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10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SAN BERNARDINO
12

13 **PEOPLE OF THE STATE OF CALIFORNIA**

14 Plaintiff,

15 v.

16 **SAUL ISMAEL AMADOR (DOB: 6/28/86), ROSA**
MARIA CONRADO (DOB: 4/1/57), JESUS
17 **MARTIN FLORES (DOB: 1/28/66), DAVID GIRON**
(DOB: 5/8/65), ANTONIA GONZALEZ (DOB:
18 **3/13/43), ISaura HERNANDEZ (DOB: 2/1/75),**
ALEJANDRINA E. MALDONADO (DOB: 7/31/66),
19 **JUAN JOSE PEREZ (DOB:9/22/61),**

Defendants.
20

**DECLARATION IN SUPPORT
OF ARREST WARRANTS**

21 **INTRODUCTION**

22 **A. Experience and Training**

23 **1. Affiant's Training and Experience**

24 I, **Katie T. Viorel**, the affiant in this case, am a sworn peace officer. I am employed as a
25 Special Agent for the California Department of Justice, Bureau of Investigation and Intelligence,
26 Office of the Attorney General. I have been so employed since November 1999. Before my current
27 assignment with the Bureau of Investigation and Intelligence, I was assigned to the Bureau of Medi-
28 Cal Fraud and Elder Abuse.

1 In May 1999, I received a Bachelor of Science Degree in Criminal Justice from California State
2 University of Sacramento. In February 2000, I graduated from the Specialized Investigator's
3 Academy for the California Department of Justice. I hold Basic, Intermediate and Advanced
4 Certificates issued by the Commission on Peace Officer's Standards and Training. I have attended
5 several conferences put on by the California Department of Justice and the United States Department
6 of Health and Human Services related to the investigation of fraud. In June 2008, I received 24
7 hours of training given by the Multi Jurisdictional Counter Drug Task Force based exclusively on
8 financial crimes and money laundering investigations.

9 I have spoken to and received on-the-job training from other Special Agents and prosecuting
10 attorneys who have years of experience relative to the investigation of financial crimes. I have
11 participated in no less than 100 search warrants involving Medi-Cal fraud. I have conducted
12 investigations and assisted other Special Agents in no less than 50 cases involving Medi-Cal fraud
13 and related financial crimes which resulted in successful arrests and convictions. I am familiar with
14 California Codes related to financial crimes, conspiracy and the rules of evidence.

15 **The undersigned hereby declares, upon information and belief:**

16 That a 39 count felony complaint has been filed charging SAUL ISMAEL AMADOR, ROSA
17 MARIA CONRADO, JESUS MARTIN FLORES, DAVID GIRON, ANTONIA GONZALEZ,
18 ISAURA HERNANDEZ, ALEJANDRINA E. MALDONADO and JUAN JOSE PEREZ each with
19 multiple felony counts of grand theft (Pen. Code § 487(a)), conspiracy to commit grand theft (Pen.
20 Code § 182 (a)(1)) and/or money laundering (Pen. Code § 186.10(a)(2)).

21 That facts set forth herein were provided through an investigation conducted by Investigator
22 Sandy Birch and reports of the investigation prepared pursuant to her duties with the California
23 Department of Justice, and Investigative Auditor Thomas Wold which facts I believe to be true.
24 Birch also obtained and provided me with reports of investigations conducted by local law
25 enforcement agencies throughout California, which I have reviewed and also believe to be true.

26 **2. Investigator Sandy Birch**

27 Investigator Sandy Birch is employed as an investigator with the California Department of
28 Justice. She was employed as a Special Agent with the California Department of Justice for twenty

1 years before retiring in January 2004. While employed as a Special Agent she was assigned to the
2 Bureau of Medi-Cal Fraud and Elder Abuse, the Major Fraud Unit and the Bureau of Narcotic
3 Enforcement. She has attended the Peace Officer's Standards and Training Certified Academy and
4 she possesses an Advanced Specialized Investigator's Certificate. She completed numerous law
5 enforcement academies which covered substantive law and investigative techniques. She has also
6 received training from other special agents, supervisors, and prosecuting attorneys. She has
7 conducted hundreds of investigations of violations of grand theft, identity theft, securities fraud,
8 money laundering and other financial crimes. She is familiar with the ways in which financial
9 crimes are committed.

10 **3. Investigative Auditor Thomas Wold**

11 Thomas Wold is currently employed as an Investigative Auditor with the California
12 Department of Justice, Office of the Attorney General, Consumer Law Section, located in San
13 Diego, California. His duties include the investigation and audit of travel agencies, or sellers of
14 travel services operating in California, in order to determine their compliance with the Sellers of
15 Travel Act, Business and Professions Code section 17550, et seq. These duties include review of
16 victim complaints, interview of witnesses, examination of financial records, analysis of bank records
17 of the business or person under investigation, as well as the preparation of investigative reports.
18 He began his current duties in October 2007. As part of his duties, he works with peace officers
19 and investigators employed within the Department of Justice, as well as other state, federal and local
20 law enforcement agencies. Prior to his appointment as an Investigative Auditor, Thomas was
21 employed as a Health Program Auditor with the California Department of Health Services, Audits
22 and Investigations Division, for a period of three years. His duties were to investigate and audit
23 Medi-Cal reimbursement to hospitals and long-term care facilities for propriety and accuracy.

24 Thomas earned a Bachelor of Accountancy degree from the University of San Diego in August
25 2001. During his employment with the State of California, he has continuously attended
26 educational seminars and has received professional training relating to the investigation, analysis,
27 auditing and prosecution of financial crimes. He is currently a member of the International
28 Association of Financial Crimes Investigators.

1 **B. Summary of the Case**

2 In January 2008, the California Department of Justice became aware of complaints about a
3 fraudulent loan modification program being offered to homeowners in foreclosure. The
4 investigation was opened after it was determined that the suspects, doing business as First Gov
5 and/or Foreclosure Prevention Services, were operating throughout California. The investigation
6 consisted of the review of investigation reports and documents received from several law
7 enforcement agencies, analysis of bank records obtained by search warrants, and interviews with
8 victims and suspects. The investigation established that SAUL ISMAEL AMADOR (AMADOR),
9 ROSA MARIA CONTRADO (CONRADO), JESUS MARTIN FLORES (FLORES), DAVID GIRON
10 (GIRON), ANTONIA GONZALEZ (GONZALEZ), ISAURA HERNANDEZ (HERNANDEZ),
11 ALEJANDRINA E. MALDONADO (MALDONADO), and JUAN JOSE PEREZ (PEREZ) engaged
12 in a sophisticated and fraudulent scheme in which homeowners paid for a loan modification program
13 that did not exist. As part of the scheme, Defendants obtained Fictitious Business Name Permits and
14 bank accounts for the purpose of depositing and laundering the stolen funds.

