the County of Mendocino, the crime of ENGAGING IN A
14 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
15 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
16 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
17 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
18 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
19 foreclosure consultant has contracted with before they had fully performed each and every service
20 that they were contracted to perform or represented that they would perform to wit: received a
21 grant deed from Robert Roberts and Timothy Brey conveying title in 44300 Lighthouse Road
22 Point Arena, California to Grand View Financial, LLC.

23 **COUNT SIXTY SEVEN**
24 **(Prohibited Act by a Foreclosure Consultant)**

25 On or about August 2016, in the County of Mendocino, the crime of ENGAGING IN A
26 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
27 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
28 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and

1 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
2 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
3 foreclosure consultant has contracted with before they had fully performed each and every service
4 that they were contracted to perform or represented that they would perform to wit: received
5 payments in the amount of \$1,500 from Robert Roberts and Timothy Brey.

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8 **COUNT SIXTY EIGHT**
9 **(Offering a False or Forged Instrument)**

10 On or about August 4, 2016, in the County of Mendocino, the crime of PROCURING OR
11 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
12 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
13 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
14 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
15 genuine, might be filed, registered, or recorded under a law of California or the United States, to
16 wit: a grant deed from Robert Roberts and Timothy Brey to Grand View Financial, LLC
17 conveying title to real property located at 44300 Lighthouse Road Point Arena, California.

18 **COUNT SIXTY NINE**
19 **(Offering a False or Forged Instrument)**

20 On or about June 15, 2017, in the County of Mendocino, the crime of PROCURING OR
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
22 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
23 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
24 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
25 genuine, might be filed, registered, or recorded under a law of California or the United States, to
26 wit: a deed of trust from Grand View Financial, LLC to Refreshing Resources, LLC securing a
27 loan in the amount of \$50,000 with real property located at 44300 Lighthouse Road Point Arena,
28 California.

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COUNT SEVENTY
(Offering a False or Forged Instrument)

On or about February 1, 2017, in the County of Mendocino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan in the amount of \$55,000 with real property located at 44300 Lighthouse Road Point Arena, California.

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COUNT SEVENTY ONE
(Offering a False or Forged Instrument)

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On or about February 1, 2017, in the County of Mendocino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Beneficial Financial Services, LLC securing a loan in the amount of \$50,000 with real property located at 44300 Lighthouse Road Point Arena, California.

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COUNT SEVENTY TWO
(Offering a False or Forged Instrument)

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On or about February 1, 2017, in the County of Mendocino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or

1 forged instrument to be filed, registered, or recorded in a public office in California, which
2 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
3 United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments,
4 LLC securing a loan in the amount of \$80,000 with real property located at 44300 Lighthouse
5 Road Point Arena, California.

6 **COUNT SEVENTY THREE**
7 **(Offering a False or Forged Instrument)**

8 On or about March 14, 2017, in the County of Mendocino, the crime of PROCURING OR
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
10 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
11 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
12 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
13 genuine, might be filed, registered, or recorded under a law of California or the United States, to
14 wit: unlawful detainer complaint filed in Superior Court in Mendocino County, California for real
15 property located at 44300 Lighthouse Road Point Arena, California, case number MCVUD-
16 17-13426.

17 **COUNT SEVENTY FOUR**
18 **(Offering a False or Forged Instrument)**

19 On or about October 19, 2016, in the County of Mendocino, the crime of PROCURING
20 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
21 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
22 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
23 forged instrument to be filed, registered, or recorded in a public office in California, which
24 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
25 United States, to wit: unlawful detainer complaint filed in Superior Court in Mendocino County,
26 California for real property located at 44300 Lighthouse Road Point Arena, California, case
27 number MCVUD-16-13354.

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COUNT SEVENTY FIVE
(Grand Theft by False Pretenses)

On and between August 2016 to June 2017, in the County of Mendocino, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and designedly, by a false and fraudulent representation and pretense, obtained money, real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$1,500 from Robert Roberts and Timothy Brey.

