

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,   v.  PAUL FLANAGAN, <i>dob 07/31/64;</i>  RANJIT KALSI, <i>dob 09/23/66;</i>  GREGORY LEE MARTIN, <i>dob 06/10/70;</i>  Defendants	Plaintiff,
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CT No. SCD274468

DA No. AEN121

INDICTMENT

PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
FLANAGAN, PAUL	DNA sample required upon conviction
KALSI, RANJIT	DNA sample required upon conviction
MARTIN, GREGORY LEE	DNA sample required upon conviction

The Grand Jury of the County of San Diego, State of California, accuses the Defendant(s) of committing, in the County of San Diego, State of California, before the finding of this Indictment, the following crime(s):

CHARGES

COUNT 1 - CONSPIRACY TO COMMIT A CRIME

On or about and between January 1, 2010 and December 31, 2018, PAUL FLANAGAN, RANJIT KALSI, and GREGORY LEE MARTIN did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of FORGERY, PENAL CODE SECTION 470(d), in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was for defendants Paul Flanagan, Ranjit Kalsi and Gregory Lee Martin, to defraud United States Military Personnel into signing incomplete life insurance and annuity policy applications, unlawfully obtain payments on the policies, so defendants would be paid commissions.

## CHARGES (cont'd)

OVERT ACT NO. (1): On or about and between JANUARY 1, 2010 and DECEMBER 31, 2018, PAUL FLANAGAN was a licensed insurance agent in the State of California and used deceptive tactics to sell life insurance products in San Diego County through his companies GO NAVY TAX SERVICES and NORTH STAR TAX AGENCY.

OVERT ACT NO. (2): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI was a licensed insurance agent in the State of California who used deceptive tactics to sell life insurance products in San Diego County as a sub-agent of PAUL FLANAGAN doing business as GO NAVY TAX SERVICES.

OVERT ACT NO. (3): On or about and between March 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN was a licensed insurance agent in the State of California who used deceptive tactics to sell life insurance products in San Diego County as a sub-agent of PAUL FLANAGAN doing business as GO NAVY TAX SERVICES.

OVERT ACT NO. (4): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, PAUL FLANAGAN, RANJIT KALSI and GREGORY LEE MARTIN used deceptive business practices, including falsely representing the true nature of policies sold and opening unauthorized bank accounts, to sell a combined total of approximately 4,759 life insurance and annuity policies to servicemembers.

OVERT ACT NO. (5): On or about JANUARY 14, 2010, PAUL FLANAGAN provided free income tax preparation services in Oceanside, County of San Diego, State of California, to BROCK PRICE, who was an active duty member of the United States Navy, with the intent to sell BROCK PRICE a life insurance and annuity policy.

OVERT ACT NO. (6): On or about JANUARY 14, 2010, PAUL FLANAGAN sold a life insurance policy to BROCK PRICE, knowing BROCK PRICE was an active duty member of the United States Marine Corps with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with BROCK PRICE to determine if additional life insurance was appropriate for his individual needs.

OVERT ACT NO. (7): On or about JANUARY 14, 2010, PAUL FLANAGAN, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to BROCK PRICE that a ROTH IRA would be a good investment for BROCK PRICE's individual needs.

OVERT ACT NO. (8): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company by misrepresenting that BROCK PRICE was applying for a ROTH IRA.

OVERT ACT NO. (9): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign applications for life insurance and annuity policies without providing the material terms of the policies.

OVERT ACT NO. (10): On or about JANUARY 14, 2010, PAUL FLANAGAN induced BROCK PRICE to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company, when BROCK PRICE did not have knowledge of the true nature of the transactions, including that he was signing applications for both a life insurance policy and an annuity.

## CHARGES (cont'd)

OVERT ACT NO. (11): On or about JANUARY 14, 2010, PAUL FLANAGAN with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced BROCK PRICE to sign incomplete applications that were later completed without BROCK PRICE's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving a commission.

OVERT ACT NO. (12): On or about JANUARY 14, 2010, PAUL FLANAGAN caused to be submitted to Colorado Bankers Life Insurance Company life insurance and annuity applications for BROCK PRICE that were obtained by misrepresenting the true nature of the transactions and concealing material terms regarding access to and withdrawal of funds, for the purpose of receiving commissions.

