

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 COUNTY OF ORANGE
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5 THE PEOPLE OF THE STATE OF
6 CALIFORNIA,

7 Plaintiff,

Grand Jury Case No. 21ZF0019

8 v.

INDICTMENT

9 ANGELA KATHRYN MIRABELLA,
10 DOB 08/03/1974,

11 CESAR SANDOVAL-VILCHIS,
12 DOB 12/21/1985,

13 STEPHEN ALLEN GAMBOA
14 DOB 01/18/1982,

15 BRIANA NACOLE GRAHAM
16 DOB 12/03/1985,

17 MATTHEW BRUCE WALSH
18 DOB 02/02/1994,

19 TERESA MARIE LOVATO
20 DOB 11/24/1975,

21 PAULINA FRANCINE PACHECO
22 DOB 05/07/1989,

23 Defendants.

24 A Grand Jury of the County of Orange, State of California, accuses the following defendants
25 of committing, in the County of Orange, before the finding of this indictment, of the following
26 crimes:

27 COUNT 1

28 CONSPIRACY TO COMMIT GRAND THEFT

On or about and between May 4, 2017, and March 2, 2020, in the COUNTY of ORANGE,
the crime of CONSPIRACY, a felony in violation of Penal Code section 182(a)(1), was committed

1 by ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA,
2 BRIANA NACOLE GRAHAM, AND MATTHEW BRUCE WALSH, who did willfully and
3 unlawfully conspire together with another person or persons whose identity is known or unknown
4 to commit the crime of GRAND THEFT BY FALSE PRETENSES, a felony, in violation of Penal
5 Code section 487(a). Pursuant to and for the purpose of carrying out the objects and purposes of
6 the aforesaid conspiracy, Defendants committed the following overt act(ds):

7 **OVERT ACT 1:** On February 2, 2012, ANGELA MIRABELLA filed Mirabella Group LLC
8 with the California Secretary of State.

9 **OVERT ACT 2:** On September 13, 2017, ANGELA MIRABELLA filed Student Renew,
10 LLC with the California Secretary of State.

11 **OVERT ACT 3:** On December 10, 2019, ANGELA MIRABELLA filed My Financial
12 Solutions, LLC with the California Secretary of State.

13 **OVERT ACT 4:** On or about October 29, 2018, and April 2, 2019, agents of ANGELA
14 MIRABELLA, requested a female voice to call FedLoan on student loans assigned to Tiffany T.
15 and Teresa R. respectively.

16 **OVERT ACT 5:** On an unknown date, but during and around 2017 through March 3, 2020,
17 agents of ANGELA MIRABELLA, requested a female voice to call on student loans assigned to
18 Jessica J. and Marines E. and a male voice to call on student loans assigned to Timothy C.

19 **OVERT ACT 6:** On or about July 1, 2017, and October 30, 2017, Equitable Acceptance
20 Corporation paid Mirabella Group, LLC, \$139,339.59 for student loan payments purportedly owed
21 to Mirabella Group, LLC.

22 **OVERT ACT 7:** On or about December 9, 2019, ANGELA MIRABELLA filed a Certificate
23 of Business: Fictitious Firm Name for ZDP Financial (Zero Dollar Payment Financial) with Clark
24 County, Nevada.

25 **OVERT ACT 8:** On or about December 14, 2018, agents of ANGELA MIRABELLA
26 instructed customer Kaitlin L. to remove automated payments set up with her federal loan servicers.
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1 **OVERT ACT 9:** On or about September 26, 2018, agents of ANGELA MIRABELLA told
2 customer Kristen T. that calls from Kristen T.'s federal loan servicer were calls from a marketing
3 company.

4 **OVERT ACT 10:** On or about December 9, 2019, agents of ANGELA MIRABELLA
5 accessed the Federal Student Aid ID account of customer Keana K., changed Keana K.'s password,
6 and changed her mailing address for Keana K. without the permission of Keana K.

7 **OVERT ACT 11:** On or about June 23, 2017, agents of ANGELA MIRABELLA signed
8 Caitlyn C. up for a revolving credit plan with Equitable Acceptance Corporation and a "special
9 limited power of attorney" agreement without Caitlyn C.'s knowledge.

10 **OVERT ACT 12:** Between May 21, 2019, and February 21, 2020, agents of ANGELA
11 MIRABELLA collected over \$1,200 from Russchel B. and told her that the money would be
12 applied toward her student loan.

13 **COUNT 2**

14 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

15 On or about May 4, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and
16 STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal identifying
17 information, as defined in Penal Code section 530.55(b), of NIKKOLE T., and did unlawfully use
18 and attempt to use that information for an unlawful purpose, without the consent of NIKKOLE
19 T., a felony in violation of Penal Code section 530.5(a).

20 **COUNT 3**

21 **COMPUTER ACCESS AND FRAUD**

22 On or about May 4, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and
23 STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter,
24 damage, and otherwise use data, a computer system, and a computer network belonging to the
25 Department of Education—to wit, the Federal Student Aid account of NIKKOLE T.—in order to
26 devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain
27 money, property, and data, a felony in violation of Penal Code section 502(c)(1).
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COUNT 4

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about May 25, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of EVAN R., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of EVAN R., a felony in violation of Penal Code section 530.5(a).

COUNT 5

COMPUTER ACCESS AND FRAUD

On or about May 25, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of EVAN R.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 6

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about June 1, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of AMIE L., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of AMIE L., a felony in violation of Penal Code section 530.5(a).

COUNT 7

COMPUTER ACCESS AND FRAUD

On or about June 1, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of AMIE L.—in order to devise

1 and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money,
2 property, and data, a felony in violation of Penal Code section 502(c)(1).

3 **COUNT 8**

4 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

5 On or about June 23, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
6 and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal identifying
7 information, as defined in Penal Code section 530.55(b), of CAITLYN C., and did unlawfully use
8 and attempt to use that information for an unlawful purpose, without the consent of CAITLYN
9 C., a felony in violation of Penal Code section 530.5(a).

10 **COUNT 9**

11 **COMPUTER ACCESS AND FRAUD**

12 On or about June 23, 2017, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and
13 STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter,
14 damage, and otherwise use data, a computer system, and a computer network belonging to the
15 Department of Education—to wit, the Federal Student Aid account of CAITLYN C.—in order to
16 devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain
17 money, property, and data, a felony in violation of Penal Code section 502(c)(1).

18 **COUNT 10**

19 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

20 On or about February 20, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
21 VILCHIS, and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal
22 identifying information, as defined in Penal Code section 530.55(b), of LADASHA H., and did
23 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
24 of LADASHA H., a felony in violation of Penal Code section 530.5(a).

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COUNT 11

COMPUTER ACCESS AND FRAUD

On or about February 20, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of LADASHA H.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 12

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about February 28, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and TERESA MARIA LOVATO did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of FANNY RAQUEL A., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of FANNY RAQUEL A., a felony in violation of Penal Code section 530.5(a).

