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8 California

**FILED**

JUN 12 2018

EL DORADO CO. SUPERIOR COURT  
BY T. Barbour (DEPUTY)

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF EL DORADO  
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13 **PEOPLE OF THE STATE OF**  
**CALIFORNIA,**

Plaintiff,

15 v.

16  
17 **DAVID REIMERS,**  
(DOB 12/22/1965)

Defendant.

Case No. **P 18 C R F 0 2 3 4**

**FELONY COMPLAINT**

20  
21 The Attorney General of the State of California hereby accuses DAVID REIMERS of the  
22 following criminal offenses:

23 **COUNT ONE**  
24 **(Fraudulent Security Scheme)**

25 Between January 2009 and April 2018, at and in the County of El Dorado, State of  
26 California, defendant DAVID REIMERS did willfully and unlawfully, in violation of section  
27 25541 of the Corporations Code of the State of California, employ, directly or indirectly, any  
28 device, scheme, or artifice to defraud in connection with the offer, purchase, or sale of any

1 security or willfully engage, directly or indirectly, in any act, practice, or course of business  
2 which operates or would operate as a fraud or deceit upon any person in connection with the  
3 offer, purchase, or sale of any security to wit: Boyd and Pamela Berggren, Patricia Griffes,  
4 Edward and Kathryn La Franchi, Martha Robison, Nancy Robison-Calhoun, Ann Simpson, David  
5 and Kimberly Traversi, Alberta Van Der Mik, Paul and Joanne Wurschmidt, and Shirley Wilson,  
6 who combined invested \$2,306,634.06 with Reimers Financial Services.

7 **COUNT TWO**  
8 **(Fraud in the Sale of a Security)**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission as the charges set forth above: On or about November 27, 2012, at and in the  
11 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
12 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
13 California, offer or sell a security to a person or persons by means of a written or oral  
14 communication that included an untrue statement of a material fact or omitted to state a material  
15 fact necessary to make the statement made, in light of the circumstances under which the  
16 statement was made, not misleading, to wit: a \$30,000 investment from Boyd and Pamela  
17 Berggren in Reimers Financial Services.

18 **COUNT THREE**  
19 **(Fraud in the Sale of a Security)**

20 For a further and separate cause of action, being a different offense from but connected in  
21 its commission as the charges set forth above: On or about October 9, 2013, at and in the County  
22 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
23 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
24 offer or sell a security to a person or persons by means of a written or oral communication that  
25 included an untrue statement of a material fact or omitted to state a material fact necessary to  
26 make the statement made, in light of the circumstances under which the statement was made, not  
27 misleading, to wit: a \$3,000 investment from Boyd and Pamela Berggren in Reimers Financial  
28 Services.



1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$17,000 investment from Boyd and Pamela Berggren in Reimers Financial  
5 Services.

6 **COUNT SEVEN**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about July 18, 2014, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$2,000 investment from Boyd and Pamela Berggren in Reimers Financial  
16 Services.

17 **COUNT EIGHT**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about July 28, 2014, at and in the County of  
21 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$13,000 investment from Boyd and Pamela Berggren in Reimers Financial  
27 Services.

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1 California, offer or sell a security to a person or persons by means of a written or oral  
2 communication that included an untrue statement of a material fact or omitted to state a material  
3 fact necessary to make the statement made, in light of the circumstances under which the  
4 statement was made, not misleading, to wit: a \$10,000 investment from Boyd and Pamela  
5 Berggren in Reimers Financial Services.

6 **COUNT TWELVE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about November 17, 2015, at and in the  
10 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
11 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
12 California, offer or sell a security to a person or persons by means of a written or oral  
13 communication that included an untrue statement of a material fact or omitted to state a material  
14 fact necessary to make the statement made, in light of the circumstances under which the  
15 statement was made, not misleading, to wit: a \$10,000 investment from Boyd and Pamela  
16 Berggren in Reimers Financial Services.

17 **COUNT THIRTEEN**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about December 23, 2015, at and in the  
21 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
22 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
23 California, offer or sell a security to a person or persons by means of a written or oral  
24 communication that included an untrue statement of a material fact or omitted to state a material  
25 fact necessary to make the statement made, in light of the circumstances under which the  
26 statement was made, not misleading, to wit: a \$10,000 investment from Boyd and Pamela  
27 Berggren in Reimers Financial Services.

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1 California, offer or sell a security to a person or persons by means of a written or oral  
2 communication that included an untrue statement of a material fact or omitted to state a material  
3 fact necessary to make the statement made, in light of the circumstances under which the  
4 statement was made, not misleading, to wit: a \$12,000 investment from Boyd and Pamela  
5 Berggren in Reimers Financial Services.

6 **COUNT SEVENTEEN**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about March 21, 2016, at and in the County  
10 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$26,800 investment from Boyd and Pamela Berggren in Reimers Financial  
16 Services.

17 **COUNT EIGHTEEN**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about April 1, 2016, at and in the County of  
21 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$15,000 investment from Boyd and Pamela Berggren in Reimers Financial  
27 Services.

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1 an accomplice, with the intent to commit larceny and any felony to wit: entered the home of Boyd  
2 and Pamela Berggren to commit securities fraud, elder abuse, and grand theft.

3 NOTICE: It is further alleged that the above offense is a violation of Penal Code section  
4 462 (a). It is further alleged that the above offense is a violent felony within the meaning of Penal  
5 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
6 during the commission of the above offense.

7 **COUNT TWENTY-TWO**  
8 **(Grand Theft)**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission as the charges set forth above: Between November 2012 and April 2018, at and  
11 in the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
12 Penal Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
13 exceeding nine hundred and fifty dollars (\$950), to wit: \$332,800 belonging to Boyd and Pamela  
14 Berggren.

15 **COUNT TWENTY-THREE**  
16 **(Fraud in the Sale of a Security)**

17 For a further and separate cause of action, being a different offense from but connected in  
18 its commission as the charges set forth above: On or about August 29, 2012, at and in the County  
19 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
20 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
21 offer or sell a security to a person or persons by means of a written or oral communication that  
22 included an untrue statement of a material fact or omitted to state a material fact necessary to  
23 make the statement made, in light of the circumstances under which the statement was made, not  
24 misleading, to wit: a \$10,000 investment from Patricia Griffes in Reimers Financial Services.

