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FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

OCT 27 2008

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8 Attorneys for the People

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10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SAN BERNARDINO

12 **PEOPLE OF THE STATE OF CALIFORNIA,**
13 Plaintiff,

Case No. FSB 804318

14 v.

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

FELONY
COMPLAINT

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20 The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants
21 SAUL ISMAEL AMADOR, ROSA MARIA CONTRADO, MARTIN JESUS FLORES,
22 ANTONIA GONZALEZ, ISAURA HERNANDEZ, JUAN JOSE PEREZ and ALEJANDRINA
23 E. MALDONADO of the following crimes, which are connected to one another in their
24 commission:

25 **COUNT ONE**
26 **[GRAND THEFT]**

27 For a separate cause of complaint, the ATTORNEY GENERAL complains and states,
28 On and between July 7, 2006, and July 13, 2006, in the County of San Bernardino,

1 defendant ROSA MARIA CONRADO unlawfully took property, to wit: money for a fictitious
2 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
3 another, to wit: Sophia Perry, in violation of Penal Code section 487, subdivision (a), a felony.

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5 **COUNT TWO**
[GRAND THEFT]

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Count One, the ATTORNEY GENERAL further
8 complains and states,

9 On and between August 30, 2006, and September 1, 2006, in the County of San Bernardino,
10 defendant DAVID GIRON unlawfully took property, to wit: money for a fictitious mortgage
11 loan modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to
12 wit: Philip Sorensen, in violation of Penal Code section 487, subdivision (a), a felony.

13 **COUNT THREE**
14 **[GRAND THEFT]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Two, the ATTORNEY
17 GENERAL further complains and states,

18 On and between October 12, 2006, and October 17, 2006, in the County of San Bernardino,
19 defendant ROSA MARIA CONRADO unlawfully took property, to wit: money for a fictitious
20 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
21 another, to wit: Philip Sorensen, in violation of Penal Code section 487, subdivision (a), a felony.

22 **COUNT FOUR**
23 **[GRAND THEFT]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts One through Three, the ATTORNEY
26 GENERAL further complains and states,

27 On and between November 17, 2006, and December 19, 2006, in the County of San
28 Bernardino, defendant DAVID GIRON unlawfully took property, to wit: money for a fictitious

1 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
2 another, to wit: Xochitl Chavez and Felipe Carbajal, in violation of Penal Code section 487,
3 subdivision (a), a felony.

4 **COUNT FIVE**
5 **[GRAND THEFT]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts One through Four, the ATTORNEY
8 GENERAL further complains and states,

9 On and between January 4, 2007, and January 13, 2007, in the County of San Bernardino,
10 defendant JUAN JOSE PEREZ unlawfully took property, to wit: money for a fictitious mortgage
11 loan modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to
12 wit: Grace Scherbarth and Thelma Gordo, in violation of Penal Code section 487, subdivision
13 (a), a felony.

14 **COUNT SIX**
15 **[GRAND THEFT]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Five, the ATTORNEY
18 GENERAL further complains and states,

19 On January 28, 2007, in the County of San Bernardino, defendants SAUL ISMAEL
20 AMADOR and JESUS MARTIN FLORES unlawfully took property, to wit: money for a
21 fictitious mortgage loan modification program, of a value in excess of Four Hundred Dollars
22 (\$400) from another, to wit: Shelby Desmond and Joan Brown, in violation of Penal Code
23 section 487, subdivision (a), a felony.

24 **COUNT SEVEN**
25 **[GRAND THEFT]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts One through Six, the ATTORNEY
28 GENERAL further complains and states,

1 On and between April 27, 2007 and June 25, 2007, in the County of San Bernardino,
2 defendant SAUL ISMAEL AMADOR unlawfully took property, to wit: money for a fictitious
3 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
4 another, to wit: Luis and Sylvia Ruiz, in violation of Penal Code section 487, subdivision (a), a
5 felony.

6 **COUNT EIGHT**
7 **[GRAND THEFT]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Seven, the ATTORNEY
10 GENERAL further complains and states,

11 On or about May 16, 2007, in the County of San Bernardino, defendants ROSA MARIA
12 CONRADO, SAUL ISMAEL AMADOR unlawfully took property, to wit: money for a fictitious
13 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
14 another, to wit: Eleuteria and Arthur Washington, in violation of Penal Code section 487,
15 subdivision (a), a felony.

16 **COUNT NINE**
17 **[GRAND THEFT]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts One through Eight, the ATTORNEY
20 GENERAL further complains and states,

21 On and between June 4, 2007, and June 6, 2007, in the County of San Bernardino,
22 defendant ROSA MARIA CONRADO unlawfully took property, to wit: money for a fictitious
23 mortgage loan
24 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
25 Alma Royo, in violation of Penal Code section 487, subdivision (a), a felony.

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1 **COUNT TEN**
2 **[GRAND THEFT]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Nine, the ATTORNEY
5 GENERAL further complains and states,

6 On and between June 11, 2007, and June 14, 2007, in the County of San Bernardino,
7 defendant ROSA MARIA CONTRADO unlawfully took property, to wit: money for a fictitious
8 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
9 another, to wit: Margaret Momoh and David Howard, in violation of Penal Code section 487,
10 subdivision (a), a felony.

11 **COUNT ELEVEN**
12 **[GRAND THEFT]**

13 For a further and separate cause of complaint, being a different offense from but connected
14 in its commission with the charges set forth in Counts One through Ten, the ATTORNEY
15 GENERAL further complains and states,

16 On and between June 15, 2007, and June 18, 2007, in the County of San Bernardino,
17 defendants SAUL ISMAEL AMADOR and ROSA MARIA CONTRADO unlawfully took
18 property, to wit: money for a fictitious mortgage loan modification program, of a value in excess
19 of Four Hundred Dollars (\$400) from another, to wit: Rawland Crawford, in violation of Penal
20 Code section 487, subdivision (a), a felony.

