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11
 12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 13 COUNTY OF LOS ANGELES

14
 15 **PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. BA453003

16 Plaintiff,

17 v.

**FIRST AMENDED FELONY
 COMPLAINT FOR ARREST
 WARRANT**

18 **RAMIL ABALKHAD aka Randy Abalkhad**
 19 **(DOB: 8/23/1963); MELINA ABALKHAD aka**
Melina Nazarian (DOB: 9/14/1974); and RAMIRO
 20 **SALINAS aka Steve Reyes (DOB: 1/18/1966)**

21 Defendants.

22 The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants RAMIL
 23 ABALKHAD and MELINA ABALKHAD of the following crimes, which are connected to one
 24 another in their commission:

25 **COUNT 1 – GRAND THEFT**

26 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD, unlawfully
 27 took property, to wit: money paid on returned check numbers 88521-88528 and 707462-707464
 drawn on accounts held by Romanos Jewelers Services, Inc. at Open Bank and made payable to
 Branden & Co., Inc. of a value in excess of nine-hundred-fifty dollars (\$950) from another, to wit:
 First Bank, in violation of Penal Code section 487, subdivision (a), a felony.

1 **COUNT 2 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

2 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
3 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
4 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
5 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
6 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
7 outstanding, in full upon its presentation, to wit: Check number 85521 drawn by Romanos
8 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
9 of Penal Code section 476a, a felony.

7 **COUNT 3 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

8 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
9 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
10 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
11 (\$950), knowing that the corporation had insufficient funds or credit for the payment of that
12 check, draft, or order and all other checks, drafts, or orders upon funds then outstanding, in full
13 upon its presentation, to wit: Check number 85522 drawn by Romanos Jewelers Services, Inc., on
14 December 3, 2014, made payable to Branden & Co., Inc., in violation of Penal Code section 476a,
15 a felony.

12 **COUNT 4 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

13 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
14 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
15 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
16 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
17 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
18 outstanding, in full upon its presentation, to wit: Check number 85523 drawn by Romanos
19 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
20 of Penal Code section 476a, a felony.

18 **COUNT 5 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

19 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
20 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
21 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
22 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
23 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
24 outstanding, in full upon its presentation, to wit: Check number 85524 drawn by Romanos
25 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
26 of Penal Code section 476a, a felony.

24 **COUNT 6 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

25 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
26 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
27 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
28 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
outstanding, in full upon its presentation, to wit: Check number 85525 drawn by Romanos

1 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
2 of Penal Code section 476a, a felony.

3 **COUNT 7 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

4 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
5 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
6 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
7 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
8 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
9 outstanding, in full upon its presentation, to wit: Check number 85526 drawn by Romanos
10 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
11 of Penal Code section 476a, a felony.

12 **COUNT 8 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

13 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
14 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
15 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
16 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
17 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
18 outstanding, in full upon its presentation, to wit: Check number 85527 drawn by Romanos
19 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
20 of Penal Code section 476a, a felony.

21 **COUNT 9 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

22 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
23 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
24 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
25 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
26 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
27 outstanding, in full upon its presentation, to wit: Check number 85528 drawn by Romanos
28 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
of Penal Code section 476a, a felony.

COUNT 10 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950

On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
(\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
outstanding, in full upon its presentation, to wit: Check number 707462 drawn by Romanos
Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
of Penal Code section 476a, a felony.

COUNT 11 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950

On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
(\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the

1 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
2 outstanding, in full upon its presentation, to wit: Check number 707463 drawn by Romanos
3 Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
of Penal Code section 476a, a felony.

4 **COUNT 12 – PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950**

5 On or about December 3, 2014, in the County of Los Angeles, RAMIL ABALKHAD willfully,
6 with intent to defraud, made, drew, uttered and/or delivered the following check upon a bank, to
7 wit: First Bank, for the payment of money in an amount exceeding nine hundred fifty dollars
8 (\$950), knowing that the maker, drawer or corporation had insufficient funds or credit for the
9 payment of that check, draft, or order and all other checks, drafts, or orders upon funds then
outstanding, in full upon its presentation, to wit: Check number 707464 drawn by Romanos
Jewelers Services, Inc., on December 3, 2014, made payable to Branden & Co., Inc., in violation
of Penal Code section 476a, a felony.