COUNT 13

COMPUTER ACCESS AND FRAUD

On or about February 28, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and TERESA MARIA LOVATO did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of FANNY RAQUEL A.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

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COUNT 14

GRAND THEFT BY FALSE PRETENSES

On or about February 28, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, AND TERESA MARIA LOVATO did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud FANNY RAQUEL A. of money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

COUNT 15

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about March 6, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of CHARLENE M., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of CHARLENE M., a felony in violation of Penal Code section 530.5(a).

COUNT 16

COMPUTER ACCESS AND FRAUD

On or about March 6, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of CHARLENE M.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 17

GRAND THEFT BY FALSE PRETENSES

On or about March 6, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, and STEPHEN ALLEN GAMBOA did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud CHARLENE M. of money, labor, real property,

1 and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation
2 of section 487(a) of the Penal Code.

3 **COUNT 18**

4 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

5 On or about March 27, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
6 STEPHEN ALLEN GAMBOA, and PAULINA FRANCINE PACHECO did willfully and
7 unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b),
8 of KRISTEN RAE T., and did unlawfully use and attempt to use that information for an unlawful
9 purpose, without the consent of KRISTEN RAE T., a felony in violation of Penal Code section
10 530.5(a).

11 **COUNT 19**

12 **COMPUTER ACCESS AND FRAUD**

13 On or about March 27, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
14 STEPHEN ALLEN GAMBOA, and PAULINA FRANCINE PACHECO did knowingly and
15 unlawfully access and without permission alter, damage, and otherwise use data, a computer
16 system, and a computer network belonging to the Department of Education—to wit, the Federal
17 Student Aid account of KRISTEN RAE T.—in order to devise and execute a scheme and artifice
18 to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in
19 violation of Penal Code section 502(c)(1).

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COUNT 20

GRAND THEFT BY FALSE PRETENSES

On or about March 27, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and PAULINA FRANCINE PACHECO did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud KRISTEN RAE T. of money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

COUNT 21

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about July 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and TERESA MARIA LOVATO did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of JAYNE D., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of JAYNE D., a felony in violation of Penal Code section 530.5(a).

COUNT 22

COMPUTER ACCESS AND FRAUD

On or about July 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and TERESA MARIA LOVATO did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of JAYNE D.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 23

GRAND THEFT BY FALSE PRETENSES

On or about July 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, and TERESA MARIA LOVATO did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud JAYNE D. of

1 money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars
2 (\$950), a felony in violation of section 487(a) of the Penal Code.

3 **COUNT 24**

4 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

5 On or about September 10, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
6 VILCHIS, and STEPHEN ALLEN GAMBOA did willfully and unlawfully obtain personal
7 identifying information, as defined in Penal Code section 530.55(b), of NICOLE K., and did
8 unlawfully use and attempt to use that information for an unlawful purpose, without the consent
9 of NICOLE K., a felony in violation of Penal Code section 530.5(a).

10 **COUNT 25**

11 **COMPUTER ACCESS AND FRAUD**

12 On or about September 10, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
13 VILCHIS, and STEPHEN ALLEN GAMBOA did knowingly and unlawfully access and without
14 permission alter, damage, and otherwise use data, a computer system, and a computer network
15 belonging to the Department of Education—to wit, the Federal Student Aid account of NICOLE
16 K.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully
17 control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

18 **COUNT 26**

19 **GRAND THEFT BY FALSE PRETENSES**

20 On or about September 10, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
21 VILCHIS, and STEPHEN ALLEN GAMBOA did unlawfully, knowingly, and designedly, by
22 any false and fraudulent representation or pretense, defraud NICOLE K. of money, labor, real
23 property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in
24 violation of section 487(a) of the Penal Code.

25 **COUNT 27**

26 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

27 On or about December 14, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
28 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did willfully and

1 unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b),
2 of KAITLIN L., and did unlawfully use and attempt to use that information for an unlawful
3 purpose, without the consent of KAITLIN L., a felony in violation of Penal Code section
4 530.5(a).

5 **COUNT 28**

6 **COMPUTER ACCESS AND FRAUD**

7 On or about December 14, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
8 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did knowingly and
9 unlawfully access and without permission alter, damage, and otherwise use data, a computer
10 system, and a computer network belonging to the Department of Education—to wit, the Federal
11 Student Aid account of KAITLIN L.—in order to devise and execute a scheme and artifice to
12 defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in
13 violation of Penal Code section 502(c)(1).

14 **COUNT 29**

15 **GRAND THEFT BY FALSE PRETENSES**

16 On or about December 14, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
17 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did unlawfully,
18 knowingly, and designedly, by any false and fraudulent representation or pretense, defraud
19 KAITLIN L. of money, labor, real property, and personal property of a value exceeding nine
20 hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

21 **COUNT 30**

22 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

23 On or about December 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
24 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did willfully and
25 unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b),
26 of SYLVIA G., and did unlawfully use and attempt to use that information for an unlawful
27 purpose, without the consent of SYLVIA G., a felony in violation of Penal Code section 530.5(a).

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1 **COUNT 31**

2 **COMPUTER ACCESS AND FRAUD**

3 On or about December 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
4 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did knowingly and
5 unlawfully access and without permission alter, damage, and otherwise use data, a computer
6 system, and a computer network belonging to the Department of Education—to wit, the Federal
7 Student Aid account of SYLVIA G.—in order to devise and execute a scheme and artifice to
8 defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in
9 violation of Penal Code section 502(c)(1).

10 **COUNT 32**

11 **GRAND THEFT BY FALSE PRETENSES**

12 On or about December 30, 2018, ANGELA MIRABELLA, CESAR SANDOVAL-
13 VILCHIS, STEPHEN ALLEN GAMBOA, and MATTHEW BRUCE WALSH did unlawfully,
14 knowingly, and designedly, by any false and fraudulent representation or pretense, defraud
15 SYLVIA G. of money, labor, real property, and personal property of a value exceeding nine
16 hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

17 **COUNT 33**

18 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

19 On or about January 25, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
20 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
21 WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal
22 Code section 530.55(b), of TERESA R., and did unlawfully use and attempt to use that
23 information for an unlawful purpose, without the consent of TERESA R., a felony in violation of
24 Penal Code section 530.5(a).

25 **COUNT 34**

26 **COMPUTER ACCESS AND FRAUD**

27 On or about January 25, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
28 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE

1 WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise
2 use data, a computer system, and a computer network belonging to the Department of Education—
3 to wit, the Federal Student Aid account of TERESA R.—in order to devise and execute a scheme
4 and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a
5 felony in violation of Penal Code section 502(c)(1).

6 **COUNT 35**

7 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

8 On or about January 31, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
9 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
10 WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal
11 Code section 530.55(b), of CHRISTINA K., and did unlawfully use and attempt to use that
12 information for an unlawful purpose, without the consent of CHRISTINA K., a felony in
13 violation of Penal Code section 530.5(a).