25 **COUNT TWENTY-FOUR**  
26 **(Fraud in the Sale of a Security)**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth above: On or about June 27, 2013, at and in the County of

1 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
2 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
3 offer or sell a security to a person or persons by means of a written or oral communication that  
4 included an untrue statement of a material fact or omitted to state a material fact necessary to  
5 make the statement made, in light of the circumstances under which the statement was made, not  
6 misleading, to wit: a \$5,000 investment from Patricia Griffes in Reimers Financial Services.

7 **COUNT TWENTY-FIVE**  
8 **(Fraud in the Sale of a Security)**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission as the charges set forth above: On or about July 9, 2013, at and in the County of  
11 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
12 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
13 offer or sell a security to a person or persons by means of a written or oral communication that  
14 included an untrue statement of a material fact or omitted to state a material fact necessary to  
15 make the statement made, in light of the circumstances under which the statement was made, not  
16 misleading, to wit: a \$5,000 investment from Patricia Griffes in Reimers Financial Services.

17 **COUNT TWENTY-SIX**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about October 2, 2013, at and in the County  
21 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$5,000 investment from Patricia Griffes in Reimers Financial Services.

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1                                   **COUNT TWENTY-SEVEN**  
2                                   **(Fraud in the Sale of a Security)**

3           For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about February 28, 2014, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$5,000 investment from Patricia Griffes in Reimers  
11 Financial Services.

12                                   **COUNT TWENTY-EIGHT**  
13                                   **(Fraud in the Sale of a Security)**

14           For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about June 10, 2016, at and in the County of  
16 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
17 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
18 offer or sell a security to a person or persons by means of a written or oral communication that  
19 included an untrue statement of a material fact or omitted to state a material fact necessary to  
20 make the statement made, in light of the circumstances under which the statement was made, not  
21 misleading, to wit: a \$40,000 investment from Patricia Griffes in Reimers Financial Services.

22                                   **COUNT TWENTY-NINE**  
23                                   **(Fraud in the Sale of a Security)**

24           For a further and separate cause of action, being a different offense from but connected in  
25 its commission as the charges set forth above: On or about August 1, 2016, at and in the County  
26 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
27 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
28 offer or sell a security to a person or persons by means of a written or oral communication that

1 included an untrue statement of a material fact or omitted to state a material fact necessary to  
2 make the statement made, in light of the circumstances under which the statement was made, not  
3 misleading, to wit: a \$30,000 investment from Patricia Griffes in Reimers Financial Services.

4 **COUNT THIRTY**  
5 **(Elder Abuse)**

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth above: Between August 2012 and August 2016, at and in  
8 the County of El Dorado, State of California, defendant, DAVID REIMERS, in violation of  
9 California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,  
10 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
11 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
12 known that said person was an elder adult, to wit: \$100,000 from Patricia Griffes.

13 **COUNT THIRTY-ONE**  
14 **(Grand Theft)**

15 For a further and separate cause of action, being a different offense from but connected in  
16 its commission as the charges set forth above: Between August 2012 and August 2016, at and in  
17 the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal  
18 Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
19 exceeding nine hundred and fifty dollars (\$950), to wit: \$100,000 from Patricia Griffes.

20 **COUNT THIRTY-TWO**  
21 **(Fraud in the Sale of a Security)**

22 For a further and separate cause of action, being a different offense from but connected in  
23 its commission as the charges set forth above: On or about September 26, 2012, at and in the  
24 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
25 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
26 California, offer or sell a security to a person or persons by means of a written or oral  
27 communication that included an untrue statement of a material fact or omitted to state a material  
28 fact necessary to make the statement made, in light of the circumstances under which the

1 statement was made, not misleading, to wit: a \$5,000 investment from Edward and Kathryn La  
2 Franchi in Reimers Financial Services.

3 **COUNT THIRTY-THREE**  
4 **(Fraud in the Sale of a Security)**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission as the charges set forth above: On or about October 12, 2012, at and in the  
7 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
8 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
9 California, offer or sell a security to a person or persons by means of a written or oral  
10 communication that included an untrue statement of a material fact or omitted to state a material  
11 fact necessary to make the statement made, in light of the circumstances under which the  
12 statement was made, not misleading, to wit: a \$85,000 investment from Edward and Kathryn La  
13 Franchi in Reimers Financial Services.

14 **COUNT THIRTY-FOUR**  
15 **(Elder Abuse)**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth above: Between November 2012 and April 2018, at and in  
18 the County of El Dorado, State of California, defendant, DAVID REIMERS, in violation of  
19 California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,  
20 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
21 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
22 known that said person was an elder adult, to wit: \$90,000 from Edward and Kathryn La Franchi.

23 **COUNT THIRTY-FIVE**  
24 **(First Burglary Residential Burglary with a Person Present)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: Between September 2012 and October 2012, at  
27 and in the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
28 California Penal Code section 459, a felony, committed First Degree Residential Burglary with a

1 person present, in that said defendant did willfully and unlawfully enter an inhabited dwelling  
2 house and trailer coach and inhabited portion of a building occupied by another person, other than  
3 an accomplice, with the intent to commit larceny and any felony to wit: entered the home of  
4 Edward and Kathryn La Franchi to commit securities fraud, elder abuse, and grand theft.

5 NOTICE: It is further alleged that the above offense is a violation of Penal Code section  
6 462 (a). It is further alleged that the above offense is a violent felony within the meaning of Penal  
7 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
8 during the commission of the above offense.

9 **COUNT THIRTY-SIX**  
10 **(Grand Theft)**

11 For a further and separate cause of action, being a different offense from but connected in  
12 its commission as the charges set forth above: Between November 2012 and April 2018, at and  
13 in the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
14 Penal Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
15 exceeding nine hundred and fifty dollars (\$950), to wit: \$90,000 belonging to Edward and  
16 Kathryn La Franchi.

17 **COUNT THIRTY-SEVEN**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about July 29, 2011, at and in the County of  
21 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$15,000 investment from Martha Robison in Reimers Financial Services.

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1 **COUNT THIRTY-EIGHT**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about April 9, 2013, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$8,000 investment from Martha Robison in Reimers Financial Services.