21 **COUNT TWELVE**
22 **[GRAND THEFT]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts One through Eleven, the ATTORNEY
25 GENERAL further complains and states,

26 On and between June 29, 2007, and July 3, 2007, in the County of San Bernardino,
27 defendant ROSA MARIA CONTRADO unlawfully took property, to wit: money for a fictitious
28 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from

1 another, to wit: Antonio and Claudia Rodriguez, in violation of Penal Code section 487,
2 subdivision (a), a felony.

3 **COUNT THIRTEEN**
4 **[GRAND THEFT]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts One through Twelve, the ATTORNEY
7 GENERAL further complains and states,

8 On or about July 9, 2007, in the County of San Bernardino, defendant ALEJANDRINA E.
9 MALDONADO unlawfully took property, to wit: money for a fictitious mortgage loan
10 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
11 Eleuteria and Arthur Washington, in violation of Penal Code section 487, subdivision (a), a
12 felony.

13 **COUNT FOURTEEN**
14 **[GRAND THEFT]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Thirteen, the ATTORNEY
17 GENERAL further complains and states,

18 On or about August 21, 2007, in the County of San Bernardino, defendant DAVID GIRON
19 unlawfully took property, to wit: money for a fictitious mortgage loan modification program, of
20 a value in excess of Four Hundred Dollars (\$400) from another, to wit: Ralston Compton, in
21 violation of Penal Code section 487, subdivision (a), a felony.

22 **COUNT FIFTEEN**
23 **[GRAND THEFT]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts One through Fourteen, the ATTORNEY
26 GENERAL further complains and states,

27 On and between July 7, 2006, and July 13, 2006, in the County of San Bernardino,
28 defendant ROSA MARIA CONRADO committed a violation of Penal Code section 186.10,

1 subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of transactions
2 involving a monetary instrument or instruments, of a value exceeding five thousand dollars
3 (\$5000), through a financial institution, to wit: cash withdrawal from Bank of America account #
4 2544540408; knowing that such monetary instrument or instruments represent the proceeds of,
5 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

6 **COUNT SIXTEEN**
7 **[MONEY-LAUNDERING]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Fifteen, the ATTORNEY
10 GENERAL further complains and states,

11 On or about August 7, 2006, in the County of San Bernardino, defendant ROSA MARIA
12 CONRADO committed a violation of Penal Code section 186.10, subdivision (a)(2), a felony, to
13 wit: willfully and unlawfully conducted a series of transactions involving a monetary instrument
14 or instruments, of a value exceeding five thousand dollars (\$5000), through a financial
15 institution, to wit: wire transfer from Bank of America account # 2544540408; knowing that
16 such monetary instrument or instruments represent the proceeds of, or were derived directly or
17 indirectly from the proceeds of criminal activity, to wit: grand theft.

18 **COUNT SEVENTEEN**
19 **[MONEY-LAUNDERING]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts One through Sixteen, the ATTORNEY
22 GENERAL further complains and states,

23 On or about September 8, 2006, in the County of San Bernardino, defendant ROSA
24 MARIA CONRADO committed a violation of Penal Code section 186.10, subdivision (a)(2), a
25 felony, to wit: willfully and unlawfully conducted a series of transactions involving a monetary
26 instrument or instruments, of a value exceeding five thousand dollars (\$5000), through a
27 financial institution, to wit: cash withdrawal from Bank of America account # 2544540408;
28 knowing that such monetary instrument or instruments represent the proceeds of, or were derived

1 directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

2 **COUNT EIGHTEEN**
3 **[MONEY-LAUNDERING]**

4 For a further and separate cause of complaint, being a different offense from but connected
5 in its commission with the charges set forth in Counts One through Seventeen, the ATTORNEY
6 GENERAL further complains and states,

7 On or about September 19, 2006, in the County of San Bernardino, defendant ROSA
8 MARIA CONRADO committed a violation of Penal Code section 186.10, subdivision (a)(2), a
9 felony, to wit: willfully and unlawfully conducted a series of transactions involving a monetary
10 instrument or instruments, of a value exceeding five thousand dollars (\$5000), through a
11 financial institution, to wit: cash withdrawal from Bank of America account # 2544540408;
12 knowing that such monetary instrument or instruments represent the proceeds of, or were derived
13 directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

14 **COUNT NINETEEN**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Eighteen, the ATTORNEY
18 GENERAL further complains and states,

19 On or about December 11, 2006, in the County of San Bernardino, defendant ROSA
20 MARIA CONRADO committed a violation of Penal Code section 186.10, subdivision (a)(2), a
21 felony, to wit: willfully and unlawfully conducted a series of transactions involving a monetary
22 instrument or instruments, of a value exceeding five thousand dollars (\$5000), through a
23 financial institution, to wit: cash withdrawal from Bank of America account # 2544540408;
24 knowing that such monetary instrument or instruments represent the proceeds of, or were derived
25 directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

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1 **COUNT TWENTY**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Nineteen, the ATTORNEY
5 GENERAL further complains and states,

6 On and between July 9, 2007, and July 10, 2007, in the County of San Bernardino,
7 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
8 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
9 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
10 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
11 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
12 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
13 criminal activity, to wit: grand theft.

14 **COUNT TWENTY-ONE**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Twenty, the ATTORNEY
18 GENERAL further complains and states,

19 On and between July 13, 2007, and July 16, 2007, in the County of San Bernardino,
20 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
21 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
22 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
23 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
24 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
25 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
26 criminal activity, to wit: grand theft.

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1 **COUNT TWENTY-TWO**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Twenty-One, the
5 ATTORNEY GENERAL further complains and states,

6 On and between July 18, 2007, and July 20, 2007, in the County of San Bernardino,
7 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
8 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
9 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
10 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
11 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
12 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
13 criminal activity, to wit: grand theft.