15 Defendants solicited hundreds of homeowners in foreclosure with mail flyers that offered to
16 stop foreclosure and appeared to be from either a lender's foreclosure department or a government
17 entity that handles foreclosures. When a homeowner called the telephone number provided on the
18 flyer, Defendants and their agents falsely represented that they would renegotiate the homeowner's
19 mortgages, reduce monthly payments, and transfer any delinquent loan amounts to the end of the
20 loan. Defendants met with interested homeowners and provided them with a standard application
21 form that gave the appearance the homeowner was applying for a mortgage loan modification. On
22 receipt of the completed application form, Defendants demanded an up-front fee, ranging from
23 \$1,500 to \$5,000, from homeowners to participate in the loan modification program. Defendants
24 also told homeowners not to make any mortgage payments or communicate with their lender
25 claiming it would interfere with Defendants' efforts to negotiate a loan modification.

26 When a homeowner complained that, after signing up for the loan modification program, they
27 were still receiving delinquency or foreclosure notices from their lender, Defendants falsely
28 represented that their mortgage loan had been renegotiated but the lender needed a “good faith”

1 payment to secure the new loan. Defendants then instructed the homeowner to make this payment
2 by depositing money into bank accounts held under business names such as “Reinstatement
3 Department” or “Resolution Department” to make it appear that payment was being applied towards
4 a new loan. Defendants also used correspondence that appeared to be from the homeowner's lender
5 to request additional money for completing the loan modification process.

6 Money collected from homeowners through this fraudulent scheme was deposited into bank
7 accounts held by Defendants SAUL ISMAEL AMADOR, ROSA MARIA CONTRADO, JESUS
8 MARTIN FLORES, DAVID GIRON, and ALEJANDRINA E. MALDONADO. At the direction
9 of JUAN PEREZ, money from these accounts was withdrawn as cash or wire transferred for deposit
10 into bank accounts held by Defendants JUAN JOSE PEREZ, ISAURA HERNANDEZ, his wife, and
11 ANTONIA GONZALEZ, his mother-in-law.

12 **C. Applicable Criminal Statutes**

13 **1. Penal Code section 182(a)(1): Conspiracy** - Two or more persons who conspire to commit
14 any crime are guilty of conspiracy, a felony.

15 **2. Penal Code section 487(a): Grand Theft** - Any person who fraudulently appropriates
16 property which has been entrusted to him or her, or who knowingly and designedly by any false or
17 fraudulent representation or pretense, defrauds another person of money, labor or property of a value
18 exceeding four hundred dollars (\$400) is guilty of grand theft, a felony.

19 **3. Penal Code section 186.10: Money Laundering** - Any person who conducts or attempts
20 to conduct a transaction or more than one transaction involving a monetary instrument with the
21 specific intent to promote, manage, establish, carry on, or facilitate the promotion, management,
22 establishment of any criminal activity, or knowing that the monetary instrument represents the
23 proceeds of, or is derived directly or indirectly from the proceeds of, criminal activity, is guilty of
24 money laundering, a felony.

25 **PROBABLE CAUSE FOR OFFENSE**

26 Based on my training and experience, and the training and experience of Investigator Birch,
27 and the facts set forth in this affidavit, I conclude that there is probable cause to believe that from
28 September 2005 and continuing through at least October 2007, AMADOR, CONTRADO, FLORES,

1 GIRON, GONZALEZ, HERNANDEZ, MALDONADO, and PEREZ engaged in a scheme to
2 defraud homeowners and steal their money. As an integral part of the scheme, PEREZ caused
3 AMADOR, GIRON, MALDONADO, and CONRADO to open bank accounts that were used to
4 obtain victim monies. Those funds were then withdrawn as cash or wire transferred and deposited
5 into accounts held by GONZALEZ, HERNANDEZ and PEREZ.

6 **A. SUSPECT INTERVIEWS**

7 **1. ROSA MARIA CONRADO**

8 CONRADO pleaded guilty to theft charges arising from the scheme described herein, but
9 involving victims not named in the instant complaint, brought against her by the District Attorneys
10 in Tulare and Merced counties. She was sentenced to five years felony probation and 365 days local
11 custody in Tulare County. Sentencing in the Merced County case is pending. CONRADO was
12 interviewed pursuant to both those investigations and the information is related below.

13 The Tulare County District Attorney's Office conducted a sting operation after victims of the
14 foreclosure scam reported their losses. The sting resulted in the September 12, 2007 arrest of
15 CONRADO, who met with an undercover officer posing as a homeowner seeking help with his
16 delinquent mortgage. CONRADO was interviewed by District Attorney Investigator Dwayne
17 Johnson at the time of her arrest and was advised of her constitutional rights before the interview.
18 CONRADO said she worked for First Gov, a business owned by PEREZ. She said she had
19 previously worked for PEREZ at his business when it was called Foreclosure Prevention Center
20 (Foreclosure Prevention). She said she began working at Foreclosure Prevention in 2005 and that
21 she was fired by PEREZ. She was later hired to work for him at First Gov. She acknowledged
22 meeting with and collecting funds from the Tulare County victims and said she was paid \$400 per
23 client. She denied knowing that homeowners were not receiving services. CONRADO was using
24 the name of Ana Gonzalez during the sting operation and when she met with the victims.

25 CONRADO was interviewed on October 19, 2007, by Detective Lomeli of the Atwater Police
26 Department during his investigation of a complaint from victim Martin Pulido about money paid to
27 a foreclosure company. CONRADO told Lomeli that her job was mainly to contact potential clients
28 on the telephone and to arrange meetings for the representatives. She did acknowledge meeting with

1 clients. CONRADO said she was working for Juan Jose PEREZ. She said she suspected something
2 was wrong with the business but she did not have any proof so she continued to work for him. She
3 learned from clients that he was not helping them with their mortgage loans, and she also learned
4 that the business location did not exist. She said she quit working for him when she learned these
5 things. CONRADO told Lomeli that she initially received checks for her commissions but was later
6 allowed to withdraw \$1,500 every two weeks from the bank accounts she opened for PEREZ to use
7 for the business expenses. She told him she recruited MALDONADO to work for the business and
8 that she was aware MALDONADO had opened a bank account for PEREZ. CONRADO was
9 subsequently arrested in Merced County as a result of the investigation by the Atwater Police
10 Department. CONRADO was interviewed on January 19, 2007, by Fontana Police Department
11 Investigator Danny Gore regarding allegations made by victim Phillip Sorensen. Gore prepared a
12 report of the interview that I have read. Gore said CONRADO told him she worked for PEREZ.
13 She told him she was aware that PEREZ was conducting an illegal business and ripping customers
14 off. She told him she had quit working for PEREZ and had established her own business called
15 "Foreclosure Prevention by Conrado." Gore told CONRADO to gather her documents and to come
16 to the station for a more complete interview. On January 22, 2007, victim Sorensen received a
17 check in the mail from CONRADO for \$5,000.

