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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAY 29 2009

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Attorneys for People of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

FELONY COMPLAINT

v.

JAMES A. SWEENEY, II, and PATRICK
M. RYAN,

Defendants.

Dept: 55
Judge JEAN LEONARD
Action Filed: 5/29/09

RIF 150506

1 THE ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses Defendants
2 JAMES A. SWEENEY, II AND PATRICK M. RYAN, of the following crimes, which are
3 connected to one another in their commission:

4 **COUNT ONE**

5 **[SALE OF UNQUALIFIED SECURITY]**

6 For a separate cause of complaint, the Attorney General complains and states, on and
7 between November 1, 2005 and December 31, 2005, in the County of Riverside, State of
8 California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and
9 unlawfully offer or sell a security in an issuer transaction which had not been qualified under
10 §§25111, 25112 or 25113 of the California Corporations Code, to wit: the sale of stock in Big
11 Co-op, Inc. and/or EZ2WIN.BIZ to ANNIE ARQUINES, in violation of California Corporations
12 Code §25110, a felony.

13 **COUNT TWO**

14 **[FRAUD IN THE OFFER OF A SECURITY]**

15 For a further and separate cause of complaint, being a different offense from but
16 connected in its commission with the charges set forth in Count 1, the Attorney General further
17 complains and states, on and between November 1, 2005 and December 31, 2005, in the County
18 of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M.
19 RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op, Inc.
20 and/or EZ2WIN.BIZ, to a person or persons, to wit: ANNIE ARQUINES, by means of a written
21 or oral communication which included an untrue statement of a material fact or an omission of a
22 material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations
23 Code, a felony.

24 **COUNT THREE**

25 **[GRAND THEFT]**

26 For a further and separate cause of complaint, being a different offense from but
27 connected in its commission with the charges set forth in Counts 1 and 2, the Attorney General
28 further complains and states, on and between November 1, 2005 and December 31, 2005, in the

1 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
2 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
3 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: ANNIE
4 ARQUINES, a violation of California Penal Code §487, subdivision (a), a felony.

5 **COUNT FOUR**

6 **[SALE OF UNQUALIFIED SECURITY]**

7 For a further and separate cause of complaint, being a different offense from but
8 connected in its commission with the charges set forth in Counts 1 through 3, the Attorney
9 General further complains and states, on and between September 1, 2006 and October 31, 2006,
10 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
11 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
12 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
13 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to EDMUND AND
14 LORNA BARRERA, in violation of California Corporations Code §25110, a felony.

15 **COUNT FIVE**

16 **[FRAUD IN THE OFFER OF A SECURITY]**

17 For a further and separate cause of complaint, being a different offense from but
18 connected in its commission with the charges set forth in Counts 1 through 4, the Attorney
19 General further complains and states, on and between September 1, 2006 and October 31, 2006,
20 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
21 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
22 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: EDMUND AND LORNA
23 BARRERA, by means of a written or oral communication which included an untrue statement of
24 a material fact or an omission of a material fact, in violation of §§25401 and 25540, subdivision
25 (b), of the California Corporations Code, a felony.

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COUNT SIX

[GRAND THEFT]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 5, the Attorney General further complains and states, on and between September 1, 2006 and October 31, 2006, in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: EDMIND AND LORNA BARRERA, a violation of California Penal Code §487, subdivision (a), a felony.

COUNT SEVEN

[SALE OF UNQUALIFIED SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 6, the Attorney General further complains and states, on and between July 1, 2006 and October 31, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to RUDOLPH CELAYA, in violation of California Corporations Code §25110, a felony.

COUNT EIGHT

[FRAUD IN THE OFFER OF A SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 7, the Attorney General further complains and states, on and between July 1, 2006 and October 31, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: RUDOLPH CELAYA, by means of a

1 written or oral communication which included an untrue statement of a material fact or an
2 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
3 Corporations Code, a felony.

4 **COUNT NINE**

5 **[GRAND THEFT]**

6 For a further and separate cause of complaint, being a different offense from but
7 connected in its commission with the charges set forth in Counts 1 through 8, the Attorney
8 General further complains and states, on and between July 1, 2006 and October 31, 2006, in the
9 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
10 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
11 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
12 RUDOLPH CELAYA, a violation of California Penal Code §487, subdivision (a), a felony.

13 **COUNT TEN**

14 **[SALE OF UNQUALIFIED SECURITY]**

15 For a further and separate cause of complaint, being a different offense from but
16 connected in its commission with the charges set forth in Counts 1 through 9, the Attorney
17 General further complains and states, on and between September 1, 2005 and May 31, 2006, in
18 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
19 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
20 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
21 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to HECTOR CEREZO,
22 M.D., in violation of California Corporations Code §25110, a felony.