14 **COUNT TWENTY-THREE**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Twenty-Two, the
18 ATTORNEY GENERAL further complains and states,

19 On and between July 26, 2007, and July 30, 2007, in the County of San Bernardino,
20 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
21 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
22 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
23 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
24 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
25 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
26 criminal activity, to wit: grand theft.

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1 **COUNT TWENTY-FOUR**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Twenty-Three, the
5 ATTORNEY GENERAL further complains and states,

6 On and between July 31, 2007, and August 3, 2007, in the County of San Bernardino,
7 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
8 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
9 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
10 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
11 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
12 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
13 criminal activity, to wit: grand theft.

14 **COUNT TWENTY-FIVE**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Twenty-Four, the
18 ATTORNEY GENERAL further complains and states,

19 On and between August 6, 2007, and August 7, 2007, in the County of San Bernardino,
20 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
21 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
22 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
23 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
24 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
25 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
26 criminal activity, to wit: grand theft.

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1 **COUNT TWENTY-SIX**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Twenty-Five, the
5 ATTORNEY GENERAL further complains and states,

6 On and between August 8, 2007, and August 10, 2007, in the County of San Bernardino,
7 defendants ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a
8 violation of Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and
9 unlawfully conducted a series of transactions involving a monetary instrument or instruments, of
10 a value exceeding five thousand dollars (\$5000), through a financial institution, to wit: cash
11 deposit to Wells Fargo account # 8045808758; knowing that such monetary instrument or
12 instruments represent the proceeds of, or were derived directly or indirectly from the proceeds of
13 criminal activity, to wit: grand theft.

14 **COUNT TWENTY-SEVEN**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Twenty-Six, the
18 ATTORNEY GENERAL further complains and states,

19 On or about September 19, 2007, in the County of San Bernardino, defendants
20 ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a violation of
21 Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully
22 conducted a series of transactions involving a monetary instrument or instruments, of a value
23 exceeding five thousand dollars (\$5000), through a financial institution, to wit: wire transfer to
24 Wells Fargo account # 8045808758; knowing that such monetary instrument or instruments
25 represent the proceeds of, or were derived directly or indirectly from the proceeds of criminal
26 activity, to wit: grand theft.

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1 **COUNT TWENTY-EIGHT**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Twenty-Seven, the
5 ATTORNEY GENERAL further complains and states,

6 On or about October 15, 2007, in the County of San Bernardino, defendants
7 ALEJANDRINA E. MALDONADO and ANTONIA GONZALEZ committed a violation of
8 Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully
9 conducted a series of transactions involving a monetary instrument or instruments, of a value
10 exceeding five thousand dollars (\$5000), through a financial institution, to wit: wire transfer to
11 Wells Fargo account # 8045808758; knowing that such monetary instrument or instruments
12 represent the proceeds of, or were derived directly or indirectly from the proceeds of criminal
13 activity, to wit: grand theft.

14 **COUNT TWENTY-NINE**
15 **[MONEY-LAUNDERING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts One through Twenty-Eight, the
18 ATTORNEY GENERAL further complains and states,

19 On or about July 28, 2006, in the County of San Bernardino, defendants DAVID GIRON
20 and ANTONIA GONZALEZ committed a violation of Penal Code section 186.10, subdivision
21 (a)(2), a felony, to wit: willfully and unlawfully conducted a series of transactions involving a
22 monetary instrument or instruments, of a value exceeding five thousand dollars (\$5000), through
23 a financial institution, to wit: wire transfer to Wells Fargo account # 8045808758; knowing that
24 such monetary instrument or instruments represent the proceeds of, or were derived directly or
25 indirectly from the proceeds of criminal activity, to wit: grand theft.

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1 **COUNT THIRTY**
2 **[MONEY-LAUNDERING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Twenty-Nine, the
5 ATTORNEY GENERAL further complains and states,

6 On and between August 4, 2006, and August 11, 2006, in the County of San Bernardino,
7 defendants DAVID GIRON and ANTONIA GONZALEZ committed a violation of Penal Code
8 section 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of
9 transactions involving a monetary instrument or instruments, of a value exceeding five thousand
10 dollars (\$5000), through a financial institution, to wit: wire transfer to Wells Fargo account #
11 8045808758; knowing that such monetary instrument or instruments represent the proceeds of,
12 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

13 **COUNT THIRTY-ONE**
14 **[MONEY-LAUNDERING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Thirty, the ATTORNEY
17 GENERAL further complains and states,

18 On or about August 12, 2006, in the County of San Bernardino, defendants DAVID
19 GIRON and ANTONIA GONZALEZ committed a violation of Penal Code section 186.10,
20 subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of transactions
21 involving a monetary instrument or instruments, of a value exceeding five thousand dollars
22 (\$5000), through a financial institution, to wit: wire transfer to Wells Fargo account #
23 8045808758; knowing that such monetary instrument or instruments represent the proceeds of,
24 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

25 **COUNT THIRTY-TWO**
26 **[MONEY-LAUNDERING]**

27 For a further and separate cause of complaint, being a different offense from but connected
28 in its commission with the charges set forth in Counts One through Thirty-One, the ATTORNEY

1 GENERAL further complains and states,

2 On and between August 20, 2006, and August 21, 2006, in the County of San Bernardino,
3 defendants DAVID GIRON and ANTONIA GONZALEZ committed a violation of Penal Code
4 section 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of
5 transactions involving a monetary instrument or instruments, of a value exceeding five thousand
6 dollars (\$5000), through a financial institution, to wit: wire transfer to Wells Fargo account #
7 8045808758; knowing that such monetary instrument or instruments represent the proceeds of,
8 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

9 **COUNT THIRTY-THREE**
10 **[MONEY-LAUNDERING]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts One through Thirty-Two, the
13 ATTORNEY GENERAL further complains and states,

