

FILED  
Clerk of the Superior Court

JUN 30 2016

By: E. SABLON, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO

**THE PEOPLE OF THE STATE OF  
CALIFORNIA,**

*Plaintiff,*

v.

1. **JACOB DANIEL ORONA,**  
*dob 05/15/1965;*
2. **AIDE ORONA,**  
*dob 05/09/1970;*
3. **JOHN MADRID CONTRERAS,**  
*dob 02/16/1968;*
4. **PRAKASHKUMAR C. BHAKTA,**  
*dob 02/26/1967;*
5. **MARCUS NEWELL ROBINSON,**  
*dob 03/11/1953; AND*
6. **DAVID THOMPSON BOYD,**  
*dob 02/18/1962;*

*Defendants.*

Case No. SCD255550

**INDICTMENT**

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

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1 [13414 MONTSERRAT CT., CHINO HILLS, SAN BERNARDINO COUNTY, CA 91709]

2 **COUNT 1**

3 **CONSPIRACY (Re: Prescy M.)**

4 On or about and between July 24, 2012 and August 12, 2015, in the County of San  
5 Bernardino, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony,  
6 was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, MARCUS  
7 ROBINSON, and JOHN CONTRERAS, who did willfully and unlawfully conspire together and  
8 with another person or persons whose identity is unknown to commit the crime of PROCURING  
9 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
10 115(a), a Felony, pursuant to and for the purposes of carrying out the objects and purposes of the  
11 aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

12 1. On or about January 28, 2015, MARCUS ROBINSON sent an email to Prescy M. with  
13 an attachment that included the signatures of "Paul C.," "Margarita C.." and "Frank R."

14 2. On or about June 20, 2015, MARCUS ROBINSON sent an email to Prescy M. stating in  
15 part "BK paperwork was prepared by an attorney."

16 3. On or about August 12, 2015, MARCUS ROBINSON sent Prescy M. and email stating  
17 "The New BK Worked, they Dismissed the UD lawsuit! Hallelujah! For now All is Good but  
18 keep me posted because I am Sure we will hear from them again, Marcus."

19 4. On or about January 13, 2016, JACOB ORONA sent Prescy M. an email stating in part  
20 "I had talked to the attorney who sent you a email he was ready to fight for your property and you  
21 had a 70% chance of walking away with your equity and possibly still keep the house."

22 5. On or about or between July 24, 2013 and August 12, 2015, PRAKASHKUMAR  
23 BHAKTA met Prescy M. at a FedEx location and went over fraudulent paperwork with Prescy  
24 M.

25 6. On or about or between July 24, 2013 and August 12, 2015, AIDE ORONA asked  
26 Prescy M. to pay money for filing false documents.

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7. On or about or between July 24, 2013 and August 12, 2015, JOHN CONTRERAS went to Prescy M.'s home at 13414 Montserrat Court, Chino Hills, California to discuss fraudulent paperwork.

**COUNT 2**

**CONSPIRACY (Re: Prescy M.)**

On or about and between July 24, 2012 and August 12, 2015, in the County of San Bernardino, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, MARCUS ROBINSON, and JOHN CONTRERAS, who did willfully and unlawfully conspire together and with another person or persons whose identity is unknown to commit the crime of GRAND THEFT, in violation of Penal Code section 487(a), a Felony, pursuant to and for the purposes of carrying out the objects and purposes of the aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

1. On or about January 28, 2015, MARCUS ROBINSON sent an email to Prescy M. with an attachment that included the signatures of “Paul C.,” “Margarita C.” and “Frank R.”

2. On or about June 20, 2015, MARCUS ROBINSON sent an email to Prescy M. stating in part “BK paperwork was prepared by an attorney.”

3. On or about August 12, 2015, MARCUS ROBINSON sent Prescy M. and email stating “The New BK Worked, they Dismissed the UD lawsuit! Hallelujah! For now All is Good but keep me posted because I am Sure we will hear from them again, Marcus.”

4. On or about January 13, 2016, JACOB ORONA sent Prescy M. an email stating in part “I had talked to the attorney who sent you a email he was ready to fight for your property and you had a 70% chance of walking away with your equity and possibly still keep the house.”

5. On or about or between July 24, 2013 and August 12, 2015, PRAKASHKUMAR BHAKTA met Prescy M. at a FedEx location and went over fraudulent paperwork with Prescy M.

6. On or about or between July 24, 2013 and August 12, 2015, AIDE ORONA asked Prescy M. to pay money for filing false documents.

7. On or about or between July 24, 2013 and August 12, 2015, JOHN CONTRERAS went to Prescy M.'s home at 13414 Montserrat Court, Chino Hills, California to discuss fraudulent paperwork.

## COUNT 3

## PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 15, 2015, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Demurrer of Paul Chavez, et. al.

**COUNT 4**

## PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 15, 2015, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Paul Chavez Prejudgment Claim of Right.

**COUNT 5**

## PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about January 15, 2015, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in

1 a public office in California, which instrument, if genuine, might be filed, registered, or recorded  
2 under a law of California or the United States, to wit: Margarita Chavez Prejudgment Claim of  
3 Right.

4 **COUNT 6**

5 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

6 On or about January 15, 2015, in the County of San Bernardino, the crime of  
7 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
8 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS  
9 ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully  
10 and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in  
11 a public office in California, which instrument, if genuine, might be filed, registered, or recorded  
12 under a law of California or the United States, to wit: Frank Romero Prejudgment Claim of Right.

13 **COUNT 7**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about January 15, 2015, in the County of San Bernardino, the crime of  
16 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
17 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS  
18 ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully  
19 and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in  
20 a public office in California, which instrument, if genuine, might be filed, registered, or recorded  
21 under a law of California or the United States, to wit: Paul Chavez Request to Waive Court Fees.

22 **COUNT 8**

23 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

24 On or about January 15, 2015, in the County of San Bernardino, the crime of  
25 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
26 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS  
27 ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully  
28 and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in

1 a public office in California, which instrument, if genuine, might be filed, registered, or recorded  
2 under a law of California or the United States, to wit: Margarita Chavez Request to Waive Court  
3 Fees.

4 **COUNT 9**

5 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

6 On or about January 15, 2015, in the County of San Bernardino, the crime of  
7 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
8 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS  
9 ROBINSON, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully  
10 and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in  
11 a public office in California, which instrument, if genuine, might be filed, registered, or recorded  
12 under a law of California or the United States, to wit: Frank Romero Request to Waive Court  
13 Fees.

14 **COUNT 10**

15 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

16 On or about June 15, 2015, in the County of San Bernardino, the crime of PROCURING  
17 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
18 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
19 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly  
20 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
21 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
22 California or the United States, to wit: Paul Chavez Notice of Stay.