10 **COUNT 13 – CONSPIRACY (UNLAWFUL CONSUMER FINANCING)**

11 Between on and about March 3, 2013, and October 4, 2014, in the county of Los Angeles,
12 RAMIL ABALKHAD and MELINA ABALKHAD, doing business as MBNB Financial, Inc., did
13 unlawfully conspire together, and with another person or persons whose identities are known and
14 unknown, to commit a crime in violation of Penal Code section 182 subdivision (a)(1), a felony,
15 to wit: issuing retail installment accounts without providing required financing disclosures and
unlawfully assessing a finance charge, in violation of Civil Code section 1810.1, a misdemeanor
as prescribed by Civil Code section 1812.6, and that pursuant to and for the purpose of carrying
out the objectives and purposes of the aforesaid conspiracy, defendants RAMIL ABALKHAD
and MELINA ABALKHAD committed the following overt acts:

16 **Overt Act One:** Between on or about August 27, 2009, and continuing to at least October
17 4, 2014, MELINA ABALKHAD, engaged in one or more of the following acts, solely, or
18 together with RAMIL ABALKHAD, for the purpose, in part, of establishing MBNB
19 Financial, Inc. to extend credit for retail purchases made at Romano's Jewelers, which
20 included the disclosure of consumer financing terms to purchasers:

21 (a) On or about August 27, 2009, MELINA ABALKHAD, then known as Melina
22 Nazarian filed, or caused to be filed, a fictitious business name statement with the
Los Angeles County Recorder's Office stating that she is the registered owner of
MBNB Financial, Inc., a dba of Romano's Jewelers, and listed herself as the CEO
and President of MBNB Financial, Inc.

23 (b) On or about November 23, 2011, and continuing to at least October 4, 2014,
24 MELINA ABALKHAD, as the sole signatory, opened and maintained a bank
25 account ending in -1586 for MBNB Financial Inc. at Bank of America for the
26 purpose of depositing retail installment payments made to MBNB Financial, Inc.
for purchases made at Romano's Jewelers.

27 (c) From on or about October 15, 2013, and continuing to at least October 4, 2014,
28 MELINA ABALKHAD, as the sole signatory, opened and maintained a bank
account ending in -7115 for MBNB Financial Inc. at First Bank for the purpose of
receiving military allotments used by servicemembers to pay retail installment

1 payments owed to MBNB Financial, Inc. for purchases made at Romano's
2 Jewelers.

3 (d) On or about January 30, 2014, MELINA ABALKHAD filed, or caused to be
4 filed, a Statement of Information for MBNB Financial, Inc. with the California
5 Secretary of State, listing herself as the Chief Executive Officer, Chief Financial
6 Officer, and President, and RAMIL ABALKHAD as the Secretary and sole
7 Director of the company.

8 **Overt Act Two:** On or about March 2, 2013, and March 3, 2013, MELINA
9 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.,
10 directed, or caused others to direct, Romano's Jewelers employees to sell jewelry financed
11 by MBNB Financial Inc. to a servicemember, to wit: [REDACTED] without
12 providing at the time of purchase a single document for said servicemember to retain in
13 which the terms and conditions of the retail installment account were disclosed, in
14 violation of Civil Code section 1810.1.

15 **Overt Act Three:** On or about August 3, 2013; August 14, 2013; and November 7, 2013,
16 MELINA ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB
17 Financial, Inc., directed, or caused others to direct, Romano's Jewelers employees to sell
18 jewelry financed by MBNB Financial Inc. to a servicemember, to wit: [REDACTED]
19 [REDACTED] without providing at the time of purchase a single document for said
20 servicemember to retain in which the terms and conditions of the retail installment
21 account were disclosed, in violation of Civil Code section 1810.1.

22 **Overt Act Four:** On or about March 29, 2014, MELINA ABALKHAD and/or RAMIL
23 ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
24 direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
25 a servicemember, to wit: [REDACTED] without providing at the time of
26 purchase a single document for said servicemember to retain in which the terms and
27 conditions of the retail installment account were disclosed, in violation of Civil Code
28 section 1810.1.