14 On or about August 25, 2006, in the County of San Bernardino, defendants DAVID
15 GIRON and ANTONIA GONZALEZ committed a violation of Penal Code section 186.10,
16 subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of transactions
17 involving a monetary instrument or instruments, of a value exceeding five thousand dollars
18 (\$5000), through a financial institution, to wit: wire transfer to Wells Fargo account #
19 8045808758; knowing that such monetary instrument or instruments represent the proceeds of,
20 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

21 **COUNT THIRTY-FOUR**
22 **[MONEY-LAUNDERING]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts One through Thirty-Three, the
25 ATTORNEY GENERAL further complains and states,

26 On and between April 10, 2007, and April 11, 2007, in the County of San Bernardino,
27 defendants ISAURA HERNANDEZ and ANTONIA GONZALEZ committed a violation of
28 Penal Code section 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully

1 conducted a series of transactions involving a monetary instrument or instruments, of a value
2 exceeding five thousand dollars (\$5000), through a financial institution, to wit: wire transfer to
3 Wells Fargo account # 8045808758; knowing that such monetary instrument or instruments
4 represent the proceeds of, or were derived directly or indirectly from the proceeds of criminal
5 activity, to wit: grand theft.

6 **COUNT THIRTY-FIVE**
7 **[MONEY-LAUNDERING]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Thirty-Four, the
10 ATTORNEY GENERAL further complains and states,

11 On or about July 26, 2007, in the County of San Bernardino, defendants ISAURA
12 HERNANDEZ and ANTONIA GONZALEZ committed a violation of Penal Code section
13 186.10, subdivision (a)(2), a felony, to wit: willfully and unlawfully conducted a series of
14 transactions involving a monetary instrument or instruments, of a value exceeding five thousand
15 dollars (\$5000), through a financial institution, to wit: wire transfer to Wells Fargo account #
16 8045808758; knowing that such monetary instrument or instruments represent the proceeds of,
17 or were derived directly or indirectly from the proceeds of criminal activity, to wit: grand theft.

18 **COUNT THIRTY-SIX**
19 **[CONSPIRACY]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts One through Thirty-Five, the
22 ATTORNEY GENERAL further complains and states,

23 On and Between October 19, 2005, and August 8, 2007, in the County of San Bernardino
24 defendants ROSA MARIA CONTRADO and JUAN JOSE PEREZ did unlawfully conspire
25 together, and with another person or persons whose identities are unknown, to commit a crime in
26 violation of Section 182 subdivision (a)(1) of the Penal Code, to wit: grand theft, in violation of
27 Section 487(a) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out
28 the

1 objectives and purposes of the aforesaid conspiracy, defendants ROSA MARIA CONTRADO and
2 JUAN JOSE PEREZ committed the following overt acts:

3 1. On or about October 19, 2005, JUAN JOSE PEREZ obtained San Bernardino County
4 fictitious business name permit # 200515133 for Foreclosure Prevention using a business
5 address of 198 N. Arrowhead, San Bernardino.

6 2. On or about October 25, 2005, JUAN JOSE PEREZ d.b.a. Foreclosure Prevention
7 opened account # 3061764673 at Washington Mutual bank in San Bernardino for the
8 deposit, withdrawal and transfer of funds fraudulently obtained from homeowners for
9 enrollment in a fictitious mortgage loan modification program.

10 3. Between January 2006, and July 2007, ROSA MARIA CONTRADO, JUAN JOSE
11 PEREZ, and others unknown solicited homeowners by mail flyers entitled "FINAL
12 NOTICE" that falsely advised homeowners their "property had been turned over to the
13 foreclosure department"; their property "may be sold without any further court action"; and
14 directed them to "immediately" call a toll free telephone number about a loan modification
15 program that did not exist.

16 4. Between January 2006, and July 2007, ROSA MARIA CONTRADO, JUAN JOSE
17 PEREZ, and others unknown provided homeowners with a standardized application form
18 entitled "First Gov" for the purpose of enrolling homeowners in a loan modification
19 program that did not exist.

20 5. On and between January 4, 2006, and January 13, 2006, ROSA MARIA CONTRADO and
21 JUAN JOSE PEREZ unlawfully took \$1,400 from Grace Scherbarth and Thelma Gordo as
22 payment for enrollment in a fictitious mortgage loan modification program.

23 6. On and between January 2006, and March 2007, JUAN JOSE PEREZ submitted
24 payments to Skype for phone services to facilitate contact with homeowners regarding a
25 fictitious mortgage loan modification program.

26 7. On or about January 31, 2006, JUAN JOSE PEREZ issued check #1042 payable to
27 ROSA MARIA CONTRADO in the amount of \$762.06 for commissions due on proceeds
28 obtained from homeowners for enrollment in a fictitious mortgage loan modification

1 program.

2 8. On or about March 3, 2006, JUAN JOSE PEREZ issued check #1012 payable to ROSA
3 MARIA CONTRADO in the amount of \$2,900.00 for commissions due on proceeds obtained
4 from homeowners for enrollment in a fictitious mortgage loan modification program.

5 9. On or about March 14, 2006, JUAN JOSE PEREZ issued check #1021 payable to ROSA
6 MARIA CONTRADO in the amount of \$2,245.00 for commissions due on proceeds obtained
7 from homeowners for enrollment in a fictitious mortgage loan modification program.

8 10. On or about May 26, 2006, at the direction of JUAN JOSE PEREZ, ROSA MARIA
9 CONTRADO d.b.a. Foreclosure Prevention by ROSA MARIA CONTRADO opened account#
10 2544540408 at Bank of America in Grand Terrace, California for the deposit, withdrawal
11 and transfer of funds fraudulently obtained from homeowners for enrollment in a fictitious
12 mortgage loan modification program.

13 11. Between September 2006, and August 2007, ROSA MARIA CONTRADO transmitted
14 payments to Skype for phone services to facilitate contact with homeowners regarding a
15 fictitious mortgage loan modification program.