18 CONRADO was interviewed by Investigator Birch in the office of the Merced County Public
19 Defender on June 12, 2008. CONRADO, who was facing charges in Merced County and Tulare
20 County at the time and was represented by counsel, signed a proffer statement prior to the interview.
21 No promises were made to CONRADO as to her criminal cases prior to the interview. CONRADO
22 told Birch that she met PEREZ and started working for him in September 2005, when he was
23 operating Foreclosure Prevention out of his garage in Grand Terrace, California. She said he
24 instructed her on contacting homeowners in default on their home loans. PEREZ told CONRADO
25 that she had to have clients sign a contract, collect their documents and a fee, and tell them
26 Foreclosure Prevention would renegotiate their home loans. CONRADO identified PEREZ from
27 a photo line up. She told Birch that she received training in the field from Martin FLORES who was
28 also working for PEREZ. She identified FLORES from a photo line up. CONRADO said she heard

1 girls in the office making calls to the lenders, and she believed they were renegotiating loans. She
2 said PEREZ provided her with business cards and all of the contracts and documents. PEREZ told
3 her to collect cash but she often collected money orders or cashier's checks from clients. She was
4 aware the company had a bank account at Bank of America. Her commissions ranged from \$400
5 to \$600 per client depending upon how much she collected from them. She also trained two young
6 girls to make contacts with clients. She instructed them to collect cash and she always deposited the
7 cash in the accounts used by PEREZ. PEREZ had asked her to move to Los Banos and to set up a
8 post office box for the business there. Soon after she moved, in late 2006, she said PEREZ accused
9 her of stealing money from him and he fired her. In May 2007, she saw an advertisement in a
10 Spanish language newspaper for a foreclosure business. She interviewed over the telephone with
11 the office manager, Sarah, and was later hired. She denied working in the foreclosure business from
12 late 2006 until being hired by First Gov in May 2007. After she was hired she received a box that
13 was sent from Mexico, which included her business cards and contracts. She was only provided
14 with business cards for Ana Gonzalez and that is why she used that name. She was paid \$600 for
15 each application she collected if she also collected the fee. She usually just set up the appointments
16 for clients and only acknowledges meeting with two homeowners, Craig Holzchuh and Xochitl
17 Chavez, who were the named victims in the Tulare County investigation. CONRADO
18 acknowledged bringing MALDONADO into the business, and she was aware that MALDONADO
19 was working directly with PEREZ. She once called the office of First Gov and heard the voice of
20 PEREZ in the background. At that point, she became aware that she was once again working for
21 PEREZ.

22 CONRADO said she intended to open her own foreclosure consulting business and established
23 a bank account at Bank of America to be used for it. Some of the client checks may have been
24 deposited to that account. CONRADO said she opened a bank account at 1st Valley Credit Union
25 in the name of Reinstatement Department. She did this at the request of "Sarah," whom she believed
26 was the office manager for First Gov. Sarah told her that the First Gov bank account had been
27 closed because of the number of returned checks. She asked her to help the company and
28 CONRADO agreed to do it. CONRADO deposited checks from clients into her 1st Valley Credit

1 Union account and withdrew cash from it. She then sent the cash to a post office box given to her
2 by Sarah. She does not have any receipts or proof that the money was mailed. She estimates she
3 did this over a six-month period.

4 CONRADO was also interviewed by Detective Gore of the Fontana Police Department. Her
5 statements to him were consistent with those above.

6 **2. ALEJANDRINA E. MALDONADO**

7 MALDONADO was interviewed by law enforcement officers after they traced victim monies
8 to accounts opened by her. Information obtained by those law enforcement investigations is
9 included in the criminal complaint filed by the California Attorney General's Office.

10 MALDONADO was interviewed by Atwater Police Department Detective Lomeli on October
11 19, 2007. MALDONADO told Lomeli she opened a bank account at Washington Mutual Bank in
12 June 2007. MALDONADO said she opened the bank account for a person she knew only as "Juan
13 Jose." She met CONRADO in California and CONRADO introduced her to her boss "Juan Jose."
14 He asked her to open a bank account at Washington Mutual under the name Resolution Department.
15 MALDONADO told Lomeli that she was offered \$100 for every deposit that was made to the
16 account. She said she also was offered commissions for making appointments with potential clients.
17 MALDONADO believed that the company had offices in El Segundo, California and she was aware
18 that representatives of the company, such as CONRADO, were using false names when they
19 contacted clients. MALDONADO said she was told to use the name Vickie Martinez when she
20 contacted homeowners on behalf of the company.

21 MALDONADO was interviewed by Port Saint Lucie, Florida police detective Thomas Nichols
22 on February 5, 2008. The interview was conducted at the request of the Solano County District
23 Attorney's Office. MALDONADO told Nichols she opened a bank account for Juan Jose PEREZ.
24 She said PEREZ asked her to send him her social security number and driver's license number. She
25 agreed to do it and said PEREZ told her he would pay her \$2,000 a month for opening the account.
26 She said she opened the account at Washington Mutual and but that others made all of the deposits
27 to the account. She said "when the money was available, I deposited in another account. . . ." She
28 said she withdrew cash from the account and deposited the cash to the accounts of HERNANDEZ

1 or GONZALEZ at Wells Fargo. She also transferred money to the bank account of David GIRON.
2 She received \$100 for every deposit that was made to the account. MALDONADO said that
3 Washington Mutual Bank closed the account. She said she asked her son to open a bank account
4 so she could use it to continue to work with PEREZ.

5 On April 21, 2008, and June 2, 2008, Investigator Birch interviewed MALDONADO by
6 telephone. MALDONADO said she allowed her bank account to be used by PEREZ. When the
7 money was available, she received instructions about making the transfers of money from PEREZ
8 or from his secretary, Sarah. She withdrew money from the Washington Mutual account and took
9 it to Wells Fargo Bank where she deposited it. She kept the deposit slips for all of the transactions
10 and she faxed copies of the receipts to the Department of Justice. MALDONADO said PEREZ told
11 her GONZALEZ is his mother-in-law and HERNANDEZ is his wife. She deposited cash to
12 accounts for each of these women. MALDONADO told Birch that she asked her son, Alan Alba,
13 to open a bank account at Bankatlantic in Florida, to be used by PEREZ. She was receiving money
14 from PEREZ to allow both of the bank accounts to be used for deposits. When her account was
15 closed by the bank, she asked her son to open an account so that MALDONADO could continue to
16 receive the money.

17 **3. SAUL ISMAEL AMADOR**

18 AMADOR pleaded guilty to theft from an elder arising from the scheme described herein, but
19 involving victims not named in the instant complaint, brought against him by the San Joaquin
20 County District Attorney's Office. He was sentenced to five years felony probation. AMADOR was
21 interviewed while in custody and the information is related below.