COUNT SEVENTY SIX
(Grand Theft by False Pretenses)

On or about August 4, 2016, in the County of Mendocino, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and designedly, by a false and fraudulent representation and pretense, obtained money, real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: a grant deed from Robert Roberts and Timothy Brey to Grand View Financial, LLC conveying title in 44300 Lighthouse Road Point Arena, California.

COUNT SEVENTY SEVEN
(Prohibited Act by a Foreclosure Consultant)

On or about May 31, 2016, in the County of San Francisco, the crime of ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the foreclosure consultant has contracted with before they had fully performed each and every service that they were contracted to perform or represented that they would perform to wit:

1 received a grant deed from Stella Tan and Edmund Yip conveying title in 4525-4527 Lincoln
2 Way San Francisco, California to Grand View Financial, LLC.

3 **COUNT SEVENTY EIGHT**
4 **(Prohibited Act by a Foreclosure Consultant)**

5 On between July 2016 and May 2017, in the County of San Francisco, the crime of
6 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of
7 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
8 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
9 did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
10 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
11 whom the foreclosure consultant has contracted with before they had fully performed each and
12 every service that they were contracted to perform or represented that they would perform to wit:
13 received payments in the amount of \$17,515.00 from Stella Tan and Edmund Yip.

14 **COUNT SEVENTY NINE**
15 **(Offering a False or Forged Instrument)**

16 On or about May 31, 2016, in the County of San Francisco, the crime of PROCURING
17 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
18 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
19 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
20 forged instrument to be filed, registered, or recorded in a public office in California, which
21 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
22 United States, to wit: a grant deed from Stella Tan and Edmund Yip to Grand View Financial,
23 LLC conveying title to real property located at 4525-4527 Lincoln Way San Francisco,
24 California.

25 **COUNT EIGHTY**
26 **(Offering a False or Forged Instrument)**

27 On or about June 1, 2016, in the County of San Francisco, the crime of PROCURING OR
28 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),

1 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
2 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
3 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
4 genuine, might be filed, registered, or recorded under a law of California or the United States, to
5 wit: a deed of trust from Grand View Financial, LLC to Sharp Financial, LLC, Premium Capital,
6 LLC, and Upscale Financial, LLC securing a loan in the amount of \$1,546,000 with real property
7 located at 4525-4527 Lincoln Way San Francisco, California.

8 **COUNT EIGHTY ONE**
9 **(Offering a False or Forged Instrument)**

10 On or about June 21, 2016, in the County of San Francisco, the crime of PROCURING
11 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
12 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
13 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
14 forged instrument to be filed, registered, or recorded in a public office in California, which
15 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
16 United States, to wit: a deed of trust from Grand View Financial, LLC Beneficial Financial
17 Services LLC securing a loan in the amount of \$75,000 with real property located at 4525-4527
18 Lincoln Way San Francisco, California.

19 **COUNT EIGHTY TWO**
20 **(Offering a False or Forged Instrument)**

21 On or about December 1, 2016, in the County of San Francisco, the crime of
22 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
23 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
24 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
25 offer a false or forged instrument to be filed, registered, or recorded in a public office in
26 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
27 California or the United States, to wit: a deed of trust from Grand View Financial, LLC to North
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1 Park Investments, LLC securing a loan in the amount of \$80,000 with real property located at
2 4525-4527 Lincoln Way San Francisco, California.

3 **COUNT EIGHTY THREE**
4 **(Offering a False or Forged Instrument)**

5 On or about December 21, 2016, in the County of San Francisco, the crime of
6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal
7 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
8 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
9 offer a false or forged instrument to be filed, registered, or recorded in a public office in
10 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
11 California or the United States, to wit: unlawful detainer complaint filed in Superior Court in San
12 Francisco County, California for real property located at 4525-4527 Lincoln Way San Francisco,
13 California, case number UD-CUD-16-657104.

