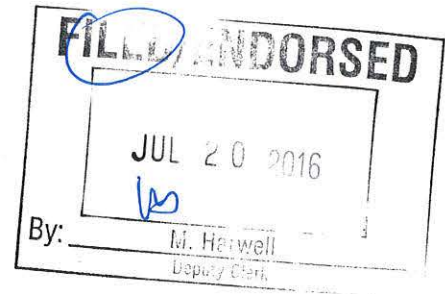


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9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SACRAMENTO
12

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

Case No.

15 Plaintiff, **FELONY COMPLAINT**

16 v.

17 **KEVIN MANZ** 750,000

18 Defendant.

19 The Attorney General of the State of California hereby accuses KEVIN MANZ of the following
20 criminal offenses:

21 **COUNT ONE**
22 **(Grand Theft)**

23 On and between January 1, 2010 and October 25, 2013, in the County of Sacramento, the
24 defendant, KEVIN MANZ, committed the crime of GRAND THEFT, in violation of PENAL
25 CODE section 487(a) in that while defendant KEVIN MANZ was an agent, servant, or employee
26 of PIONEER FOUNDATION defendant did unlawfully take from PIONEER FOUNDATION
27 money and personal property which aggregates to a value exceeding Nine Hundred Fifty Dollars
28 (\$950.00) in any 12 consecutive month period, to wit \$612,418.43.

1 **SPECIAL ALLEGATION 12022.6(A)(2)**

2 It is further alleged as to count 1, that in the commission of the above offense the said
3 defendant, KEVIN MANZ, with the intent to do so, took, damaged, and destroyed property of a
4 value exceeding \$200,000.00, within the meaning of Penal Code section 12022.6(a)(2).

5 **COUNT TWO**
6 **(Grand Theft)**

7 On and between May 22, 2013 and October 7, 2013, in the County of Sacramento
8 defendant, KEVIN MANZ, committed the crime of GRAND THEFT, in violation of PENAL
9 CODE section 487(a) in that while defendant KEVIN MANZ was an agent, servant, or employee
10 of CATHEDRAL PIONEER CHURCH HOMES INC. the defendant did unlawfully take from
11 CATHEDRAL PIONEER CHURCH HOMES INC. money and personal property which
12 aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950.00) in any 12 consecutive
13 month period, to wit \$223,830.00.

14 **SPECIAL ALLEGATION 12022.6(A)(2)**

15 It is further alleged as to count 2, that in the commission of the above offense the said
16 defendant, KEVIN MANZ, with the intent to do so, took, damaged, and destroyed property of a
17 value exceeding \$200,000.00, within the meaning of Penal Code section 12022.6(a)(2).

18 **COUNT THREE**
19 **(Grand Theft)**

20 On and between November 1, 2013 and December 24, 2013, in the County of Sacramento
21 defendant, KEVIN MANZ, committed the crime of GRAND THEFT, in violation of PENAL
22 CODE section 487(a) in that while defendant KEVIN MANZ was an agent, servant, or employee
23 of CATHEDRAL PIONEER CHURCH HOMES FOUNDATION the defendant did unlawfully
24 take from CATHEDRAL PIONEER CHURCH HOMES FOUNDATION money and personal
25 property which aggregates to a value exceeding Nine Hundred Fifty Dollars (\$950.00) in any 12
26 consecutive month period, to wit \$207,825.00.

27 ///

1 **SPECIAL ALLEGATION 12022.6(A)(2)**

2 It is further alleged as to count 3, that in the commission of the above offense the said
3 defendant, KEVIN MANZ, with the intent to do so, took, damaged, and destroyed property of a
4 value exceeding \$200,000.00, within the meaning of Penal Code section 12022.6(a)(2).

5 **SPECIAL ALLEGATION 186.11(A)(2) PC**

6 **AGGRAVATED WHITE COLLAR CRIME**

7 It is further alleged, that defendant KEVIN MANZ, pursuant to Penal Code section
8 186.11(a)(2), in committing the offenses set forth in Counts 1, 2, and 3, committed related
9 felonies, a material element of which is fraud, which involves a pattern of related felony conduct,
10 and the pattern of related conduct involves the taking of more than \$500,000.00.

11 NOTICE: A conviction of this offense excludes defendant from a sentence of imprisonment
12 in the county jail pursuant to Penal Code section 1170(h).

13 **TOLLING OF THE STATUTE OF LIMITATIONS**

14 IT IS FURTHER ALLEGED, as described in Penal Code section 803(c), that the charge in
15 Count 1 was not discovered until December 1, 2013 at the earliest, by the victim. Defendant
16 MANZ transferred money between accounts to give the appearance of higher balances in Pioneer
17 Foundation accounts. Moreover, defendant MANZ had sole access to the Pioneer Foundation
18 accounts and provided false reports to the board of directors during quarterly meetings. The
19 board members trusted the defendant. No victim of said violations and no law enforcement
20 agency chargeable with the investigation and prosecution of said violations had actual or
21 constructive knowledge of the thefts prior to December of 2013 and no reason to suspect the
22 defendant of embezzling funds within the meaning of Penal Code section 803 subdivision (c).

23
24 Pursuant to Penal Code Section 1054.5(b), the People hereby informally request that
25 defense counsel provide the People with discovery as required by Penal Code section
26 1054.3.

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DECLARATION

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

Dated: July 21, 2016

Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California



MAGGY KRELL
Supervising Deputy Attorney General
Attorneys for People