11 **COUNT THIRTY-NINE**  
12 **(Fraud in the Sale of a Security)**

13 For a further and separate cause of action, being a different offense from but connected in  
14 its commission as the charges set forth above: On or about October 2, 2015, at and in the County  
15 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
16 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
17 offer or sell a security to a person or persons by means of a written or oral communication that  
18 included an untrue statement of a material fact or omitted to state a material fact necessary to  
19 make the statement made, in light of the circumstances under which the statement was made, not  
20 misleading, to wit: a \$8,000 investment from Martha Robison in Reimers Financial Services.

21 **COUNT FORTY**  
22 **(Fraud in the Sale of a Security)**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth above: On or about May 18, 2017, at and in the County of  
25 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
26 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
27 offer or sell a security to a person or persons by means of a written or oral communication that  
28 included an untrue statement of a material fact or omitted to state a material fact necessary to



1 make the statement made, in light of the circumstances under which the statement was made, not  
2 misleading, to wit: a \$75,000 investment from Martha Robison in Reimers Financial Services.

3 **COUNT FORTY-ONE**  
4 **(Fraud in the Sale of a Security)**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission as the charges set forth above: On or about July 14, 2017, at and in the County of  
7 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
8 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
9 offer or sell a security to a person or persons by means of a written or oral communication that  
10 included an untrue statement of a material fact or omitted to state a material fact necessary to  
11 make the statement made, in light of the circumstances under which the statement was made, not  
12 misleading, to wit: a \$5,000 investment from Martha Robison in Reimers Financial Services.

13 **COUNT FORTY-TWO**  
14 **(Fraud in the Sale of a Security)**

15 For a further and separate cause of action, being a different offense from but connected in  
16 its commission as the charges set forth above: On or about August 10, 2017, at and in the County  
17 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
18 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
19 offer or sell a security to a person or persons by means of a written or oral communication that  
20 included an untrue statement of a material fact or omitted to state a material fact necessary to  
21 make the statement made, in light of the circumstances under which the statement was made, not  
22 misleading, to wit: a \$20,000 investment from Martha Robison in Reimers Financial Services.

23 **COUNT FORTY-THREE**  
24 **(Fraud in the Sale of a Security)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about October 12, 2017, at and in the  
27 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
28 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of

1 California, offer or sell a security to a person or persons by means of a written or oral  
2 communication that included an untrue statement of a material fact or omitted to state a material  
3 fact necessary to make the statement made, in light of the circumstances under which the  
4 statement was made, not misleading, to wit: a \$2,500 investment from Martha Robison in  
5 Reimers Financial Services.

6 **COUNT FORTY-FOUR**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about May 23, 2012, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$40,000 investment from Martha Robison in Reimers Financial Services.

16 **COUNT FORTY-FIVE**  
17 **(Fraud in the Sale of a Security)**

18 For a further and separate cause of action, being a different offense from but connected in  
19 its commission as the charges set forth above: On or about March 14, 2017, at and in the County  
20 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
21 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
22 offer or sell a security to a person or persons by means of a written or oral communication that  
23 included an untrue statement of a material fact or omitted to state a material fact necessary to  
24 make the statement made, in light of the circumstances under which the statement was made, not  
25 misleading, to wit: a \$92,000 investment from Martha Robison in Reimers Financial Services.

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1 **COUNT FORTY-SIX**  
2 **(Elder Abuse)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: Between July 2011 and October 2017, at and in the  
5 County of El Dorado, State of California, defendant, DAVID REIMERS, in violation of  
6 California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,  
7 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
8 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
9 known that said person was an elder adult, to wit: \$265,500 from Martha Robison.

10 **COUNT FORTY-SEVEN**  
11 **(Grand Theft)**

12 For a further and separate cause of action, being a different offense from but connected in  
13 its commission as the charges set forth above: Between July 2011 and October 2017, at and in  
14 the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal  
15 Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
16 exceeding nine hundred and fifty dollars (\$950), to wit: \$265,500 from Martha Robison.

17 **COUNT FORTY-EIGHT**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about October 28, 2016, at and in the  
21 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
22 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
23 California, offer or sell a security to a person or persons by means of a written or oral  
24 communication that included an untrue statement of a material fact or omitted to state a material  
25 fact necessary to make the statement made, in light of the circumstances under which the  
26 statement was made, not misleading, to wit: a \$100,000 investment from Nancy Robison-Calhoun  
27 in Reimers Financial Services.

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1 **COUNT FORTY-NINE**  
2 **(Grand Theft)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On October 28, 2016, at and in the County of El  
5 Dorado, State of California, defendant DAVID REIMERS, in violation of Penal Code section  
6 487(a), a felony, willfully and unlawfully took personal property of a value exceeding nine  
7 hundred and fifty dollars (\$950), to wit: \$100,000 from Nancy Robison-Calhoun.

8 **COUNT FIFTY**  
9 **(Fraud in the Sale of a Security)**

10 For a further and separate cause of action, being a different offense from but connected in  
11 its commission as the charges set forth above: On or about September 13, 2011, at and in the  
12 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
13 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
14 California, offer or sell a security to a person or persons by means of a written or oral  
15 communication that included an untrue statement of a material fact or omitted to state a material  
16 fact necessary to make the statement made, in light of the circumstances under which the  
17 statement was made, not misleading, to wit: a \$2,500 investment from Ann Simpson in Reimers  
18 Financial Services.

19 **COUNT FIFTY-ONE**  
20 **(Fraud in the Sale of a Security)**

21 For a further and separate cause of action, being a different offense from but connected in  
22 its commission as the charges set forth above: On or about October 4, 2011, at and in the County  
23 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
24 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
25 offer or sell a security to a person or persons by means of a written or oral communication that  
26 included an untrue statement of a material fact or omitted to state a material fact necessary to  
27 make the statement made, in light of the circumstances under which the statement was made, not  
28 misleading, to wit: a \$8,000 investment from Ann Simpson in Reimers Financial Services.

1                                   **COUNT FIFTY-TWO**  
2                                   **(Fraud in the Sale of a Security)**

3           For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about July 16, 2012, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$10,000 investment from Ann Simpson in Reimers Financial Services.