23 **COUNT 11**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about July 20, 2015, in the County of San Bernardino, the crime of PROCURING  
26 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
27 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
28 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly

1 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
2 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
3 California or the United States, to wit: Paul Chavez, et. al., Notice of Stay.

4 **COUNT 12**

5 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

6 On or about June 12, 2015, in the County of San Bernardino, the crime of PROCURING  
7 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
8 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
9 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly  
10 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
11 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
12 California or the United States, to wit: Paul Chavez Bankruptcy Petition.

13 **COUNT 13**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about June 25, 2015, in the County of San Bernardino, the crime of PROCURING  
16 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
17 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
18 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly  
19 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
20 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
21 California or the United States, to wit: Paul Chavez Bankruptcy Statements and Schedules.

22 **COUNT 14**

23 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

24 On or about June 12, 2015, in the County of San Bernardino, the crime of PROCURING  
25 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
26 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
27 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly  
28 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office

1 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
2 California or the United States, to wit: Paul Chavez Statement of Social Security Number.

3 **COUNT 15**

4 **GRAND THEFT OF PERSONAL PROPERTY (Re: Prescy M.)**

5 On or about and between June 17, 2013 and November 9, 2015, in the County of San  
6 Bernardino, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony,  
7 was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON,  
8 PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did unlawfully take money and  
9 personal property of another of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit:  
10 money paid by Prescy M.

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1 [34524 FAWN RIDGE PLACE, YUCAIPA, SAN BERNARDINO COUNTY, CA, 92399]

2 **COUNT 16**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about March 8, 2012, in the County of San Bernardino, the crime of PROCURING  
5 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
6 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
7 BHAKTA, and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false  
8 or forged instrument to be filed, registered, or recorded in a public office in California, which  
9 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
10 United States, to wit: Paulina U. Bankruptcy Petition and Statements & Schedules.

11 **COUNT 17**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about July 11, 2012, in the County of San Bernardino, the crime of PROCURING  
14 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
15 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
16 BHAKTA, JOHN CONTRERAS, and DAVID BOYD, who did unlawfully and knowingly  
17 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
18 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
19 California or the United States, to wit: Grant Deed Paulina U. to "Presscott Rosche LLP."

20 **COUNT 18**

21 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

22 On or about July 27, 2012, in the County of San Bernardino, the crime of PROCURING  
23 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
24 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
25 BHAKTA, JOHN CONTRERAS, and DAVID BOYD, who did unlawfully and knowingly  
26 procure or offer a false or forged instrument to be filed, registered, or recorded in a public office  
27 in California, which instrument, if genuine, might be filed, registered, or recorded under a law of

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1 California or the United States, to wit: Grant Deed "Presscott Rosche LLP" to "Blacks Edition,  
2 LLC."

3 **COUNT 19**

4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

5 On or about July 27, 2012, in the County of San Bernardino, the crime of PROCURING  
6 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
7 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS,  
8 PRAKASHKUMAR BHAKTA, and DAVID BOYD, who did unlawfully and knowingly procure  
9 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
10 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
11 California or the United States, to wit: "Blacks Edition LLC" Complaint.

12 **COUNT 20**

13 **GRAND THEFT OF PERSONAL PROPERTY (Re: Paulina U.)**

14 On or about and between September 16, 2011 and July 27, 2012, in the County of San  
15 Bernardino, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony,  
16 was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, DAVID  
17 BOYD, and JOHN CONTRERAS, who did unlawfully take money and personal property of  
18 another of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: money paid by  
19 Paulina U.

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1 **[66689 MESQUITE AVE., DESERT HOT SPRINGS, RIVERSIDE COUNTY, CA 92240]**

2 **COUNT 21**

3 **CONSPIRACY (Re: Olga L.)**

4 On or about and between March 17, 2011 and September 26, 2013, in the County of  
5 Riverside, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony,  
6 was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and  
7 JOHN CONTRERAS, who did willfully and unlawfully conspire together and with another  
8 person or persons whose identity is unknown to commit the crime of PROCURING OR  
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
10 a Felony, pursuant to and for the purposes of carrying out the objects and purposes of the  
11 aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

- 12 1. On or about September 26, 2013, JACOB ORONA advised ERIK GALVAN to file a  
13 false grant deed in Riverside County in Olga L.'s name.  
14 2. On or about September 26, 2013, PRAKASHKUMAR BHAKTA notarized a false grant  
15 deed in Olga L.'s name.

16 **COUNT 22**

17 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

18 On or about March 17, 2011, in the County of Riverside, the crime of PROCURING OR  
19 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
20 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
21 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
22 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
23 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
24 wit: Olga L. Bankruptcy Petition.

25 **COUNT 23**

26 **IDENTITY THEFT (Re: Olga L.)**

27 On or about March 17, 2011, in the County of Riverside, the crime of IDENTITY THEFT,  
28 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE

1 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
2 unlawfully obtain personal identifying information of Olga L. and used that information for an  
3 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
4 or medical information without the consent of Olga L.

5 **COUNT 24**

6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

7 On or about March 31, 2011, in the County of Riverside, the crime of PROCURING OR  
8 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
9 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
10 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
11 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
12 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
13 wit: Olga L. Bankruptcy Statements and Schedules.

14 **COUNT 25**

15 **IDENTITY THEFT (Re: Olga L.)**

16 On or about March 31, 2011, in the County of Riverside, the crime of IDENTITY THEFT,  
17 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
18 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
19 unlawfully obtain personal identifying information of Olga L. and used that information for an  
20 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
21 or medical information without the consent of Olga L.

22 **COUNT 26**

23 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

24 On or about June 13, 2011, in the County of Riverside, the crime of PROCURING OR  
25 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
26 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA  
27 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
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1 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
2 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
3 wit: Grant Deed Olga L. to Rodrigo Aquino.

4 **COUNT 27**

5 **IDENTITY THEFT (Re: Olga L.)**

6 On or about June 13, 2011, in the County of Riverside, the crime of IDENTITY THEFT, in  
7 violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
8 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
9 unlawfully obtain personal identifying information of Olga L. and used that information for an  
10 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
11 or medical information without the consent of Olga L.

12 **COUNT 28**

13 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

14 On or about August 29, 2011, in the County of Riverside, the crime of PROCURING OR  
15 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
16 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA  
17 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
18 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
19 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
20 wit: Grant Deed Olga L. to Heber Castillo.

21 **COUNT 29**

22 **IDENTITY THEFT (Re: Olga L.)**

23 On or about August 29, 2011, in the County of Riverside, the crime of IDENTITY THEFT,  
24 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
25 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
26 unlawfully obtain personal identifying information of Olga L. and used that information for an  
27 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
28 or medical information without the consent of Olga L.