14 **COUNT 36**

15 **COMPUTER ACCESS AND FRAUD**

16 On or about January 31, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
17 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
18 WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise
19 use data, a computer system, and a computer network belonging to the Department of Education—
20 to wit, the Federal Student Aid account of CHRISTINA K.—in order to devise and execute a
21 scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and
22 data, a felony in violation of Penal Code section 502(c)(1).

23 **COUNT 37**

24 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

25 On or about March 22, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
26 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
27 WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal
28 Code section 530.55(b), of SHAWN J., and did unlawfully use and attempt to use that

1 information for an unlawful purpose, without the consent of SHAWN J., a felony in violation of
2 Penal Code section 530.5(a).

3 **COUNT 38**

4 **COMPUTER ACCESS AND FRAUD**

5 On or about March 22, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
6 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
7 WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise
8 use data, a computer system, and a computer network belonging to the Department of Education—
9 to wit, the Federal Student Aid account of SHAWN J.—in order to devise and execute a scheme
10 and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a
11 felony in violation of Penal Code section 502(c)(1).

12 **COUNT 39**

13 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

14 On or about March 25, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
15 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
16 WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal
17 Code section 530.55(b), of ROBERT M., and did unlawfully use and attempt to use that
18 information for an unlawful purpose, without the consent of ROBERT M., a felony in violation of
19 Penal Code section 530.5(a).

20 **COUNT 40**

21 **COMPUTER ACCESS AND FRAUD**

22 On or about March 25, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
23 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
24 WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise
25 use data, a computer system, and a computer network belonging to the Department of Education—
26 to wit, the Federal Student Aid account of ROBERT M.—in order to devise and execute a scheme
27 and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a
28 felony in violation of Penal Code section 502(c)(1).

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COUNT 41

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about April 1, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of MARIA F., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of MARIA F., a felony in violation of Penal Code section 530.5(a).

COUNT 42

COMPUTER ACCESS AND FRAUD

On or about April 1, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of MARIA F.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 43

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about April 9, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of LUZ C., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of LUZ C., a felony in violation of Penal Code section 530.5(a).

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COUNT 47

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about April 30, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of ERNESTEEN B., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of ERNESTEEN B., a felony in violation of Penal Code section 530.5(a).

COUNT 48

COMPUTER ACCESS AND FRAUD

On or about April 30, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of ERNESTEEN B.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 49

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about May 14, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of MAKISHA P., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of MAKISHA P., a felony in violation of Penal Code section 530.5(a).

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COUNT 50

COMPUTER ACCESS AND FRAUD

On or about May 14, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of MAKISHA P.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 51

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about May 21, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of RUSSCHEL B., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of RUSSCHEL B., a felony in violation of Penal Code section 530.5(a).

COUNT 52

COMPUTER ACCESS AND FRAUD

On or about May 21, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of RUSSCHEL B.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

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1 **COUNT 53**

2 **GRAND THEFT BY FALSE PRETENSES**

3 On or about May 21, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
4 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
5 WALSH did unlawfully, knowingly, and designedly, by any false and fraudulent representation
6 or pretense, defraud RUSSCHEL B. of money, labor, real property, and personal property of a
7 value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the
8 Penal Code.

9 **COUNT 54**

10 **UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION**

11 On or about June 27, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
12 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
13 WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal
14 Code section 530.55(b), of YOLANDA B., and did unlawfully use and attempt to use that
15 information for an unlawful purpose, without the consent of YOLANDA B., a felony in violation
16 of Penal Code section 530.5(a).

17 **COUNT 55**

18 **COMPUTER ACCESS AND FRAUD**

19 On or about June 27, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS,
20 STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE
21 WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise
22 use data, a computer system, and a computer network belonging to the Department of Education—
23 to wit, the Federal Student Aid account of YOLANDA B.—in order to devise and execute a scheme
24 and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a
25 felony in violation of Penal Code section 502(c)(1).

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COUNT 56

GRAND THEFT BY FALSE PRETENSES

On or about June 27, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud YOLANDA B. of money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

COUNT 57

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about July 10, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of ROMI W., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of ROMI W., a felony in violation of Penal Code section 530.5(a).

COUNT 58

COMPUTER ACCESS AND FRAUD

On or about July 10, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of ROMI W.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

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COUNT 59

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about October 18, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of CIERA MARIE P., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of CIERA MARIE P., a felony in violation of Penal Code section 530.5(a).

COUNT 60

COMPUTER ACCESS AND FRAUD

On or about October 18, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of CIERA MARIE P.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 61

GRAND THEFT BY FALSE PRETENSES

On or about October 18, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud CIERA MARIE P. of money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

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COUNT 62

UNAUTHORIZED USE OF PERSONAL IDENTIFYING INFORMATION

On or about October 30, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did willfully and unlawfully obtain personal identifying information, as defined in Penal Code section 530.55(b), of NANCY L., and did unlawfully use and attempt to use that information for an unlawful purpose, without the consent of NANCY L., a felony in violation of Penal Code section 530.5(a).

COUNT 63

COMPUTER ACCESS AND FRAUD

On or about October 30, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did knowingly and unlawfully access and without permission alter, damage, and otherwise use data, a computer system, and a computer network belonging to the Department of Education—to wit, the Federal Student Aid account of NANCY L.—in order to devise and execute a scheme and artifice to defraud, deceive and to wrongfully control and obtain money, property, and data, a felony in violation of Penal Code section 502(c)(1).

COUNT 64

GRAND THEFT BY FALSE PRETENSES

On or about October 30, 2019, ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, and MATTHEW BRUCE WALSH did unlawfully, knowingly, and designedly, by any false and fraudulent representation or pretense, defraud NANCY L. of money, labor, real property, and personal property of a value exceeding nine hundred fifty dollars (\$950), a felony in violation of section 487(a) of the Penal Code.

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COUNT 67

MONEY LAUNDERING

On or about and between June 1, 2018, and June 26, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891 AND 3557, AS DETAILED IN THE TABLE BELOW.

DATE	AMOUNT	TRANSACTION
6/1/2018	\$15,779.47	First Republic Bank -4253 internet transfer to First Republic -3557
6/1/2018	\$6,591.75	First Republic Bank -4253 internet transfer to First Republic -3557
6/4/2018	\$2,000	First Republic Bank -4253 internet transfer to First Republic -3557
6/4/2018	\$19,561.51	First Republic Bank -4253 internet transfer to First Republic -3557
6/5/2018	\$1,727.90	First Republic Bank -4253 internet transfer to First Republic -3557
6/5/2018	\$10,500	First Republic Bank -4253 internet transfer to First Republic -3891
6/11/2018	\$15,099.26	First Republic Bank -4253 internet transfer to First Republic -3557
6/12/2018	\$13,767.24	First Republic Bank -4253 internet transfer to First Republic -3557
6/13/2018	\$750	First Republic Bank -4253 internet transfer to First Republic -3557
6/14/2018	\$1,544.13	First Republic Bank -4253 internet transfer to First Republic -3891
6/20/2018	\$21,523.40	First Republic Bank -4253 internet transfer to First Republic -3891
6/20/2018	\$15,000	First Republic Bank -4253 internet transfer to First Republic -3891
6/21/2018	\$2,000	First Republic Bank -4253 internet transfer to First Republic -3891
6/22/2018	\$5,000	First Republic Bank -4253 internet transfer to First Republic -3891
6/25/2018	\$57.28	First Republic Bank -4253 internet transfer to First Republic -3891
6/26/2018	\$1,911.74	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 68

MONEY LAUNDERING

On or about and between July 1, 2018, and July 31, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, AS DETAILED IN THE TABLE BELOW.