11                                   **COUNT FIFTY-THREE**  
12                                   **(Fraud in the Sale of a Security)**

13           For a further and separate cause of action, being a different offense from but connected in  
14 its commission as the charges set forth above: On or about May 8, 2013, at and in the County of  
15 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
16 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
17 offer or sell a security to a person or persons by means of a written or oral communication that  
18 included an untrue statement of a material fact or omitted to state a material fact necessary to  
19 make the statement made, in light of the circumstances under which the statement was made, not  
20 misleading, to wit: a \$10,000 investment from Ann Simpson in Reimers Financial Services.

21                                   **COUNT FIFTY-FOUR**  
22                                   **(Fraud in the Sale of a Security)**

23           For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth above: On or about September 8, 2014, at and in the  
25 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
26 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
27 California, offer or sell a security to a person or persons by means of a written or oral  
28 communication that included an untrue statement of a material fact or omitted to state a material

1 fact necessary to make the statement made, in light of the circumstances under which the  
2 statement was made, not misleading, to wit: a \$140,000 investment from Ann Simpson in  
3 Reimers Financial Services.

4 **COUNT FIFTY-FIVE**  
5 **(Fraud in the Sale of a Security)**

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth above: On or about June 19, 2015, at and in the County of  
8 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
9 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
10 offer or sell a security to a person or persons by means of a written or oral communication that  
11 included an untrue statement of a material fact or omitted to state a material fact necessary to  
12 make the statement made, in light of the circumstances under which the statement was made, not  
13 misleading, to wit: a \$1,000 investment from Ann Simpson in Reimers Financial Services.

14 **COUNT FIFTY-SIX**  
15 **(Fraud in the Sale of a Security)**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth above: On or about September 7, 2016, at and in the  
18 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
19 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
20 California, offer or sell a security to a person or persons by means of a written or oral  
21 communication that included an untrue statement of a material fact or omitted to state a material  
22 fact necessary to make the statement made, in light of the circumstances under which the  
23 statement was made, not misleading, to wit: a \$10,000 investment from Ann Simpson in Reimers  
24 Financial Services.

25 **COUNT FIFTY-SEVEN**  
26 **(Fraud in the Sale of a Security)**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth above: On or about March 27, 2017, at and in the County

1 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
2 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
3 offer or sell a security to a person or persons by means of a written or oral communication that  
4 included an untrue statement of a material fact or omitted to state a material fact necessary to  
5 make the statement made, in light of the circumstances under which the statement was made, not  
6 misleading, to wit: a \$99,472.06 investment from Ann Simpson in Reimers Financial Services.

7 **COUNT FIFTY-EIGHT**  
8 **(Elder Abuse)**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission as the charges set forth above: Between September 2014 to March 2017, at and in  
11 the County of El Dorado, State of California, defendant, DAVID REIMERS, in violation of  
12 California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,  
13 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
14 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
15 known that said person was an elder adult, to wit: \$250,472.06 from Ann Simpson.

16 **COUNT FIFTY-NINE**  
17 **(Grand Theft)**

18 For a further and separate cause of action, being a different offense from but connected in  
19 its commission as the charges set forth above: Between September 2011 to March 2017, at and in  
20 the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal  
21 Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
22 exceeding nine hundred and fifty dollars (\$950), to wit: \$280,972.06 belonging to Ann Simpson.

23 **COUNT SIXTY**  
24 **(Fraud in the Sale of a Security)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about April 26, 2011, at and in the County  
27 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
28 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,

1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$5,000 investment from David and Kimberly Traversi in Reimers Financial  
5 Services.

6 **COUNT SIXTY-ONE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about April 26, 2011, at and in the County  
10 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$5,000 investment from David and Kimberly Traversi in Reimers Financial  
16 Services.

17 **COUNT SIXTY-TWO**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about May 4, 2011, at and in the County of  
21 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$2,500 investment from David and Kimberly Traversi in Reimers Financial  
27 Services.

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1 California, offer or sell a security to a person or persons by means of a written or oral  
2 communication that included an untrue statement of a material fact or omitted to state a material  
3 fact necessary to make the statement made, in light of the circumstances under which the  
4 statement was made, not misleading, to wit: a \$5,000 investment from David and Kimberly  
5 Traversi in Reimers Financial Services.

6 **COUNT SIXTY-SIX**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about April 9, 2012, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$25,000 investment from David and Kimberly Traversi in Reimers Financial  
16 Services.

17 **COUNT SIXTY-SEVEN**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about July 23, 2012, at and in the County of  
21 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$100,000 investment from David and Kimberly Traversi in Reimers  
27 Financial Services.

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1                                   **COUNT SIXTY-EIGHT**  
2                                   **(Fraud in the Sale of a Security)**

3           For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about December 28, 2012, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$50,000 investment from David and Kimberly  
11 Traversi in Reimers Financial Services.

12                                   **COUNT SIXTY-NINE**  
13                                   **(Fraud in the Sale of a Security)**

14           For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about December 28, 2012, at and in the  
16 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
17 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
18 California, offer or sell a security to a person or persons by means of a written or oral  
19 communication that included an untrue statement of a material fact or omitted to state a material  
20 fact necessary to make the statement made, in light of the circumstances under which the  
21 statement was made, not misleading, to wit: a \$50,000 investment from David and Kimberly  
22 Traversi in Reimers Financial Services.

23                                   **COUNT SEVENTY**  
24                                   **(Fraud in the Sale of a Security)**

25           For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about July 11, 2013, at and in the County of  
27 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
28 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,

1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$25,000 investment from David and Kimberly Traversi in Reimers Financial  
5 Services.

6 **COUNT SEVENTY-ONE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about August 15, 2013, at and in the County  
10 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$25,000 investment from David and Kimberly Traversi in Reimers Financial  
16 Services.

17 **COUNT SEVENTY-TWO**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about August 15, 2013, at and in the County  
21 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$100,000 investment from David and Kimberly Traversi in Reimers  
27 Financial Services.

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1 **COUNT SEVENTY-THREE**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about December 9, 2013, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$50,000 investment from David and Kimberly  
11 Traversi in Reimers Financial Services.

12 **COUNT SEVENTY-FOUR**  
13 **(Fraud in the Sale of a Security)**

14 For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about March 24, 2014, at and in the County  
16 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
17 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
18 offer or sell a security to a person or persons by means of a written or oral communication that  
19 included an untrue statement of a material fact or omitted to state a material fact necessary to  
20 make the statement made, in light of the circumstances under which the statement was made, not  
21 misleading, to wit: a \$10,000 investment from David and Kimberly Traversi in Reimers Financial  
22 Services.