1 **COUNT 30**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about September 8, 2011, in the County of Riverside, the crime of PROCURING  
4 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
5 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
6 BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false  
7 or forged instrument to be filed, registered, or recorded in a public office in California, which  
8 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
9 United States, to wit: Grant Deed Olga L. to Josephine Mirando.

10 **COUNT 31**

11 **IDENTITY THEFT (Re: Olga L.)**

12 On or about September 8, 2011, in the County of Riverside, the crime of IDENTITY  
13 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
14 ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did  
15 willfully and unlawfully obtain personal identifying information of Olga L. and used that  
16 information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods,  
17 services, real property, or medical information without the consent of Olga L.

18 **COUNT 32**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about October 6, 2011, in the County of Riverside, the crime of PROCURING OR  
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
22 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA  
23 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
24 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
25 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
26 wit: Grant Deed Olga L. to Francisco Godinez.

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1 **COUNT 33**

2 **IDENTITY THEFT (Re: Olga L.)**

3 On or about October 6, 2011, in the County of Riverside, the crime of IDENTITY THEFT,  
4 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
5 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
6 unlawfully obtain personal identifying information of Olga L. and used that information for an  
7 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
8 or medical information without the consent of Olga L.

9 **COUNT 34**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about January 5, 2012, in the County of Riverside, the crime of PROCURING OR  
12 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
13 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA  
14 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
15 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
16 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
17 wit: Grant Deed Olga L. to Lilia Tapia.

18 **COUNT 35**

19 **IDENTITY THEFT (Re: Olga L.)**

20 On or about January 5, 2012, in the County of Riverside, the crime of IDENTITY THEFT,  
21 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
22 ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and  
23 unlawfully obtain personal identifying information of Olga L. and used that information for an  
24 unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property,  
25 or medical information without the consent of Olga L.

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1 **COUNT 36**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about September 26, 2013, in the County of Riverside, the crime of PROCURING  
4 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
5 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
6 BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false  
7 or forged instrument to be filed, registered, or recorded in a public office in California, which  
8 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
9 United States, to wit: Grant Deed Francisco Godinez to Olga L.

10 **COUNT 37**

11 **IDENTITY THEFT (Re: Olga L.)**

12 On or about September 26, 2013, in the County of Riverside, the crime of IDENTITY  
13 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
14 ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did  
15 willfully and unlawfully obtain personal identifying information of Olga L. and used that  
16 information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods,  
17 services, real property, or medical information without the consent of Olga L.

18 **COUNT 38**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about September 26, 2013, in the County of Riverside, the crime of PROCURING  
21 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
22 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
23 BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false  
24 or forged instrument to be filed, registered, or recorded in a public office in California, which  
25 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
26 United States, to wit: Grant Deed Josephine Mirando to Olga L.

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**COUNT 39**

**IDENTITY THEFT (Re: Olga L.)**

On or about September 26, 2013, in the County of Riverside, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and unlawfully obtain personal identifying information of Olga L. and used that information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property, or medical information without the consent of Olga L.

**COUNT 40**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 26, 2013, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Heber Castillo to Olga L.

**COUNT 41**

**IDENTITY THEFT (Re: Olga L.)**

On or about September 26, 2013, in the County of Riverside, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and unlawfully obtain personal identifying information of Olga L. and used that information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property, or medical information without the consent of Olga L.

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**COUNT 42**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 26, 2013, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Lilia Tapia to Olga L.

**COUNT 43**

**IDENTITY THEFT (Re: Olga L.)**

On or about September 26, 2013, in the County of Riverside, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and unlawfully obtain personal identifying information of Olga L. and used that information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property, or medical information without the consent of Olga L.

**COUNT 44**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 26, 2013, in the County of Riverside, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Rodrigo Aquino to Olga L.

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COUNT 45

IDENTITY THEFT (Re: Olga L.)

On or about September 26, 2013, in the County of Riverside, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, and JOHN CONTRERAS, who did willfully and unlawfully obtain personal identifying information of Olga L. and used that information for an unlawful purpose, including to obtain, or attempt to obtain, credit, goods, services, real property, or medical information without the consent of Olga L.

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1 **[7120 & 7122 BENARES STREET, DOWNEY, LOS ANGELES COUNTY, CA 90241]**

2 **COUNT 46**

3 **CONSPIRACY (Re: Maria C.)**

4 On or about and between December 10, 2010 and April 3, 2015, in the County of Los  
5 Angeles, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony, was  
6 committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, MARCUS ROBINSON,  
7 and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully conspire together and with  
8 another person or persons whose identity is unknown to commit the crime of PROCURING OR  
9 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
10 a felony, pursuant to and for the purposes of carrying out the objects and purposes of the  
11 aforesaid conspiracy, said defendants and other conspirators committed the following overt act(s):

12 1. On or about September 17, 2013, a false grand deed was filed in Los Angeles County in  
13 Adriana K. and Maria C.'s names at the direction of JACOB ORONA.

14 2. On or about April 3, 2015, Bankruptcy Statements and Schedules were filed in the name  
15 of "Pat Kelley" in Los Angeles County at the direction of JACOB ORONA.

16 3. On or about or between November 24, 2014 and April 3, 2015, MARCUS ROBINSON  
17 spoke to Maria C. about filing false bankruptcy documents for the property located at 7120 &  
18 7122 Benares Street, Downey, Los Angeles County, California.

19 **COUNT 47**

20 **CONSPIRACY (Re: Maria C.)**

21 On or about and between December 10, 2010 and April 3, 2015, in the County of Los  
22 Angeles, the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), a felony, was  
23 committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, MARCUS ROBINSON,  
24 and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully conspire together and with  
25 another person or persons whose identity is unknown to commit the crime of GRAND THEFT, in  
26 violation of Penal Code section 487(a), a Felony, pursuant to and for the purposes of carrying out  
27 the objects and purposes of the aforesaid conspiracy, said defendants and other conspirators  
28 committed the following overt act(s):

1. On or about September 17, 2013, a false grand deed was filed in Los Angeles County in Adriana K. and Maria C.'s names at the direction of JACOB ORONA.

2. On or about April 3, 2015, Bankruptcy Statement and Schedules was filed in the name of "Pat Kelley" in Los Angeles County at the direction of JACOB ORONA.

3. On or about or between November 24, 2014 and April 3, 2015, MARCUS ROBINSON spoke to Maria C. about filing false bankruptcy documents for the property located at 7120 & 7122 Benares Street, Downey, Los Angeles County, California.