DATE	AMOUNT	TRANSACTION
7/2/2018	\$76.99	First Republic Bank -4253 internet transfer to First Republic -3891
7/3/2018	\$1,024	First Republic Bank -4253 internet transfer to First Republic -3891
7/6/2018	\$8,000	First Republic Bank -4253 internet transfer to First Republic -3891
7/9/2018	\$5,000	First Republic Bank -4253 internet transfer to First Republic -3891
7/12/2018	\$1,500	First Republic Bank -4253 internet transfer to First Republic -3891
7/12/2018	\$1,000	First Republic Bank -4253 internet transfer to First Republic -3891
7/13/2018	\$5,000	First Republic Bank -4253 internet transfer to First Republic -3891
7/16/2018	\$79.42	First Republic Bank -4253 internet transfer to First Republic -3891
7/19/2018	\$20,112.11	First Republic Bank -4253 internet transfer to First Republic -3891
7/30/2018	\$74.56	First Republic Bank -4253 internet transfer to First Republic -3891
7/30/2018	\$18,339.84	First Republic Bank -4253 internet transfer to First Republic -3891
7/31/2018	\$60	First Republic Bank -4253 internet transfer to First Republic -3891
7/31/2018	\$1,197.72	First Republic Bank -4253 internet transfer to First Republic -3891
7/31/2018	\$26,276.60	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 69

MONEY LAUNDERING

On or about and between August 1, 2018, and August 29, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
8/1/2018	\$9,907.89	First Republic Bank -4253 internet transfer to First Republic -3891
8/3/2018	\$26,141	First Republic Bank -4253 internet transfer to First Republic -3891
8/7/2018	\$80	First Republic Bank -4253 internet transfer to First Republic -3891
8/13/2018	\$75.78	First Republic Bank -4253 internet transfer to First Republic -3891
8/13/2018	\$3,000	First Republic Bank -4253 internet transfer to First Republic -3891
8/13/2018	\$6.084	First Republic Bank -4253 internet transfer to First Republic -3891
8/17/2018	\$1,791.60	First Republic Bank -4253 internet transfer to First Republic -3891
8/20/2018	\$22,878.84	First Republic Bank -4253 internet transfer to First Republic -3891
8/22/2018	\$878.15	First Republic Bank -4253 internet transfer to First Republic -3891
8/23/2018	\$9.172	First Republic Bank -4253 internet transfer to First Republic -3891
8/27/2018	\$3.216	First Republic Bank -4253 internet transfer to First Republic -3891
8/27/2018	\$2,907.87	First Republic Bank -4253 internet transfer to First Republic -3891
8/27/2018	\$2,801.29	First Republic Bank -4253 internet transfer to First Republic -3891
8/29/2018	\$15,299.19	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 70

MONEY LAUNDERING

On or about and between September 1, 2018, and September 26, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
9/4/2018	\$134.54	First Republic Bank -4253 web transfer to First Republic -3891
9/6/2018	\$31,251.34	First Republic Bank -4253 web transfer to First Republic -3891
9/6/2018	\$211.45	First Republic Bank -4253 web transfer to First Republic -3891
9/7/2018	\$300	First Republic Bank -4253 web transfer to First Republic -3891
9/11/2018	\$15,000	First Republic Bank -4253 web transfer to First Republic -3891
9/13/2018	\$1,397.68	First Republic Bank -4253 web transfer to First Republic -3891
9/17/2018	\$7,874	First Republic Bank -4253 web transfer to First Republic -3891
9/17/2018	\$2,518.22	First Republic Bank -4253 web transfer to First Republic -3891
9/18/2018	\$600	First Republic Bank -4253 web transfer to First Republic -3891
9/19/2018	\$13,566	First Republic Bank -4253 web transfer to First Republic -3891
9/19/2018	\$78.20	First Republic Bank -4253 web transfer to First Republic -3891
9/21/2018	\$191.11	First Republic Bank -4253 web transfer to First Republic -3891
9/21/2018	\$26,421.39	First Republic Bank -4253 web transfer to First Republic -3891
9/24/2018	\$3,280	First Republic Bank -4253 web transfer to First Republic -3891
9/24/2018	\$400	First Republic Bank -4253 web transfer to First Republic -3891
9/25/2018	\$7,182	First Republic Bank -4253 web transfer to First Republic -3891
9/26/2018	\$9,450	First Republic Bank -4253 web transfer to First Republic -3891

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COUNT 71

MONEY LAUNDERING

On or about and between October 1, 2018, and October 29, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
10/1/2018	\$79.42	First Republic Bank -4253 internet transfer to First Republic -3891
10/1/2018	\$9,864	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2018	\$200	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2018	\$400	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2018	\$215.74	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2018	\$32,124.69	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2018	\$10,872	First Republic Bank -4253 internet transfer to First Republic -3891
10/10/2018	\$12,348	First Republic Bank -4253 internet transfer to First Republic -3891
10/11/2018	\$1,269.63	First Republic Bank -4253 internet transfer to First Republic -3891
10/11/2018	\$875	First Republic Bank -4253 internet transfer to First Republic -3891
10/17/2018	\$79.42	First Republic Bank -4253 internet transfer to First Republic -3891
10/17/2018	\$500	First Republic Bank -4253 internet transfer to First Republic -3891
10/22/2018	\$34,207.21	First Republic Bank -4253 internet transfer to First Republic -3891
10/22/2018	\$235.48	First Republic Bank -4253 internet transfer to First Republic -3891
10/22/2018	\$9,522	First Republic Bank -4253 internet transfer to First Republic -3891
10/24/2018	\$17,724	First Republic Bank -4253 internet transfer to First Republic -3891
10/26/2018	\$10,242	First Republic Bank -4253 internet transfer to First Republic -3891
10/29/2018	\$13,720	First Republic Bank -4253 internet transfer to First Republic -3891
10/29/2018	\$200	First Republic Bank -4253 internet transfer to First Republic -3891
10/29/2018	\$169.66	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 72

MONEY LAUNDERING

On or about and between November 1, 2018, and November 27, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
11/6/2018	\$249.15	First Republic Bank -4253 internet transfer to First Republic -3891
11/6/2018	\$40,452.42	First Republic Bank -4253 internet transfer to First Republic -3891
11/6/2018	\$249.15	First Republic Bank -4253 internet transfer to First Republic -3891
11/19/2018	\$79.42	First Republic Bank -4253 internet transfer to First Republic -3891
11/20/2018	\$27,129.37	First Republic Bank -4253 internet transfer to First Republic -3891
11/21/2018	\$11,430	First Republic Bank -4253 internet transfer to First Republic -3891
11/21/2018	\$11,538	First Republic Bank -4253 internet transfer to First Republic -3891
11/21/2018	\$9,558	First Republic Bank -4253 internet transfer to First Republic -3891
11/21/2018	\$830.34	First Republic Bank -4253 internet transfer to First Republic -3891
11/27/2018	\$11,250	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 73

