

EDMUND G. BROWN JR.
Attorney General of California
FRANCES T. GRUNDER
Senior Assistant Attorney General
CATHERINE Z. YSRAEL
Supervising Deputy Attorney General
ANGELA K. ROSENAU
Deputy Attorney General
State Bar No. 182175
110 West A Street, Suite 1100
San Diego, CA 92101
P.O. Box 85266
San Diego, CA 92186-5266

Attorneys for the People

FILED
LOS ANGELES SUPERIOR COURT

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BY

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DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

**ANNA MARIA SANTOS (DOB: 8/15/87), ANTONIA
GONZALEZ (DOB: 3/13/43), ISAURA HERNANDEZ
(DOB: 2/1/75), JUAN JOSE PEREZ (DOB: 9/22/61),**

Defendants.

CASE NO LA061454

**FELONY COMPLAINT
FOR ARREST WARRANT**

The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants,
ANNA MARIA SANTOS, ANTONIA GONZALEZ, ISUARA HERNANDEZ, and JUAN JOSE
PEREZ, of the following crimes, which are connected to one another in their commission:

COUNT ONE

[GRAND THEFT]

For a separate cause of complaint, the ATTORNEY GENERAL complains and states:

1 On or about October 28, 2008, in the County of Los Angeles, defendant ANNA MARIA
2 SANTOS unlawfully took property, to wit: money for a fictitious mortgage loan modification
3 program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit: Maria
4 Caudillo, in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT TWO**

6 **[GRAND THEFT]**

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

10 On or about November 10, 2008, in the County of Los Angeles, defendant ANNA MARIA
11 SANTOS unlawfully took property, to wit: money for a fictitious mortgage loan modification
12 program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit: Alejandro
13 Alamillo-Lugo, in violation of Penal Code section 487, subdivision (a), a felony.

14 **COUNT THREE**

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 and Two, the ATTORNEY
18 GENERAL further complains and states:

19 On or about November 10, 2008, in the County of Los Angeles, defendant ANNA MARIA
20 SANTOS unlawfully took property, to wit: money for a fictitious mortgage loan modification
21 program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit: Jose Serrano,
22 in violation of Penal Code section 487, subdivision (a), a felony.

23 **COUNT FOUR**

24 **[GRAND THEFT]**

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

1 On or about November 10, 2008, in the County of Los Angeles, defendant ANNA MARIA
2 SANTOS unlawfully took property, to wit: money for a fictitious mortgage loan modification
3 program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit: Jorge Medina,
4 in violation of Penal Code section 487, subdivision (a), a felony.

5 **COUNT FIVE**

6 **[GRAND THEFT]**

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

10 On and between March 21, 2008, and May 19, 2008, in the County of Los Angeles,
11 defendant JUAN PEREZ unlawfully took property, to wit: money for a fictitious mortgage loan
12 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
13 Maria Munoz, in violation of Penal Code section 487, subdivision (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 and between July 28, 2008, and September 23, 2008, in the County of Los Angeles,
20 defendant JUAN PEREZ unlawfully took property, to wit: money for a fictitious mortgage loan
21 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
22 Alvaro Ayala, in violation of Penal Code section 487, subdivision (a), a felony.

23 **COUNT SEVEN**

24 **[GRAND THEFT]**

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

1 On and between August 26, 2008, and October 10, 2008, in the County of Los Angeles,
2 defendant JUAN PEREZ unlawfully took property, to wit: money for a fictitious mortgage loan
3 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
4 Maricela Castellanos, in violation of Penal Code section 487, subdivision (a), a felony.

5
6 **COUNT EIGHT**

7 **[GRAND THEFT]**

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

11 On and between September 9, 2008, and November 10, 2008, in the County of Los
12 Angeles, defendant JUAN PEREZ 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: Jose Serrano, in violation of Penal Code section 487, subdivision (a), a felony.