## COUNT 48

## PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about December 10, 2010, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States. to wit: Grant Deed Maria C. to Jane C. and James C and David G.

## COUNT 49

## PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT

On or about February 11, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Jose Barajas.

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1 **COUNT 50**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about March 18, 2011, in the County of Los Angeles, the crime of PROCURING  
4 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
5 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS,  
6 and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false  
7 or forged instrument to be filed, registered, or recorded in a public office in California, which  
8 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
9 United States, to wit: Grant Deed Maria C. to Olga L.

10 **COUNT 51**

11 **IDENTITY THEFT (Re: Olga L.)**

12 On or about March 18, 2011, in the County of Los Angeles, the crime of IDENTITY  
13 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
14 ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did  
15 willfully and unlawfully obtain personal identifying information of Olga L. and used that  
16 information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods,  
17 services, real property, or medical information without the consent of Olga L.

18 **COUNT 52**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about April 15, 2011, in the County of Los Angeles, the crime of PROCURING OR  
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
22 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
23 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
24 forged instrument to be filed, registered, or recorded in a public office in California, which  
25 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
26 United States, to wit: Grant Deed Maria C. to Hilario Garcia.

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**COUNT 53**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about May 17, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Jovita Rodriguez.

**COUNT 54**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about May 18, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Jovita Rodriguez.

**COUNT 55**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about June 17, 2011, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Rodrigo Aquino.

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1 **COUNT 56**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about July 19, 2011, in the County of Los Angeles, the crime of PROCURING OR  
4 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
5 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
6 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
7 forged instrument to be filed, registered, or recorded in a public office in California, which  
8 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
9 United States, to wit: Grant Deed Maria C. to Hilario Garcia.

10 **COUNT 57**

11 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

12 On or about September 12, 2011, in the County of Los Angeles, the crime of  
13 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
14 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN  
15 CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure  
16 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
17 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
18 California or the United States, to wit: Grant Deed Maria C. to Josephine Mirando.

19 **COUNT 58**

20 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

21 On or about March 5, 2012, in the County of Los Angeles, the crime of PROCURING OR  
22 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
23 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
24 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
25 forged instrument to be filed, registered, or recorded in a public office in California, which  
26 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
27 United States, to wit: Grant Deed Maria C. to Silvia Vilchez.

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**COUNT 59**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about March 16, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Silvia Vilchez to Maria C.

**COUNT 60**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about April 9, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Adriana K.

**COUNT 61**

**IDENTITY THEFT (Re: Adriana K.)**

On or about April 9, 2012, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully obtain personal identifying information of Adriana K. and used that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property, or medical information without the consent of Adriana K.

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1 **COUNT 62**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about April 9, 2012, in the County of Los Angeles, the crime of PROCURING OR  
4 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
5 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
6 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
7 forged instrument to be filed, registered, or recorded in a public office in California, which  
8 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
9 United States, to wit: Grant Deed Maria C. to Paulina U.

10 **COUNT 63**

11 **IDENTITY THEFT (Re: Paulina U.)**

12 On or about April 9, 2012, in the County of Los Angeles, the crime of IDENTITY THEFT,  
13 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
14 ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did willfully and  
15 unlawfully obtain personal identifying information of Paulina U. and used that information for an  
16 unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property,  
17 or medical information without the consent of Paulina U.

18 **COUNT 64**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about May 9, 2012, in the County of Los Angeles, the crime of PROCURING OR  
21 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
22 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
23 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
24 forged instrument to be filed, registered, or recorded in a public office in California, which  
25 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
26 United States, to wit: Grant Deed Maria C to Pedro S.

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1 **COUNT 65**

2 **IDENTITY THEFT (Re: Pedro S.)**

3 On or about May 9, 2012, in the County of Los Angeles, the crime of IDENTITY THEFT,  
4 in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE  
5 ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did willfully and  
6 unlawfully obtain personal identifying information of Pedro S. and used that information for an  
7 unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property,  
8 or medical information without the consent of Pedro S.

9 **COUNT 66**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about July 11, 2012, in the County of Los Angeles, the crime of PROCURING OR  
12 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
13 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
14 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
15 forged instrument to be filed, registered, or recorded in a public office in California, which  
16 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
17 United States, to wit: Grant Deed Maria C. to Artemio N.

18 **COUNT 67**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about August 9, 2012, in the County of Los Angeles, the crime of PROCURING  
21 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
22 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS,  
23 and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false  
24 or forged instrument to be filed, registered, or recorded in a public office in California, which  
25 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
26 United States, to wit: Grant Deed Maria C. to Cecilia T.

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1 **COUNT 68**

2 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

3 On or about September 19, 2012, in the County of Los Angeles, the crime of  
4 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
5 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN  
6 CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure  
7 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
8 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
9 California or the United States, to wit: Grant Deed Maria C. to Alberto V.

10 **COUNT 69**

11 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

12 On or about October 22, 2012, in the County of Los Angeles, the crime of PROCURING  
13 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
14 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS,  
15 and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false  
16 or forged instrument to be filed, registered, or recorded in a public office in California, which  
17 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
18 United States, to wit: Grant Deed Maria C. to Sandra A.

19 **COUNT 70**

20 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

21 On or about November 27, 2012, in the County of Los Angeles, the crime of  
22 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
23 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN  
24 CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure  
25 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
26 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
27 California or the United States, to wit: Grant Deed Maria C. to Noemi E.

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**COUNT 71**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about December 27, 2012, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to Erik Galvan.

**COUNT 72**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about January 28, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Maria C. to James C.

**COUNT 73**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about June 11, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed David Esteban Galvan to Maria C.

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**COUNT 74**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about June 19, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Jane C. to Maria C.

**COUNT 75**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about June 25, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed James C. to Maria C.

**COUNT 76**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about July 31, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Noemi E. to Maria C.

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**COUNT 77**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about August 7, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Olga L. to Maria C.

**COUNT 78**

**IDENTITY THEFT (Re: Olga L.)**

On or about August 7, 2013, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully obtain personal identifying information of Olga L. and used that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property, or medical information without the consent of Olga L.

**COUNT 79**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 13, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Paulina U. to Maria C.

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1 **COUNT 80**

2 **IDENTITY THEFT (Re: Paulina U.)**

3 On or about September 13, 2013, in the County of Los Angeles, the crime of IDENTITY  
4 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
5 ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did  
6 willfully and unlawfully obtain personal identifying information of Paulina U. and used that  
7 information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods,  
8 services, real property, or medical information without the consent of Paulina U.

9 **COUNT 81**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about August 14, 2013, in the County of Los Angeles, the crime of PROCURING  
12 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
13 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS,  
14 and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false  
15 or forged instrument to be filed, registered, or recorded in a public office in California, which  
16 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
17 United States, to wit: Grant Deed Pedro S. to Maria C.