MONEY LAUNDERING

On or about and between December 1, 2018, and December 31, 2018, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
12/6/2018	\$36,858.47	First Republic Bank -4253 web transfer to First Republic -3891
12/6/2018	\$621.33	First Republic Bank -4253 web transfer to First Republic -3891
12/6/2018	\$11,862	First Republic Bank -4253 web transfer to First Republic -3891
12/10/2018	\$12,380	First Republic Bank -4253 web transfer to First Republic -3891
12/12/2018	\$850	First Republic Bank -4253 web transfer to First Republic -3891
12/19/2018	\$11,547	First Republic Bank -4253 web transfer to First Republic -3891
12/19/2018	\$11,520	First Republic Bank -4253 web transfer to First Republic -3891
12/21/2018	\$35,357.69	First Republic Bank -4253 web transfer to First Republic -3891
12/21/2018	\$205.08	First Republic Bank -4253 web transfer to First Republic -3891
12/21/2018	\$10,000	First Republic Bank -4253 web transfer to First Republic -3891
12/24/2018	\$13,464	First Republic Bank -4253 web transfer to First Republic -3891
12/31/2018	\$14,462	First Republic Bank -4253 web transfer to First Republic -3891
12/31/2018	\$6,696	First Republic Bank -4253 web transfer to First Republic -3891

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COUNT 74

MONEY LAUNDERING

On or about and between January 1, 2019, and January 28, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
1/7/2019	\$114.40	First Republic Bank -4253 internet transfer to First Republic -3891
1/7/2019	\$33,654.50	First Republic Bank -4253 internet transfer to First Republic -3891
1/16/2019	\$1,867.02	First Republic Bank -4253 internet transfer to First Republic -3891
1/16/2019	\$81.85	First Republic Bank -4253 internet transfer to First Republic -3891
1/22/2019	\$329.54	First Republic Bank -4253 internet transfer to First Republic -3891
1/22/2019	\$46,596.09	First Republic Bank -4253 internet transfer to First Republic -3891
1/22/2019	\$318.57	First Republic Bank -4253 internet transfer to First Republic -3891
1/22/2019	\$13,122	First Republic Bank -4253 internet transfer to First Republic -3891
1/23/2019	\$500	First Republic Bank -4253 internet transfer to First Republic -3891
1/25/2019	\$156.25	First Republic Bank -4253 internet transfer to First Republic -3891
1/25/2019	\$11,646	First Republic Bank -4253 internet transfer to First Republic -3891
1/25/2019	\$8,370	First Republic Bank -4253 internet transfer to First Republic -3891
1/25/2019	\$13,302	First Republic Bank -4253 internet transfer to First Republic -3891
1/25/2019	\$7,574	First Republic Bank -4253 internet transfer to First Republic -3891
1/28/2019	\$103.72	First Republic Bank -4253 internet transfer to First Republic -3891
1/28/2019	\$1,619.11	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 75

MONEY LAUNDERING

On or about and between February 1, 2019, and February 27, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
2/1/2019	\$400	First Republic Bank -4253 internet transfer to First Republic -3891
2/1/2019	\$329.55	First Republic Bank -4253 internet transfer to First Republic -3891
2/6/2019	\$401.56	First Republic Bank -4253 internet transfer to First Republic -3891
2/6/2019	\$54,795.75	First Republic Bank -4253 internet transfer to First Republic -3891
2/6/2019	\$19,008	First Republic Bank -4253 internet transfer to First Republic -3891
2/13/2019	\$19,782	First Republic Bank -4253 internet transfer to First Republic -3891
2/21/2019	\$18,162	First Republic Bank -4253 internet transfer to First Republic -3891
2/21/2019	\$418.04	First Republic Bank -4253 internet transfer to First Republic -3891
2/21/2019	\$59,313.68	First Republic Bank -4253 internet transfer to First Republic -3891
2/22/2019	\$515.66	First Republic Bank -4253 internet transfer to First Republic -3891
2/22/2019	\$700	First Republic Bank -4253 internet transfer to First Republic -3891
2/27/2019	\$17,946	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 76

MONEY LAUNDERING

On or about and between March 1, 2019, and March 25, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
3/7/2019	\$595	First Republic Bank -4253 internet transfer to First Republic -3891
3/7/2019	\$343.03	First Republic Bank -4253 internet transfer to First Republic -3891
3/7/2019	\$41,609.89	First Republic Bank -4253 internet transfer to First Republic -3891
3/7/2019	\$18,324	First Republic Bank -4253 internet transfer to First Republic -3891
3/13/2019	\$17,694	First Republic Bank -4253 internet transfer to First Republic -3891
3/18/2019	\$21,258	First Republic Bank -4253 internet transfer to First Republic -3891
3/21/2019	\$448.92	First Republic Bank -4253 internet transfer to First Republic -3891
3/21/2019	\$70,596.20	First Republic Bank -4253 internet transfer to First Republic -3891
3/25/2019	\$18,108	First Republic Bank -4253 internet transfer to First Republic -3891
3/25/2019	\$2,042.98	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 77

MONEY LAUNDERING

On or about and between April 1, 2019, and April 29, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
4/2/2019	\$21,582	First Republic Bank -4253 web transfer to First Republic -3891
4/8/2019	\$22,726	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$111.01	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$417.85	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$44,188.12	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$236.16	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$532.84	First Republic Bank -4253 web transfer to First Republic -3891
4/9/2019	\$13,550.08	First Republic Bank -4253 web transfer to First Republic -3891
4/15/2019	\$25,234	First Republic Bank -4253 web transfer to First Republic -3891
4/18/2019	\$17,540.48	First Republic Bank -4253 web transfer to First Republic -3891
4/18/2019	\$55	First Republic Bank -4253 web transfer to First Republic -3891
4/18/2019	\$490.92	First Republic Bank -4253 web transfer to First Republic -3891
4/18/2019	\$50,400.94	First Republic Bank -4253 web transfer to First Republic -3891
4/22/2019	\$19,184	First Republic Bank -4253 web transfer to First Republic -3891
4/22/2019	\$55,777.78	First Republic Bank -4253 web transfer to First Republic -3891
4/22/2019	\$21,300	First Republic Bank -4253 web transfer to First Republic -3891
4/29/2019	\$29,326	First Republic Bank -4253 web transfer to First Republic -3891

