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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ORANGE
12 HARBOR JUSTICE CENTER

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14 **THE PEOPLE OF THE STATE OF**
CALIFORNIA,
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Plaintiff,
16
17 v.
18 **NELSON ANDRES HOLDO,**
19 *DOB: [REDACTED]*
20
Defendant.

Case No. 26HF0776
FIRST AMENDED COMPLAINT

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22 The Attorney General of the State of California, pursuant to Penal Code section 786.5,
23 accuses defendant NELSON ANDRES HOLDO of committing, in the Counties of Orange and
24 Los Angeles, of the following crimes, which are connected to each other in their commission:

25 **COUNT 1**

26 On or about September 15, 2021, in the County of Los Angeles, the crime of GRAND
27 THEFT, in violation of Penal Code section 487(a), a felony, was committed by NELSON
28 ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent representation

1 and pretense, obtain money by fraud from ARTIN M., specifically, \$115,000, which had a value
2 exceeding nine hundred fifty dollars (\$950).

3 **COUNT 2**

4 On or about and between February 20, 2022 to November 30, 2022, in the County of Los
5 Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was
6 committed by NELSON ANDRES HOLDO, who did knowingly and designedly, by a false and
7 fraudulent representation and pretense, obtain money by fraud from MIKE G., specifically,
8 \$438,900, which had a value exceeding nine hundred fifty dollars (\$950).

9 **COUNT 3**

10 On or about and between March 25, 2022 to May 16, 2022, in the County of Los Angeles,
11 the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed
12 by NELSON ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent
13 representation and pretense, obtain money by fraud from WILLIAM G., specifically, \$254,000,
14 which had a value exceeding nine hundred fifty dollars (\$950).

15 **COUNT 4**

16 On or about July 25, 2022, in the County of Los Angeles, the crime of NON-SUFFICIENT
17 FUND CHECK in violation of PENAL CODE SECTION 476a(a), a felony, was committed by
18 NELSON ANDRES HOLDO, with the intent to defraud, did willfully and unlawfully make,
19 draw, utter, and deliver to WILLIAM G., a check, draft and order for the payment of money in
20 the sum of ONE HUNDRED SEVENTY-SEVEN THOUSAND FIVE HUNDRED DOLLARS,
21 (\$177,500), CHECK NO. 6564, knowing at the time of the making, drawing, uttering, and
22 delivering, that the defendant had insufficient funds in and credit with the bank for the payment of
23 the check and draft and all other checks, drafts, and orders upon the funds then outstanding, in
24 full upon its presentation.

25 **COUNT 5**

26 On or about July 27, 2022, in the County of Los Angeles, the crime of GRAND THEFT, in
27 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
28 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and

1 pretense, obtain money by fraud from FAIEZ E., specifically, \$32,000, which had a value
2 exceeding nine hundred fifty dollars (\$950).

3 **COUNT 6**

4 On or about September 22, 2022, in the County of Los Angeles, the crime of GRAND
5 THEFT, in violation of Penal Code section 487(a), a felony, was committed by NELSON
6 ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent representation
7 and pretense, obtain money by fraud from YOUNG K. and TERRY R., specifically, \$113,000,
8 which had a value exceeding nine hundred fifty dollars (\$950).

9 **COUNT 7**

10 On or about March 16, 2023, in the County of Los Angeles, the crime of GRAND THEFT,
11 in violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
12 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
13 pretense, obtain money by fraud from MARAT A., specifically, \$100,000, which had a value
14 exceeding nine hundred fifty dollars (\$950).

15 **COUNT 8**

16 On or about May 25, 2023, in the County of Los Angeles, the crime of GRAND THEFT, in
17 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
18 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
19 pretense, obtain money by fraud from WALEED D., specifically, \$88,000, which had a value
20 exceeding nine hundred fifty dollars (\$950).

21 **COUNT 9**

22 On or about April 3, 2023, in the County of Los Angeles, the crime of GRAND THEFT, in
23 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
24 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
25 pretense, obtain money by fraud from MKRTYCH O., specifically, \$26,265, which had a value
26 exceeding nine hundred fifty dollars (\$950).

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1 **COUNT 10**

2 On or about August 8, 2023, in the County of Orange, the crime of GRAND THEFT, in
3 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
4 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
5 pretense, obtain money by fraud from SERBAN P., specifically, \$12,000, which had a value
6 exceeding nine hundred fifty dollars (\$950).