OVERT ACT NO. (13): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign an allotment form authorizing the withdrawal of money from BROCK PRICE's military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for life insurance and annuity policies.

OVERT ACT NO. (14): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI provided free income tax preparation services at the Go Navy Tax Service trailer located in San Diego, County of San Diego, State of California, to the following named persons, who were active duty members of the United States Navy, with the intent to sell said persons life insurance and annuity policies:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (15): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI sold a life insurance policy to the following named persons, knowing each said person was an active duty member of the United States Navy with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with said persons to determine if additional life insurance was appropriate for their individual needs:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (16): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to one or more of the following persons that a financial product she variably called a ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, savings plan, or similar, would be a good investment for said person's individual needs:

## CHARGES (cont'd)

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (17): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI knowingly induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company by variably misrepresenting that said persons were applying for ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, or savings plan:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (18): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI induced one or more of the following persons to sign applications for life insurance and annuity policies without providing the material terms of the policies:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (19): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company, without telling said persons the true nature of the transaction, including that he or she was signing applications for both a life insurance policy and an annuity policy:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (20): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced one or more of the following persons to sign incomplete applications that were later completed without said person's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving commissions for herself and PAUL FLANAGAN:

## CHARGES (cont'd)

Lemar Ballard, Jaylynn Brady, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Jessica Stewart, and Casey Weir.

OVERT ACT NO. (21): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI with the intent to fill in blank sections on life insurance and annuity application forms for Occidental Life Insurance Company, induced one or more of the following persons to sign the incomplete applications that were later completed without said person's knowledge and submitted to Occidental Life Insurance Company for the purpose of receiving commissions for herself and PAUL FLANAGAN:

Israel Morales Balite, Lemar Ballard, Brian Cepeda, Nicholas Siordia, and Tanner Thompson.

OVERT ACT NO. (22): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI knowingly induced one or more of the following persons to sign an allotment form authorizing the withdrawal of money from said persons military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for life insurance and annuity policies:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (23): On or about FEBRUARY 2, 2018, RANJIT KALSI knowingly submitted applications for life insurance and annuity policies to Colorado Bankers Life Insurance for JAYELIN BECKETT that were not signed or otherwise authorized by JAYELIN BECKETT.

OVERT ACT NO. (24): On or about FEBRUARY 2, 2018, RANJIT KALSI knowingly submitted an allotment form to Colorado Bankers Life Insurance for JAYELIN BECKETT for the payment of monthly insurance premiums from JAYELIN BECKETT's military pay that was not signed or otherwise authorized by JAYELIN BECKETT.

OVERT ACT NO. (25): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN provided free income tax preparation services at the Go Navy Tax Service trailer located in San Diego, County of San Diego, State of California, to the following named persons, who were active duty members of the United States Navy, with the intent to sell said persons a life insurance and annuity policy:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (26): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN sold a life insurance policy to the following named persons, knowing each said person was an active duty member of the United States Navy with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with said persons to determine if additional life insurance was appropriate for their individual needs:

## CHARGES (cont'd)

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (27): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to one or more of the following persons that a financial product he variably called a ROTH IRA, ROTH IRA savings plan or account, retirement account, or similar, would be a good investment for said person's individual needs:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (28): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN knowingly induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company by variably misrepresenting that said persons were applying for ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, or savings plan:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (29): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN induced one or more of the following persons to sign applications for a life insurance and annuity policy without providing the material terms of the policies:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (30): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN II induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company, without telling said persons the true nature of the transaction, including that he or she was signing applications for both a life insurance policy and an annuity policy:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (31): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced one or more of the following persons to sign incomplete applications that were later completed without said person's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving a commissions for himself and PAUL FLANAGAN:

## CHARGES (cont'd)

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (32): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN knowingly induced one or more of the following persons to sign an allotment form authorizing the withdrawal of money from said persons military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for a life insurance and annuity policy:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (33): On or about JANUARY 23, 2017, GREGORY LEE MARTIN knowingly submitted an application for a life insurance and annuity policy to Occidental Life Insurance for RILEY PETERSON that was not signed or otherwise authorized by RILEY PETERSON.