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COUNT 78

MONEY LAUNDERING

On or about and between May 1, 2019, and May 30, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891 AND 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
5/1/2019	\$10,302	First Republic Bank -4253 internet transfer to First Republic -3891
5/6/2019	\$15,180	First Republic Bank -4253 internet transfer to First Republic -3891
5/6/2019	\$16,698	First Republic Bank -4253 internet transfer to First Republic -3891
5/6/2019	\$1,000	First Republic Bank -4253 internet transfer to First Republic -5716
5/7/2019	\$14,683.03	First Republic Bank -4253 internet transfer to First Republic -3891
5/7/2019	\$144.83	First Republic Bank -4253 internet transfer to First Republic -3891
5/7/2019	\$55	First Republic Bank -4253 internet transfer to First Republic -3891
5/7/2019	\$451.86	First Republic Bank -4253 internet transfer to First Republic -3891
5/7/2019	\$440.02	First Republic Bank -4253 internet transfer to First Republic -3891
5/7/2019	\$28,574.24	First Republic Bank -4253 internet transfer to First Republic -3891
5/13/2019	\$107.37	First Republic Bank -4253 internet transfer to First Republic -3891
5/13/2019	\$7.04	First Republic Bank -4253 internet transfer to First Republic -3891
5/13/2019	\$280.97	First Republic Bank -4253 internet transfer to First Republic -3891
5/13/2019	\$75.81	First Republic Bank -4253 internet transfer to First Republic -3891
5/13/2019	\$29,950	First Republic Bank -4253 internet transfer to First Republic -3891
5/20/2019	\$29,575	First Republic Bank -4253 internet transfer to First Republic -3891
5/20/2019	\$55	First Republic Bank -4253 internet transfer to First Republic -3891
5/20/2019	\$55	First Republic Bank -4253 internet transfer to First Republic -3891
5/20/2019	\$283.89	First Republic Bank -4253 internet transfer to First Republic -3891
5/20/2019	\$46,989.74	First Republic Bank -4253 internet transfer to First Republic -3891
5/22/2019	\$2.39	First Republic Bank -4253 internet transfer to First Republic -3891
5/22/2019	\$389.23	First Republic Bank -4253 internet transfer to First Republic -3891
5/22/2019	\$31,000	First Republic Bank -4253 internet transfer to First Republic -5716
5/28/2019	\$30,950	First Republic Bank -4253 internet transfer to First Republic -3891
5/30/2019	\$863.43	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 79

MONEY LAUNDERING

On or about and between June 1, 2019, and June 27, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891 AND 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
6/3/2019	\$19,950	First Republic Bank -4253 internet transfer to First Republic -3891
6/6/2019	\$2,645.08	First Republic Bank -4253 internet transfer to First Republic -3891
6/6/2019	\$413.55	First Republic Bank -4253 internet transfer to First Republic -3891
6/6/2019	\$12,148.98	First Republic Bank -4253 internet transfer to First Republic -3891
6/6/2019	\$35,362.93	First Republic Bank -4253 internet transfer to First Republic -3891
6/10/2019	\$20,100	First Republic Bank -4253 internet transfer to First Republic -3891
6/17/2019	\$20,200	First Republic Bank -4253 internet transfer to First Republic -3891
6/17/2019	\$3,387.16	First Republic Bank -4253 internet transfer to First Republic -3891
6/17/2019	\$223.41	First Republic Bank -4253 internet transfer to First Republic -3891
6/17/2019	\$128.12	First Republic Bank -4253 internet transfer to First Republic -3891
6/17/2019	\$2,836.56	First Republic Bank -4253 internet transfer to First Republic -5716
6/18/2019	\$34,750	First Republic Bank -4253 internet transfer to First Republic -5716
6/18/2019	\$1,313.41	First Republic Bank -4253 internet transfer to First Republic -3891
6/20/2019	\$336.18	First Republic Bank -4253 internet transfer to First Republic -3891
6/20/2019	\$9,139.16	First Republic Bank -4253 internet transfer to First Republic -3891
6/20/2019	\$28,923.25	First Republic Bank -4253 internet transfer to First Republic -3891
6/22/2019	\$18,378	First Republic Bank -4253 internet transfer to First Republic -3891
6/22/2019	\$57.28	First Republic Bank -4253 internet transfer to First Republic -3891
6/26/2019	\$4.82	First Republic Bank -4253 internet transfer to First Republic -3891
6/26/2019	\$155.71	First Republic Bank -4253 internet transfer to First Republic -3891
6/26/2019	\$770.78	First Republic Bank -4253 internet transfer to First Republic -3891
6/27/2019	\$9,196.15	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 80

MONEY LAUNDERING

On or about and between July 1, 2019, and July 31, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891 AND 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
7/1/2019	\$21,300	First Republic Bank -4253 internet transfer to First Republic -3891
7/1/2019	\$2,772.87	First Republic Bank -4253 internet transfer to First Republic -3891
7/1/2019	\$744.06	First Republic Bank -4253 internet transfer to First Republic -3891
7/1/2019	\$109.80	First Republic Bank -4253 internet transfer to First Republic -3891
7/1/2019	\$21.85	First Republic Bank -4253 internet transfer to First Republic -3891
7/2/2019	\$29,500	First Republic Bank -4253 internet transfer to First Republic -5716
7/2/2019	\$7,930.87	First Republic Bank -4253 internet transfer to First Republic -3891
7/2/2019	\$219.28	First Republic Bank -4253 internet transfer to First Republic -3891
7/2/2019	\$28,595.45	First Republic Bank -4253 internet transfer to First Republic -3891
7/5/2019	\$9,575	First Republic Bank -4253 internet transfer to First Republic -3891
7/8/2019	\$1,187.55	First Republic Bank -4253 internet transfer to First Republic -3891
7/8/2019	\$211.90	First Republic Bank -4253 internet transfer to First Republic -3891
7/8/2019	\$117.26	First Republic Bank -4253 internet transfer to First Republic -3891
7/8/2019	\$7.15	First Republic Bank -4253 internet transfer to First Republic -3891
7/11/2019	\$2,368.08	First Republic Bank -4253 internet transfer to First Republic -3891
7/11/2019	\$3,462.40	First Republic Bank -4253 internet transfer to First Republic -3891
7/15/2019	\$19,825	First Republic Bank -4253 internet transfer to First Republic -3891
7/15/2019	\$1,135.75	First Republic Bank -4253 internet transfer to First Republic -3891
7/15/2019	\$162.52	First Republic Bank -4253 internet transfer to First Republic -3891
7/16/2019	\$4,025	First Republic Bank -4253 internet transfer to First Republic -3891
7/17/2019	\$4,900	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$2,475	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$102.61	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$6,887.84	First Republic Bank -4253 internet transfer to First Republic -3891