23 **COUNT ELEVEN**

24 **[FRAUD IN THE OFFER OF A SECURITY]**

25 For a further and separate cause of complaint, being a different offense from but
26 connected in its commission with the charges set forth in Counts 1 through 10, the Attorney
27 General further complains and states, on and between September 1, 2005 and May 31, 2006, in
28 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and

1 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
2 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: HECTOR CEREZO, M.D.,
3 by means of a written or oral communication which included an untrue statement of a material
4 fact or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
5 California Corporations Code, a felony.

6 **COUNT TWELVE**

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 1 through 11, the Attorney
10 General further complains and states, on and between September 1, 2005 and May 31, 2006, in
11 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
12 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
13 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
14 HECTOR CEREZO, M.D., a violation of California Penal Code §487, subdivision (a), a felony.

15 **COUNT THIRTEEN**

16 **[SALE OF UNQUALIFIED SECURITY]**

17 For a further and separate cause of complaint, being a different offense from but
18 connected in its commission with the charges set forth in Counts 1 through 12 the Attorney
19 General further complains and states, on and between November 1, 2005 and January 31, 2006, in
20 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
21 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
22 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
23 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to ELSIE CORPUZ, in
24 violation of California Corporations Code §25110, a felony.

25 **COUNT FOURTEEN**

26 **[FRAUD IN THE OFFER OF A SECURITY]**

27 For a further and separate cause of complaint, being a different offense from but
28 connected in its commission with the charges set forth in Counts 1 through 13, the Attorney

1 General further complains and states, on and between November 1, 2005 and January 31, 2006, in
2 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
3 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
4 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: ELSIE CORPUZ, by means
5 of a written or oral communication which included an untrue statement of a material fact or an
6 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
7 Corporations Code, a felony.

8 **COUNT FIFTEEN**

9 **[GRAND THEFT]**

10 For a further and separate cause of complaint, being a different offense from but
11 connected in its commission with the charges set forth in Counts 1 through 14, the Attorney
12 General further complains and states, On and November 1, 2005 and January 31, 2006, in the
13 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
14 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
15 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: ELSIE
16 CORPUZ, a violation of California Penal Code §487, subdivision (a), a felony.

17 **COUNT SIXTEEN**

18 **[SALE OF UNQUALIFIED SECURITY]**

19 For a further and separate cause of complaint, being a different offense from but
20 connected in its commission with the charges set forth in Counts 1 through 15, the Attorney
21 General further complains and states, on and between October 1, 2005 and February 28, 2006, in
22 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
23 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
24 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
25 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to NOLASCO DAYLEG,
26 in violation of California Corporations Code §25110, a felony.

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1 **COUNT SEVENTEEN**

2 **[FRAUD IN THE OFFER OF A SECURITY]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 16, the Attorney
5 General further complains and states, on and between October 1, 2005 and February 28, 2006, in
6 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
7 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
8 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: NOLASCO DAYLEG, by
9 means of a written or oral communication which included an untrue statement of a material fact
10 or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
11 California Corporations Code, a felony.

12 **COUNT EIGHTEEN**

13 **[GRAND THEFT]**

14 For a further and separate cause of complaint, being a different offense from but
15 connected in its commission with the charges set forth in Counts 1 through 17, the Attorney
16 General further complains and states, on and between October 1, 2005 and February 28, 2006, in
17 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
18 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
19 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
20 NOLASCO DAYLEG, a violation of California Penal Code §487, subdivision (a), a felony.

21 **COUNT NINETEEN**

22 **[SALE OF UNQUALIFIED SECURITY]**

23 For a further and separate cause of complaint, being a different offense from but
24 connected in its commission with the charges set forth in Counts 1 through 18, the Attorney
25 General further complains and states, on and between October 1, 2006 and December 31, 2006 in
26 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
27 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
28 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations

1 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to ED DUCUSIN, in
2 violation of California Corporations Code §25110, a felony.

3 **COUNT TWENTY**

4 **[FRAUD IN THE OFFER OF A SECURITY]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 19, the Attorney
7 General further complains and states, on and between October 1, 2006 and December 31, 2006, in
8 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
9 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
10 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: ED DUCUSIN, by means of
11 a written or oral communication which included an untrue statement of a material fact or an
12 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
13 Corporations Code, a felony.

14 **COUNT TWENTY-ONE**

15 **[GRAND THEFT]**

16 For a further and separate cause of complaint, being a different offense from but
17 connected in its commission with the charges set forth in Counts 1 through 20, the Attorney
18 General further complains and states, on and between October 1, 2006 and December 31, 2006, in
19 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
20 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
21 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: ED
22 DUCUSIN, a violation of California Penal Code §487, subdivision (a), a felony.