14 **COUNT EIGHTY FOUR**
15 **(Grand Theft by False Pretenses)**

16 On or between July 2016 and May 2017, in the County of San Francisco, the crime of
17 **GRAND THEFT**, in violation of Penal Code section 487(a), a felony, was committed by
18 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
19 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
20 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
21 (\$950), to wit: \$17,515.00 from Stella Tan and Edmund Yip.

22 **COUNT EIGHTY FIVE**
23 **(Grand Theft by False Pretenses)**

24 On or about May 31, 2016, in the County of San Francisco, the crime of **GRAND THEFT**,
25 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
26 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
27 designedly, by a false and fraudulent representation and pretense, obtained money, real and
28 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to

1 wit: a grant deed from Stella Tan and Edmund Yip to Grand View Financial, LLC conveying title
2 in 4525-4527 Lincoln Way San Francisco, California.

3 **COUNT EIGHTY SIX**
4 **(Offering a False or Forged Instrument)**

5 On or about December 27, 2016, in the County of San Diego, the crime of PROCURING
6 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
7 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
8 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
9 forged instrument to be filed, registered, or recorded in a public office in California, which
10 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
11 United States, to wit: a grant deed from Ty Valkanas to Grand View Financial, LLC conveying
12 title to real property located at 1422 Hemlock Avenue Imperial Beach, California.

13 **COUNT EIGHTY SEVEN**
14 **(Offering a False or Forged Instrument)**

15 On or about December 29, 2016, in the County of San Diego, the crime of PROCURING
16 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
17 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
18 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
19 forged instrument to be filed, registered, or recorded in a public office in California, which
20 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
21 United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments,
22 LLC securing a loan in the amount of \$80,000 with real property located at 1422 Hemlock
23 Avenue Imperial Beach, California.

24 **COUNT EIGHTY EIGHT**
25 **(Offering a False or Forged Instrument)**

26 On or about February 14, 2017, in the County of San Diego, the crime of PROCURING
27 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
28 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,

1 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
2 forged instrument to be filed, registered, or recorded in a public office in California, which
3 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
4 United States, to wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC
5 securing a loan in the amount of \$80,000 with real property located at 1422 Hemlock Avenue
6 Imperial Beach, California.

7 **COUNT EIGHTY NINE**
8 **(Grand Theft by False Pretenses)**

9 On or about December 27, 2016, in the County of San Diego, the crime of GRAND
10 THEFT, in violation of Penal Code section 487(a), a felony, was committed by STEVEN
11 JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
12 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
13 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
14 (\$950), to wit: a grant deed from Ty Valkanas to Grand View Financial, LLC conveying title in
15 1422 Hemlock Avenue Imperial Beach, California.

16 **COUNT NINETY**
17 **(Prohibited Act by a Foreclosure Consultant)**

18 On or about June 21, 2016, in the County of El Dorado, the crime of ENGAGING IN A
19 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
20 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
21 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
22 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
23 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
24 foreclosure consultant has contracted with before they had fully performed each and every service
25 that they were contracted to perform or represented that they would perform to wit: received a
26 grant deed from Rajiv and Gina Wadhwa conveying title in 1102 Penninan Drive El Dorado
27 Hills, California to Grand View Financial, LLC.

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1 **COUNT NINETY ONE**
2 **(Prohibited Act by a Foreclosure Consultant)**

3 On and between June 2016 and June 2017, in the County of El Dorado, the crime of
4 **ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT**, in violation of
5 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by
6 **STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN**, who
7 did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
8 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
9 whom the foreclosure consultant has contracted with before they had fully performed each and
10 every service that they were contracted to perform or represented that they would perform to wit:
11 received payments in the amount of \$20,428.60 from Rajiv and Gina Wadhwa.