23 **COUNT SEVENTY-FIVE**  
24 **(Fraud in the Sale of a Security)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about June 23, 2014, at and in the County of  
27 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
28 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,

1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$10,000 investment from David and Kimberly Traversi in Reimers Financial  
5 Services.

6 **COUNT SEVENTY-SIX**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about August 21, 2014, at and in the County  
10 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$40,000 investment from David and Kimberly Traversi in Reimers Financial  
16 Services.

17 **COUNT SEVENTY-SEVEN**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about March 18, 2015, at and in the County  
21 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$40,000 investment from David and Kimberly Traversi in Reimers Financial  
27 Services.

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1 **COUNT SEVENTY-EIGHT**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about June 30, 2015, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$30,000 investment from David and Kimberly Traversi in Reimers Financial  
11 Services.

12 **COUNT SEVENTY-NINE**  
13 **(Fraud in the Sale of a Security)**

14 For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about September 2, 2015, at and in the  
16 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
17 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
18 California, offer or sell a security to a person or persons by means of a written or oral  
19 communication that included an untrue statement of a material fact or omitted to state a material  
20 fact necessary to make the statement made, in light of the circumstances under which the  
21 statement was made, not misleading, to wit: a \$16,000 investment from David and Kimberly  
22 Traversi in Reimers Financial Services.

23 **COUNT EIGHTY**  
24 **(Fraud in the Sale of a Security)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about April 29, 2016, at and in the County  
27 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
28 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,

1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$30,000 investment from David and Kimberly Traversi in Reimers Financial  
5 Services.

6 **COUNT EIGHTY-ONE**  
7 **(Grand Theft)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: Between April 2011 to April 2016, at and in the  
10 County of El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal  
11 Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
12 exceeding nine hundred and fifty dollars (\$950), to wit: \$626,000 belonging to David and  
13 Kimberly Traversi.

14 **COUNT EIGHTY-TWO**  
15 **(Fraud in the Sale of a Security)**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth above: On or about July 16, 2009, at and in the County of  
18 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
19 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
20 offer or sell a security to a person or persons by means of a written or oral communication that  
21 included an untrue statement of a material fact or omitted to state a material fact necessary to  
22 make the statement made, in light of the circumstances under which the statement was made, not  
23 misleading, to wit: a \$126,000 investment from Alberta Van Der Mik in Reimers Financial  
24 Services.

25 **COUNT EIGHTY-THREE**  
26 **(Fraud in the Sale of a Security)**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth above: On or about September 13, 2010, at and in the



1 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
2 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
3 California, offer or sell a security to a person or persons by means of a written or oral  
4 communication that included an untrue statement of a material fact or omitted to state a material  
5 fact necessary to make the statement made, in light of the circumstances under which the  
6 statement was made, not misleading, to wit: a \$5,000 investment from Alberta Van Der Mik in  
7 Reimers Financial Services.

8 **COUNT EIGHTY-FOUR**  
9 **(Fraud in the Sale of a Security)**

10 For a further and separate cause of action, being a different offense from but connected in  
11 its commission as the charges set forth above: On or about January 12, 2011, at and in the  
12 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
13 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
14 California, offer or sell a security to a person or persons by means of a written or oral  
15 communication that included an untrue statement of a material fact or omitted to state a material  
16 fact necessary to make the statement made, in light of the circumstances under which the  
17 statement was made, not misleading, to wit: a \$10,000 investment from Alberta Van Der Mik in  
18 Reimers Financial Services.

19 **COUNT EIGHTY-FIVE**  
20 **(Fraud in the Sale of a Security)**

21 For a further and separate cause of action, being a different offense from but connected in  
22 its commission as the charges set forth above: On or about February 8, 2011, at and in the  
23 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
24 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
25 California, offer or sell a security to a person or persons by means of a written or oral  
26 communication that included an untrue statement of a material fact or omitted to state a material  
27 fact necessary to make the statement made, in light of the circumstances under which the  
28

1 statement was made, not misleading, to wit: a \$5,000 investment from Alberta Van Der Mik in  
2 Reimers Financial Services.

3 **COUNT EIGHTY-SIX**  
4 **(Fraud in the Sale of a Security)**

5 For a further and separate cause of action, being a different offense from but connected in  
6 its commission as the charges set forth above: On or about March 11, 2011, at and in the County  
7 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
8 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
9 offer or sell a security to a person or persons by means of a written or oral communication that  
10 included an untrue statement of a material fact or omitted to state a material fact necessary to  
11 make the statement made, in light of the circumstances under which the statement was made, not  
12 misleading, to wit: a \$25,000 investment from Alberta Van Der Mik in Reimers Financial  
13 Services.

14 **COUNT EIGHTY-SEVEN**  
15 **(Fraud in the Sale of a Security)**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth above: On or about April 26, 2011, at and in the County  
18 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
19 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
20 offer or sell a security to a person or persons by means of a written or oral communication that  
21 included an untrue statement of a material fact or omitted to state a material fact necessary to  
22 make the statement made, in light of the circumstances under which the statement was made, not  
23 misleading, to wit: a \$2,500 investment from Alberta Van Der Mik in Reimers Financial Services.

24 **COUNT EIGHTY-EIGHT**  
25 **(Fraud in the Sale of a Security)**

26 For a further and separate cause of action, being a different offense from but connected in  
27 its commission as the charges set forth above: On or about June 23, 2011, at and in the County of  
28 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in

1 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
2 offer or sell a security to a person or persons by means of a written or oral communication that  
3 included an untrue statement of a material fact or omitted to state a material fact necessary to  
4 make the statement made, in light of the circumstances under which the statement was made, not  
5 misleading, to wit: a \$5,000 investment from Alberta Van Der Mik in Reimers Financial Services.

6 **COUNT EIGHTY-NINE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about June 23, 2011, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$12,500 investment from Alberta Van Der Mik in Reimers Financial  
16 Services.

17 **COUNT NINETY**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about September 26, 2011, at and in the  
21 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
22 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
23 California, offer or sell a security to a person or persons by means of a written or oral  
24 communication that included an untrue statement of a material fact or omitted to state a material  
25 fact necessary to make the statement made, in light of the circumstances under which the  
26 statement was made, not misleading, to wit: a \$2,500 investment from Alberta Van Der Mik in  
27 Reimers Financial Services.