18 **COUNT 82**

19 **IDENTITY THEFT (Re: Pedro S.)**

20 On or about August 14, 2013, in the County of Los Angeles, the crime of IDENTITY  
21 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
22 ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did  
23 willfully and unlawfully obtain personal identifying information of Pedro S. and used that  
24 information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods,  
25 services, real property, or medical information without the consent of Pedro S.

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**COUNT 83**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 3, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Jovita R. to Maria C.

**COUNT 84**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 3, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Francisco G. to Maria C.

**COUNT 85**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 3, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Rodrigo Aquino to Maria C.

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**COUNT 86**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 3, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Josephine Mirando to Maria C.

**COUNT 87**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 3, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Albert Vilchez to Maria C.

**COUNT 88**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 17, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Adriana K. to Maria C.

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**COUNT 89**

**IDENTITY THEFT (Re: Adriana K.)**

On or about September 17, 2013, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully obtain personal identifying information of Adriana K. and used that information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods, services, real property, or medical information without the consent of Adriana K.

**COUNT 90**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 17, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Sandra Agraz. to Maria C.

**COUNT 91**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 17, 2013, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Adriana K. to Maria C.

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1 **COUNT 92**

2 **IDENTITY THEFT (Re: Adriana K.)**

3 On or about September 17, 2013, in the County of Los Angeles, the crime of IDENTITY  
4 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
5 ORONA, AIDE ORONA, JOHN CONTRERAS, and PRAKASHKUMAR BHAKTA, who did  
6 willfully and unlawfully obtain personal identifying information of Adriana K. and used that  
7 information for an unlawful purpose, including to obtain, or attempt to obtain credit, goods,  
8 services, real property, or medical information without the consent of Adriana K.

9 **COUNT 93**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about November 24, 2014, in the County of Los Angeles, the crime of  
12 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
13 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA,  
14 PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did  
15 unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or  
16 recorded in a public office in California, which instrument, if genuine, might be filed, registered,  
17 or recorded under a law of California or the United States, to wit: "Terry Kelley" Prejudgment  
18 Claim of Right of Possession.

19 **COUNT 94**

20 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

21 On or about November 24, 2014, in the County of Los Angeles, the crime of  
22 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
23 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA,  
24 PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did  
25 unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or  
26 recorded in a public office in California, which instrument, if genuine, might be filed, registered,  
27 or recorded under a law of California or the United States, to wit: "Pat Kelley" Prejudgment  
28 Claim of Right of Possession.

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**COUNT 95**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about November 24, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, PRAKASHKUMAR BHAKTA, and MARCUS ROBINSON, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Demurrer of "Pat and Terry Kelley."

**COUNT 96**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about December 8, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: "Pat Kelley" Answer to Unlawful Detainer.

**COUNT 97**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about December 8, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded

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1 under a law of California or the United States, to wit: "Terry Kelley" Answer to Unlawful  
2 Detainer.

3 **COUNT 98**

4 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

5 On or about December 29, 2014, in the County of Los Angeles, the crime of  
6 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
7 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA,  
8 PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did  
9 unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or  
10 recorded in a public office in California, which instrument, if genuine, might be filed, registered,  
11 or recorded under a law of California or the United States, to wit: "Terry Kelley" Bankruptcy  
12 Petition.

13 **COUNT 99**

14 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

15 On or about January 12, 2015, in the County of Los Angeles, the crime of PROCURING  
16 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
17 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
18 BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and  
19 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
20 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
21 under a law of California or the United States, to wit: "Terry Kelley" Bankruptcy Statement and  
22 Schedules.

23 **COUNT 100**

24 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

25 On or about December 29, 2014, in the County of Los Angeles, the crime of  
26 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
27 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA,  
28 PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did

1 unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or  
2 recorded in a public office in California, which instrument, if genuine, might be filed, registered,  
3 or recorded under a law of California or the United States, to wit: "Terry Kelley" Statement of  
4 Social Security Number.

5 **COUNT 101**

6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

7 On or about January 6, 2015, in the County of Los Angeles, the crime of PROCURING  
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
9 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
10 BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and  
11 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
12 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
13 under a law of California or the United States, to wit: "Terry Kelley" Notice of Stay of  
14 Proceedings.

15 **COUNT 102**

16 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

17 On or about March 20, 2015, in the County of Los Angeles, the crime of PROCURING  
18 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
19 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
20 BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and  
21 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
22 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
23 under a law of California or the United States, to wit: "Pat Kelley" Bankruptcy Petition.

24 **COUNT 103**

25 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

26 On or about April 3, 2015, in the County of Los Angeles, the crime of PROCURING OR  
27 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
28 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,

1 JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and knowingly procure  
2 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
3 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
4 California or the United States, to wit: "Pat Kelley" Bankruptcy Statements & Schedules.

5 **COUNT 104**

6 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

7 On or about March 20, 2015, in the County of Los Angeles, the crime of PROCURING  
8 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
9 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
10 BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and  
11 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
12 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
13 under a law of California or the United States, to wit: "Pat Kelly" Statement of Social Security  
14 Number.

15 **COUNT 105**

16 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

17 On or about March 23, 2015, in the County of Los Angeles, the crime of PROCURING  
18 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
19 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR  
20 BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did unlawfully and  
21 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
22 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
23 under a law of California or the United States, to wit: "Pat Kelley" Notice of Stay of Unlawful  
24 Detainer.

25 **COUNT 106**

26 **GRAND THEFT OF PERSONAL PROPERTY (Re: Maria C.)**

27 On or about and between October 12, 2010 and April 3, 2015, in the County of Los  
28 Angeles, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was



1 committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
2 PRAKASHKUMAR BHAKTA, JOHN CONTRERAS, and MARCUS ROBINSON, who did  
3 unlawfully take money and personal property of another of a value exceeding Nine Hundred Fifty  
4 Dollars (\$950), to wit: money paid by Maria C.

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1 [1364 & 1364 ½ WEST 8TH STREET, SAN BERNARDINO, CA 92411]

2 **COUNT 107**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about September 15, 2011, in the County of San Bernardino, the crime of  
5 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
6 Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, and  
7 PRAKASHKUMAR BHAKTA, who did unlawfully and knowingly procure or offer a false or  
8 forged instrument to be filed, registered, or recorded in a public office in California, which  
9 instrument, if genuine, might be filed, registered, or recorded under a law of California or the  
10 United States, to wit: Grant Deed Pedro S. to Josephine M..