12 **COUNT NINETY TWO**
13 **(Offering a False or Forged Instrument)**

14 On or about June 21, 2016, in the County of El Dorado, the crime of **PROCURING OR**
15 **OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal Code section 115(a),
16 a felony, was committed by **STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and**
17 **AUDREY GRACE GAN**, who did unlawfully and knowingly procure or offer a false or forged
18 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
19 genuine, might be filed, registered, or recorded under a law of California or the United States, to
20 wit: a grant deed from Rajiv and Gina Wadhwa to Grand View Financial, LLC conveying title to
21 real property located at 1102 Penniman Drive El Dorado Hills, California.

22 **COUNT NINETY THREE**
23 **(Offering a False or Forged Instrument)**

24 On or about June 16, 2017, in the County of El Dorado, the crime of **PROCURING OR**
25 **OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal Code section 115(a),
26 a felony, was committed by **STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and**
27 **AUDREY GRACE GAN**, who did unlawfully and knowingly procure or offer a false or forged
28 instrument to be filed, registered, or recorded in a public office in California, which instrument, if

1 genuine, might be filed, registered, or recorded under a law of California or the United States, to
2 wit: a deed of trust from Grand View Financial, LLC to Refreshing Resources, LLC securing a
3 loan in the amount of \$50,000 with real property located at 1102 Penniman Drive El Dorado
4 Hills, California.

5 **COUNT NINETY FOUR**
6 **(Offering a False or Forged Instrument)**

7 On or about December 13, 2016, in the County of El Dorado, the crime of PROCURING
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
9 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
10 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
11 forged instrument to be filed, registered, or recorded in a public office in California, which
12 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
13 United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments,
14 LLC securing a loan in the amount of \$50,000 with real property located at 1102 Penniman Drive
15 El Dorado Hills, California.

16 **COUNT NINETY FIVE**
17 **(Offering a False or Forged Instrument)**

18 On or about June 21, 2016, in the County of El Dorado, the crime of PROCURING OR
19 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
20 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
21 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
22 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
23 genuine, might be filed, registered, or recorded under a law of California or the United States, to
24 wit: a deed of trust from Grand View Financial, LLC to Upscale Financial, LLC securing a loan
25 in the amount of \$224,000 with real property located at 1102 Penniman Drive El Dorado Hills,
26 California.

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COUNT NINETY SIX
(Offering a False or Forged Instrument)

On or about September 20, 2016 in the County of El Dorado, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: unlawful detainer complaint filed in Superior Court in El Dorado County, California for real property located at 1102 Penniman Drive El Dorado Hills, California, case number PCU-20160268.

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COUNT ONE NINETY SEVEN
(Offering a False or Forged Instrument)

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On or about September 1, 2017, in the County of El Dorado, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: unlawful detainer complaint filed in Superior Court in El Dorado County, California for real property located at 1102 Penniman Drive El Dorado Hills, California, case number PCU-20170166.

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COUNT NINETY EIGHT
(Grand Theft by False Pretenses)

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On or between July 2016 and May 2017, in the County of El Dorado, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,

1 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
2 (\$950), to wit: \$20,428.60 from Rajiv and Gina Wadhwa.

3 **COUNT NINETY NINE**
4 **(Grand Theft by False Pretenses)**

5 On or about June 21, 2016, in the County of El Dorado, the crime of GRAND THEFT, in
6 violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH
7 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
8 designedly, by a false and fraudulent representation and pretense, obtained money, real and
9 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
10 wit: a grant deed from Rajiv and Gina Wadhwa to Grand View Financial, LLC conveying title in
11 1102 Penniman Drive El Dorado Hills, California.

12 **COUNT ONE HUNDRED**
13 **(Prohibited Act by a Foreclosure Consultant)**

14 On or about May 13, 2016, in the County of Sacramento, the crime of ENGAGING IN A
15 PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of Civil Code section
16 2945.4, a felony pursuant to civil code section 2945.7, was committed by STEVEN JOSEPH
17 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and
18 knowingly claim, demand, charge, collect and/or receive compensation as a foreclosure
19 consultant and/or acquire an interest in a residence in foreclosure from an owner with whom the
20 foreclosure consultant has contracted with before they had fully performed each and every service
21 that they were contracted to perform or represented that they would perform to wit: received a
22 grant deed from Sunil and Lori Wadhwa conveying title in 747 Sturbridge Drive Folsom,
23 California to Grand View Financial, LLC.

