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**FILED/ENDORSED**  
JUL 22 2020  
By M. Yearly, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

**THE PEOPLE OF THE STATE OF CALIFORNIA,**  
  
Plaintiff,  
  
v.  
  
**CHRISTOPHER J. MANCUSO, JOHN D. BLACK, AND JOSEPH P. TUFO,**  
  
Defendants.

Case No. 20F2011219  
**FELONY COMPLAINT**

The Attorney General of the State of California hereby accuses **CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO** of the following criminal offenses:  
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**COUNT ONE  
(FRAUDULENT SECURITIES SCHEME)**

On and between March of 2015 and January of 2020, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO did willfully and unlawfully engage in acts, practices, and a course of business which operated as a fraud and deceit upon a person or persons in connection with the offer of a security to a person or persons, to wit: C.B., D.S., C.G., W.H., P.I., A.G., R.M., P.G., J.C., T.A., W.G., H.B, G.H., and others who invested in Financial Tree Trust, Financial Solutions Group Trust, and New Money Advisors, LLC., in violation of Corporations Code section 25541, which is made a felony by Corporations Code section 25540, subdivision (b).

**COUNT TWO  
(GRAND THEFT)**

On or about September 20, 2016, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: C.B., in violation of Penal Code section 487(a), a felony.

**COUNT THREE  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about September 20, 2016, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: C.B., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

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**COUNT FOUR  
(GRAND THEFT)**

On or about January 13, 2017, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: D.S., in violation of Penal Code section 487(a), a felony.

**COUNT FIVE  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about January 13, 2017, in part in the County of Sacramento and in part in other jurisdictional territories defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO did willfully and unlawfully offer or sell a security to a person or persons, to wit: D.S., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

**COUNT SIX  
(GRAND THEFT)**

On or about July 27, 2017, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: C.G., in violation of Penal Code section 487(a), a felony.

**COUNT SEVEN  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about July 27, 2017, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: C.G., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).



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**COUNT TWELVE  
(GRAND THEFT)**

On or about February 23, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: A.G., in violation of Penal Code section 487(a), a felony.

**COUNT THIRTEEN  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about February 23, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: A.G., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

**COUNT FOURTEEN  
(GRAND THEFT)**

On or about April 26, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK, unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: R.M., in violation of Penal Code section 487(a), a felony.

**COUNT FIFTEEN  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about April 26, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: R.M., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

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**COUNT SIXTEEN  
(GRAND THEFT)**

On or about May 23, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: K.G., in violation of Penal Code section 487(a), a felony.

**COUNT SEVENTEEN  
(GRAND THEFT)**

On or about June 27, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: J.P., in violation of Penal Code section 487(a), a felony.

**COUNT EIGHTEEN  
(GRAND THEFT)**

On or about September 24, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO, JOHN D. BLACK, and JOSEPH P. TUFO unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: R.B., in violation of Penal Code section 487(a), a felony.

**COUNT NINETEEN  
(GRAND THEFT)**

On or about October 26, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: P.G., in violation of Penal Code section 487(a), a felony.

**COUNT TWENTY  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about October 26, 2018, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did

1 willfully and unlawfully offer or sell a security to a person or persons, to wit: P.G., by means of a  
2 written or oral communication which included an untrue statement of a material fact or an  
3 omission of a material fact, in violation of Corporations Code section 25401(b), which is made a  
4 felony by Corporations Code section 25540(b).

5 **COUNT TWENTY-ONE**  
6 **(GRAND THEFT)**

7 On or about December 22, 2018, in part in the County of Sacramento and in part in other  
8 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK  
9 unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from  
10 another, to wit: P.G., in violation of Penal Code section 487(a), a felony.

11 **COUNT TWENTY-TWO**  
12 **(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

13 On or about December 22, 2018, in part in the County of Sacramento and in part in other  
14 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did  
15 willfully and unlawfully offer or sell a security to a person or persons, to wit: P.G., by means of a  
16 written or oral communication which included an untrue statement of a material fact or an  
17 omission of a material fact, in violation of Corporations Code section 25401(b), which is made a  
18 felony by Corporations Code section 25540(b).

19 **COUNT TWENTY-THREE**  
20 **(GRAND THEFT)**

21 On or about March 18, 2019, in part in the County of Sacramento and in part in other  
22 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK  
23 unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from  
24 another, to wit: J.C., in violation of Penal Code section 487(a), a felony.

25 **COUNT TWENTY-FOUR**  
26 **(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

27 On or about March 18, 2019, in part in the County of Sacramento and in part in other  
28 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did

1 willfully and unlawfully offer or sell a security to a person or persons, to wit: J.C., by means of a  
2 written or oral communication which included an untrue statement of a material fact or an  
3 omission of a material fact, in violation of Corporations Code section 25401(b), which is made a  
4 felony by Corporations Code section 25540(b).