7 **COUNT 11**

8 On or about October 20, 2023, in the County of Orange, the crime of GRAND THEFT, in
9 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
10 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
11 pretense, obtain money by fraud from JORES K., specifically, \$25,000, which had a value
12 exceeding nine hundred fifty dollars (\$950).

13 **COUNT 12**

14 On or about October 23, 2023, in the County of Orange, the crime of GRAND THEFT, in
15 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
16 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
17 pretense, obtain money by fraud from MIKE R., specifically, \$65,000, which had a value
18 exceeding nine hundred fifty dollars (\$950).

19 **COUNT 13**

20 On or about March 6, 2024, in the County of Orange, the crime of GRAND THEFT, in
21 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
22 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
23 pretense, obtain money by fraud from ASHLEY B. and JOSEPH K., specifically, \$41,500, which
24 had a value exceeding nine hundred fifty dollars (\$950).

25 **COUNT 14**

26 On or about and between April 5, 2024 to May 28, 2024, in the County of Orange, the
27 crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by
28 NELSON ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent

1 representation and pretense, obtain money by fraud from HARLEY U., specifically, \$38,700,
2 which had a value exceeding nine hundred fifty dollars (\$950).

3 **COUNT 15**

4 On or about and between June 27, 2024 to July 31, 2024, in the County of Orange, the
5 crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by
6 NELSON ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent
7 representation and pretense, obtain money by fraud from ERIK P., specifically, \$27,000, which
8 had a value exceeding nine hundred fifty dollars (\$950).

9 **COUNT 16**

10 On or about October 4, 2024, in the County of Orange, the crime of GRAND THEFT, in
11 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
12 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
13 pretense, obtain money by fraud from LISA S., specifically, \$26,000, which had a value
14 exceeding nine hundred fifty dollars (\$950).

15 **COUNT 17**

16 On or about July 3, 2025, in the County of Orange, the crime of GRAND THEFT, in
17 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
18 HOLDO, who did fraudulently appropriate property which had been entrusted to him by
19 MICHELA M., specifically, a Tiffany & Company diamond ring, which had a value exceeding
20 nine hundred fifty dollars (\$950).

21 **COUNT 18**

22 On or about August 1, 2025, in the County of Orange, the crime of NON-SUFFICIENT
23 FUND CHECK in violation of PENAL CODE SECTION 476a(a), a felony, was committed by
24 NELSON ANDRES HOLDO, with the intent to defraud, did willfully and unlawfully make,
25 draw, utter, and deliver to MICHELA M., a check, draft and order for the payment of money in
26 the sum of THIRTY THOUSAND DOLLARS, (\$30,000), drawn upon JP MPORGAN CHASE
27 BANK - CHECK NO. 6161, knowing at the time of the making, drawing, uttering, and
28 delivering, that the defendant had insufficient funds in and credit with the bank for the payment of

1 the check and draft and all other checks, drafts, and orders upon the funds then outstanding, in
2 full upon its presentation.

3 **COUNT 19**

4 On or about June 16, 2025, in the County of Orange, the crime of GRAND THEFT, in
5 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
6 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
7 pretense, obtain money by fraud from LORETTA S., specifically, \$5,000, which had a value
8 exceeding nine hundred fifty dollars (\$950).

9 **COUNT 20**

10 On or about August 13, 2025, in the County of Orange, the crime of GRAND THEFT, in
11 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
12 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
13 pretense, obtain money by fraud from JOHN T., specifically, \$7,000, which had a value
14 exceeding nine hundred fifty dollars (\$950).

15 **COUNT 21**

16 On or about September 29, 2025, in the County of Orange, the crime of GRAND THEFT,
17 in violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
18 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
19 pretense, obtain money by fraud from DARRIN G., specifically, \$60,000, which had a value
20 exceeding nine hundred fifty dollars (\$950).

21 **COUNT 22**

22 On or about January 15, 2026, in the County of Orange, the crime of GRAND THEFT, in
23 violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES
24 HOLDO, who did knowingly and designedly, by a false and fraudulent representation and
25 pretense, obtain money by fraud from JOHN M., specifically, a Rolex Submariner watch, which
26 had a value exceeding nine hundred fifty dollars (\$950).

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COUNT 23

On or about January 15, 2026, in the County of Orange, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by NELSON ANDRES HOLDO, who did knowingly and designedly, by a false and fraudulent representation and pretense, obtain money by fraud from JOHN M., specifically, \$33,500, which had a value exceeding nine hundred fifty dollars (\$950).