24 **COUNT ONE HUNDRED ONE**
25 **(Prohibited Act by a Foreclosure Consultant)**

26 On and between May 2016 and June 2017, in the County of Sacramento, the crime of
27 ENGAGING IN A PROHIBITED ACT AS A FORECLOSURE CONSULTANT, in violation of
28 Civil Code section 2945.4, a felony pursuant to civil code section 2945.7, was committed by

1 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
2 did unlawfully and knowingly claim, demand, charge, collect and/or receive compensation as a
3 foreclosure consultant and/or acquire an interest in a residence in foreclosure from an owner with
4 whom the foreclosure consultant has contracted with before they had fully performed each and
5 every service that they were contracted to perform or represented that they would perform to wit:
6 received payments in the amount of \$15,830.00 from Sunil and Lori Wadhwa.

7 **COUNT ONE HUNDRED TWO**
8 **(Offering a False or Forged Instrument)**

9 On or about May 13, 2016, in the County of Sacramento, the crime of PROCURING OR
10 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
11 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
12 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
13 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
14 genuine, might be filed, registered, or recorded under a law of California or the United States, to
15 wit: a grant deed from Sunil and Lori Wadhwa to Grand View Financial, LLC conveying title to
16 real property located at 747 Sturbridge Drive Folsom, California.

17 **COUNT ONE HUNDRED THREE**
18 **(Offering a False or Forged Instrument)**

19 On or about January 24, 2017, in the County of Sacramento, the crime of PROCURING
20 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
21 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
22 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
23 forged instrument to be filed, registered, or recorded in a public office in California, which
24 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
25 United States, to wit: a deed of trust from Grand View Financial, LLC to North Park Investments,
26 LLC securing a loan in the amount of \$80,000 with real property located at 747 Sturbridge Drive
27 Folsom, California.

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**COUNT ONE HUNDRED FOUR
(Offering a False or Forged Instrument)**

On or about June 16, 2017, in the County of Sacramento, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Refreshing Resources, LLC securing a loan in the amount of \$50,000 with real property located at 747 Sturbridge Drive Folsom, California.

**COUNT ONE HUNDRED FIVE
(Offering a False or Forged Instrument)**

On or about June 23, 2017, in the County of Sacramento, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: a deed of trust from Grand View Financial, LLC to Beneficial Financial Services, LLC securing a loan in the amount of \$75,000 with real property located at 747 Sturbridge Drive Folsom, California.

**COUNT ONE HUNDRED SIX
(Offering a False or Forged Instrument)**

On or about September 20, 2016, in the County of Sacramento, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or

1 offer a false or forged instrument to be filed, registered, or recorded in a public office in
2 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
3 California or the United States, to wit: unlawful detainer complaint filed in Superior Court in
4 Sacramento, California for real property located at 747 Sturbridge Drive Folsom, California, case
5 number 16UD05996.

6 **COUNT ONE HUNDRED SEVEN**
7 **(Offering a False or Forged Instrument)**

8 On or about November 21, 2016, in the County of Sacramento, the crime of
9 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**, in violation of Penal
10 Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
11 WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
12 offer a false or forged instrument to be filed, registered, or recorded in a public office in
13 California, which instrument, if genuine, might be filed, registered, or recorded under a law of
14 California or the United States, to wit: unlawful detainer complaint filed in Superior Court in
15 Sacramento, California for real property located at 747 Sturbridge Drive Folsom, California, case
16 number 16UD07346.