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1                                   **COUNT NINETY-ONE**  
2                                   **(Fraud in the Sale of a Security)**

3           For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about November 1, 2011, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$5,000 investment from Alberta Van Der Mik in  
11 Reimers Financial Services.

12                                   **COUNT NINETY-TWO**  
13                                   **(Fraud in the Sale of a Security)**

14           For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about November 16, 2011, at and in the  
16 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
17 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
18 California, offer or sell a security to a person or persons by means of a written or oral  
19 communication that included an untrue statement of a material fact or omitted to state a material  
20 fact necessary to make the statement made, in light of the circumstances under which the  
21 statement was made, not misleading, to wit: a \$25,000 investment from Alberta Van Der Mik in  
22 Reimers Financial Services.

23                                   **COUNT NINETY-THREE**  
24                                   **(Fraud in the Sale of a Security)**

25           For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about November 16, 2011, at and in the  
27 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
28 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of

1 California, offer or sell a security to a person or persons by means of a written or oral  
2 communication that included an untrue statement of a material fact or omitted to state a material  
3 fact necessary to make the statement made, in light of the circumstances under which the  
4 statement was made, not misleading, to wit: a \$5,000 investment from Alberta Van Der Mik in  
5 Reimers Financial Services.

6 **COUNT NINETY-FOUR**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about December 27, 2011, at and in the  
10 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
11 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
12 California, offer or sell a security to a person or persons by means of a written or oral  
13 communication that included an untrue statement of a material fact or omitted to state a material  
14 fact necessary to make the statement made, in light of the circumstances under which the  
15 statement was made, not misleading, to wit: a \$15,000 investment from Alberta Van Der Mik in  
16 Reimers Financial Services.

17 **COUNT NINETY-FIVE**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about January 26, 2012, at and in the  
21 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
22 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
23 California, offer or sell a security to a person or persons by means of a written or oral  
24 communication that included an untrue statement of a material fact or omitted to state a material  
25 fact necessary to make the statement made, in light of the circumstances under which the  
26 statement was made, not misleading, to wit: a \$20,000 investment from Alberta Van Der Mik in  
27 Reimers Financial Services.

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1                                   **COUNT NINETY-SIX**  
2                                   **(Fraud in the Sale of a Security)**

3           For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about February 29, 2012, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$20,000 investment from Alberta Van Der Mik in  
11 Reimers Financial Services.

12                                   **COUNT NINETY-SEVEN**  
13                                   **(Fraud in the Sale of a Security)**

14           For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about June 19, 2012, at and in the County of  
16 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
17 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
18 offer or sell a security to a person or persons by means of a written or oral communication that  
19 included an untrue statement of a material fact or omitted to state a material fact necessary to  
20 make the statement made, in light of the circumstances under which the statement was made, not  
21 misleading, to wit: a \$43,862 investment from Alberta Van Der Mik in Reimers Financial  
22 Services.

23                                   **COUNT NINETY-EIGHT**  
24                                   **(Fraud in the Sale of a Security)**

25           For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: On or about June 19, 2012, at and in the County of  
27 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
28 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,

1 offer or sell a security to a person or persons by means of a written or oral communication that  
2 included an untrue statement of a material fact or omitted to state a material fact necessary to  
3 make the statement made, in light of the circumstances under which the statement was made, not  
4 misleading, to wit: a \$23,500 investment from Alberta Van Der Mik in Reimers Financial  
5 Services.

6 **COUNT NINETY-NINE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about May 22, 2013, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$40,000 investment from Alberta Van Der Mik in Reimers Financial  
16 Services.

17 **COUNT ONE HUNDRED**  
18 **(Fraud in the Sale of a Security)**

19 For a further and separate cause of action, being a different offense from but connected in  
20 its commission as the charges set forth above: On or about April 30, 2014, at and in the County  
21 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
22 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
23 offer or sell a security to a person or persons by means of a written or oral communication that  
24 included an untrue statement of a material fact or omitted to state a material fact necessary to  
25 make the statement made, in light of the circumstances under which the statement was made, not  
26 misleading, to wit: a \$10,000 investment from Alberta Van Der Mik in Reimers Financial  
27 Services.

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1 **COUNT ONE HUNDRED-ONE**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about May 25, 2014, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$20,000 investment from Alberta Van Der Mik in Reimers Financial  
11 Services.

12 **COUNT ONE HUNDRED-TWO**  
13 **(Fraud in the Sale of a Security)**

14 For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about September 29, 2015, at and in the  
16 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
17 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
18 California, offer or sell a security to a person or persons by means of a written or oral  
19 communication that included an untrue statement of a material fact or omitted to state a material  
20 fact necessary to make the statement made, in light of the circumstances under which the  
21 statement was made, not misleading, to wit: a \$16,000 investment from Alberta Van Der Mik in  
22 Reimers Financial Services.

23 **COUNT ONE HUNDRED-THREE**  
24 **(Elder Abuse)**

25 For a further and separate cause of action, being a different offense from but connected in  
26 its commission as the charges set forth above: Between January 2009 and August 2016, at and in  
27 the County of El Dorado, State of California, defendant, DAVID REIMERS, in violation of  
28 California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,



1 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
2 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
3 known that said person was an elder adult, to wit: \$436,862 from Alberta Van Der Mik.

4 **COUNT ONE HUNDRED-FOUR**  
5 **(First Burglary Residential Burglary with a Person Present)**

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth above: Between January 2009 and August 2016, at and in  
8 the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
9 California Penal Code section 459, a felony, committed First Degree Residential Burglary with a  
10 person present, in that said defendant did willfully and unlawfully enter an inhabited dwelling  
11 house and trailer coach and inhabited portion of a building occupied by another person, other than  
12 an accomplice, with the intent to commit larceny and any felony to wit: entered the home of  
13 Alberta Van Der Mik to commit securities fraud, elder abuse, and grand theft.

14 NOTICE: It is further alleged that the above offense is a violation of Penal Code section  
15 462 (a). It is further alleged that the above offense is a violent felony within the meaning of Penal  
16 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
17 during the commission of the above offense.