7/18/2019	\$141.25	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$24,250.40	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$384.95	First Republic Bank -4253 internet transfer to First Republic -3891
7/18/2019	\$204.22	First Republic Bank -4253 internet transfer to First Republic -3891
7/19/2019	\$3,875	First Republic Bank -4253 internet transfer to First Republic -3891
7/22/2019	\$4,325	First Republic Bank -4253 internet transfer to First Republic -3891
7/22/2019	\$181.01	First Republic Bank -4253 internet transfer to First Republic -3891
7/23/2019	\$4,425	First Republic Bank -4253 internet transfer to First Republic -3891
7/23/2019	\$181.01	First Republic Bank -4253 internet transfer to First Republic -3891
7/24/2019	\$7,160	First Republic Bank -4253 internet transfer to First Republic -3891
7/25/2019	\$2,350	First Republic Bank -4253 internet transfer to First Republic -3891
7/25/2019	\$315.39	First Republic Bank -4253 internet transfer to First Republic -3891
7/26/2019	\$3,575	First Republic Bank -4253 internet transfer to First Republic -3891
7/29/2019	\$3,225	First Republic Bank -4253 internet transfer to First Republic -3891
7/29/2019	\$119.74	First Republic Bank -4253 internet transfer to First Republic -3891
7/30/2019	\$4,350	First Republic Bank -4253 internet transfer to First Republic -3891
7/30/2019	\$3,550	First Republic Bank -4253 internet transfer to First Republic -3891
7/31/2019	\$3,700	First Republic Bank -4253 internet transfer to First Republic -3891

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COUNT 81

MONEY LAUNDERING

On or about and between August 1, 2019, and August 30, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891 AND 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
8/1/2019	\$1,412.49	First Republic Bank -4253 internet transfer to First Republic -3891
8/1/2019	\$892.81	First Republic Bank -4253 internet transfer to First Republic -3891
8/1/2019	\$18.16	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$3,925	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$4,700	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$31,128.61	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$431.36	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$8,720.79	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$175.57	First Republic Bank -4253 internet transfer to First Republic -3891
8/2/2019	\$232.58	First Republic Bank -4253 internet transfer to First Republic -3891
8/6/2019	\$7,975	First Republic Bank -4253 internet transfer to First Republic -3891
8/6/2019	\$1,750	First Republic Bank -4253 internet transfer to First Republic -3891
8/8/2019	\$4,575	First Republic Bank -4253 internet transfer to First Republic -3891
8/8/2019	\$118.78	First Republic Bank -4253 internet transfer to First Republic -3891
8/9/2019	\$27,125	First Republic Bank -4253 internet transfer to First Republic -5716
8/9/2019	\$4,625	First Republic Bank -4253 internet transfer to First Republic -3891
8/12/2019	\$4,575	First Republic Bank -4253 internet transfer to First Republic -3891
8/12/2019	\$121.62	First Republic Bank -4253 internet transfer to First Republic -3891
8/12/2019	\$1,669.40	First Republic Bank -4253 internet transfer to First Republic -3891
8/12/2019	\$4,800	First Republic Bank -4253 internet transfer to First Republic -3891
8/14/2019	\$5,625	First Republic Bank -4253 internet transfer to First Republic -3891
8/15/2019	\$5,975	First Republic Bank -4253 internet transfer to First Republic -3891
8/15/2019	\$1,595.04	First Republic Bank -4253 internet transfer to First Republic -3891
8/15/2019	\$3,837.86	First Republic Bank -4253 internet transfer to First Republic -3891

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8/15/2019	\$4,400	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$5,175	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$104.40	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$31,362.47	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$8,790.84	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$530.89	First Republic Bank -4253 internet transfer to First Republic -3891
8/19/2019	\$245.94	First Republic Bank -4253 internet transfer to First Republic -3891
8/20/2019	\$5,375	First Republic Bank -4253 internet transfer to First Republic -3891
8/20/2019	\$2,324.70	First Republic Bank -4253 internet transfer to First Republic -3891
8/20/2019	\$414.81	First Republic Bank -4253 internet transfer to First Republic -3891
8/20/2019	\$22.33	First Republic Bank -4253 internet transfer to First Republic -3891
8/21/2019	\$5,375	First Republic Bank -4253 internet transfer to First Republic -3891
8/22/2019	\$5,500	First Republic Bank -4253 internet transfer to First Republic -3891
8/23/2019	\$5,225	First Republic Bank -4253 internet transfer to First Republic -3891
8/26/2019	\$5,625	First Republic Bank -4253 internet transfer to First Republic -3891
8/26/2019	\$118.78	First Republic Bank -4253 internet transfer to First Republic -3891
8/27/2019	\$6,425	First Republic Bank -4253 internet transfer to First Republic -3891
8/27/2019	\$7,025	First Republic Bank -4253 internet transfer to First Republic -3891
8/29/2019	\$6,350	First Republic Bank -4253 internet transfer to First Republic -3891
8/30/2019	\$6,975	First Republic Bank -4253 internet transfer to First Republic -3891
8/30/2019	\$5,000	First Republic Bank -4253 internet transfer to First Republic -3891
8/30/2019	\$3,825	First Republic Bank -4253 internet transfer to First Republic -3891

COUNT 82

MONEY LAUNDERING

On or about and between September 1, 2019, and September 30, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNTS 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
9/3/2019	\$6,200	First Republic Bank -4253 internet transfer to First Republic -3891
9/3/2019	\$1,351.04	First Republic Bank -4253 internet transfer to First Republic -3891
9/3/2019	\$181.69	First Republic Bank -4253 internet transfer to First Republic -3891
9/4/2019	\$9,471.44	First Republic Bank -4253 internet transfer to First Republic -3891
9/4/2019	\$14,574.94	First Republic Bank -4253 internet transfer to First Republic -3891
9/5/2019	\$250.05	First Republic Bank -4253 internet transfer to First Republic -3891
9/5/2019	\$529.66	First Republic Bank -4253 internet transfer to First Republic -3891
9/5/2019	\$6,125	First Republic Bank -4253 internet transfer to First Republic -3891
9/6/2019	\$7,950	First Republic Bank -4253 internet transfer to First Republic -3891
9/9/2019	\$4,725	First Republic Bank -4253 internet transfer to First Republic -3891
9/10/2019	\$5,975	First Republic Bank -4253 internet transfer to First Republic -3891
9/11/2019	\$6,700	First Republic Bank -4253 internet transfer to First Republic -3891
9/12/2019	\$6,575	First Republic Bank -4253 internet transfer to First Republic -3891
9/16/2019	\$11,100	First Republic Bank -4253 internet transfer to First Republic -3891
9/17/2019	\$6,975	First Republic Bank -4253 internet transfer to First Republic -3891
9/18/2019	\$6,100	First Republic Bank -4253 internet transfer to First Republic -3891
9/18/2019	\$110.79	First Republic Bank -4253 internet transfer to First Republic -3891
9/19/2019	\$9,800	First Republic Bank -4253 internet transfer to First Republic -3891
9/19/2019	\$250.58	First Republic Bank -4253 internet transfer to First Republic -3891
9/19/2019	\$8,485.42	First Republic Bank -4253 internet transfer to First Republic -3891
9/19/2019	\$533.29	First Republic Bank -4253 internet transfer to First Republic -3891
9/19/2019	\$30,439.74	First Republic Bank -4253 internet transfer to First Republic -3891
9/23/2019	\$7,525	First Republic Bank -4253 internet transfer to First Republic -3891
9/24/2019	\$10,175	First Republic Bank -4253 internet transfer to First Republic -3891
9/26/2019	\$8,175	First Republic Bank -4253 internet transfer to First Republic -3891
9/30/2019	\$6,550	First Republic Bank -4253 internet transfer to First Republic -3891