17 **COUNT ONE HUNDRED EIGHT**
18 **(Grand Theft by False Pretenses)**

19 On and between May 2017 and June 2017, in the County of Sacramento, the crime of
20 **GRAND THEFT**, in violation of Penal Code section 487(a), a felony, was committed by
21 STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who
22 knowingly and designedly, by a false and fraudulent representation and pretense, obtained money,
23 real and personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars
24 (\$950), to wit: \$15,830.00 from Sunil and Lori Wadhwa.

25 **COUNT ONE HUNDRED NINE**
26 **(Grand Theft by False Pretenses)**

27 On or about May 13, 2016, in the County of Sacramento, the crime of **GRAND THEFT**,
28 in violation of Penal Code section 487(a), a felony, was committed by STEVEN JOSEPH

1 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN, who knowingly and
2 designedly, by a false and fraudulent representation and pretense, obtained money, real and
3 personal property by fraud, which had a value exceeding Nine Hundred Fifty Dollars (\$950), to
4 wit: a grant deed from Sunil and Lori Wadhwa to Grand View Financial, LLC conveying title in
5 747 Sturbridge Drive Folsom, California.

6 **COUNT ONE HUNDRED TEN**
7 **(Offering a False or Forged Instrument)**

8 On or about June 16, 2016, in the County of Santa Barbara, the crime of PROCURING
9 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
10 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
11 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
12 forged instrument to be filed, registered, or recorded in a public office in California, which
13 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
14 United States, to wit: a bankruptcy petition filed in United States Bankruptcy Court case number
15 9:16-BK-11136-DS.

16 **COUNT ONE HUNDRED ELEVEN**
17 **(Offering a False or Forged Instrument)**

18 On or about August 17, 2017, in the County of Los Angeles, the crime of PROCURING
19 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
20 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
21 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
22 forged instrument to be filed, registered, or recorded in a public office in California, which
23 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
24 United States, to wit: a bankruptcy petition filed in United States Bankruptcy Court, case number
25 2:17-BK-20125-RK.

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**COUNT ONE HUNDRED TWELVE
(Offering a False or Forged Instrument)**

On or about December 20, 2016, in the County of Santa Barbara, the crime of
PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
offer a false or forged instrument to be filed, registered, or recorded in a public office in
California, which instrument, if genuine, might be filed, registered, or recorded under a law of
California or the United States, to wit: a bankruptcy petition filed in United States Bankruptcy
Court, case number 9:16-BK-12371-PC.

**COUNT ONE HUNDRED THIRTEEN
(Offering a False or Forged Instrument)**

On or about September 19, 2016, in the County of Santa Barbara, the crime of
PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
offer a false or forged instrument to be filed, registered, or recorded in a public office in
California, which instrument, if genuine, might be filed, registered, or recorded under a law of
California or the United States, to wit: a bankruptcy petition filed in United States Bankruptcy
Court, case number 9:16-BK-11730-PC.

**COUNT ONE HUNDRED FOURTEEN
(Offering a False or Forged Instrument)**

On or about September 28, 2016, in the County of Santa Barbara, the crime of
PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal
Code section 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT
WAYNE SEDLAR, and AUDREY GRACE GAN, who did unlawfully and knowingly procure or
offer a false or forged instrument to be filed, registered, or recorded in a public office in
California, which instrument, if genuine, might be filed, registered, or recorded under a law of

1 California or the United States, to wit: a bankruptcy petition filed in United States Bankruptcy
2 Court, case number 9:16-BK-11795-PC.

3 **COUNT ONE HUNDRED FIFTEEN**
4 **(Offering a False or Forged Instrument)**

5 On or about October 19, 2016, in the County of Santa Barbara, the crime of PROCURING
6 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
7 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
8 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
9 forged instrument to be filed, registered, or recorded in a public office in California, which
10 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
11 United States, to wit: a bankruptcy petition filed in United States Bankruptcy Court case number
12 9:16-BK-11939-PC.