15
16 **COUNT NINE**

17 **[GRAND THEFT]**

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

21
22 On and between September 18, 2008, and November 10, 2008, in the County of Los
23 Angeles, defendant JUAN PEREZ unlawfully took property, to wit: money for a fictitious
24 mortgage loan modification program, of a value in excess of Four Hundred Dollars (\$400) from
25 another, to wit: Jorge Medina, in violation of Penal Code section 487, subdivision (a), a felony.

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 September 25, 2008, and October 15, 2008, in the County of Los Angeles,
7 defendant JUAN PEREZ unlawfully took property, to wit: money for a fictitious mortgage loan
8 modification program, of a value in excess of Four Hundred Dollars (\$400) from another, to wit:
9 Humberto Diaz, in violation of Penal Code section 487, subdivision (a), a felony.

10 **COUNT ELEVEN**

11 **[MONEY-LAUNDERING]**

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

15 On or about November 12, 2008, in the County of Los Angeles, defendant ANNA MARIA
16 SANTOS committed a violation of Penal Code section 186.10, subdivision (a)(2), a felony, to
17 wit: willfully and unlawfully conducted a series of transactions involving a monetary instrument
18 or instruments, of a value exceeding five thousand dollars (\$5000), through a financial institution,
19 to wit: cash withdrawal from Wachovia Bank account number 200042138954; knowing that such
20 monetary instrument or instruments represent the proceeds of, or were derived directly or
21 indirectly from the proceeds of criminal activity, to wit: grand theft.

22 **COUNT TWELVE**

23 **[CONSPIRACY]**

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 Eleven the ATTORNEY
26 GENERAL further complains and states:

27 Between October 2007 and November 2008, in the County of Los Angeles, defendants
28 ANNA MARIA SANTOS, ANTONIA GONZALEZ, ISUARA HERNANDEZ, and JUAN JOSE

1 PEREZ, and others unknown, did unlawfully conspire together, and with another person or
2 persons whose identities are unknown, to commit a crime in violation of Penal Code Section 182
3 subdivision (a)(1), to wit: grand theft, in violation of Section 487(a) of the Penal Code, a felony;
4 that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid
5 conspiracy, defendants ANNA MARIA SANTOS, ANTONIA GONZALEZ, ISUARA
6 HERNANDEZ, and JUAN JOSE PEREZ committed the following overt acts:

7 1. Between October 2007 and November 2008, JUAN JOSE PEREZ, and others unknown
8 solicited homeowners by mail flyers entitled "FINAL NOTICE" that falsely advised homeowners
9 their "property had been turned over to the foreclosure department;" their property "may be sold
10 without any further court action;" and directed them to "immediately" call a toll-free telephone
11 number about a loan modification program that did not exist.

12 2. Between October 2007 and November 2008, JUAN JOSE PEREZ, and others unknown
13 falsely represented that homeowners were approved for a mortgage loan modification program
14 that required them to send their first three monthly mortgage payments to Payment Processing
15 Department.

16 3. Between October 2007 and November 2008, JUAN JOSE PEREZ, and others unknown
17 sent homeowners correspondence that contained fictitious loan modification documents
18 purportedly from the homeowner's lender.

19 4. Between October 2007 and November 2008, ISUARA HERNANDEZ held account
20 number 012320001546381316 at Bancomer Bank in Guadalajara, Mexico for the deposit and
21 withdrawal of funds fraudulently obtained as payment for fictitious mortgage loan modifications.

22 5. Between October 2007 and November 2008, ANTONIA GONZALEZ held account
23 number 8045808758 at Wells Fargo Bank for the deposit and withdrawal of funds fraudulently
24 obtained as payment for fictitious mortgage loan modifications.

25 6. On October 30, 2007, ANNA MARIA SANTOS, at the direction of JUAN PEREZ and

1 #34, North Hills, California, for the purpose of receiving money orders and cashier's check sent
2 by homeowners as payments on mortgage loan modifications that did not exist.