5 **COUNT TWENTY-FIVE**  
6 **(GRAND THEFT)**

7 On or about April 15, 2019, in part in the County of Sacramento and in part in other  
8 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK  
9 unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from  
10 another, to wit: T.A., in violation of Penal Code section 487(a), a felony.

11 **COUNT TWENTY-SIX**  
12 **(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

13 On or about April 15, 2019, in part in the County of Sacramento and in part in other  
14 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did  
15 willfully and unlawfully offer or sell a security to a person or persons, to wit: T.A., by means of a  
16 written or oral communication which included an untrue statement of a material fact or an  
17 omission of a material fact, in violation of Corporations Code section 25401(b), which is made a  
18 felony by Corporations Code section 25540(b).

19 **COUNT TWENTY-SEVEN**  
20 **(GRAND THEFT)**

21 On or about May 1, 2019, in part in the County of Sacramento and in part in other  
22 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK  
23 unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from  
24 another, to wit: W.G., in violation of Penal Code section 487(a), a felony.

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**COUNT TWENTY-EIGHT  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about May 1, 2019, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: W.G., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

**COUNT TWENTY-NINE  
(GRAND THEFT)**

On or about May 2, 2019, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: H.B., in violation of Penal Code section 487(a), a felony.

**COUNT THIRTY  
(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

On or about May 2, 2019, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did willfully and unlawfully offer or sell a security to a person or persons, to wit: H.B., by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of Corporations Code section 25401(b), which is made a felony by Corporations Code section 25540(b).

**COUNT THIRTY-ONE  
(GRAND THEFT)**

On or about January 12, 2020, in part in the County of Sacramento and in part in other jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK unlawfully took property, to wit: money, of a value in excess of Nine Hundred Fifty Dollars from another, to wit: G.H., in violation of Penal Code section 487(a), a felony.

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**COUNT THIRTY-TWO**  
**(FRAUD IN THE OFFER OR SALE OF A SECURITY)**

3 On or about January 12, 2020, in part in the County of Sacramento and in part in other  
4 jurisdictional territories, defendants CHRISTOPHER J. MANCUSO and JOHN D. BLACK did  
5 willfully and unlawfully offer or sell a security to a person or persons, to wit: G.H., by means of a  
6 written or oral communication which included an untrue statement of a material fact or an  
7 omission of a material fact, in violation of Corporations Code section 25401(b), which is made a  
8 felony by Corporations Code section 25540(b).

9  
**FIRST SPECIAL ALLEGATION**

10  
**(THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045))**

11 It is further alleged that CHRISTOPHER J. MANCUSO and JOHN D. BLACK in the  
12 commission of the offenses alleged in Counts 1 through 32 in this complaint, with the intent to do  
13 so, took funds of a value exceeding one hundred thousand dollars within the meaning of Penal  
14 Code section 1203.045.

15  
**SECOND SPECIAL ALLEGATION**

16  
**(THEFT OF AMOUNT OVER \$100,000 (PENAL CODE SECTION 1203.045))**

17 It is further alleged that JOSEPH P. TUFO in the commission of the offenses alleged in  
18 Counts 1, 4, 5, and 16 through 18 in this complaint, with the intent to do so, took funds of a value  
19 exceeding one hundred thousand dollars within the meaning of Penal Code section 1203.045.

20  
**THIRD SPECIAL ALLEGATION**

21  
**(EXCESSIVE LOSS OVER \$500,000 (PENAL CODE SECTION 186.11(A)(2)))**

22 It is further alleged pursuant to Penal Code section 186.11, subdivision (a)(2),  
23 CHRISTOPHER J. MANCUSO and JOHN D. BLACK committed two or more related felonies,  
24 to wit Counts 1 through 32 in this complaint, a material element of which is fraud, involving a  
25 pattern of related felony conduct and the taking of, or resulted in the loss by another person or  
26 entity of, more than five hundred thousand dollars.

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**FOURTH SPECIAL ALLEGATION**

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

It is further alleged pursuant to Penal Code section 186.11, subdivision (a)(2), JOSEPH P. TUFO committed two or more related felonies, to wit Counts 4, 5, and 16 through 18 in this complaint, a material element of which is fraud, involving a pattern of related felony conduct and the taking of, or resulted in the loss by another person or entity of, more than five hundred thousand dollars.

**DECLARATION**

I verify under information and belief, pursuant to Penal Code section 806, that the forgoing is true and correct.

Dated: July 17, 2020

Respectfully Submitted,

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Attorney General of California  
JAMES ROOT  
Senior Assistant Attorney General  
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