23 **COUNTY TWENTY-TWO**

24 **[SALE OF UNQUALIFIED SECURITY]**

25 For a further and separate cause of complaint, being a different offense from but
26 connected in its commission with the charges set forth in Counts 1 through 21, the Attorney
27 General further complains and states, on and between August 1, 2005 and September 30, 2005, in
28 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and

1 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
2 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
3 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to ESPERANZA DULAY,
4 in violation of California Corporations Code §25110, a felony.

5 **COUNT TWENTY-THREE**

6 **[FRAUD IN THE OFFER OF A SECURITY]**

7 For a further and separate cause of complaint, being a different offense from but
8 connected in its commission with the charges set forth in Counts 1 through 22, the Attorney
9 General further complains and states, on and between August 1, 2005 and September 30, 2005, in
10 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
11 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
12 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: ESPERANZA DULAY, by
13 means of a written or oral communication which included an untrue statement of a material fact
14 or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
15 California Corporations Code, a felony.

16 **COUNT TWENTY-FOUR**

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 1 through 23, the Attorney
20 General further complains and states, on and between August 1, 2005 and September 30, 2005, in
21 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
22 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
23 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
24 ESPERANZA DULAY, a violation of California Penal Code §487, subdivision (a), a felony.

25 **COUNT TWENTY-FIVE**

26 **[SALE OF UNQUALIFIED SECURITY]**

27 For a further and separate cause of complaint, being a different offense from but
28 connected in its commission with the charges set forth in Counts 1 through 24, the Attorney

1 General further complains and states, on and between October 1, 2005 and April 30, 2006, in the
2 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
3 M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had
4 not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit:
5 the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JESSIE DUONG, in violation of
6 California Corporations Code §25110, a felony.

7 **COUNT TWENTY-SIX**

8 **[FRAUD IN THE OFFER OF A SECURITY]**

9 For a further and separate cause of complaint, being a different offense from but
10 connected in its commission with the charges set forth in Counts 1 through 25, the Attorney
11 General further complains and states, on and between October 1, 2005 and April 30, 2006, in the
12 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
13 M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op,
14 Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JESSIE DUONG, by means of a written
15 or oral communication which included an untrue statement of a material fact or an omission of a
16 material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations
17 Code, a felony.

18 **COUNT TWENTY-SEVEN**

19 **[GRAND THEFT]**

20 For a further and separate cause of complaint, being a different offense from but
21 connected in its commission with the charges set forth in Counts 1 through 26, the Attorney
22 General further complains and states, on and between October 1, 2005 and April 30, 2006, in the
23 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
24 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
25 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: JESSIE
26 DUONG, a violation of California Penal Code §487, subdivision (a), a felony.

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1 **COUNT TWENTY-EIGHT**

2 **[SALE OF UNQUALIFIED SECURITY]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 27, the Attorney
5 General further complains and states, on and between July 1, 2006 and November 30, 2006, in the
6 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
7 M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had
8 not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit:
9 the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to VICTOR FACUN, in violation of
10 California Corporations Code §25110, a felony.

11 **COUNT TWENTY-NINE**

12 **[FRAUD IN THE OFFER OF A SECURITY]**

13 For a further and separate cause of complaint, being a different offense from but
14 connected in its commission with the charges set forth in Counts 1 through 28, the Attorney
15 General further complains and states, on and between July 1, 2006 and November 30, 2006, in the
16 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
17 M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op,
18 Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: VICTOR FACUN, by means of a written
19 or oral communication which included an untrue statement of a material fact or an omission of a
20 material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations
21 Code, a felony.

22 **COUNT THIRTY**

23 **[GRAND THEFT]**

24 For a further and separate cause of complaint, being a different offense from but
25 connected in its commission with the charges set forth in Counts 1 through 29, the Attorney
26 General further complains and states, on and between July 1, 2006 and November 30, 2006, in the
27 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
28 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or

1 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: VICTOR
2 FACUN, a violation of California Penal Code §487, subdivision (a), a felony.

3 **COUNT THIRTY-ONE**

4 **[SALE OF UNQUALIFIED SECURITY]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 30, the Attorney
7 General further complains and states, on and between November 1, 2005 and January 31, 2006, in
8 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
9 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
10 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
11 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to ERLINDA LYNCH, in
12 violation of California Corporations Code §25110, a felony.