18 **COUNT ONE HUNDRED-FIVE**  
19 **(Grand Theft)**

20 For a further and separate cause of action, being a different offense from but connected in  
21 its commission as the charges set forth above: Between January 2009 and August 2016, at and in  
22 the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal  
23 Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
24 exceeding nine hundred and fifty dollars (\$950), to wit: \$436,862 belonging to Alberta Van Der  
25 Mik.

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1 **COUNT ONE HUNDRED-SIX**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about June 4, 2013, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$10,000 investment from Paul and Joanne Wurschmidt in Reimers Financial  
11 Services.

12 **COUNT ONE HUNDRED-SEVEN**  
13 **(Elder Abuse)**

14 For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about June 4, 2013, at and in the County of  
16 El Dorado, State of California, defendant, DAVID REIMERS, in violation of California Penal  
17 Code section 368 (d), a felony, did willfully and unlawfully commit theft, embezzlement, or  
18 fraud, with respect to the property of an elder adult, said property, moneys taken and obtained  
19 having a value exceeding \$950, when he knew or reasonably should have known that said person  
20 was an elder adult, to wit: \$10,000 from Paul and Joanne Wurschmidt.

21 **COUNT ONE HUNDRED-EIGHT**  
22 **(First Burglary Residential Burglary with a Person Present)**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth above: On or about June 4, 2013, at and in the County of  
25 El Dorado, State of California, defendant DAVID REIMERS, in violation of California Penal  
26 Code section 459, a felony, committed First Degree Residential Burglary with a person present, in  
27 that said defendant did willfully and unlawfully enter an inhabited dwelling house and trailer  
28 coach and inhabited portion of a building occupied by another person, other than an accomplice,

1 with the intent to commit larceny and any felony to wit: entered the home of Paul and Joanne  
2 Wurschmidt to commit securities fraud, elder abuse, and grand theft.

3 NOTICE: It is further alleged that the above offense is a violation of Penal Code section  
4 462 (a). It is further alleged that the above offense is a violent felony within the meaning of Penal  
5 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
6 during the commission of the above offense.

7 **COUNT ONE HUNDRED-NINE**  
8 **(Grand Theft)**

9 For a further and separate cause of action, being a different offense from but connected in  
10 its commission as the charges set forth above: On or about June 4, 2013, at and in the County of  
11 El Dorado, State of California, defendant DAVID REIMERS, in violation of Penal Code section  
12 487(a), a felony, willfully and unlawfully took personal property of a value exceeding nine  
13 hundred and fifty dollars (\$950), to wit: \$10,000 belonging to Paul and Joanne Wurschmidt.

14 **COUNT ONE HUNDRED-TEN**  
15 **(Fraud in the Sale of a Security)**

16 For a further and separate cause of action, being a different offense from but connected in  
17 its commission as the charges set forth above: On or about May 19, 2011, at and in the County of  
18 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
19 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
20 offer or sell a security to a person or persons by means of a written or oral communication that  
21 included an untrue statement of a material fact or omitted to state a material fact necessary to  
22 make the statement made, in light of the circumstances under which the statement was made, not  
23 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

24 **COUNT ONE HUNDRED-ELEVEN**  
25 **(Fraud in the Sale of a Security)**

26 For a further and separate cause of action, being a different offense from but connected in  
27 its commission as the charges set forth above: On or about May 31, 2011, at and in the County of  
28 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in

1 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
2 offer or sell a security to a person or persons by means of a written or oral communication that  
3 included an untrue statement of a material fact or omitted to state a material fact necessary to  
4 make the statement made, in light of the circumstances under which the statement was made, not  
5 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

6 **COUNT COUNT ONE HUNDRED-TWELVE**  
7 **(Fraud in the Sale of a Security)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or about June 8, 2011, at and in the County of  
10 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
11 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
12 offer or sell a security to a person or persons by means of a written or oral communication that  
13 included an untrue statement of a material fact or omitted to state a material fact necessary to  
14 make the statement made, in light of the circumstances under which the statement was made, not  
15 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

16 **COUNT ONE HUNDRED-THIRTEEN**  
17 **(Fraud in the Sale of a Security)**

18 For a further and separate cause of action, being a different offense from but connected in  
19 its commission as the charges set forth above: On or about July 13, 2011, at and in the County of  
20 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
21 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
22 offer or sell a security to a person or persons by means of a written or oral communication that  
23 included an untrue statement of a material fact or omitted to state a material fact necessary to  
24 make the statement made, in light of the circumstances under which the statement was made, not  
25 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

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1 **COUNT ONE FOURTEEN**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about July 19, 2011, at and in the County of  
5 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
6 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
7 offer or sell a security to a person or persons by means of a written or oral communication that  
8 included an untrue statement of a material fact or omitted to state a material fact necessary to  
9 make the statement made, in light of the circumstances under which the statement was made, not  
10 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

11 **COUNT ONE HUNDRED FIFTEEN**  
12 **(Fraud in the Sale of a Security)**

13 For a further and separate cause of action, being a different offense from but connected in  
14 its commission as the charges set forth above: On or about August 19, 2011, at and in the County  
15 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
16 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
17 offer or sell a security to a person or persons by means of a written or oral communication that  
18 included an untrue statement of a material fact or omitted to state a material fact necessary to  
19 make the statement made, in light of the circumstances under which the statement was made, not  
20 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

21 **COUNT ONE HUNDRED SIXTEEN**  
22 **(Fraud in the Sale of a Security)**

23 For a further and separate cause of action, being a different offense from but connected in  
24 its commission as the charges set forth above: On or about September 7, 2011, at and in the  
25 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
26 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
27 California, offer or sell a security to a person or persons by means of a written or oral  
28 communication that included an untrue statement of a material fact or omitted to state a material

1 fact necessary to make the statement made, in light of the circumstances under which the  
2 statement was made, not misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers  
3 Financial Services.

4 **COUNT ONE HUNDRED SEVENTEEN**  
5 **(Fraud in the Sale of a Security)**

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth above: On or about September 22, 2015, at and in the  
8 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
9 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
10 California, offer or sell a security to a person or persons by means of a written or oral  
11 communication that included an untrue statement of a material fact or omitted to state a material  
12 fact necessary to make the statement made, in light of the circumstances under which the  
13 statement was made, not misleading, to wit: a \$2,000 investment from Shirley Wilson in Reimers  
14 Financial Services.