11 **COUNT 108**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about March 16, 2012, in the County of San Bernardino, the crime of PROCURING  
14 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
15 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, and PRAKASHKUMAR  
16 BHAKTA, who did unlawfully and knowingly procure or offer a false or forged instrument to be  
17 filed, registered, or recorded in a public office in California, which instrument, if genuine, might  
18 be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed  
19 Pedro S. to Paulina U..

20 **COUNT 109**

21 **IDENTITY THEFT (Re: Paulina U.)**

22 On or about March 16, 2012, in the County of San Bernardino, the crime of IDENTITY  
23 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by JACOB  
24 ORONA, AIDE ORONA, and PRAKASHKUMAR BHAKTA, who did willfully and unlawfully  
25 obtain personal identifying information of Paulina U. and used that information for an unlawful  
26 purpose, including to obtain, or attempt to obtain credit, goods, services, real property, or medical  
27 information without the consent of Paulina U.

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**COUNT 110**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about May 7, 2012, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA and AIDE ORONA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Pedro S. Bankruptcy Petition and Statements and Schedules.

**COUNT 111**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about January 31, 2013, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA and AIDE ORONA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Pedro S. to James C.

**COUNT 112**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about March 21, 2013, in the County of San Bernardino, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA and AIDE ORONA, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Pedro S. to Asta W.

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COUNT 113

**GRAND THEFT OF PERSONAL PROPERTY (Re: Pedro S.)**

On or about and between April 12, 2011 and March 21, 2013, in the County of San Bernardino, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JACOB ORONA and AIDE ORONA, who did unlawfully take money and personal property of another of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: money paid by Pedro S.

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1 **[5765 SOLEDAD MOUNTAIN ROAD, SAN DIEGO, CA 92037]**

2 **COUNT 114**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about April 5, 2012, in the County of San Diego, the crime of PROCURING OR  
5 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
6 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
7 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
8 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
9 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
10 wit: Adriana K. Bankruptcy Petition.

11 **COUNT 115**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about April 19, 2012, in the County of San Diego, the crime of PROCURING OR  
14 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
15 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
16 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
17 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
18 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
19 wit: Adriana K. Bankruptcy Statement and Schedules.

20 **COUNT 116**

21 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

22 On or about April 23, 2012, in the County of San Diego, the crime of PROCURING OR  
23 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
24 a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA,  
25 and JOHN CONTRERAS, who did unlawfully and knowingly procure or offer a false or forged  
26 instrument to be filed, registered, or recorded in a public office in California, which instrument, if  
27 genuine, might be filed, registered, or recorded under a law of California or the United States, to  
28 wit: Adriana K. Bankruptcy Court Complaint.

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**COUNT 117**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about July 12, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, and DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed Adriana K. to "Summers Gathers."

**COUNT 118**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about July 31, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, and DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed "Summers Gathers" to "Blacks Edition."

**COUNT 119**

**GRAND THEFT OF PERSONAL PROPERTY (Re: Adriana K.)**

On or about and between April 5, 2012 and September 23, 2013, in the County of San Diego, the crime of GRAND THEFT, in violation of Penal Code section 487(a), a felony, was committed by JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA, DAVID BOYD, and JOHN CONTRERAS, who did unlawfully take money and personal property of another of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: Adriana K.

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1 [2655 FERN VALLEY ROAD, CHULA VISTA, CA 91915]

2 **COUNT 120**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about May 23, 2012, in the County of San Diego, the crime of PROCURING OR  
5 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
6 a felony, was committed by JACOB ORONA, AIDE ORONA, and JOHN CONTRERAS, who  
7 did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered,  
8 or recorded in a public office in California, which instrument, if genuine, might be filed,  
9 registered, or recorded under a law of California or the United States, to wit: Grant Deed Eddie  
10 Ybarra to Ernestina L.

11 **COUNT 121**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about July 12, 2012, in the County of San Diego, the crime of PROCURING OR  
14 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
15 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
16 DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument  
17 to be filed, registered, or recorded in a public office in California, which instrument, if genuine,  
18 might be filed, registered, or recorded under a law of California or the United States, to wit: Grant  
19 Deed Vella Ybarra to "Summers Gathers."

20 **COUNT 122**

21 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

22 On or about July 31, 2012, in the County of San Diego, the crime of PROCURING OR  
23 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
24 a felony, was committed by JACOB ORONA, AIDE ORONA, JOHN CONTRERAS, and  
25 DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument  
26 to be filed, registered, or recorded in a public office in California, which instrument, if genuine,  
27 might be filed, registered, or recorded under a law of California or the United States, to wit: Grant  
28 Deed "Summers Gathers" to "Black's Edition."

1 **[2628 SECRET LAKE LANE, FALLBROOK, SAN DIEGO COUNTY, CA 92028]**

2 **COUNT 123**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about July 12, 2012, in the County of San Diego, the crime of PROCURING OR  
5 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
6 a felony, was committed by JACOB ORONA, AIDE ORONA, DAVID BOYD and MARCUS  
7 ROBINSON, who did unlawfully and knowingly procure or offer a false or forged instrument to  
8 be filed, registered, or recorded in a public office in California, which instrument, if genuine,  
9 might be filed, registered, or recorded under a law of California or the United States, to wit: Grant  
10 Deed Marcus Robinson to "Summers Gathers."

11 **COUNT 124**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about July 31, 2012, in the County of San Diego, the crime of PROCURING OR  
14 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
15 a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, and  
16 DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument  
17 to be filed, registered, or recorded in a public office in California, which instrument, if genuine,  
18 might be filed, registered, or recorded under a law of California or the United States, to wit: Grant  
19 Deed "Summers Gathers" to "Black's Edition."

20 **COUNT 125**

21 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

22 On or about August 20, 2012, in the County of San Diego, the crime of PROCURING OR  
23 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
24 a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, and  
25 DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument  
26 to be filed, registered, or recorded in a public office in California, which instrument, if genuine,  
27 might be filed, registered, or recorded under a law of California or the United States, to wit:  
28 "Black's Edition" Complaint.



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**COUNT 126**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about September 18, 2012, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, JOHN CONTRERAS, and DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: David Boyd and "Black's Edition" Complaint.

**COUNT 127**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about November 15, 2013, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, JOHN CONTRERAS, PRAKASHKUMAR BHAKTA, and DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Warranty Deed Marcus Robinson to "America's Outcry."

**COUNT 128**

**PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

On or about January 24, 2014, in the County of San Diego, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by JACOB ORONA, AIDE ORONA, MARCUS ROBINSON, JOHN CONTRERAS, and DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Marcus Robinson Complaint to Quiet Title.