13 **COUNT ONE HUNDRED SIXTEEN**
14 **(Offering a False or Forged Instrument)**

15 On or about June 14, 2017, in the County of Santa Barbara, the crime of PROCURING
16 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
17 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
18 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
19 forged instrument to be filed, registered, or recorded in a public office in California, which
20 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
21 United States, to wit: a bankruptcy petition filed in United States Bankruptcy Court, case number
22 9:16-BK-11075-PC.

23 **COUNT ONE HUNDRED SEVENTEEN**
24 **(Offering a False or Forged Instrument)**

25 On or about August 4, 2015, in the County of San Diego, the crime of PROCURING OR
26 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
27 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
28 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged

1 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
2 genuine, might be filed, registered, or recorded under a law of California or the United States, to
3 wit: a bankruptcy petition filed in the United States Bankruptcy Court, case number 3:15-BK-
4 05200.

5 **COUNT ONE HUNDRED EIGHTEEN**
6 **(Offering a False or Forged Instrument)**

7 On or about August 8, 2016, in the County of Los Angeles, the crime of PROCURING
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section
9 115(a), a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR,
10 and AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or
11 forged instrument to be filed, registered, or recorded in a public office in California, which
12 instrument, if genuine, might be filed, registered, or recorded under a law of California or the
13 United States, to wit: a bankruptcy petition filed in United States Bankruptcy Court, case number
14 2:16-BK-20496-RK.

15 **COUNT ONE HUNDRED NINETEEN**
16 **(Offering a False or Forged Instrument)**

17 On or about June 26, 2017, in the County of Los Angeles, the crime of PROCURING OR
18 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
19 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
20 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
21 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
22 genuine, might be filed, registered, or recorded under a law of California or the United States, to
23 wit: a bankruptcy petition filed in United States Bankruptcy Court, case number 2:17-BK-17738-
24 RK.

25 **COUNT ONE HUNDRED TWENTY**
26 **(Offering a False or Forged Instrument)**

27 On or about May 17, 2016, in the County of Los Angeles, the crime of PROCURING OR
28 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),

1 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
2 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
3 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
4 genuine, might be filed, registered, or recorded under a law of California or the United States, to
5 wit: a bankruptcy petition filed in United States Bankruptcy Court, case number 2:16-BK-16472-
6 RK.

7 **COUNT ONE HUNDRED TWENTY ONE**
8 **(Offering a False or Forged Instrument)**

9 On or about May 8, 2017, in the County of Los Angeles, the crime of PROCURING OR
10 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),
11 a felony, was committed by STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
12 AUDREY GRACE GAN, who did unlawfully and knowingly procure or offer a false or forged
13 instrument to be filed, registered, or recorded in a public office in California, which instrument, if
14 genuine, might be filed, registered, or recorded under a law of California or the United States, to
15 wit: a bankruptcy petition filed in United States Bankruptcy Court, case number 2:17-BK-15656-
16 RK.

17 **FIRST SPECIAL ALLEGATION**

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

19 It is further alleged that STEVEN JOSEPH ROGERS, ROBERT WAYNE SEDLAR, and
20 AUDREY GRACE GAN, in the commission of the offenses alleged in Counts 1 through 121 in
21 this Indictment, with the intent to do so, took funds of a value exceeding one hundred thousand
22 dollars (\$100,000) within the meaning of Penal Code section 1203.045.

23 **SECOND SPECIAL ALLEGATION**

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

25 It is further alleged pursuant to Penal Code section 186.11(a)(2), STEVEN JOSEPH
26 ROGERS, ROBERT WAYNE SEDLAR, and AUDREY GRACE GAN committed two or more
27 related felonies to wit: Counts 1 through 121, a material element of which is fraud, involving a
28

1 pattern of related felony conduct and the taking of, or resulted in the loss by another person or
2 entity of, more than five hundred thousand dollars (\$500,000).