16 12. On or about September 26, 2006, at the direction of JUAN JOSE PEREZ, ROSA
17 MARIA CONTRADO d.b.a. Foreclosure Prevention by ROSA MARIA CONTRADO opened
18 account # 17044875 at Bank of America for the deposit, withdrawal and transfer of funds
19 fraudulently obtained from homeowners for enrollment in a fictitious mortgage loan
20 modification program.

21 13. On and between September 28, 2006, and October 17, 2006, ROSA MARIA
22 CONTRADO unlawfully took \$11,180 from Juan Carlos Morales as payment for enrollment
23 in a fictitious mortgage loan a program.

24 14. On and between October 12, 2007, and October 17, 2006, ROSA MARIA CONTRADO
25 unlawfully took \$5,000 from Phillip Sorensen, a resident of San Bernardino county, as
26 payment for enrollment in a fictitious mortgage loan modification program.

27 15. On or about October 25, 2006, at the direction of JUAN JOSE PEREZ, ROSA MARIA
28 CONTRADO d.b.a. Reinstatement Department opened account # 2544043829 Bank of

1 America in Grand Terrace, California, for the deposit, withdrawal and transfer of funds
2 fraudulently obtained from homeowners for enrollment in a fictitious mortgage loan a
3 program.

4 16. On or about November 3, 2006, ROSA MARIA CONTRADO unlawfully took \$1,800
5 from MARIA Rodriguez as payment for enrollment in a fictitious mortgage loan
6 modification program.

7 17. On or about February 27, 2007, at the direction of JUAN JOSE PEREZ, ROSA MARIA
8 CONTRADO obtained San Bernardino County fictitious business name permit #
9 20070003246 for Reinstatement Processing Center, 494 Macy St.#38, San Bernardino,
10 California.

11 18. On or about February 27, 2007, at the direction of JUAN JOSE PEREZ, ROSA MARIA
12 CONTRADO d.b.a. Reinstatement Processing opened account # 1005628 00-1 at First
13 Valley Credit Union in San Bernardino for the deposit, withdrawal and transfer of funds
14 fraudulently obtained from homeowners for enrollment in a fictitious mortgage loan a
15 program.

16 19. On or about February 27, 2007, at the direction of JUAN JOSE PEREZ, ROSA
17 MARIA CONTRADO d.b.a. Reinstatement Processing opened account # 100562855-1 at
18 First Valley Credit Union in San Bernardino for the deposit, withdrawal and transfer of
19 funds fraudulently obtained from homeowners for enrollment in a fictitious mortgage loan a
20 program.

21 20. On and between June 4, 2007, and June 6, 2007, ROSA MARIA CONTRADO
22 unlawfully took \$2,050 from Alma Royas as payment for enrollment in a fictitious mortgage
23 loan modification program.

24 21. On and between June 11, 2007, and June 14, 2007, ROSA MARIA CONTRADO
25 unlawfully took \$5,549 from Margaret Momoh and David Howard as payment for
26 enrollment in a fictitious mortgage loan modification program.

27 22. On and between June 29, 2007, and July 3, 2007, ROSA MARIA CONTRADO
28 unlawfully took \$2,515 from Antonio and Claudia Rodriguez as payment for enrollment in

1 a fictitious mortgage loan modification program.

2 23. On and Between June 6, 2006, and August 8, 2007, ROSA MARIA CONRADO
3 withdrew in excess of \$125,000 in cash from bank accounts she held for the deposit,
4 withdrawal, and transfer of funds fraudulently obtained from homeowners for enrollment in
5 a fictitious mortgage loan a program.

6 **COUNT THIRTY-SEVEN**
7 **[CONSPIRACY]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Thirty-Six, the ATTORNEY
10 GENERAL further complains and states,

11 On and between September 6, 2005, and June 10, 2007, in the County of San Bernardino
12 defendants SAUL ISMAEL AMADOR, JESUS MARTIN FLORES, JUAN JOSE PEREZ, and
13 ISAURA HERNANDEZ did unlawfully conspire together, and with another person or persons
14 whose identities are unknown, to commit a crime in violation of Section 182 subdivision (a)(1)
15 of the Penal Code, to wit: grand theft, in violation of Section 487(a) of the Penal Code, a felony;
16 that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid
17 conspiracy, Defendants SAUL ISMAEL AMADOR, JESUS MARTIN FLORES, JUAN JOSE
18 PEREZ, and ISAURA HERNANDEZ committed the following overt acts:

19 1. On or about September 6, 2005, at the direction of JUAN JOSE PEREZ, MARTIN
20 JESUS FLORES obtained San Bernardino County fictitious business name permit #
21 200512770 for Foreclosure Resolution Department using a business address of 198 N.
22 Arrowhead, San Bernardino, California.

23 2. On or about September 6, 2005, at the direction of JUAN JOSE PEREZ, MARTIN
24 JESUS FLORES d.b.a. Foreclosure Resolution Department opened account # 2454941491
25 at Bank of America in Grand Terrace, California.

26 3. Between September 2005 and June 2007, SAUL ISMAEL AMADOR, JESUS MARTIN
27 FLORES, JUAN JOSE PEREZ, and others unknown solicited homeowners by mail flyers
28 entitled "FINAL NOTICE" that falsely advised homeowners their "property had been

1 turned over to the foreclosure department”; their property “may be sold without any further
2 court action”; and

3 directed them to “immediately” call a toll free telephone number about a loan modification
4 program that did not exist.

5 4. Between September 2005 and June 2007, SAUL ISMAEL AMADOR, JESUS MARTIN
6 FLORES, JUAN JOSE PEREZ, and others unknown provided homeowners with a
7 standardized application form entitled “First Gov” for the purpose of enrolling homeowners
8 in a loan modification program that did not exist.

9 5. On or about January 23, 2007, at the direction of JUAN JOSE PEREZ, SAUL ISMAEL
10 AMADOR obtained Los Angeles County fictitious business name permit # 20070140076
11 for Resolution Department using a business address of 209 N. Arrowhead, Baldwin Park,
12 California.