22 On September 3, 2007, Stockton Police Detective Ken Southwick interviewed AMADOR in
23 custody. Prior to the interview, Southwick read AMADOR his constitutional rights. AMADOR
24 admitted to Southwick that he had opened the Bank of America account as a favor for his dad's
25 friend, Jose PEREZ. AMADOR said PEREZ used the account for his business, which he claimed
26 was helping people keep their homes out of foreclosure. AMADOR denied making deposits to the
27 account and said he gave PEREZ the ATM card for the account. He said PEREZ would notify him
28 with a fax to wire money to PEREZ from the account. AMADOR said he went to the bank on

1 directions from PEREZ and wired money to the account of PEREZ in Mexico. AMADOR said he
2 took \$8,000 of the money in the account and kept the money. He said that PEREZ had a business
3 in California but he did not know where it was, and he believes that PEREZ lives in Mexico.
4 AMADOR pleaded guilty to a felony related to victim Rimland and is currently on felony probation
5 out of San Joaquin County. AMADOR did not disclose to Detective Southwick or law enforcement
6 that he had also opened additional bank accounts used in the scheme.

7 **4. DAVID GIRON**

8 GIRON was arrested by the Fontana Police Department on March 31, 2008, after a Fontana
9 Police Department detective traced victim monies to an account opened by him. The San
10 Bernardino County District Attorney did not file a complaint against GIRON, and he was
11 subsequently released. GIRON was interviewed as a result of that investigation and the information
12 is related below. The criminal complaint filed by the California Attorney General's Office includes
13 the investigation conducted by the Fontana Police Department.

14 David GIRON came to the Fontana Police Department at the request of Detective Ward Haas.
15 Haas sought the interview as a result of his investigation of theft from victim Ralston Compton after
16 Haas traced the victim's funds to a bank account opened by GIRON. GIRON told Haas that he and
17 a friend, JUAN PEREZ, had a mortgage type of business. He said PEREZ had opened a bank
18 account using GIRON's name with a d.b.a. of Resolution Department. He said he provided PEREZ
19 with his personal information so that PEREZ could open the account. GIRON said PEREZ could
20 not open the account because PEREZ is undocumented and did not possess the proper
21 identification. GIRON said he had nothing to do with the business but that PEREZ had promised
22 to pay him \$300 a week if he opened the bank account. When GIRON was questioned by a Spanish
23 speaking officer he changed his story slightly to say that he had actually opened the Washington
24 Mutual account for PEREZ. He denied making the deposits or withdrawals to the account.

25 GIRON did not disclose to Detective Haas or to law enforcement that he had opened additional
26 bank accounts used to deposit victim funds.

27 **B. VICTIM INTERVIEWS**

28 Investigator Birch obtained investigative reports from the Solano County District Attorney's

1 Office, the Fontana Police Department, the Merced County District Attorney's Office, and the
2 Stanislaus County District Attorney's Office regarding interviews with victims of Foreclosure
3 Prevention Center or First Gov. Investigator Birch also conducted interviews with victims who paid
4 money to First Gov or Foreclosure Prevention. She located the victims through complaints made
5 to the Better Business Bureau, the Federal Trade Commission (FTC) and from the review of bank
6 records obtained by warrants. All of the victims received a flyer in the mail regarding their
7 delinquent mortgage and none of the victims reported receiving any assistance with their mortgages
8 despite payments to the suspects. The victims, whose statements are outlined below, were residing
9 in San Bernardino County when their money was stolen or their stolen funds were deposited to a San
10 Bernardino bank account. Their losses have not previously resulted in criminal charges and each
11 has been included in the complaint filed by the California Attorney General's Office.

12 **1. Joan Brown**

13 On January 14, 2008, Investigator Birch interviewed Joan Brown. In January 2007, a Notice
14 of Default was recorded against Brown's home in San Bernardino. The home was owned by her
15 father, Charles Brown, but she made the payments and had a Power of Attorney to handle her
16 father's financial affairs. Shortly afterwards, she received a mailed flyer that provided a telephone
17 number to call to save her father's home from foreclosure. Brown called the number and spoke with
18 a woman who identified herself as a representative of First Gov. The woman told Brown that First
19 Gov could renegotiate her mortgage and avoid foreclosure. Brown was told to collect certain
20 documents and give them to First Gov. A Hispanic male came to her home to collect the documents.
21 He told Brown that First Gov had a lawyer who was familiar with contracts for loans with their
22 lender, Countrywide Mortgage. He said if Brown's lender was not cooperative in renegotiating her
23 loan, First Gov would advise the lender of a clause in Brown's loan that required them to cooperate.
24 He also told Brown that she had to pay an up-front fee of \$1,595 for the services offered by First
25 Gov. She later gave him a US Postal Service money order for \$1,595.

26 Brown continued to receive delinquency notices from her lender. In March 2007, she
27 telephoned First Gov and was told that her loan had been renegotiated. She was told the payments
28 would decrease from \$1,600 to \$1,220 and the delinquency would be moved to the end of the loan

1 term. She was also told that the first payment on the new loan would not be due for several months,
2 but she had to make an initial deposit equal to one month's payment to her lender. Brown was told
3 to deposit the money in Bank of America account number 5515141514 (AMADOR's bank account).
4 She recalls that she deposited the money but cannot recall the exact amount or date. Brown later
5 learned that her loan was not renegotiated and no payments were credited to her mortgage.

6 Brown did not recall the name of the Hispanic male she met with, but her husband, Desmond
7 Shelby, had written down the license plate number of the vehicle he was driving. Investigator Birch
8 determined that vehicle was registered to FLORES. Birch prepared a photo line up which included
9 the photograph of FLORES. Both Brown and Shelby independently identified FLORES as the male
10 who came to their residence.

11 Brown's money order to First Gov for \$1,595 was located in the January 28, 2007, deposit
12 items for Bank of America, account number 5515141514 held by AMADOR. The date and amount
13 of Brown's second payment has not been determined.

14 **2. Xochitl Chavez & Felipe Carbajal**

15 On January 9, 2008, Birch interviewed Xochitl Chavez. Chavez said she and her husband,
16 Felipe Carbajal, were delinquent on the mortgage loan for their home in Indio, in the County of San
17 Bernardino. A Notice of Default had been filed against their property. Shortly after that they
18 received a flyer in the mail from First Gov and called the number listed on the flyer. Chavez was
19 told that First Gov was experienced in getting home loans renegotiated. A woman, (unidentified but
20 using a business card of Isabel Palacios) came to her residence and told them that First Gov could
21 renegotiate their loan. Chavez completed paperwork and gave the woman a cashier's check for
22 \$1,500, dated November 17, 2006.

23 Chavez said she called First Gov approximately one week later and was told that her loan had
24 been modified. She was told that the lender wanted a payment of \$3,500 as a down payment on the
25 loan. On December 13, 2006, Chavez obtained a cashier's check for \$3,500 which she made
26 payable to "Installment Department - Wilshire." At the time, her mortgage lender was Wilshire,
27 and she believed the payment was going to them and would be credited to her loan. Her notes
28 indicate she mailed the check on December 21, 2006, to a post office box number that had been

1 given to her by the First Gov representative.