OVERT ACT NO. (34): JANUARY 23, 2017, GREGORY LEE MARTIN knowingly submitted an allotment form to Occidental Life Insurance for the purpose of having funds withdrawn from RILEY PETERSON's military pay that was not signed or otherwise authorized by RILEY PETERSON.

### **COUNT 2 - CONSPIRACY TO COMMIT A CRIME**

On or about and between January 1, 2010 and December 31, 2018, PAUL FLANAGAN, RANJIT KALSI, and GREGORY LEE MARTIN did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of TWISTING, INSURANCE CODE SECTION 781, in violation of PENAL CODE SECTION 182(a)(1).

Thereafter, in the County of San Diego, State of California, pursuant to the above conspiracy and in furtherance of the objects thereof:

The object of the conspiracy was for defendants Paul Flanagan, Ranjit Kalsi and Gregory Lee Martin, to defraud United States military personnel into signing misrepresented life insurance and annuity contracts and unlawfully obtain payments on the policies so defendants would be paid commissions.

OVERT ACT NO. (1): On or about and between JANUARY 1, 2010 and DECEMBER 31, 2018, PAUL FLANAGAN was a licensed insurance agent in the State of California and used deceptive tactics to sell life insurance products in San Diego County through his companies GO NAVY TAX SERVICES and NORTH STAR TAX AGENCY.

OVERT ACT NO. (2): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI was a licensed insurance agent in the State of California who used deceptive tactics to sell life insurance products in San Diego County as a sub-agent of PAUL FLANAGAN doing business as GO NAVY TAX SERVICES.

## CHARGES (cont'd)

OVERT ACT NO. (3): On or about and between March 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN was a licensed insurance agent in the State of California who used deceptive tactics to sell life insurance products in San Diego County as a sub-agent of PAUL FLANAGAN doing business as GO NAVY TAX SERVICES.

OVERT ACT NO. (4): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, PAUL FLANAGAN, RANJIT KALSI and GREGORY LEE MARTIN used deceptive business practices, including falsely representing the true nature of policies sold and opening unauthorized bank accounts, to sell a combined total of approximately 4,759 life insurance and annuity policies to servicemembers.

OVERT ACT NO. (5): On or about JANUARY 14, 2010, PAUL FLANAGAN provided free income tax preparation services in Oceanside, County of San Diego, State of California, to BROCK PRICE, who was an active duty member of the United States Navy, with the intent to sell BROCK PRICE a life insurance and annuity policy.

OVERT ACT NO. (6): On or about JANUARY 14, 2010, PAUL FLANAGAN sold a life insurance policy to BROCK PRICE, knowing BROCK PRICE was an active duty member of the United States Marine Corps with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with BROCK PRICE to determine if additional life insurance was appropriate for his individual needs.

OVERT ACT NO. (7): On or about JANUARY 14, 2010, PAUL FLANAGAN, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to BROCK PRICE that a ROTH IRA would be a good investment for BROCK PRICE's individual needs.

OVERT ACT NO. (8): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company by misrepresenting that BROCK PRICE was applying for a ROTH IRA.

OVERT ACT NO. (9): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign applications for life insurance and annuity policies without providing the material terms of the policies.

OVERT ACT NO. (10): On or about JANUARY 14, 2010, PAUL FLANAGAN induced BROCK PRICE to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company, when BROCK PRICE did not have knowledge of the true nature of the transactions, including that he was signing applications for both a life insurance policy and an annuity.

OVERT ACT NO. (11): On or about JANUARY 14, 2010, PAUL FLANAGAN with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced BROCK PRICE to sign incomplete applications that were later completed without BROCK PRICE's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving a commission.



## CHARGES (cont'd)

OVERT ACT NO. (12): On or about JANUARY 14, 2010, PAUL FLANAGAN caused to be submitted to Colorado Bankers Life Insurance Company life insurance and annuity applications for BROCK PRICE that were obtained by misrepresenting the true nature of the transactions and concealing material terms regarding access to and withdrawal of funds, for the purpose of receiving commissions.