15 **COUNT ONE HUNDRED EIGHTEEN**  
16 **(Fraud in the Sale of a Security)**

17 For a further and separate cause of action, being a different offense from but connected in  
18 its commission as the charges set forth above: On or about October 26, 2015, at and in the  
19 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
20 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
21 California, offer or sell a security to a person or persons by means of a written or oral  
22 communication that included an untrue statement of a material fact or omitted to state a material  
23 fact necessary to make the statement made, in light of the circumstances under which the  
24 statement was made, not misleading, to wit: a \$2,000 investment from Shirley Wilson in Reimers  
25 Financial Services.

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1 **COUNT ONE HUNDRED NINETEEN**  
2 **(Fraud in the Sale of a Security)**

3 For a further and separate cause of action, being a different offense from but connected in  
4 its commission as the charges set forth above: On or about October 30, 2015, at and in the  
5 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
6 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
7 California, offer or sell a security to a person or persons by means of a written or oral  
8 communication that included an untrue statement of a material fact or omitted to state a material  
9 fact necessary to make the statement made, in light of the circumstances under which the  
10 statement was made, not misleading, to wit: a \$10,000 investment from Shirley Wilson in  
11 Reimers Financial Services.

12 **COUNT ONE HUNDRED TWENTY**  
13 **(Fraud in the Sale of a Security)**

14 For a further and separate cause of action, being a different offense from but connected in  
15 its commission as the charges set forth above: On or about May 2, 2017, at and in the County of  
16 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
17 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
18 offer or sell a security to a person or persons by means of a written or oral communication that  
19 included an untrue statement of a material fact or omitted to state a material fact necessary to  
20 make the statement made, in light of the circumstances under which the statement was made, not  
21 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

22 **COUNT ONE HUNDRED TWENTY-ONE**  
23 **(Fraud in the Sale of a Security)**

24 For a further and separate cause of action, being a different offense from but connected in  
25 its commission as the charges set forth above: On or about July 3, 2017, at and in the County of  
26 El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
27 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
28 offer or sell a security to a person or persons by means of a written or oral communication that

1 included an untrue statement of a material fact or omitted to state a material fact necessary to  
2 make the statement made, in light of the circumstances under which the statement was made, not  
3 misleading, to wit: a \$5,000 investment from Shirley Wilson in Reimers Financial Services.

4 **COUNT ONE HUNDRED TWENTY-TWO**  
5 **(Fraud in the Sale of a Security)**

6 For a further and separate cause of action, being a different offense from but connected in  
7 its commission as the charges set forth above: On or about September 29, 2017, at and in the  
8 County of El Dorado, State of California, defendant DAVID REIMERS, did willfully and  
9 unlawfully, in violation of sections 25401 and 25540(b) of the Corporations Code of the State of  
10 California, offer or sell a security to a person or persons by means of a written or oral  
11 communication that included an untrue statement of a material fact or omitted to state a material  
12 fact necessary to make the statement made, in light of the circumstances under which the  
13 statement was made, not misleading, to wit: a \$2,500 investment from Shirley Wilson in Reimers  
14 Financial Services.

15 **COUNT ONE HUNDRED TWENTY-THREE**  
16 **(Fraud in the Sale of a Security)**

17 For a further and separate cause of action, being a different offense from but connected in  
18 its commission as the charges set forth above: On or about January 8, 2018, at and in the County  
19 of El Dorado, State of California, defendant DAVID REIMERS, did willfully and unlawfully, in  
20 violation of sections 25401 and 25540(b) of the Corporations Code of the State of California,  
21 offer or sell a security to a person or persons by means of a written or oral communication that  
22 included an untrue statement of a material fact or omitted to state a material fact necessary to  
23 make the statement made, in light of the circumstances under which the statement was made, not  
24 misleading, to wit: a \$3,000 investment from Shirley Wilson in Reimers Financial Services.

25 **COUNT ONE HUNDRED TWENTY-FOUR**  
26 **(Elder Abuse)**

27 For a further and separate cause of action, being a different offense from but connected in  
28 its commission as the charges set forth above: On or between May 2011 through January 2018, at



1 and in the County of El Dorado, State of California, defendant, DAVID REIMERS, in violation  
2 of California Penal Code section 368 (d), a felony, did willfully and unlawfully commit theft,  
3 embezzlement, or fraud, with respect to the property of an elder adult, said property, moneys  
4 taken and obtained having a value exceeding \$950, when he knew or reasonably should have  
5 known that said person was an elder adult, to wit: \$64,500 from Shirley Wilson.

6 **COUNT ONE HUNDRED TWENTY-FIVE**  
7 **(First Burglary Residential Burglary with a Person Present)**

8 For a further and separate cause of action, being a different offense from but connected in  
9 its commission as the charges set forth above: On or between May 2011 through January 2018, at  
10 and in the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
11 California Penal Code section 459, a felony, committed First Degree Residential Burglary with a  
12 person present, in that said defendant did willfully and unlawfully enter an inhabited dwelling  
13 house and trailer coach and inhabited portion of a building occupied by another person, other than  
14 an accomplice, with the intent to commit larceny and any felony to wit: entered the home of  
15 Shirley Wilson to commit securities fraud, elder abuse, and grand theft.

16 NOTICE: It is further alleged that the above offense is a violation of Penal Code section  
17 462 (a). It is further alleged that the above offense is a violent felony within the meaning of Penal  
18 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
19 during the commission of the above offense.

20 **COUNT ONE HUNDRED TWENTY-SIX**  
21 **(Grand Theft)**

22 For a further and separate cause of action, being a different offense from but connected in its  
23 commission as the charges set forth above: On or between May 2011 through January 2018, at  
24 and in the County of El Dorado, State of California, defendant DAVID REIMERS, in violation of  
25 Penal Code section 487(a), a felony, willfully and unlawfully took personal property of a value  
26 exceeding nine hundred and fifty dollars (\$950), to wit: \$64,500 belonging to Shirley Wilson.

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Pursuant to Penal Code Section 1054.5, subdivision (b), the People of the State of California hereby informally request that defense counsel provide to the People of the State of California all discovery as required by Penal Code Section 1054.3.

**DECLARATION**

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

Dated: June 12, 2018

XAVIER BECERRA  
Attorney General of California



RANDY M. MAILMAN  
Deputy Attorney General  
*Attorneys for People*