2 Chavez said she continued to receive delinquency notices from her lender and never received
3 the documents for the loan modification. When she finally contacted her lender, she learned that the
4 loan had not been modified, and the payments had not been credited to her loans. Chavez obtained
5 copies of the negotiated cashier's checks and determined that on November 29, 2006, \$1,500 was
6 deposited to Bank of America account #583144450 (GIRON's account) and on December 13, 2006,
7 \$3,500 was deposited to Bank of America #5583244384 (GIRON's account).

8 **3. Ralston Compton**

9 On October 5, 2007, the Fontana Police Department received a complaint from victim Ralston
10 Compton. Subsequent investigation was conducted by Detective Ward Haas. Compton reported
11 that he was delinquent on his home mortgage loan. A Notice of Default had been filed against his
12 property. He received a "final notice" in the mail and responded to the telephone number on the
13 flyer. He spoke with an unidentified woman who purported to be with his lender, Option One
14 Mortgage. Compton said he was delinquent on his loan by \$8,000, but the woman told him the
15 matter could be settled with a one-time payment of \$4,286. The woman instructed him to make the
16 deposit to an account at Washington Mutual Bank. On August 21, 2007, victim Compton directed
17 his bank to transfer the money from his Washington Mutual bank account to account number
18 3114956557 (GIRON's account). Haas contacted Option One Mortgage and learned that they did
19 not receive any payments in that amount on behalf of victim Compton.

20 **4. Margaret Momoh**

21 On January 15, 2008, Birch interviewed Margaret Momoh. Momoh was trying to save her
22 home in Sacramento County from going into foreclosure. She responded to a flyer and a woman
23 using the name "Ana Gonzalez" came to her residence. The woman instructed Momoh to prepare
24 two checks to Re-enstatement Department [sic]. She instructed Momoh to make one check for
25 \$3,640.03 and a second check for \$1,909. Both checks were dated June 11, 2007. Momoh gave
26 both checks to "Gonzalez." On February 19, 2008, Birch showed Momoh a photo line up which
27 included the photograph of CONRADO. Momoh identified CONRADO as the woman named
28 Gonzalez who came to her home and picked up her checks. The checks written by Momoh were

1 negotiated at 1st Valley Credit Union, account number 1005628001 (CONRADO's account) on June
2 14, 2007.

3 **5. Alma Roya**

4 On April 28, 2008, Birch interviewed Alma Roya. Roya told Birch that she had received a
5 flyer in the mail after her home mortgage was in default. She resides in Fresno, California. She
6 telephoned the numbers on the flyer and a woman, using the name of "Ana Gonzalez," came to her
7 residence. Roya had purchased a cashier's check payable to her mortgage company but was advised
8 by "Gonzalez" to make the check payable to "Reinstatement Processing Center." Roya had the
9 check reissued for \$1,350 and gave it to the woman along with three money orders totaling \$700.
10 The three money orders (\$300, \$200, and \$200) and the cashier's check for \$1,350 were located in
11 the June 17, 2007 deposit items at 1st Valley Credit Union (CONRADO's account).

12 **6. Sylvia Ruiz**

13 On January 16, 2008, Birch interviewed Sylvia Ruiz. Ruiz told Birch that she received a flyer
14 in the mail after her residential mortgage went into default. Her home was in San Bernardino. She
15 telephoned the number on the flyer and spoke in Spanish to a female representative. Reyes set up
16 an interview at her home. On April 27, 2007, a woman, using the name of "Ana Gonzalez," came
17 to her residence. "Gonzalez" told her First Gov could get her mortgage renegotiated and that she
18 needed to get a cashier's check for \$1,800. Ruiz had a cashier's check payable to one of her lenders,
19 HSBC, but the woman told her to get it reissued to Resolution Department. Ruiz had the check
20 reissued and gave it to "Gonzalez." Ruiz gave a physical description of "Ana Gonzalez" which is
21 similar to that of CONRADO.

22 Ruiz said she was instructed not to communicate with her lender while First Gov was working
23 on the renegotiation. In June 2007, Ruiz telephoned First Gov. She was told that her loan had been
24 renegotiated and that the payments would be reduced and delinquency moved to the end of the loan.
25 The loan documents were being drawn up and required that Ruiz make a good faith payment of
26 \$1,800. Ruiz was instructed to go to Washington Mutual and deposit the money to account number
27 3401712290 (AMADOR's account). Ruiz made that payment on June 23, 2007. The \$1,800
28 cashier's check purchased by Ruiz was located in the April 30, 2007, deposit items of Bank of

1 America, account 5515141514 (AMADOR's account). Ruiz said her loans were not renegotiated,
2 and she lost her home.

3 **7. Grace Scherbarth & Thelma Gordo**

4 On January 16, 2008, Investigator Birch interviewed Grace Scherbarth. Scherbarth said she
5 lives with her mother, Thelma Gordo, in San Jose. The mortgage loan on their home is in her
6 mother's name. When the loan became delinquent, they received a flyer from the Foreclosure
7 Prevention Center. Scherbarth met with a young woman named Criselda (not yet identified) who
8 explained that Foreclosure Prevention Center could save the home by getting the loan renegotiated.
9 On or about January 13, 2006, Scherbarth paid \$1,400 with a cashier's check payable to
10 Foreclosure Prevention Center. Neither Scherbarth or Gordo ever received any services from the
11 Foreclosure Prevention Center. Scherbarth provided a copy of the negotiated cashier's check. The
12 check was deposited to Washington Mutual account number 3061764673 (PEREZ's account) on
13 January 13, 2006 .

14 **8. Philip Sorensen**

15 Fontana Police Department Detective Danny Gore conducted an investigation regarding
16 allegations of a foreclosure fraud scam. The victim, Phillip Sorensen, reported that he had paid
17 \$5,000 to the Foreclosure Prevention Center to assist him with his delinquent residential mortgage.
18 Sorensen reported that he was negotiating with Countrywide Home Loans. When the letter arrived
19 from the Foreclosure Prevention Center, he thought it was a division of Countrywide. A woman,
20 representing First Gov, instructed him to send \$5,000 to a post office box. On October 17, 2006,
21 the check was deposited to Bank of America account 0017044875 (CONRADO's account).

22 On January 19, 2007, Detective Gore went to the residence of CONRADO and spoke with her.
23 Gore later received a call from a representative of Foreclosure Prevention Center who told him there
24 was a mistake, and Sorensen would receive a refund. On January 25, 2007, Sorensen received a
25 cashier's check for \$5,000 in the mail. Included with the check was a note asking him to contact
26 Detective Gore and notify him about the refund. A review of bank deposits for Bank of America
27 account number 0583044385 (GIRON's account) revealed that on August 30, 2006, Sorensen had
28 written a check to Foreclosure Prevention Center in the amount of \$1,600. On September 29, 2008,

1 Investigator Birch interviewed Sorensen about the check. Sorensen told her he paid the additional
2 \$1,600 to Foreclosure Prevention Center for a loan modification. He did not receive a refund of that
3 amount.