13 6. On or about January 24, 2007, at the direction of JUAN JOSE PEREZ, SAUL ISMAEL
14 AMADOR d.b.a. Resolution Department opened account # 5515141514 at Bank of
15 America for the deposit, withdrawal and transfer of funds fraudulently obtained from
16 homeowners for enrollment in a fictitious mortgage loan modification program.

17 7. On or about January 28, 2007, SAUL ISMAEL AMADOR and JESUS MARTIN
18 FLORES unlawfully took \$1,595 as payment for enrollment in a fictitious mortgage loan
19 modification program from Shelby Desmond and Joan Brown, a resident of San Bernardino
20 county.

21 8. On and between February 5, 2007, and July 9, 2007, SAUL ISMAEL AMADOR
22 withdrew in excess of \$40,000 in cash from bank accounts he held for the deposit,
23 withdrawal, and transfer of funds fraudulently obtained from homeowners for enrollment in
24 a fictitious mortgage loan a program.

25 9. On and between February 13, 2007, and June 25, 2007, SAUL ISMAEL AMADOR wire
26 transferred \$90,800, in funds fraudulently obtained from homeowners as payment for
27 enrollment in a fictitious mortgage loan modification program, to bank accounts held by
28 ISAURA HERNANDEZ.

1 10. Between March 2007, and May 2007, SAUL ISMAEL AMADOR submitted payments
2 to Skype for phone services to facilitate contact with homeowners regarding a fictitious
3 mortgage loan modification program.

4 11. On and between April 27, 2007, and June 25, 2007, SAUL ISMAEL AMADOR
5 unlawfully took \$3,662 as payment for enrollment in a fictitious mortgage loan
6 modification program from Luis and Sylvia Ruiz, residents of San Bernardino county.

7 12. On or about May 4, 2007, SAUL ISMAEL AMADOR unlawfully took \$2,700 from Sue
8 and Timothy Elder as payment for enrollment in a fictitious mortgage loan modification
9 program.

10 13. On or about May 19, 2007, SAUL ISMAEL AMADOR unlawfully took \$1,920 from
11 Ricardo and Gloria Moreno as payment for enrollment in a fictitious mortgage loan
12 modification program.

13 14. On or about May 10, 2007, SAUL ISMAEL AMADOR unlawfully took \$2,712 from
14 Mario and Arely Rivera as payment for enrollment in a fictitious mortgage loan
15 modification program.

16 15. On and between May 14, 2007, and July 2, 2007, SAUL ISMAEL AMADOR wire
17 transferred \$59,800 in funds fraudulently obtained from homeowners as payment for
18 enrollment in a fictitious mortgage loan modification program, to bank accounts held JUAN
19 JOSE PEREZ.

20 16. On or about May 16, 2007, SAUL ISMAEL AMADOR unlawfully took \$2,023 as
21 payment for a fictitious mortgage loan modification program from Eleuteria and Arthur
22 Washington, residents of San Bernardino county.

23 17. On or about May 23, 2007, at the direction of JUAN JOSE PEREZ, SAUL ISMAEL
24 AMADOR d.b.a. Resolution Department opened account # 3401712290 at Washington
25 Mutual bank for the deposit, withdrawal and transfer of funds fraudulently obtained from
26 homeowners for enrollment in a fictitious mortgage loan modification program.

27 18. On or about June 13, 2007, SAUL ISMAEL AMADOR unlawfully took \$2,325 from
28 Bernardo and Adriana Vera as payment for a fictitious mortgage loan modification

1 program.

2 **COUNT THIRTY-EIGHT**
3 **[CONSPIRACY]**

4 For a further and separate cause of complaint, being a different offense from but connected
5 in its commission with the charges set forth in Counts One through Thirty-Seven, the
6 ATTORNEY GENERAL further complains and states,

7 On and Between June 2006, and September 2007, in the County of San Bernardino
8 defendants DAVID GIRON, JUAN JOSE PEREZ, ISAURA HERNANDEZ and ANTONIA
9 GONZALEZ, did unlawfully conspire together, and with another person or persons whose
10 identities are unknown, to commit a crime in violation of Section 182 subdivision (a)(1) of the
11 Penal Code, to wit: grand theft, in violation of Section 487(a) of the Penal Code, a felony; that
12 pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid
13 conspiracy, defendants DAVID GIRON, JUAN JOSE PEREZ, ISAURA HERNANDEZ,
14 ANTONIA GONZALEZ committed the following overt acts:

15 1. Between June 2006, and September 2007, DAVID GIRON and JUAN JOSE PEREZ, and
16 others unknown solicited homeowners by mail flyers entitled "FINAL NOTICE" that
17 falsely advised homeowners their "property had been turned over to the foreclosure
18 department"; their property "may be sold without any further court action"; and directed
19 them to "immediately" call a toll free telephone number about a loan modification
20 modification program that did not exist.

21 2. Between June 2006, and September 2007, DAVID GIRON, JUAN JOSE PEREZ, and
22 others unknown provided homeowners with a standardized application form entitled "First
23 Gov" for the purpose of enrolling homeowners in a loan modification program that did not
24 exist.

25 3. On or about June 6, 2006, at the direction of JUAN JOSE PEREZ, DAVID GIRON
26 obtained Los Angeles County fictitious business name permit# 1242548 for Reinstatement
27 Department and Foreclosure Prevention using a business address of 450 N. Brand Blvd,
28 Glendale, California.

4. On or about June 8, 2006, at the direction of JUAN JOSE PEREZ, DAVID GIRON

1 d.b.a. Foreclosure Prevention opened account # 583044385 at Bank of America in Ontario,
2 California for the deposit, withdrawal and transfer of funds fraudulently obtained from
3 homeowners for enrollment in a fictitious mortgage loan modification program.