COUNT 83

MONEY LAUNDERING

On or about and between October 1, 2019, and October 28, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891 and 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
10/2/2019	\$7,550	First Republic Bank -4253 internet transfer to First Republic -3891
10/2/2019	\$2,526.29	First Republic Bank -4253 internet transfer to First Republic -3891
10/2/2019	\$472.53	First Republic Bank -4253 internet transfer to First Republic -3891
10/2/2019	\$21.92	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$15,000	First Republic Bank -4253 internet transfer to First Republic -5716
10/3/2019	\$3,900	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$237.19	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$31,611.22	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$443.45	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$7,773.91	First Republic Bank -4253 internet transfer to First Republic -3891
10/3/2019	\$184.98	First Republic Bank -4253 internet transfer to First Republic -3891
10/4/2019	\$3,625	First Republic Bank -4253 internet transfer to First Republic -3891
10/7/2019	\$5,350	First Republic Bank -4253 internet transfer to First Republic -3891
10/8/2019	\$2,325	First Republic Bank -4253 internet transfer to First Republic -3891
10/14/2019	\$23,125	First Republic Bank -4253 internet transfer to First Republic -5716
10/14/2019	\$11,875	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$2,475	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$409.07	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$81	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$643.20	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$530.56	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$156.52	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$3.44	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$233.98	First Republic Bank -4253 internet transfer to First Republic -3891

10/15/2019	\$2,283.75	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$407.50	First Republic Bank -4253 internet transfer to First Republic -3891
10/15/2019	\$59.39	First Republic Bank -4253 internet transfer to First Republic -3891
10/16/2019	\$2,300	First Republic Bank -4253 internet transfer to First Republic -3891
10/17/2019	\$3,075	First Republic Bank -4253 internet transfer to First Republic -3891
10/17/2019	\$41,000	First Republic Bank -4253 internet transfer to First Republic -3891
10/23/2019	\$13,950	First Republic Bank -4253 internet transfer to First Republic -3891
10/25/2019	\$10,000	First Republic Bank -4253 internet transfer to First Republic -3891
10/28/2019	\$10,000	First Republic Bank -4253 internet transfer to First Republic -3891

COUNT 84

MONEY LAUNDERING

On November 6, 2019, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
11/6/2019	\$26,500	First Republic Bank -4253 internet transfer to First Republic -5716

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COUNT 85

MONEY LAUNDERING

On or about and between January 1, 2020, and January 16, 2020, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
1/2/2020	\$10,000	First Republic Bank -4253 internet transfer to First Republic -5716
1/6/2020	\$5,000	First Republic Bank -4253 internet transfer to First Republic -5716
1/15/2020	\$185	First Republic Bank -4253 internet transfer to First Republic -5716
1/16/2020	\$11,500	First Republic Bank -4253 internet transfer to First Republic -5716

COUNT 86

MONEY LAUNDERING

On or about and between February 1, 2020, and February 28, 2020, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 5716, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
2/5/2020	\$10,000	First Republic Bank -4253 web transfer to First Republic -5716
2/19/2020	\$8,375	First Republic Bank -4253 web transfer to First Republic -5716
2/20/2020	\$6,000	First Republic Bank -4253 web transfer to First Republic -5716
2/28/2020	\$10,000	First Republic Bank -4253 web transfer to First Republic -5716

COUNT 87

MONEY LAUNDERING

On March 3, 2020, in the COUNTY of ORANGE, the crime of MONEY LAUNDERING in violation of Penal Code section 186.10(a), a felony, was committed by ANGELA MIRABELLA, who did unlawfully conduct transactions involving monetary instruments of a value exceeding \$25,000, through a financial institution knowing that the monetary instruments represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity, to wit: FUNDS SUBMITTED FROM FIRST REPUBLIC ACCOUNT 4253 to FIRST REPUBLIC ACCOUNT 3891, as detailed in the table below.

DATE	AMOUNT	TRANSACTION
3/3/2020	\$30,000	First Republic Bank -4253 internet transfer to First Republic -3891

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SPECIAL ALLEGATION:

MONEY LAUNDERING TRANSACTIONS IN EXCESS OF TWO MILLION, FIVE
HUNDRED THOUSAND DOLLARS (\$2,500,000)

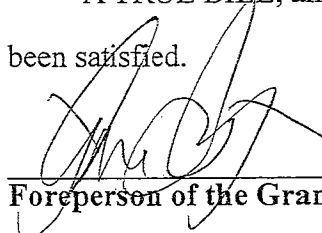
It is further alleged, pursuant to Penal Code section 186.10(c), that the offenses set forth as violations of Money Laundering pursuant to Penal Code section 186.10(a) against ANGELA KATHRYN MIRABELLA, when combined, constitute transactions exceeding Two Million, Five Hundred Thousand Dollars (\$2,500,000).

SPECIAL ALLEGATION:

AGGRAVATED WHITE COLLAR CRIME


It is further alleged, as to ANGELA MIRABELLA, CESAR SANDOVAL-VILCHIS, STEPHEN ALLEN GAMBOA, BRIANA NACOLE GRAHAM, AND MATTHEW BRUCE WALSH, pursuant to Penal Code section 186.11(a), that the offenses set forth in counts 1 through 66 are related felonies, a material element of which is fraud or embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

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


Foreperson of the Grand Jury


Juror #

Dated: 9/8/2021


Clerk, Superior Court
County of Orange

9/8/2021
Dated

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

- | | | | |
|----|-----------------|-----------------------|----------------------|
| 3 | 1. Lisa A. | 16. Jeff Henn | 31. Bruce Pixley |
| 4 | 2. Fanny A. | 17. Jeffrey Jacques | 32. Makisha P. |
| | 3. Yolanda B. | 18. Shawn J. | 33. Teresa R. |
| 5 | 4. Derek Bishop | 19. Katherine Kanavas | 34. Evan R. |
| | 5. Russchel B. | 20. Kaena K. | 35. Michelle |
| 6 | 6. Ernesteen B. | 21. Mark Kelly | Rundbaken |
| | 7. Kirby Bunts | 22. Christina K. | 36. Michael Sakamoto |
| 7 | 8. Luz C. | 23. Nicole K. | 37. Alain Sirgy |
| | 9. Rick Chase | 24. Si Kim | 38. Nikkole T. |
| 8 | 10. Caitlyn C. | 25. Kaitlin L. | 39. Kristen T. |
| | 11. Jayne D. | 26. Amie L. | 40. Romi W. |
| 9 | 12. Maria F. | 27. Nancy L. | 41. Shannon Wurmb |
| | 13. Sylvia G. | 28. Charlene M. | 42. David Wise |
| 10 | 14. Ladasha H. | 29. Robert M. | 43. Martha Carrillo |
| | 15. Tom Harper | 30. Ciera P. | |