1 [5510 SOUTH WILTON PLACE, LOS ANGELES, CA 90062]

2 **COUNT 129**

3 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

4 On or about November 8 2010, in the County of Los Angeles, the crime of PROCURING  
5 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
6 115(a), a felony, was committed by DAVID BOYD, who did unlawfully and knowingly procure  
7 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
8 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
9 California or the United States, to wit: Grant Deed Juanita Everline to "Ancestral Acquisition  
10 Trust."

11 **COUNT 130**

12 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

13 On or about June 18 2012, in the County of Los Angeles, the crime of PROCURING OR  
14 OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a),  
15 a felony, was committed by DAVID BOYD, who did unlawfully and knowingly procure or offer  
16 a false or forged instrument to be filed, registered, or recorded in a public office in California,  
17 which instrument, if genuine, might be filed, registered, or recorded under a law of California or  
18 the United States, to wit: Grant Deed "Ancestral Acquisition Trust" to David Boyd.

19 **COUNT 131**

20 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

21 On or about August 1, 2012, in the County of Los Angeles, the crime of PROCURING  
22 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
23 115(a), a felony, was committed by DAVID BOYD, who did unlawfully and knowingly procure  
24 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
25 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
26 California or the United States, to wit: Grant Deed Federal Home Loan Mortgage Corporation to  
27 "Ancestral Acquisition Trust."

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1 **COUNT 132**

2 **IDENTITY THEFT (Re: Federal Home Loan Mortgage Corporation)**

3 On or about August 1, 2012, in the County of Los Angeles, the crime of IDENTITY  
4 THEFT, in violation of Penal Code section 530.5(a), a felony, was committed by DAVID BOYD,  
5 who did willfully and unlawfully obtain personal identifying information of Federal Home Loan  
6 Mortgage Corporation and used that information for an unlawful purpose, including to obtain, or  
7 attempt to obtain credit, goods, services, real property, or medical information without the  
8 consent of Federal Home Loan Mortgage Corporation.

9 **COUNT 133**

10 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

11 On or about November 13, 2012, in the County of Los Angeles, the crime of  
12 PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal  
13 Code section 115(a), a felony, was committed by DAVID BOYD, who did unlawfully and  
14 knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a  
15 public office in California, which instrument, if genuine, might be filed, registered, or recorded  
16 under a law of California or the United States, to wit: Grant Deed David Boyd to "Ancestral  
17 Acquisition Trust."

18 **COUNT 134**

19 **PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT**

20 On or about December 3, 2012, in the County of Los Angeles, the crime of PROCURING  
21 OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section  
22 115(a), a felony, was committed by DAVID BOYD, who did unlawfully and knowingly procure  
23 or offer a false or forged instrument to be filed, registered, or recorded in a public office in  
24 California, which instrument, if genuine, might be filed, registered, or recorded under a law of  
25 California or the United States, to wit: Grant of Lien "Ancestral Acquisition Trust" to David  
26 Boyd.

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On or about August 11, 2014, in the County of Los Angeles, the crime of PROCURING OR OFFERING A FALSE OR FORGED INSTRUMENT, in violation of Penal Code section 115(a), a felony, was committed by DAVID BOYD, who did unlawfully and knowingly procure or offer a false or forged instrument to be filed, registered, or recorded in a public office in California, which instrument, if genuine, might be filed, registered, or recorded under a law of California or the United States, to wit: Grant Deed "Ancestral Acquisition Trust" to David Boyd.

[illegible]

1 **FIRST SPECIAL ALLEGATION**

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

3 **[JACOB ORONA, AIDE ORONA, PRAKASHKUMAR BHAKTA & JOHN CONTRERAS]**

4 It is further alleged that JACOB ORONA, AIDE ORONA, in the commission of the  
5 offenses alleged in Counts 15, 20, 106, 113, and 119 in this Indictment, JOHN CONTRERAS, in  
6 the commission of the offenses alleged in Counts 15, 20, 106, and 119, and PRAKASHKUMAR  
7 BHAKTA, in the commission of the offenses alleged in Counts 15, 20, 106, 119, with the intent  
8 to do so, took funds of a value exceeding one hundred thousand dollars (\$100,000) within the  
9 meaning of Penal Code section 1203.045.

10 **SECOND SPECIAL ALLEGATION**

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

12 It is further alleged pursuant to Penal Code section 186.11(a)(2), that each and every  
13 defendant in the Indictment committed two or more related felonies to wit: Counts 1 through 135,  
14 a material element of which is fraud, involving a pattern of related felony conduct and the taking  
15 of, or resulted in the loss by another person or entity of, more than five hundred thousand dollars  
16 (\$500,000).

17 **THIRD SPECIAL ALLEGATION**

18 **[EXCESSIVE LOSS OVER \$3,200,000 (PENAL CODE SECTION 12022.6(A)(4))]**

19 **[JACOB ORONA & AIDE ORONA]**

20 It is further alleged, pursuant to Penal Code section 12022.6, subdivisions (a)(4), (b),  
21 and (c), that JACOB ORONA and AIDE ORONA took, damaged, or destroyed any property in  
22 the commission or attempted commission of the felonies described in Counts 1 through 128 of  
23 this Indictment, with the intent to cause that taking, damage, or destruction, and the aggregate  
24 losses to the victims from the felonies described in Counts 1 through 128 exceed three million  
25 two hundred thousand dollars (\$3,200,000), and arise from a common scheme or plan.

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1 **FOURTH SPECIAL ALLEGATION**

2 **[EXCESSIVE LOSS OVER \$3,200,000 (PENAL CODE SECTION 12022.6(A)(4))]**

3 **[JOHN CONTRERAS]**

4 It is further alleged, pursuant to Penal Code section 12022.6, subdivisions (a)(4), (b),  
5 and (c), that JOHN CONTRERAS took, damaged, or destroyed any property in the commission  
6 or attempted commission of the felonies described in Counts 1-106, 114-116, 119-122, and 126-  
7 128 of this Indictment, with the intent to cause that taking, damage, or destruction, and the  
8 aggregate losses to the victims from the felonies described in Counts 1-106, 114-116, 119-122,  
9 126-128 exceed three million two hundred thousand dollars (\$3,200,000), and arise from a  
10 common scheme or plan.

11 **FIFTH SPECIAL ALLEGATION**

12 **[EXCESSIVE LOSS OVER \$1,300,000 (PENAL CODE SECTION 12022.6(A)(3))]**

13 **[PRAKASHKUMAR BHAKTA]**

14 It is further alleged, pursuant to Penal Code section 12022.6, subdivisions (a)(3), (b),  
15 and (c), that PRAKASHKUMAR BHAKTA took, damaged, or destroyed any property in the  
16 commission or attempted commission of the felonies described in Counts 1-109, 114-116, 119,  
17 and 127 of this Indictment, with the intent to cause that taking, damage, or destruction, and the  
18 aggregate losses to the victims from the felonies described in Counts 1-109, 114-116, 119, and  
19 127 exceed one million three hundred thousand dollars (\$1,300,000), and arise from a common  
20 scheme or plan.