OVERT ACT NO. (13): On or about JANUARY 14, 2010, PAUL FLANAGAN knowingly induced BROCK PRICE to sign an allotment form authorizing the withdrawal of money from BROCK PRICE's military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for life insurance and annuity policies.

OVERT ACT NO. (14): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI provided free income tax preparation services at the Go Navy Tax Service trailer located in San Diego, County of San Diego, State of California, to the following named persons, who were active duty members of the United States Navy, with the intent to sell said persons life insurance and annuity policies:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (15): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI sold a life insurance policy to the following named persons, knowing each said person was an active duty member of the United States Navy with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with said persons to determine if additional life insurance was appropriate for their individual needs:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (16): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to one or more of the following persons that a financial product she variably called a ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, savings plan, or similar, would be a good investment for said person's individual needs:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

## CHARGES (cont'd)

OVERT ACT NO. (17): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI knowingly induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company by variably misrepresenting that said persons were applying for ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, or savings plan:

Israel Morales Balite, Lemar Ballard, Jayelin Beckett, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (18): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI induced one or more of the following persons to sign applications for life insurance and annuity policies without providing the material terms of the policies:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (19): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company, without telling said persons the true nature of the transaction, including that he or she was signing applications for both a life insurance policy and an annuity policy:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (20): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced one or more of the following persons to sign incomplete applications that were later completed without said person's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving commissions for herself and PAUL FLANAGAN:

Lemar Ballard, Jaylynn Brady, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Jessica Stewart, and Casey Weir.

## CHARGES (cont'd)

OVERT ACT NO. (21): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI with the intent to fill in blank sections on life insurance and annuity application forms for Occidental Life Insurance Company, induced one or more of the following persons to sign the incomplete applications that were later completed without said person's knowledge and submitted to Occidental Life Insurance Company for the purpose of receiving commissions for herself and PAUL FLANAGAN:

Israel Morales Balite, Lemar Ballard, Brian Cepeda, Nicholas Siordia, and Tanner Thompson.

OVERT ACT NO. (22): On or about and between JANUARY 24, 2012 and DECEMBER 31, 2018, RANJIT KALSI knowingly induced one or more of the following persons to sign an allotment form authorizing the withdrawal of money from said persons military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for life insurance and annuity policies:

Israel Morales Balite, Lemar Ballard, Jaylynn Brady, Brian Cepeda, Tonya Clark, Samatha Davis, Christopher Deguzman, William Elmore, Harris Esters, Dylan Gibson, Elijah Jefferson, Marquise Kendal, Gage Kunze, Mercedes (Favors) Lockhard, Gregory Lorick, Isaac Pettis, Andrew Rodriguez, Nicholas Siordia, Jessica Stewart, Tanner Thompson, and Casey Weir.

OVERT ACT NO. (23): On or about FEBRUARY 2, 2018, RANJIT KALSI knowingly submitted applications for life insurance and annuity policies to Colorado Bankers Life Insurance for JAYELIN BECKETT that were not signed or otherwise authorized by JAYELIN BECKETT.

OVERT ACT NO. (24): On or about FEBRUARY 2, 2018, RANJIT KALSI knowingly submitted an allotment form to Colorado Bankers Life Insurance for JAYELIN BECKETT for the payment of monthly insurance premiums from JAYELIN BECKETT's military pay that was not signed or otherwise authorized by JAYELIN BECKETT.

OVERT ACT NO. (25): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN provided free income tax preparation services at the Go Navy Tax Service trailer located in San Diego, County of San Diego, State of California, to the following named persons, who were active duty members of the United States Navy, with the intent to sell said persons a life insurance and annuity policy:

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OVERT ACT NO. (26): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN sold a life insurance policy to the following named persons, knowing each said person was an active duty member of the United States Navy with \$400,000 of life insurance coverage through Servicemembers Group Life Insurance (SGLI), without discussing relevant facts with said persons to determine if additional life insurance was appropriate for their individual needs:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