3 7. On October 30, 2007, ANNA MARIA SANTOS, at the direction of JUAN PEREZ and
4 others unknown, obtained P.O. Box 2384, North Hills, California, in the name of Payment
5 Prossing (*sic.*) Department for the purpose of receiving money orders and cashier's check sent by
6 homeowners as payment on mortgage loan modifications that did not exist.

7 8. On or about October 30, 2007, ANNA MARIA SANTOS, at the direction of JUAN
8 PEREZ and others unknown, opened account number 4214544614 at Washington Mutual Bank
9 located in Mission Hills, California, for the deposit transfer, and withdrawal of funds fraudulently
10 obtained as payment for fictitious mortgage loan modifications.

11 9. On November 30, 2007, ANNA MARIA SANTOS and uncharged co-conspirator Dimas
12 Santos, at the direction of JUAN PEREZ and others unknown, obtained Los Angeles County
13 Fictitious Business Name Permit 20072637475 for Payment Processing Department using an
14 address of 8542 Columbus Avenue #34, North Hills, California, for the purpose of receiving
15 money orders and cashier's check sent by homeowners as payment on mortgage loan
16 modifications that did not exist.

17 10. On November 30, 2007, ANNA MARIA SANTOS and uncharged co-conspirator
18 Dimas Santos, at the direction of JUAN PEREZ and others unknown, opened account number
19 1358540282 at Wells Fargo Bank located in Panorama City, California, for the deposit transfer,
20 and withdrawal of funds fraudulently obtained as payment for fictitious mortgage loan
21 modifications.

22 11. On November 30, 2007, ANNA MARIA SANTOS, at the direction of JUAN PEREZ
23 and others unknown, opened account number 6834787654 at Wells Fargo Bank located in
24 Panorama City, California, for the deposit transfer, and withdrawal of funds fraudulently obtained
25 as payment for fictitious mortgage loan modifications.

26 12. On and between January and June 2008, ANNA MARIA SANTOS, at the direction of
27 JUAN PEREZ and others unknown, submitted payments to Vonage for phone services to
28 facilitate contact with homeowners regarding a fictitious mortgage loan modification program.

1 13. On February 28, 2008, ANNA MARIA SANTOS, at the direction of JUAN PEREZ and
2 others unknown, ANNA MARIA SANTOS obtained P.O. Box 950422, Mission Hills, California,
3 in the name of Payment Processing Department for the purpose of receiving money orders and
4 cashier's check sent by homeowners as payment on a mortgage loan modification program that
5 did not exist.

6 14. On March 8, 2008, ANNA MARIA SANTOS transferred \$5,600 in funds fraudulently
7 obtained as payment for fictitious mortgage loan modifications to Bancomer account number
8 012320001546381316 held by ISUARA HERNANDEZ.

9 15. On and between March 21, 2008 and May 19, 2008, ANNA MARIA SANTOS, JUAN
10 PEREZ and others unknown, unlawfully took \$6,034 from Maria Munoz as payment for a
11 fictitious mortgage loan modification.

12 16. On April 7, 2008, ANNA MARIA SANTOS, at the direction of JUAN PEREZ and
13 others unknown, opened account number 200042138954 at Wachovia Bank located in
14 Northridge, California, for the deposit transfer, and withdrawal of funds fraudulently obtained as
15 payment for fictitious mortgage loan modifications.

16 17. On May 1, 2008, ANNA MARIA SANTOS, at the direction of JUAN PEREZ and
17 others unknown, opened account number 2194815052 at Wells Fargo Bank located in Panorama
18 City, California, for the deposit, transfer, and withdrawal of funds fraudulently obtained as
19 payment for fictitious mortgage loan modifications.

20 18. On July 16, 2008, ANNA MARIA SANTOS transferred \$3,300 in funds fraudulently
21 obtained as payment for fictitious mortgage loan modifications to Bancomer account number
22 012320001546381316 held by ISUARA HERNANDEZ.