Overt Act Five: On or about April 17, 2014, MELINA ABALKHAD and/or RAMIL
ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
a servicemember, to wit: [REDACTED] without providing at the
time of purchase a single document for said servicemember to retain in which the terms
and conditions of the retail installment account were disclosed, in violation of Civil Code
section 1810.1.

Overt Act Six: On or about May 24, 2014, MELINA ABALKHAD and/or RAMIL
ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
a servicemember, to wit: [REDACTED] without providing at the time of
purchase a single document for said servicemember to retain in which the terms and
conditions of the retail installment account were disclosed, in violation of Civil Code
section 1810.1.

1 **Overt Act Seven:** On or about June 27, 2014, MELINA ABALKHAD and/or RAMIL
2 ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
3 direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
4 a servicemember, to wit: [REDACTED] without providing at
5 the time of purchase a single document for said servicemember to retain in which the
6 terms and conditions of the retail installment account were disclosed, in violation of Civil
7 Code section 1810.1.

8 **Overt Act Eight:** On or about June 27, 2014, June 30, 2014, and July 27, 2014,
9 MELINA ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB
10 Financial, Inc., directed, or caused others to direct, Romano's Jewelers employees to sell
11 jewelry financed by MBNB Financial Inc. to a servicemember, to wit: [REDACTED]
12 [REDACTED] without providing at the time of purchase a single document for
13 said servicemember to retain in which the terms and conditions of the retail installment
14 account were disclosed, in violation of Civil Code section 1810.1.

15 **Overt Act Nine:** On or about July 3, 2014, MELINA ABALKHAD and/or RAMIL
16 ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
17 direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
18 a servicemember, to wit: [REDACTED] without providing at the
19 time of purchase a single document for said servicemember to retain in which the terms
20 and conditions of the retail installment account were disclosed, in violation of Civil Code
21 section 1810.1.

22 **Overt Act Ten:** On or about August 6, 2014, MELINA ABALKHAD and/or RAMIL
23 ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
24 direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
25 a servicemember, to wit: [REDACTED] without providing at the time of
26 purchase a single document for said servicemember to retain in which the terms and
27 conditions of the retail installment account were disclosed, in violation of Civil Code
28 section 1810.1.

Overt Act Eleven: On or about October 4, 2014, MELINA ABALKHAD and/or RAMIL
ABALKHAD doing business as MBNB Financial, Inc., directed, or caused others to
direct, Romano's Jewelers employees to sell jewelry financed by MBNB Financial Inc. to
a servicemember, to wit: [REDACTED] without providing at the time
of purchase a single document for said servicemember to retain in which the terms and
conditions of the retail installment account were disclosed, in violation of Civil Code
section 1810.1.

24 **COUNT 14 – CONSPIRACY (UNLAWFUL DEBT COLLECTION)**

25 On and between March 27, 2013, and October 9, 2014, in the county of Los Angeles, RAMIL
26 ABALKHAD, MELINA ABALKHAD, and RAMIRO SALINAS doing business as MBNB
27 Financial, Inc., did unlawfully conspire together, and with another person or persons whose
28 identities are known and unknown, to commit a crime in violation of Penal Code section 182
subdivision (a)(1), a felony, to wit: attempting to collect a consumer debt owed to MBNB
Financial Inc. by sending communications that gave the appearance of being authorized, issued,
or approved by an attorney when they were not, in violation of Civil Code section 1788.16, a

1 misdemeanor, and that pursuant to and for the purpose of carrying out the objectives and purposes
2 of the aforesaid conspiracy, defendants RAMIL ABALKHAD and/or MELINA ABALKHAD
3 committed the following overt acts:

4 **Overt Act One:** Between on or about August 27, 2009, and continuing to at least October
5 4, 2014, MELINA ABALKHAD, engaged in one or more of the following acts, solely, or
6 together with RAMIL ABALKHAD, for the purpose, in part, of establishing MBNB
7 Financial Inc, to collect consumer debt owed for purchases made at Romano's Jewelers,
8 which included the use of the name "Thomas Parker" to feign the appearance of a lawyer
9 of law firm when threatening legal action to collect past-due debt:

10 (a) On or about August 27, 2009, MELINA ABALKHAD, then known as Melina
11 Nazarian filed, or caused to be filed, a fictitious business name statement with the
12 Los Angeles County Recorder's Office stating that she is the registered owner of
13 MBNB Financial, Inc., a dba of Romano's Jewelers, and listed herself as the CEO
14 and President of MBNB Financial, Inc.