3 TOLLING OF THE STATUTE OF LIMITATIONS

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

5 IT IS FURTHER ALLEGED, as to all counts and offenses subject to Penal Code section
6 803(c), that the above violations were not discovered until July 5, 2017, at the earliest, by District
7 Attorney Investigator (“DAI”) Ted Horlbeck of the El Dorado County District Attorney’s when
8 Bruce Werking filed a citizen complaint with the El Dorado County District Attorney’s Office. In
9 the complaint submitted by Bruce Werking, DAI Horlbeck learned that Bruce Werking purchased
10 a foreclosed property located at 1102 Penniman Drive in El Dorado Hills, California at an auction
11 on June 1, 2017. Attached to the complaint was a Deed of Trust recorded by Steven Rogers on
12 June 16, 2017. Steven Rogers recorded this Deed of Trust on the property without Bruce
13 Werking’s knowledge. The Deed of Trust named Grand View Financial, LLC as the Trustor,
14 Noted Results, LLC as the Trustee, and Refreshing Resources, LLC as the Beneficiary. This was
15 the first time DAI Horlbeck became aware of the names Steven Rogers, Grand View Financial,
16 Noted Results, and Refreshing Resources.

17 As reflected in this Indictment, counts are charged through December of 2018. For the
18 Engaging in a Prohibited Act as a Foreclosure Consultant, Procuring or Offering a False or
19 Forged Document, Grand Theft, and Elder Abuse, charges, the counts in this Indictment that
20 occurred less than four years ago fall within the statute of limitations based on the date of their
21 commission without reference to tolling due to the date of discovery. For the Conspiracy charges,
22 the counts in this Indictment that have an overt act that occurred within three years of finding this
23 indictment are within the statute of limitations based on the date of their commission without
24 reference to tolling due to the date of discovery.

25 For those counts alleged to have occurred before July 5, 2017, it is alleged that no victim of
26 said violation and no law enforcement agency chargeable with the investigation and prosecution
27 of said violation had actual and constructive knowledge of said violation prior to the date alleged
28 above within the meaning of Penal Code section 803(c).

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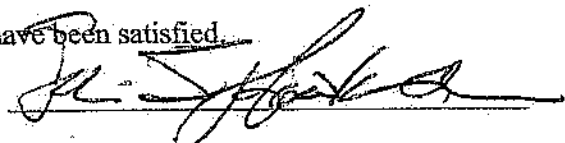
THE FOLLOWING WITNESSES APPEARED BEFORE THE GRAND JURY IN THE ABOVE-CAPTIONED MATTER:

- 1. Patty Brundige
- 2. Larry Webb
- 3. Jim Thiede
- 4. John Carrillo
- 5. Terrence Brass
- 6. Angelica Aguilar
- 7. Robert Borbonus
- 8. Frankie Cheung
- 9. Ellen Davenport
- 10. Shirley Hanes
- 11. Kevin Hunter
- 12. Danna Ladd
- 13. Angela Leung
- 14. Johanna Lohse
- 15. Wilfredo Quiroz
- 16. Robert Roberts
- 17. Stella Tan
- 18. Tyrone Valkanas
- 19. Rajiv Wadhwa
- 20. Sunil Wadhwa
- 21. Bruce Werking
- 22. Hazel Valera
- 23. Bryant Delgadillo
- 24. Renier Hernandez
- 25. Ted Horlbeck
- 26. Jim Harbin
- 27. Joyce Arnel

TRUE BILL

This indictment, having been approved and concurred in by at least twelve (12) members of the Grand Jury in and for the County of Sacramento, is a true bill with a finding that the requirements of Penal Code section 923(c) have been satisfied.

Dated: 9-6-19



FOREPERSON
SACRAMENTO COUNTY GRAND JURY

Presented by the Foreman to the Court in the presence of the Grand Jury and filed this

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Presented by the Foreman to the Court in the presence of the Grand Jury and filed this

6 day of August, 2019.

K. PETERS
CLERK OF THE COURT

By: _____
DEPUTY CLERK



RUSSELL L. HOM