FIRST SPECIAL ALLEGATION

FELONY OFFENSE WHILE OUT ON BAIL OR OWN RECOGNIZANCE

It is further alleged that as to Counts 13-23 at the time of the commission of the above offenses, the defendant was released from custody on bail or on his own recognizance in Orange County Case Number 23HF2150, within the meaning of Penal Code section 12022.1.

SECOND SPECIAL ALLEGATION

FELONY OFFENSE WHILE OUT ON BAIL OR OWN RECOGNIZANCE

It is further alleged that as to Counts 17-23 at the time of the commission of the above offenses, the defendant was released from custody on bail or on his own recognizance in Los Angeles County Case Number 25PDCF0012501, within the meaning of Penal Code section 12022.1.

THIRD SPECIAL ALLEGATION

DENIAL OF PROBATION – THEFT AMOUNT OVER \$100,000

(P.C. § 1203.045(a))

It is further alleged that as to Counts 1-23 of this Complaint, the defendant took funds of a value exceeding one hundred thousand dollars (\$100,000) within the meaning of Penal Code section 1203.045(a).

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1 **FOURTH SPECIAL ALLEGATION**

2 **ENHANCEMENT – LOSS OVER \$200,000**

3 **(P.C. § 12022.6(a)(2))**

4 It is further alleged that as to Counts 1-23 of this Complaint, during the commission and
5 attempted commission of the above felony, the defendant took, damaged, and destroyed property
6 with a value exceeding two hundred thousand dollars (\$200,000), within the meaning of Penal
7 Code section 12022.6(a)(2).

8
9 **FIFTH SPECIAL ALLEGATION**

10 **AGGRAVATED WHITE COLLAR ENHANCEMENT – TAKING/LOSS OVER \$500,000**

11 **(P.C. § 186.11(a)(2))**

12 It is further alleged that Counts 1-23 are related felonies, a material element of which is
13 fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of
14 related felony conduct involved the taking of, and resulted in the loss of more than Five Hundred
15 Thousand Dollars (\$500,000), thus subjecting the Defendant to the additional punishment
16 provided for in Penal Code section 186.11(a)(2).

17 NOTICE: Prison custody time is to be served in state prison if the enhancement pursuant to
18 Penal Code section 186.11 is imposed as part of the sentence for the above offense, within the
19 meaning of Penal Code section 1170(h)(3).

20
21 **SIXTH SPECIAL ALLEGATION**

22 **DELAYED DISCOVERY OF CRIME TOLLING STATUTE OF LIMITATIONS**

23 It is further alleged as to Count 1, for purposes of Penal Code section 803, subdivision (c),
24 that crime was not discovered until at least August 2022 when the defendant stopped making
25 refund payments to Artin M. The defendant initially told Artin M. that the watch would be
26 delivered within three to six months, after which the defendant continued to tell Artin M. that the
27 watch would arrive “any day.” Approximately eleven months after Artin M. purchased the watch,
28 the defendant agreed to provide him with a full refund on August 9, 2022. Artin M. did not

1 suspect a crime had been committed during that timeframe and did not have actual or constructive
2 knowledge because the defendant continued to offer false assurances, which delayed its
3 discovery.

4
5 **CIRCUMSTANCES IN AGGRAVATION**

6 **(CALIFORNIA RULE OF COURT 4.421; PENAL CODE SECTION 1170(b)(2))**

7 It is further alleged as to all charges, per Penal Code section 1170(b)(2) and within the
8 meaning of Rule 4.421 of the California Rules of Court, that there exist circumstances in
9 aggravation including the following factors:

- 10 1. The manner in which the crimes were carried out indicates planning, sophistication, or
11 professionalism (4.421(a)(8));
12 2. The crimes involved an attempted or actual taking or damage of great monetary value
13 (4.421(a)(9));
14 3. The defendant took advantage of a position of trust or confidence to commit the
15 offenses (4.421(a)(11)).

16
17 **NOTICE TO DEFENDANT**

18 Conviction of the offenses charged in this complaint will require the defendant(s) to
19 provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1.
20 Willful refusal to provide the samples and impressions is a crime.

21
22 **NOTICE TO DEFENDANT AND ATTORNEYS**

23 Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby
24 informally request that defense counsel provide discovery to the People as required by Penal
25 Code section 1054.3.

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