15 (b) On or about November 23, 2011, and continuing to at least October 4, 2014,
16 MELINA ABALKHAD, as the sole signatory, opened and maintained a bank
17 account ending in -1586 for MBNB Financial Inc. at Bank of America for the
18 purpose of depositing retail installment payments made to MBNB Financial, Inc.
19 for purchases made at Romano's Jewelers.

20 (c) From on or about October 15, 2013, and continuing to at least October 4, 2014,
21 MELINA ABALKHAD, as the sole signatory, opened and maintained a bank
22 account ending in -7115 for MBNB Financial Inc. at First Bank for the purpose of
23 receiving military allotments used by servicemembers to pay retail installment
24 payments owed to MBNB Financial, Inc. for purchases made at Romano's
25 Jewelers.

26 (d) On or about January 30, 2014, MELINA ABALKHAD filed, or caused to be
27 filed, a Statement of Information for MBNB Financial, Inc. with the California
28 Secretary of State, listing herself as the Chief Executive Officer, Chief Financial
Officer, and President, and RAMIL ABALKHAD as the Secretary and sole
Director of the company.

Overt Act Two: On or about May 22, 2002, RAMIL ABALKHAD, a.k.a. Randy
Abalkhad filed or caused to be filed, a fictitious business name statement with the Loan
Angeles County Recorder's Office stating he is the registered owner of "Thomas Parker
Collection Agency," located at 510 West 6th Street, Suite #900, Los Angeles, California,
with the intent of using the name to collect consumer debt.

Overt Act Three: At various times unknown through at least October 9, 2014, MELINA
ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
posted or caused to be posted a sign with the business names MBNB Financial, Inc. and
Thomas Parker on Suite #950 at 510 West 6th Street, Los Angeles, California, with the
intent of using the name "Thomas Parker" for collecting consumer debt owed to MBNB
Financial Inc.

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2 **Overt Act Four:** On and between about June 1, 2013, and October 9, 2014, MELINA
3 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
4 directed, or caused others to direct, employees of MBNB Financial Inc., including
5 RAMIRO SALINAS (aka Steve Reyes), to engage in debt collection as "Thomas Parker"
6 for the purpose of giving the false appearance that an attorney or law firm authorized,
7 issued, or approved certain communications used for collecting consumer debt owed to
8 MBNB Financial Inc., in violation of Civil Code section 1788.16.

9
10 **Overt Act Five:** On and between March 27, 2013, and October 9, 2014, MELINA
11 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
12 directed, or caused others to direct, employees of MBNB Financial Inc., including
13 RAMIRO SALINAS (aka Steve Reyes), to engage in debt collection as Thomas Parker by
14 using email accounts, including thomas.jparker950@gmail.com, for the purpose of giving
15 the false appearance that an attorney or law firm authorized, issued, or approved certain
16 communications used for collecting consumer debt owed to MBNB Financial Inc., in
17 violation of Civil Code section 1788.16.

18
19 **Overt Act Six:** On and between March 27, 2013, and February 28, 2014, MELINA
20 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
21 directed, or caused others to direct, employees of MBNB Financial Inc., including
22 Hampton Ruiz, to engage in debt collection by sending text messages giving the false
23 appearance that Thomas Parker was an attorney or law firm engaged by MBNB Financial
24 Inc. to collect consumer debt, in violation of Civil Code section 1788.16.

25
26 **Overt Act Seven:** Between on or about June 28, 2013, and March 27, 2014, MELINA
27 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
28 directed, or caused others to direct, employees of MBNB Financial, Inc. including
Hampton Ruiz, to attempt to collect on consumer debt owed by [REDACTED]
for purchases made at Romano's Jewelers by contacting her and falsely representing that
Thomas Parker, an attorney or law office, was threatening legal process, including
contacting her military command to initiate a non-judicial punishment under Article 134
of the Uniform Code of Military Justice, if the past due amounts owed to MBNB
Financial, Inc. were not paid, in violation of Civil Code section 1788.16.