23 19. On and between July 28, 2008, and September 23, 2008, ANNA MARIA SANTOS,
24 JUAN PEREZ, and others unknown, unlawfully took \$7,125 from Alvaro Ayala as payment for a
25 fictitious mortgage loan modification.

26 20. On and between August 26, 2008, and October 10, 2008, ANNA MARIA SANTOS,
27 JUAN PEREZ, and others unknown, unlawfully took \$3,668 from Maricela Castellanos as
28 payment for a fictitious mortgage loan modification.

1 21. On August 29, 2008, ANNA MARIA SANTOS transmitted \$4,100 in funds
2 fraudulently obtained as payment for fictitious mortgage loan modifications to JUAN PEREZ
3 through WESTERN UNION located in Sepulveda, California.

4 22. On September 3, 2008, ANNA MARIA SANTOS transmitted \$970 in funds
5 fraudulently obtained as payment for fictitious mortgage loan modifications to JUAN PEREZ
6 through WESTERN UNION located in Sepulveda, California.

7 23. September 13, 2008, ANNA MARIA SANTOS transferred \$3,000 in funds fraudulently
8 obtained as payment for fictitious mortgage loan modifications to Wells Fargo account number
9 8045808758 held by ANTONIA GONZALEZ.

10 24. On and between September 9, 2008, and November 10, 2008, ANNA MARIA
11 SANTOS, JUAN PEREZ, and others unknown, unlawfully took \$6,995 from Jose Serrano as
12 payment for a fictitious mortgage loan modification.

13 25. On and between September 18, 2008, and November 8, 2008, ANNA MARIA
14 SANTOS, JUAN PEREZ, and others unknown, unlawfully took \$7,018 from Jorge Medina as
15 payment for a fictitious mortgage loan modification.

16 26. On and between September 25, 2008, and October 15, 2008, ANNA MARIA SANTOS,
17 JUAN PEREZ, and others unknown, unlawfully took \$3,669 from Humberto Diaz as payment for
18 a fictitious mortgage loan modification.

19 27. On and between October 24, 2008, and October 28, 2008, ANNA MARIA SANTOS,
20 JUAN PEREZ, and others unknown, unlawfully took \$2,939 from Maria Caudillo as payment for
21 a fictitious mortgage loan modification.

22 28. On and between October 30, 2008, and November 10, 2008, ANNA MARIA SANTOS,
23 JUAN PEREZ, and others unknown, unlawfully took \$2,789 from Alejandro Alamillo-Lugo as
24 payment for a fictitious mortgage loan modification.

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26 ///

27 ///

1 29. On November 12, 2008, ANNA MARIA SANTOS withdrew \$5,936 in cash proceeds
2 obtained as payment for fictitious mortgage loan modifications from Wachovia account number
3 200042138954.

4
5 Dated: March 5, 2009

EDMUND G. BROWN JR.
Attorney General of the State of California
FRANCES T. GRUNDER
Senior Assistant Attorney General
CATHERINE Z. YSREAL
Supervising Deputy Attorney General

8
9 By: [REDACTED]
10 ANGELO K. ROSENAU
Deputy Attorney General
Attorneys for the People

11 **BAIL RECOMMENDATIONS:**

12 **ANTONIA GONZALEZ – \$1,000,000 (\$20,000 per bail schedule)**

13 **ISAURA HERNANDEZ - \$1,000,000 (\$20,000 per bail schedule)**

14 **JUAN JOSE PEREZ – \$1,000,000 (\$140,000 per bail schedule)**

15 **ANNA MARIA SANTOS -\$120,000 per bail schedule**
16



I certify that this is a true and correct copy of the original
on file in this office consisting of
10
JAMES L. CLARKE, Executive Officer/
Clerk of the Superior Court of California,
County of Los Angeles.

Date 3-10-9 By ABergin Deputy