4 **9. Eleuteria and Arthur Washington**

5 On January 14, 2008, Birch interviewed Eleuteria Washington. Washington told her that she
6 responded to a flyer regarding her delinquent home loan. On May 16, 2007, a representative of First
7 Gov named "Ana Gonzalez," came to their residence in Redlands. "Gonzalez" told Washington she
8 needed two cashier's checks each for \$2,023.58 (totalling \$4,046.56). The amount was calculated
9 as two times the combined total of the monthly payment on their first and second mortgage.
10 Washington purchased the cashier's checks payable to "Reinstatement" as the woman instructed and
11 gave them to her when she came to the home. On May 16, 2007, the checks were deposited into
12 Bank of America, account number 5515141514 (AMADOR's account).

13 Washington said she did not hear from First Gov, and she continued to receive letters from her
14 lenders that the house would be auctioned. She left messages for First Gov, and one day she
15 received a call from a woman with First Gov. The woman told Washington that her lenders had
16 agreed to the loan modification. The next day, she received another call from First Gov to advise
17 her that the new loan documents would be sent to her to sign. She was told the lender wanted an
18 additional payment and was instructed to make a deposit to Washington Mutual account number
19 3080204808 (MALDONADO's account) for \$2,023.58. She was instructed to make the deposit to
20 the Resolution Department. On July 9, 2007, Washington deposited the money to that bank account.
21 Washington never heard from First Gov or "Gonzalez" again. She learned from her lender that the
22 loan was never renegotiated, and the lender never heard of First Gov. On April 9, 2008, Birch
23 showed Washington, and her husband Arthur, a photo line up including the photograph of
24 CONRADO. Eleuteria Washington did not make a positive identification but Arthur Washington
25 identified CONRADO as the woman who came to their residence and collected the payments.

26 **10. Additional Victim Interviews**

27 Interviews by local law enforcement and Birch determined additional victims who paid money
28 to First Gov or Foreclosure Prevention. The money from those victims was traced to bank accounts

1 controlled by AMADOR, CONRADO, GIRON, or MALDONADO (and Alban) and have not been
2 previously charged in a criminal complaint. Those witnesses and their losses, included in the
3 complaint filed by the California Attorney General’s Office, are: Joe and Ruby Carter (\$1,576),
4 Rawland Crawford (\$2,298), Sue Elder (\$2,700), Alvaro Gadea (\$2,144), Juan Morales (\$11,680),
5 Ricardo Moreno (\$1,920), Sophia Perry (\$3,000), Bernardo Vera (\$2,325) Rodney Shead (\$2,264),
6 Maria Rodriguez (\$1,800) Claudia Rodriguez (\$2,515) and Mario Rivera (\$4,988).

7 **C. DOCUMENT REVIEW**

8 **1. Loan Modification Applications**

9 Investigator Birch obtained and reviewed the applications provided by Defendants to the above-
10 named victims. The application forms she reviewed were substantially similar in format, content,
11 and contact information.

12 Victims Scherbarth and Sorensen signed applications for a loan modification program with
13 Foreclosure Prevention Center. The first page is different but each lists the address of Foreclosure
14 Prevention as 450 North Brand Blvd. Glendale, California. The second page of the application is
15 identical, including the italics font used to print the form. The contracts (two pages each) for victims
16 Scherbarth and Sorensen are attached to this affidavit as Attachment 1.

17 Victims Chavez, Momoh, Crawford, Gadea, Moreno, Rivera, C. Rodriguez, and Eleuteria
18 Washington were given the same application form. Each application contains a heading for First
19 Gov and the statement “The United States Official Loss Mitigation Program Services” and a
20 fictitious Washington, D.C. address. Some victims received a second page that is identical to the
21 second page of the Foreclosure Prevention contract mentioned above. The contracts for the above-
22 listed victims (some two pages) are attached to this affidavit as Attachment 2.

23 **2. Loan Modification Mailers**

24 Investigator Birch reviewed copies of mailed flyers provided to her by the above-named
25 victims. Each of the flyers she received contain the title “FINAL NOTICE PLEASE ANSWER
26 ONLY THIS NOTICE” and appear almost identical. All the flyers include the following
27 grammatical error, “In the reason for delinquent payments is listed below you may qualify for
28 special consideration through a program designed to save your property.” Each flyer contained the

1 typed name and address of the victim. The contact name and phone number provided on each flyer
2 was different. According to CONRADO, the phone numbers listed on the flyers were for cell
3 phones used by the representatives of Foreclosure Prevention and First Gov.

4 **3. Fictitious Business Name Records**

5 County recorder records indicate that the following fictitious business names were obtained by
6 Defendants in connection with commission of the charged offenses:

7 **a. SAUL AMADOR**

8 (i) Resolutions Department 209 N. Arrowhead Avenue, Baldwin Park - Los Angeles
9 County FBN permit #20070140076 issued on January 23, 2007.

10 **b. ROSE MARIA CONRADO**

11 (i) Reinstatement Processing Department 494 S. Macy Street, Apartment 38, San
12 Bernardino - San Bernardino County FBN permit #20070003246 issued on February
13 27, 2007.

14 **c. JESUS MARTIN FLORES**

15 (i) Foreclosure Resolution Department 198 N. Arrowhead Avenue, San Bernardino -
16 San Bernardino County FBN permit #200512770 issued on September 6, 2005.

17 **d. DAVID GIRON**

18 (i) Reinstatement Department and Foreclosure Prevention 450 N. Brand
19 Boulevard, Glendale - Los Angeles County FBN permit #061242548
20 issued on June 6, 2006.

21 (ii) First Gov., - 22020 Bay Street, Moreno Valley - Riverside County FBN
22 permit #R-200612668, issued on September 6, 2006.

23 (iii) Resolution Department 1727 N. Baker, Ontario - San Bernardino
24 County FBN permit #20070012824 issued on August 6, 2007.

25 **e. JUAN JOSE PEREZ**

26 (i) Foreclosure Prevention 198 N. Arrowhead Avenue, San Bernardino -
27 San Bernardino County FBN permit # 200515133, issued on October 19,
28 2005.

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2 **f. ALEJANDRINA MALDONADO**

3 (i) Resolution Department 848 Vermont Street, Oakland, Alameda County

4 FBN permit #398031 issued on July 5, 2007

5 AutoTrack XP (an online research source used by law enforcement) indicates that a
6 fictitious business name permit was issued to a business name used by Defendants in
7 committing the instant offenses:

8 Reinstatement Department, Port Saint Lucie County, FLA permit #G07253900057

9 issued on September 7, 2007 to Alan Alban.