4 5. On or about June 8, 2006, at the direction of JUAN JOSE PEREZ, DAVID GIRON d.b.a.
5 Reinstatement Department opened account # 583244384 at Bank of America in Ontario,
6 California, for the deposit, withdrawal and transfer of funds fraudulently obtained from
7 homeowners for enrollment in a fictitious mortgage loan modification program.

8 6. Between July 2006, and September 2007, DAVID GIRON submitted payments to Skype
9 for phone services to facilitate contact with homeowners regarding a fictitious mortgage
10 loan modification program.

11 7. Between July 2006, and March 2007, ISAURA HERNANDEZ submitted payments to
12 Skype for phone services to facilitate contact with homeowners regarding a fictitious
13 mortgage loan modification program.

14 8. Between June 2006, and August 2007, ANTONIA GONZALEZ submitted payments to
15 Skype for phone services to facilitate contact with homeowners regarding a fictitious
16 mortgage loan modification program.

17 9. On and between July 24, 2006, and August 29, 2007, DAVID GIRON withdrew in
18 excess of \$10,000 in cash from bank accounts he held for the deposit, withdrawal and
19 transfer of funds fraudulently obtained from homeowners for enrollment in a fictitious
20 mortgage loan modification program.

21 10. On or about September 1, 2006, DAVID GIRON unlawfully took \$1,600 from Phillip
22 Sorensen as payment for enrollment in a fictitious mortgage loan modification program.

23 11. On or about September 6, 2006, at the direction of JUAN JOSE PEREZ, DAVID
24 GIRON obtained Riverside County fictitious business name permit # R-200612668 for First
25 Gov using a business address of 22020 Bay St., Moreno Valley California.

26 12. On or about September 7, 2006, at the direction of JUAN JOSE PEREZ, DAVID
27 GIRON d.b.a. First Gov opened account # 583144450 at Bank of America in Ontario,
28 California for the deposit, withdrawal and transfer of funds fraudulently obtained from

1 homeowners as payment for enrollment in a fictitious mortgage loan modification program.

2 13. On and between November 17, 2006, and December 19, 2006, DAVID GIRON
3 unlawfully took \$6,500 from Xochitl Chavez and Felipe Carbajal as payment for enrollment
4 in a fictitious mortgage loan modification program.

5 14. On or about August 6, 2007, at the direction of JUAN JOSE PEREZ, DAVID GIRON
6 obtained San Bernardino County fictitious business name permit # 20070012824 for
7 Resolution Department located at 1727 N. Baker, Ontario California.

8 15. On or about August 6, 2007, at the direction of JUAN JOSE PEREZ, DAVID GIRON
9 d.b.a. Resolution Department opened account #3114956557 at Washington Mutual bank for
10 the deposit, withdrawal and transfer of funds fraudulently obtained as payment for a
11 fictitious mortgage loan modification program.

12 16. On or about August 21, 2007, DAVID GIRON unlawfully took \$4,326 from Ralston
13 Compton as payment for enrollment in a fictitious mortgage loan modification program.

14 17. On and Between September 13, 2006, and October 11, 2006, DAVID GIRON
15 transferred \$20,000, in funds fraudulently obtained from homeowners as payment for
16 enrollment in a fictitious mortgage loan modification program, to a bank account held by
17 JUAN JOSE PEREZ.

18 18. On and Between August 23, 2007, and September 4, 2007, DAVID GIRON wire
19 transferred \$27,000, in funds fraudulently obtained from homeowners as payment for
20 enrollment in a fictitious mortgage loan modification program, to a bank account held by
21 ISAURA HERNANDEZ.

22 19. On and Between June 3, 2006, and November 6, 2006, DAVID GIRON transferred in
23 excess of \$112,000, in funds fraudulently obtained from homeowners as payment for
24 enrollment in a fictitious mortgage loan modification program, to a bank account held by
25 ANTONIA GONZALEZ.

26 **COUNT THIRTY-NINE**
27 **[CONSPIRACY]**

28 For a further and separate cause of complaint, being a different offense from but connected

1 in its commission with the charges set forth in Count Thirty-Eight, the ATTORNEY GENERAL
2 further complains and states,

3 On and Between May 2, 2005 and October 15, 2007, in the County of San Bernardino
4 defendants ALEJANDRINA E. MALDONADO, JUAN JOSE PEREZ, and ANTONIA
5 GONZALEZ did unlawfully conspire together, and with another person or persons whose
6 identities are unknown, to commit a crime in violation of Section 182 subdivision (a)(1) of the
7 Penal Code, to wit: grand theft, in violation of Section 487(a) of the Penal Code, a felony; that
8 pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid
9 conspiracy, defendants ALEJANDRINA E. MALDONADO, JUAN JOSE PEREZ and
10 ANTONIA GONZALEZ committed the following overt acts:

- 11
12 1. On or about May 2, 2005, ANTONIA GONZALEZ opened account #8045808758 at
13 Wells Fargo bank in San Bernardino, California.
- 14 2. Between June 2006, and September 2007, ALEJANDRINA E. MALDONADO, JUAN
15 JOSE PEREZ, and others unknown solicited homeowners by mail flyers entitled “FINAL
16 NOTICE” that falsely advised homeowners their “property had been turned over to the
17 foreclosure department”; their property “may be sold without any further court action”; and
18 directed them to “immediately” call a toll free telephone number about a loan modification
19 program that did not exist.
- 20 3. Between June 2006, and September 2007, ALEJANDRINA E. MALDONADO, JUAN
21 JOSE PEREZ, and others unknown provided homeowners with a standardized application
22 form entitled “First Gov” for the purpose of enrolling homeowners in a loan modification
23 program that did not exist.
- 24 4. Between June 2006, and August 2007, ANTONIA GONZALEZ submitted payments to
25 Skype for phone services to facilitate contact with homeowners regarding a fictitious
26 mortgage loan modification program.
- 27 5. On or about July 5, 2007, at the direction of JUAN JOSE PEREZ, ALEJANDRINA E.
28 MALDONADO obtained Alameda County fictitious business name permit # 398031 for

1 Resolution Department using a business address of 848 Vermont Street, Oakland,
2 California.

3 6. On or about July 9, 2007, at the direction of JUAN JOSE PEREZ, ALEJANDRINA E.
4 MALDONADO d.b.a. Resolution Department opened account # 3080204808 at
5 Washington Mutual bank for the deposit, withdrawal and transfer of funds fraudulently
6 obtained from homeowners for enrollment in a fictitious mortgage loan modification
7 program.