## CHARGES (cont'd)

OVERT ACT NO. (27): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN, without conducting a clearly stated review of financial and investment needs to determine suitability, misrepresented to one or more of the following persons that a financial product he variably called a ROTH IRA, ROTH IRA savings plan or account, retirement account, or similar, would be a good investment for said person's individual needs:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (28): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN knowingly induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company by variably misrepresenting that said persons were applying for ROTH IRA, ROTH IRA savings account, tax free investment fund, retirement savings account, or savings plan:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (29): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN induced one or more of the following persons to sign applications for a life insurance and annuity policy without providing the material terms of the policies:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (30): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN II induced one or more of the following persons to sign applications for life insurance and annuity policies with Colorado Bankers Life Insurance Company or Occidental Life Insurance Company, without telling said persons the true nature of the transaction, including that he or she was signing applications for both a life insurance policy and an annuity policy:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (31): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN with the intent to fill in blank sections on life insurance and annuity application forms for Colorado Bankers Life Insurance Company, induced one or more of the following persons to sign incomplete applications that were later completed without said person's knowledge and submitted to Colorado Bankers Life Insurance Company for the purpose of receiving a commissions for himself and PAUL FLANAGAN:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Logan Sperber, and Eden Zabala.

## **CHARGES (cont'd)**

OVERT ACT NO. (32): On or about and between MARCH 21, 2013 and DECEMBER 31, 2018, GREGORY LEE MARTIN knowingly induced one or more of the following persons to sign an allotment form authorizing the withdrawal of money from said persons military pay by making false and misleading statements intended to conceal that the allotment would be used to pay monthly premiums for a life insurance and annuity policy:

Candice Akpa-Williams, Nathan Johnston, Clark Lappert, Shuting Lee, Joshua Padilla, Riley Peterson, Logan Sperber, and Eden Zabala.

OVERT ACT NO. (33): On or about JANUARY 23, 2017, GREGORY LEE MARTIN knowingly submitted an application for a life insurance and annuity policy to Occidental Life Insurance for RILEY PETERSON that was not signed or otherwise authorized by RILEY PETERSON.

OVERT ACT NO. (34): JANUARY 23, 2017, GREGORY LEE MARTIN knowingly submitted an allotment form to Occidental Life Insurance for the purpose of having funds withdrawn from RILEY PETERSON's military pay that was not signed or otherwise authorized by RILEY PETERSON.

### **COUNT 3 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between July 1, 2013 and February 21, 2019, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of CANDICE AKPA-WILLIAMS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

And it is further alleged that the above offense was not discovered until JANUARY 2, 2019 by CANDICE AKPA-WILLIAMS by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CANDICE AKPA-WILLIAMS WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 4 - FORGERY OF DOCUMENTS AND ITEMS**

On or about July 1, 2013, PAUL FLANAGAN, RANJIT KALSI, and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: CANDICE AKPA-WILLIAMS)

## **CHARGES (cont'd)**

And it is further alleged that the above offense was not discovered until JANUARY 2, 2019 by CANDICE AKPA-WILLIAMS by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CANDICE AKPA-WILLIAMS WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 5 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about July 1, 2013, PAUL FLANAGAN, RANJIT KALSI, and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, CANDICE AKPA-WILLIAMS, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

And it is further alleged that the above offense was not discovered until JANUARY 2, 2019 by CANDICE AKPA-WILLIAMS by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CANDICE AKPA-WILLIAMS WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 6 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between January 24, 2017 and June 15, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of ISRAEL MORALES BALITE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 7 - FORGERY OF DOCUMENTS AND ITEMS**

On or about January 24, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: ISRAEL MORALES BALITE)

### **COUNT 8 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about January 24, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, ISRAEL M. BALITE, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

## **CHARGES (cont'd)**

### **COUNT 9 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 2, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, LEMAR BALLARD, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 10 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 2, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, JAYELIN BECKETT, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 11 - FORGERY OF DOCUMENTS AND ITEMS**

On or about February 2, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: JAYELIN BECKETT)

### **COUNT 12 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between January 16, 2018 and May 31, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of JAYLYNN BRADY, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 13 - FORGERY OF DOCUMENTS AND ITEMS**

On or about January 16, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: JAYLYNN BRADY)

### **COUNT 14 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about January 16, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, JAYLYNN BRADY, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