10 **4. Bank Records**

11 Bank records for the period May 10, 2004, through February 6, 2007, for the following
12 accounts used to deposit, withdraw, and transfer victim funds were obtained by search warrant and
13 examined by California Department of Justice investigative auditor Thomas Wold.

14 **a. SAUL AMADOR**

15 (i) Saul Amador dba Resolution Department, Bank of America account # 515141514

16 (Whittier branch)

17 (ii) Saul Amador dba Resolution Department, Washington Mutual Bank account

18 #3401712290 (West Covina branch)

19 **b. ROSE MARIA CONTRADO**

20 (i) Rosa Conrado dba Reinstatement Processing, 1st Valley Credit Union

21 accounts #1005628001 and #1005628551 (San Bernardino branch)

22 (ii) Rosa Conrada dba Reinstatement Department, Bank of America account

23 #2544043829 (Grand Terrace branch)

24 (iii) Foreclosure Prevention by Rosa Conrado, Bank of America account

25 #2544540408 (Grand Terrace branch)

26 (iii) Foreclosure Prevention by Rosa Conrado, Bank of America account

27 #17044875 (Grand Terrace branch)

28 (iv) Rosa Conrado (personal), Bank of America account #2454842533 (Grand

1 Terrace branch)

2 **c. JESUS MARTIN FLORES**

3 (i) Jesus Martin Flores dba Foreclosure Resolution Department, Bank of America
4 account #2454941491 (San Bernardino branch)

5 **d. DAVID GIRON**

6 (i) David Giron dba Reinstatement Department, Bank of America account
7 #5583244384 (Ontario branch)

8 (ii) David Giron dba First Gov, Bank of America account #583144450 (Ontario
9 Branch)

10 (iii) David Giron dba Resolution Department, Washington Mutual account
11 #3114956557 (Montclair branch)

12 (iv) David Giron dba Foreclosure Prevention, Bank of America account #583044385
13 (Ontario branch)

14 (v) David Giron (personal), Washington Mutual account #4922416428 (Montclair
15 branch)

16 **e. ANTONIA GONZALEZ**

17 (i) Antonia Gonzalez dba Resolution Department, Wells Fargo account
18 #8045808758 (San Bernardino branch)

19 **f. ISAURA HERNANDEZ**

20 (i) Isaura Hernandez (personal) Wells Fargo account #2777715075 (La Habra
21 branch)

22 **g. ALEJANDRINA MALDONADO**

23 (i) Alejandrina Maldonado dba Resolution Department, Washington Mutual account
24 #3080204808 (Oakland branch)

25 (ii) Alan Alba dba Reinstatement Department, Bank Atlantic account #3024 (Port St.
26 Lucie, Florida branch)

27 **h. JUAN JOSE PEREZ**

28 (i) Juan Perez dba Foreclosure Prevention, Washington Mutual account

1 #3061764673 (San Bernardino branch)

2 (ii) Juan Perez dba Foreclosure Prevention, Wells Fargo account #2018629477 (La
3 Habra branch)

4 (iii) Juan Perez (personal), Washington Mutual account #1884121583 (San
5 Bernardino branch)

6 As a result of his examination, Wold determined the following:

7 Fourteen accounts of the above-listed accounts were closed less than one year after they were
8 opened; seven were closed in less than six months. The records reviewed showed a total \$1,188,428
9 in deposits for all accounts combined. \$393,333 of these funds are attributed to a deposit item that
10 contained a person's name and a deposit amount consistent with the up-front fee charged by
11 Defendants for participation in the fictitious loan modification program. The remaining \$795,095
12 are payments from unknown individuals via cash, money order, cashier's check or personal check
13 made payable to one of the Defendants' business names in amounts consistent with the up-front fee
14 charged by Defendants for participation in the fictitious loan modification program.

15 The bank records did not reveal a source of income consistent with regular employment
16 because there is no pattern of regular installments such as a salary or monthly commissions and no
17 indication of income tax payments or refunds. With the exception of an immaterial amount from
18 "Herbalife" in one of CONRADO's account, the only source of income evidenced by the bank
19 records appears to be money received from homeowners pursuant to loan modification scheme. This
20 conclusion is based on the payee/payor information or number and amount of the transactions.

21 Nearly all funds deposited into accounts held by CONRADO, GIRON, AMADOR and
22 MALDONADO were withdrawn within a few days as cash, wire transfers or check and deposited
23 into an account held by GONZALEZ, HERNANDEZ or PEREZ, including accounts they held with
24 Bancomer in Mexico. Funds in accounts held by GONZALEZ, HERNANDEZ or PEREZ were
25 then used by for personal living expenses such as utility bills, groceries, and car payments.

26 For the time period examined, a total of \$323,513 was deposited into accounts held by
27 CONRADO; \$301,106 of that amount is attributable to consumer deposits. The remaining deposits
28 are inter-account transfers between the above-listed accounts and an immaterial amount

1 from "Herbalife." A total of \$163,154 was withdrawn as cash, wire transfer or check and deposited
2 into an account held by GONZALEZ, HERNANDEZ or PEREZ. Four cash transactions exceeding
3 \$5,000 were made in a seven-day period.

4 For the time period examined, a total of \$290,192 was deposited into accounts held by GIRON.
5 \$147,831 of that amount is attributable to consumer deposits. The remaining deposits are inter-
6 account transfers between the above-listed accounts. A total of \$184,353 was withdrawn as cash,
7 wire transfer or check and deposited into an account held by GONZALEZ, HERNANDEZ or
8 PEREZ. Five wire transfer transactions exceeding \$5,000 were made in a seven-day period.

9 For the time period examined, a total of \$90,502 was deposited into accounts held by
10 MALDONADO. \$89,372 of that amount is attributable to consumer deposits. The remaining
11 deposits are inter-account transfers between the above-listed accounts. A total of \$82,179 was
12 withdrawn as cash, wire transfer or check and deposited into an account held by GONZALEZ,
13 HERNANDEZ or PEREZ. Ten cash or wire transfer transactions exceeding \$5,000 were made in
14 a seven-day period.

15 For the time period examined, a total of \$207,443 was deposited into accounts held by
16 AMADOR; \$207,160 is attributable to consumer deposits. The remaining deposits are numerous
17 inter-account transfers between the above-listed accounts. A total of \$193,081 was withdrawn as
18 cash, wire transfer or check and deposited into an account held by GONZALEZ, HERNANDEZ or
19 PEREZ. No transactions exceeded \$5,000 in a seven-day period. Two wire transfer transaction
20 between GONZALEZ and HERNANDEZ exceeding \$5,000 were made within a seven-day period.

21 Bank records also showed numerous payments from Defendants accounts to Skype. Total
22 amount paid to Skype by Defendants \$1,672: AMADOR (\$714), CONRADO (\$48), GIRON (\$366),
23 MALDONADO (\$50), GONZALEZ (\$448), PEREZ (\$46).