Overt Act Eight: Between on or about April 1 2014, and May 30, 2014, MELINA
ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
directed, or caused others to direct, employees of MBNB Financial, Inc. to attempt to
collect on consumer debt owed by [REDACTED] for
purchases made at Romano's Jewelers by contacting him and falsely representing that an
attorney or law office, was threatening legal process, including contacting his military
command to initiate a non-judicial punishment under Article 134 of the Uniform Code of
Military Justice, if the past due amounts owed to MBNB Financial, Inc. were not paid, in
violation of Civil Code section 1788.16.

Overt Act Nine: Between on or about July 1, 2014, and July 31, 2014, MELINA
ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
directed, or caused others to direct, employees of MBNB Financial, Inc. to attempt to

1 collect on consumer debt owed by [REDACTED] for purchases made at
2 Romano's Jewelers by contacting him and falsely representing that Thomas Parker, an
3 attorney or law office, was threatening legal process, including contacting his military
4 command to initiate a non-judicial punishment under Article 134 of the Uniform Code of
Military Justice, if the past due amounts owed to MBNB Financial, Inc. were not paid, in
violation of Civil Code section 1788.16.

5 **Overt Act Ten:** Between on or about April 10, 2014, and October 1, 2014, MELINA
6 ABALKHAD and/or RAMIL ABALKHAD doing business as MBNB Financial, Inc.
7 directed, or caused others to direct, employees of MBNB Financial, Inc. to attempt to
8 collect on consumer debt owed by [REDACTED] for purchases made at
9 Romano's Jewelers by contacting him and falsely representing that an attorney or law
10 office was threatening legal process, including contacting his military command to initiate
11 a non-judicial punishment under Article 134 of the Uniform Code of Military Justice, if
12 the past due amounts owed to MBNB Financial, Inc. were not paid, in violation of Civil
13 Code section 1788.16.

14 **Overt Act Eleven:** On and between about June 1, 2013, and October 9, 2014, RAMIRO
15 SALINAS (aka Steve Reyes), engaged in debt collection for MBNB Financial Inc, by
16 contacting persons with a past due account and falsely representing that he, or another,
17 was an attorney, including use of the alias "Thomas Parker" and threatened legal process
18 when no attorney or law firm had authorized, issued, or approved such contact or
19 communication, in violation of Civil Code section 1788.16.

20 **FIRST SPECIAL ALLEGATION – EXCESSIVE TAKING**

21 It is further alleged that the property taken by defendant RAMIL ABALKHAD in the commission
22 of the felonies alleged in Counts One through Twelve above, which property defendant intended
23 to take, was of a value in excess of \$65,000, within the meaning of Penal Code section 12022.6,
24 subdivision (a)(1).

25 **SECOND SPECIAL ALLEGATION – EXCESSIVE TAKING**

26 It is further alleged that the property taken by defendant RAMIL ABALKHAD in the commission
27 of the felonies alleged in counts One through Twelve above, which property defendant intended
28 to take, was of a value in excess of \$200,000, within the meaning of Penal Code section 12022.6,
subdivision (a)(2).

THIRD SPECIAL ALLEGATION – AGGRAVATED WHITE-COLLAR CRIME

It is further alleged that RAMIL ABALKHAD committed two or more related felonies, to wit:
Counts One through Twelve, a material element of which is fraud, involving a pattern of related
felony conduct and the taking of more than \$100,000, within the meaning of Penal Code section
186.11, subdivision (a)(3).

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DECLARATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: September 28, 2017

XAVIER BECERRA
Attorney General of the State of California

By: 
ANGELA K. ROSENAU
Deputy Attorney General
Attorneys for the People

DISCOVERY

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

NOTICE TO ATTORNEY

Any material accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and showing of good cause."

Agency: Calif. Dept. of Justice I/O: Special Agent T. Donohue Phone No: 323-838-1939

DR NO: None OPERATOR: None PRELIM TIME EST: 2 days

<u>DEFENDANT</u>	<u>CII No.</u>	<u>DOB</u>	<u>BOOKING NUMBER</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RET DATE</u>
Salinas, Ramiro		01/18/1966		\$100,000	