## **CHARGES (cont'd)**

### **COUNT 15 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between January 17, 2017 and October 11, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of BRIAN CEPEDA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 16 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about January 17, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully and unlawfully obtain personal identifying information of another person, and use that information for an unlawful purpose, to wit: COMMIT THEFT, in violation of PENAL CODE SECTION 530.5(a). (to wit: BRIAN CEPEDA)

### **COUNT 17 - FORGERY OF DOCUMENTS AND ITEMS**

On or about January 17, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: BRIAN CEPEDA)

### **COUNT 18 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 2, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, TONYA CLARK, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 19 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between July 5, 2017 and June 15, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of SAMATHA DAVIS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 20 - FORGERY OF DOCUMENTS AND ITEMS**

On or about July 5, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: SAMATHA DAVIS)



## **CHARGES (cont'd)**

### **COUNT 21 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about July 5, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, SAMATHA DAVIS, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 22 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between February 20, 2018 and December 13, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of WILLIAM ELMORE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 23 - FORGERY OF DOCUMENTS AND ITEMS**

On or about February 20, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: WILLIAM ELMORE)

### **COUNT 24 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 20, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, WILLIAM ELMORE, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 25 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 1, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, HARRIS ESTERS, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 26 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 23, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, DYLAN GIBSON, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

## **CHARGES (cont'd)**

### **COUNT 27 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between July 9, 2017 and July 28, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of ELIJAH JEFFERSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 28 - FORGERY OF DOCUMENTS AND ITEMS**

On or about July 28, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: ELIJAH JEFFERSON)

### **COUNT 29 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about July 28, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, ELIJAH JEFFERSON, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 30 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 15, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, MARQUISE KENDAL, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 31 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 23, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, GAGE KUNZE, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 32 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between January 16, 2018 and June 30, 2019, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of CLARK LAPPERT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

## **CHARGES (cont'd)**

### **COUNT 33 - FORGERY OF DOCUMENTS AND ITEMS**

On or about January 16, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: CLARK LAPPERT)

### **COUNT 34 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about January 16, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, CLARK LAPPERT, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 35 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between April 10, 2018 and October 26, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of SHU TING LEE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 36 - FORGERY OF DOCUMENTS AND ITEMS**

On or about April 10, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: SHU TING LEE)

### **COUNT 37 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about April 10, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, SHU TING LEE, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 38 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 14, 2018 and August 31, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of MERCEDES (FAVORS) LOCKARD, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

## **CHARGES (cont'd)**

### **COUNT 39 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 14, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: MERCEDES (FAVORS) LOCKARD)

### **COUNT 40 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 14, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, MERCEDES (FAVORS) LOCKARD, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 41 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 6, 2018 and June 30, 2019, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of GREGORY LORICK, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 42 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 6, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: GREGORY LORICK)

### **COUNT 43 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 6, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, GREGORY LORICK, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 44 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 25, 2013 and March 5, 2019, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of JOSHUA PADILLA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

## **CHARGES (cont'd)**

### **COUNT 45 - FORGERY OF DOCUMENTS AND ITEMS**

On or about and between March 25, 2013 and March 6, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: JOSHUA PADILLA)

### **COUNT 46 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about and between March 25, 2013 and March 6, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, JOSHUA PADILLA, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 47 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between January 23, 2017 and June 3, 2019, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of RILEY PETERSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 48 - FORGERY OF DOCUMENTS AND ITEMS**

On or about January 23, 2017, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: RILEY PETERSON)

### **COUNT 49 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about January 23, 2017, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully and unlawfully obtain personal identifying information of another person, and use that information for an unlawful purpose, to wit: COMMIT THEFT, in violation of PENAL CODE SECTION 530.5(a). (to wit: RILEY PETERSON)

### **COUNT 50 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about April 17, 2018, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, ISAAC PETTIS, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

## **CHARGES (cont'd)**

### **COUNT 51 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between July 25, 2016 and May 3, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of ANDREW RODRIGUEZ, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 52 - FORGERY OF DOCUMENTS AND ITEMS**

On or about July 25, 2016, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: ANDREW RODRIGUEZ)