24 **5. Skype Records**

25 On July 25, 2008, Investigator Birch telephoned (202) 657-4124. The number is listed under
26 the Washington, D.C. address on the First Gov application form signed by victims Chavez, Momoh,
27 Crawford, Gadea, Moreno, Rivera, C. Rodriguez, and Washington. The number was active and was
28 answered by a voice mail message. Birch contacted Skype Communication Sarl, Global Law

1 Enforcement Operations and determined that (202) 657-4124 was the phone number of an active
2 Skype subscriber. (Skype Communication Sarl provides an Internet based telephone subscription
3 service.) Birch obtained a search warrant for the subscriber information, payment information and
4 call detail for that number and any and all related telephone numbers. I served the warrant on Skype
5 Communication Sarl and they complied by providing records by electronic means in an Excel
6 database format. Skype Law Enforcement Operations advised that they found six accounts which
7 were linked to (202)657-4124 phone number by a common email address and provided the call
8 detail, subscriber and payment records for all six numbers from their inception to their end date or
9 August 2008.

10 Birch reviewed the account registration, payment and call data produced by Skype and
11 determined that six accounts were established between February 24, 2006, and November 21, 2006,
12 Birch reviewed the incoming call data for all six accounts provided by Skype and summarized the
13 following call dates and activity:

Dialed Number	Start Date	End Date	# of incoming calls
(206) 734-4605	February 24, 2006	November 23, 2006	4,111
(909) 581-9726	March 1, 2006	August 21, 2008	5,145
(562) 219-2181	April 1, 2006	April 25, 2006	5
(310) 817-6415	September 8, 2006	May 26, 2008	3,179
(202) 657-4124	September 12, 2006	August 19, 2008	12,885
(702) 508-4181	November 21, 2006	December 13, 2006	12

21 Birch determined that four of the six above listed numbers appear in the notes or paperwork
22 of the victims outlined above. When interviewed by law enforcement, victims Sorensen and Chavez
23 provided the telephone number (206) 734-4605 (4,111 incoming calls) as a number they were given
24 for Foreclosure Prevention/First Gov. Sorensen's contract (signed August 9, 2006) was with
25 Foreclosure Prevention and Chavez's contract (signed November 9, 2006) was with First Gov. Both
26 contracts were signed within the active date range of that telephone number and seem to represent
27 the approximate dates of the transition from the name of Foreclosure Prevention to First Gov. The
28 telephone number (909) 581-9726 (5,145 incoming calls) was listed on the Foreclosure Prevention

1 contract provided by victim Sorensen. The telephone numbers (310) 817-6415 (3,179 incoming
2 calls) and (202) 657-4124 (12,885 incoming calls) are both listed on each of the First Gov contracts
3 submitted by victims Chavez, Momoh, Crawford, Gadea, Moreno, Rivera, C. Rodriguez, and
4 Washington. No record was found in victim notes or files of (562) 219-2181 (5 incoming calls) or
5 (702) 508-4181 (12 incoming calls).

6 Skype payment data reviewed by Birch showed that payment for call services was submitted
7 to Skype under the following names on and between the following dates: JUAN PEREZ 1/6/06 -
8 3/18/07; ANTONIA GONZALEZ, 6/24/06 - 8/7/07; ISAURA HERNANDEZ, 7/2/06 and 3/15/07;
9 DAVID GIRON 7/6/06 - 1/13/07; SAUL AMADOR 3/2/07 - 5/10/07; ROSA CONRADO 5/25/07.

10 Birch also compared payment data received from Skype to the bank account records of
11 accounts controlled by Defendants. She determined that payments were made to Skype using Visa
12 debit cards attached to bank accounts, as follows:

Account Name	Bank and account#	Debit Card #	# of payments
Juan Jose Perez/ Foreclosure Prevention	Washington Mutual 3061764673	2016	7
Saul Amador/ Resolutions Department	Bank of America 0515141514	1953	12
David Giron/ Reinstatement Department	Bank of America 583244384	8396	11

19
20 Some of the payments made to Skype were billed through a third party payment system (such
21 as Paypal and Bibit) so all payments to Skype were not traced back to Defendants' bank accounts.
22 Investigator Birch compared the records, supplied by Skype of outgoing calls, to a sampling of a few
23 of the telephone numbers of victims. She located an outgoing call on February 15, 2007, to the
24 home telephone number of victim Joan Brown and a call to the home of victim Joe Carter on July
25 26, 2007.

26 **6. Property Records**

27 Investigator Birch reviewed the property records obtained from the county recorder's office
28 of the respective counties in which the victims lived and determined that a Notice of Default had

1 been recorded against their property as indicated: Brown (1/5/07), Carter (7/20/07), Chavez
2 (10/26/06), Compton (7/17/07), Crawford (5/4/07), Elder (3/16/07), Gadea (6/29/07), Momoh
3 (5/24/07), Morales (10/26/08), Moreno (4/13/07), Perry (10/17/06), Rivera (8/6/07), Rodriguez,
4 C. (6/20/07), Rodriguez, M. (9/27/06), Royo (5/10/07), Ruiz (4/08/07), Scherbarth (12/23/05),
5 Shead (6/20/07), Sorensen (8/24/06), Vera (7/9/07), and Washington (5/9/07).

6 **CONCLUSION AND REQUEST**

7 Based on the contents of the affidavit, your Affiant's aforementioned training and
8 experience, and the training and experience of Investigator Birch, I conclude that between
9 September 2005 and the present, SAUL ISMAEL AMADOR, ROSA MARIA CONTRADO, JESUS
10 MARTIN FLORES, DAVID GIRON, ANTONIA GONZALEZ, ISAURA HERNANDEZ,
11 ALEJANDRINA E. MALDONADO and JUAN JOSE PEREZ engaged in a scheme to defraud
12 homeowners who were already struggling with delinquent mortgage payments. As a result of the
13 scheme victims gave funds in excess of \$400 to the suspects in violation of Penal Code section
14 487(a) (Grand Theft). I also conclude that AMADOR, CONTRADO, FLORES, GIRON,
15 GONZALEZ, HERNANDEZ, MALDONADO, and PEREZ, engaged in multiple conspiracies,
16 Penal Code section 182(a)(1) to commit grand theft, Penal Code 487(a) and that CONTRADO,
17 MALDONADO, GIRON, GONZALEZ, HERNANDEZ laundered the stolen funds in violation of
18 Penal Code section 186 .10 (a)(2).

19 I therefore request, based upon this Declaration, that warrants be issued for the arrest of
20 SAUL ISMAEL AMADOR, ROSA MARIA CONTRADO, JESUS MARTIN FLORES, DAVID
21 GIRON, ANTONIA GONZALEZ, ISAURA HERNANDEZ, ALEJANDRINA E. MALDONADO
22 and JUAN JOSE PEREZ who may be dealt with according to law.

23 been examined.
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