8 7. On or about July 9, 2007, ALEJANDRINA E. MALDONADO unlawfully took \$2,023 as
9 payment for enrollment in a fictitious mortgage loan modification program from Eleuteria
10 and Arthur Washington, residents of San Bernardino County.

11 8. On and between July 10, 2007, and August 10, 2007 ALEJANDRINA E.
12 MALDONADO, deposited in excess of \$60,000, in cash funds fraudulently obtained from
13 homeowners as payment for enrollment in a fictitious mortgage loan modification program,
14 to Wells Fargo account #8045808758 held by ANNTONIA GONZALEZ.

15 9. On or about August 6, 2007, ALEJANDRINA E. MALDONADO unlawfully took
16 \$1,576 from Joe and Ruby Carter as payment for enrollment in a fictitious mortgage loan
17 modification program.

18 10. On or about July 30, 2007, ALEJANDRINA E. MALDONADO unlawfully took \$2,264
19 from Rodney Shead as payment for enrollment in a fictitious mortgage loan modification
20 program.

21 11. Between July and August 2007, ALEJANDRINA E. MALDONADO submitted
22 payments to Skype for phone services to facilitate contact with homeowners regarding a
23 fictitious mortgage loan modification program.

24 12. On or about August 6, 2007, ALEJANDRINA E. MALDONADO unlawfully took
25 \$2,276 from Mario and Arely Rivera as payment for enrollment in a fictitious mortgage
26 loan modification program.

27 13. On and between June 28, 2007, and August 10, 2007, ANTONIA GONZALEZ
28 withdrew in excess of \$60,000 in cash from a bank account she held for the deposit,

1 withdrawal and transfer of funds fraudulently obtained from homeowners for enrollment in
2 a fictitious mortgage loan modification program.

3 14. On and Between July 9, 2007, and August 10, 2007, ALEJANDRINA E.
4 MALDONADO withdrew in excess of \$75,000 in cash from a bank account she held for the
5 deposit, withdrawal and transfer of funds fraudulently obtained from homeowners for
6 enrollment in a fictitious mortgage loan modification program.

7 15. On and Between July 10, 2007, and August 10, 2007, at the direction of JUAN JOSE
8 PEREZ, ALEJANDRINA E. MALDONADO wire transferred \$54,800, in funds
9 fraudulently obtained from homeowners for enrollment in a fictitious mortgage loan
10 modification program, to Wells Fargo account # 8045808758 held by ANTONIA
11 GONZALEZ.

12 16. On or about September 11, 2007, at the direction of JUAN JOSE PEREZ,
13 ALEJANDRINA E. MALDONADO, caused Alan Alban, an uncharged coconspirator, to
14 obtain a fictitious business license for Reinstatement Department in Port Lucie, Florida.

15 17. On or about September 11, 2007, at the direction of JUAN JOSE PEREZ,
16 ALEJANDRINA E. MALDONADO, caused Alan Alban, an uncharged coconspirator, to
17 open a bank account # 3024 at Bankatlantic in Port Lucie Florida, for the deposit,
18 withdrawal and transfer of funds fraudulently obtained from homeowners for enrollment in
19 a fictitious mortgage loan modification program.

20 18. On or about September 19, 2007, at the direction of JUAN JOSE PEREZ,
21 ALEJANDRINA E. MALDONADO, caused Alan Alban, an uncharged coconspirator, to
22 wire transfer \$7,000, in funds funds fraudulently obtained from homeowners for enrollment
23 in a fictitious mortgage loan modification program, to Wells Fargo account # 8045808758
24 held by ANTONIA GONZALEZ.

25 19. On or about October 15, 2007, at the direction of JUAN JOSE PEREZ,
26 ALEJANDRINA E. MALDONADO, caused Alan Alban, an uncharged coconspirator, to
27 wire transfer \$9,500, in funds funds fraudulently obtained from homeowners for enrollment
28 in a fictitious mortgage loan modification program, to Wells Fargo account # 8045808758

1 held by ANTONIA GONZALEZ.

2 20. On or about October 5, 2007, ALEJANDRINA E. MALDONADO unlawfully took
3 \$2,144 from Alvaro Gadea as payment for enrollment in a fictitious mortgage loan
4 modification program.

5 21. On or about October 15, 2007, at the direction of JUAN JOSE PEREZ,
6 ALEJANDRINA E. MALDONADO, caused Alan Alban, an uncharged coconspirator, to
7 wire transfer \$9,500, in funds funds fraudulently obtained from homeowners for enrollment
8 in a fictitious mortgage loan modification program, to Wells Fargo account # 8045808758
9 held by ANTONIA GONZALEZ.

10 **DECLARATION**

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

13 Dated: October 24, 2008

14
15 EDMUND G. BROWN JR.
16 Attorney General of the State of California

17
18 By: _____

19 ANGELA K. ROSENAU
20 Deputy Attorney General

21 **BAIL RECOMMENDATION:**

22 **SAUL ISMAEL AMADOR - \$100,000**

23 **ROSA MARIA CONTRADO - \$210,000**

24 **JESUS MARTIN FLORES - \$40,000**

25 **DAVID GIRON - \$130,000**

26 **ANTONIA GONZALEZ - \$250,000**

27 **ISAURA HERNANDEZ - \$250,000**

28 **ALEJANDRINA E. MALDONADO - \$90,000**

JUAN JOSE PEREZ - \$250,000