### **COUNT 53 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about July 25, 2016, PAUL FLANAGAN and RANJIT KALSI, did willfully and unlawfully obtain personal identifying information of another person, and use that information for an unlawful purpose, to wit: COMMIT THEFT, in violation of PENAL CODE SECTION 530.5(a). (to wit: ANDREW RODRIGUEZ)

### **COUNT 54 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 29, 2017 and March 25, 2019, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of NICHOLAS SIORDIA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 55 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 29, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: NICHOLAS SIORDIA)

### **COUNT 56 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 29, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, NICHOLAS SIORDIA, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

## **CHARGES (cont'd)**

### **COUNT 57 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between June 1, 2016 and October 24, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully take and steal money and personal property of LOGAN SPERBER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 58 - FORGERY OF DOCUMENTS AND ITEMS**

On or about June 1, 2016, PAUL FLANAGAN and GREGORY LEE MARTIN did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: LOGAN SPERBER)

### **COUNT 59 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about June 1, 2016, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, LOGAN SPERBER, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 60 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 22, 2016 and June 6, 2018, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of JESSICA STEWART SAVAGE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 61 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 22, 2016, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, JESSICA STEWART SAVAGE, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 62 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 26, 2016, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: JESSICA STEWART SAVAGE)

## **CHARGES (cont'd)**

### **COUNT 63 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 27, 2017 and February 9, 2019, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of TANNER THOMPSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

### **COUNT 64 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 27, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: TANNER THOMPSON)

### **COUNT 65 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 27, 2017, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, TANNER THOMPSON, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

### **COUNT 66 - GRAND THEFT OF PERSONAL PROPERTY**

On or about and between March 13, 2013 and March 10, 2017, PAUL FLANAGAN and RANJIT KALSI did unlawfully take and steal money and personal property of CASEY WEIR, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

And it is further alleged that the above offense was not discovered until MARCH 10, 2017 by CASEY WEIR by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CASEY WEIR WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 67 - FORGERY OF DOCUMENTS AND ITEMS**

On or about March 13, 2013, PAUL FLANAGAN and RANJIT KALSI did unlawfully, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt and offer to pass, as true and genuine a APPLICATIONS FOR LIFE INSURANCE, ANNUITY, AND BANK ACCOUNT, knowing the same to be false, altered, forged and counterfeited, in violation of PENAL CODE SECTION 470(d). (to wit: CASEY WEIR)



## **CHARGES (cont'd)**

And it is further alleged that the above offense was not discovered until MARCH 10, 2017 by CASEY WEIR by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CASEY WEIR WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 68 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about March 13, 2013, PAUL FLANAGAN and RANJIT KALSI, did willfully obtain personal identifying information of another person, CASEY WEIR, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

And it is further alleged that the above offense was not discovered until MARCH 10, 2017 by CASEY WEIR by NOTIFIED BY COMMAND OF POTENTIAL FRAUD, and that no victim of said offense and no law enforcement agency chargeable with the investigation and prosecution of said offense had actual and constructive knowledge of said offense prior to said date because CASEY WEIR WAS DEFRAUDED INTO SIGNING BLANK FORMS, within the meaning of PENAL CODE SECTION 803(c).

### **COUNT 69 - USE PERSONAL IDENTIFYING INFORMATION OF ANOTHER**

On or about February 10, 2018, PAUL FLANAGAN and GREGORY LEE MARTIN, did willfully obtain personal identifying information of another person, EDEN ZABALA, and use that information for an unlawful purpose without that person's consent, in violation of PENAL CODE SECTION 530.5(a).

ALLEGATIONS AS TO ALL COUNTS:

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, PAUL FLANAGAN, RANJIT KALSI and GREGORY LEE MARTIN committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).



THIS INDICTMENT, NUMBERED SCD274468, CONSISTS OF 69 COUNTS.

**"A TRUE BILL"**

**Summer Stephan**

District Attorney, County of San Diego, State of California

\_\_\_\_\_  
Foreman of the Grand Jury

\_\_\_\_\_  
Deputy District Attorney

DATE: \_\_\_\_\_

DATE: \_\_\_\_\_