21 **SIXTH SPECIAL ALLEGATION**

22 **[EXCESSIVE LOSS OVER \$1,300,000 (PENAL CODE SECTION 12022.6(A)(3))]**

23 **[MARCUS ROBINSON]**

24 It is further alleged, pursuant to Penal Code section 12022.6, subdivisions (a)(3), (b),  
25 and (c), that MARCUS ROBINSON took, damaged, or destroyed any property in the commission  
26 or attempted commission of the felonies described in Counts 1-15, 46-47, 93-106, and 123-128 of  
27 this Indictment, with the intent to cause that taking, damage, or destruction, and the aggregate  
28 losses to the victims from the felonies described in Counts 1-15, 46-47, 93-106, and 123-128

1 exceed one million three hundred thousand dollars (\$1,300,000), and arise from a common  
2 scheme or plan.

### 3 SEVENTH SPECIAL ALLEGATION

#### 4 EXCESSIVE LOSS OVER \$1,300,000 (PENAL CODE SECTION 12022.6(A)(3))

#### 5 [DAVID BOYD]

6 It is further alleged, pursuant to Penal Code section 12022.6, subdivisions (a)(3), (b),  
7 and (c), that DAVID BOYD took, damaged, or destroyed any property in the commission or  
8 attempted commission of the felonies described in Counts 17-20, 117-119, and 121-135 of this  
9 Indictment, with the intent to cause that taking, damage, or destruction, and the aggregate losses  
10 to the victims from the felonies described in Counts 17-20, 117-119, and 121-135 exceed one  
11 million three hundred thousand dollars (\$1,300,000), and arise from a common scheme or plan.

### 12 TOLLING OF THE STATUTE OF LIMITATIONS

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

14 It is further alleged, as to all counts and offenses subject to Penal Code section 803(c), that  
15 the above violation was not discovered until September 17, 2012, by District Attorney  
16 Investigator Glenn Gulley of the Stanislaus County District Attorney's Office ("DAI Gulley").

17 It is alleged in counts 1 through 135, that defendants JACOB DANIEL ORONA, AIDE  
18 ORONA, PRAKASHKUMAR BHAKTA, JOHN MADRID CONTRERAS, DAVID  
19 THOMPSON BOYD, and MARCUS NEWELL ROBINSON (hereinafter collectively referred to  
20 as "defendants"), which are listed in this Indictment, Procured or Offered False or Forged  
21 Instruments for Record (Penal Code section 115), committed Grand Theft (Penal Code section  
22 487(a)) and Conspired (Penal Code section 182) to do the same. It is alleged that these crimes  
23 were committed with the intent to defraud homeowners, banks, and the State and Federal Court  
24 systems.

25 On July 2, 2012, DAI Gulley was conducting a mortgage fraud investigative interview of a  
26 prospective homeowner and victim witness named Lilia Tapia. DAI Gulley was told by Lilia  
27 Tapia that she had attended five seminars where Jacob Orona described a mortgage relief  
28 program for distressed homeowners under the name Document Recovery Forensic, LLC. Lilia

1 Tapia described Jacob Orona as the leader of the program. Lilia Tapia explained that she was in  
2 constant contact with Aide Orona (Jacob Orona's wife) regarding filling out and filing false and  
3 fraudulent fractional interest grant deeds of her property to others as part of the mortgage relief  
4 program. This was the first time DAI Gulley heard the name Jacob Orona. During the July 2,  
5 2012 interview, Lilia Tapia told DAI Gulley that she believed numerous homeowners were  
6 involved in the program. Lilia Tapia also provided DAI Gulley her personal checks paid for the  
7 mortgage relief program services. The checks were made out to World Financial Investments.

8 On August 22, 2012, DAI Gulley obtained bank account information search warrants for  
9 Document Recovery Forensic, LLC and World Financial Investments from Wells Fargo Bank,  
10 Bank of America, and U.S. Bank. These were entities that DAI Gulley believed were controlled  
11 by Jacob Orona.

12 On September 17 and 18, 2012, DAI Gulley examined the documents that were received in  
13 response to the bank account search warrants. The bank accounts revealed numerous deposits by  
14 homeowners that looked like program payments. DAI Gulley believed these depositing  
15 homeowners were victims. The examination of the search warrant bank records was the first time  
16 DAI Gulley had a list of victim names and payment information, and was the date he discovered  
17 the crimes associated with this Indictment.

18 As reflected in this Indictment, defendants continued their crimes and counts are charged  
19 through 2015. For the Procuring or Offering a False or Forged Document, Grand Theft, and  
20 Identity Theft charges, the counts in this Indictment that occurred less than four years ago fall  
21 within the statute of limitations based on the date of their commission without reference to tolling  
22 due to the date of discovery. For the Conspiracy charges, the counts in this Indictment that have  
23 an overt act that occurred within three years of finding this indictment are within the statute of  
24 limitations based on the date of their commission without reference to tolling due to the date of  
25 discovery.

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1 For those counts alleged to have occurred before September 17, 2012, it is alleged that no  
2 victim of said violation and no law enforcement agency chargeable with the investigation and  
3 prosecution of said violation had actual or constructive knowledge of said violation prior to said  
4 date because DAI Gulley had not discovered their names or association with the defendants.  
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11 A TRUE BILL, and with a finding that the requirements of Penal Code section 923(c) have  
12 been satisfied.

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14 Foreperson of the Grand Jury 19 Juror #  
15 Dated: June 30, 2016  
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18 **THE FOLLOWING WITNESSES APPEARED BEFORE THE GRAND JURY IN THE**  
19 **ABOVE-CAPTIONED MATTER:**

- 20 1. Prescy M.  
21 2. Paulina U.  
22 3. Patty Brundige  
23 4. Jason Rund  
24 5. Olga L.  
25 6. Erik Galvan  
26 7. Martha Salas  
27 8. Maria C.  
28 9. Wei Wang  
10. Pedro S.  
11. Joshua Jjemba  
12. Adriana K.  
13. Eddie Ybarra  
14. Vella Ybarra  
15. Andy Thomas

- 1 16. Bradley Tuck
- 2 17. Joseph Perry
- 3 18. James Harbin
- 4 19. Asondoh Tangwe
- 5 20. Sanford Doi
- 6 21. Ronda Shelton
- 7 22. Brandon Lawler
- 8 23. Michelle Moreno
- 9 24. Glen Gulley
- 10 25. Herminia Neblina

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