13 **COUNT THIRTY-TWO**

14 **[FRAUD IN THE OFFER OF A SECURITY]**

15 For a further and separate cause of complaint, being a different offense from but
16 connected in its commission with the charges set forth in Counts 1 through 31, the Attorney
17 General further complains and states, on and between November 1, 2005 and January 31, 2006, in
18 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
19 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
20 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: ERLINDA LYNCH, by
21 means of a written or oral communication which included an untrue statement of a material fact
22 or an omission of a material fact, in violation of §§25401 and 2540, subdivision (b), of the
23 California Corporations Code, a felony.

24 **COUNT THIRTY-THREE**

25 **[GRAND THEFT]**

26 For a further and separate cause of complaint, being a different offense from but
27 connected in its commission with the charges set forth in Counts 1 through 32, the Attorney
28 General further complains and states, on and between November 1, 2005 and January 31, 2006, in

1 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
2 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
3 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
4 ERLINDA LYNCH, a violation of California Penal Code §487, subdivision (a), a felony.

5 **COUNT THIRTY-FOUR**

6 **[SALE OF UNQUALIFIED SECURITY]**

7 For a further and separate cause of complaint, being a different offense from but
8 connected in its commission with the charges set forth in Counts 1 through 33, the Attorney
9 General further complains and states, on and between November 1, 2005 and December 31, 2005,
10 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
11 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
12 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
13 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to EMIGDIO MENDEZ,
14 in violation of California Corporations Code §25110, a felony.

15 **COUNT THIRTY-FIVE**

16 **[FRAUD IN THE OFFER OF A SECURITY]**

17 For a further and separate cause of complaint, being a different offense from but
18 connected in its commission with the charges set forth in Counts 1 through 34, the Attorney
19 General further complains and states, on and between November 1, 2005 and December 31, 2005,
20 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
21 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
22 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: EMIGDIO MENDEZ, by
23 means of a written or oral communication which included an untrue statement of a material fact
24 or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
25 California Corporations Code, a felony.

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1 **COUNT THIRTY-SIX**

2 **[GRAND THEFT]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 35, the Attorney
5 General further complains and states, on and between November 1, 2005 and December 31, 2005,
6 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
7 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
8 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
9 EMIGDIO MENDEZ, a violation of California Penal Code §487, subdivision (a), a felony.

10 **COUNT THIRTY-SEVEN**

11 **[SALE OF UNQUALIFIED SECURITY]**

12 For a further and separate cause of complaint, being a different offense from but
13 connected in its commission with the charges set forth in Counts 1 through 36, the Attorney
14 General further complains and states, on and between September 1, 2005 and September 30,
15 2005, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
16 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
17 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
18 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to ARNEL MILLET, in
19 violation of California Corporations Code §25110, a felony.

20 **COUNT THIRTY-EIGHT**

21 **[FRAUD IN THE OFFER OF A SECURITY]**

22 For a further and separate cause of complaint, being a different offense from but
23 connected in its commission with the charges set forth in Counts 1 through 37, the Attorney
24 General further complains and states, on and between September 1, 2005 and September 30,
25 2005, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
26 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
27 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: ARNEL MILLET, by means
28 of a written or oral communication which included an untrue statement of a material fact or an

omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations Code, a felony.

COUNT THIRTY-NINE

[GRAND THEFT]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 38, the Attorney General further complains and states, on and between September 1, 2005 and September 30, 2005, in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: ARNEL MILLET, a violation of California Penal Code §487, subdivision (a), a felony.

COUNT FORTY

[SALE OF UNQUALIFIED SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 39, the Attorney General further complains and states, on and between August 1, 2006 and November 30, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to BENJAMIN NG, in violation of California Corporations Code §25110, a felony.

COUNT FORTY-ONE

[FRAUD IN THE OFFER OF A SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 40, the Attorney General further complains and states, on and between August 1, 2006 and November 30, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in

1 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: BENJAMIN NG, by means
2 of a written or oral communication which included an untrue statement of a material fact or an
3 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
4 Corporations Code, a felony.

5 **COUNT FORTY-TWO**

6 **[GRAND THEFT]**

7 For a further and separate cause of complaint, being a different offense from but
8 connected in its commission with the charges set forth in Counts 1 through 41, the Attorney
9 General further complains and states, on and between August 1, 2006 and November 30, 2006, in
10 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
11 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
12 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
13 BENJAMIN NG, a violation of California Penal Code §487, subdivision (a), a felony.

14 **COUNT FORTY-THREE**

15 **[SALE OF UNQUALIFIED SECURITY]**

16 For a further and separate cause of complaint, being a different offense from but
17 connected in its commission with the charges set forth in Counts 1 through 42, the Attorney
18 General further complains and states, on and between December 1, 2005 and December 31, 2005,
19 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
20 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
21 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
22 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to MILAGROS RETUTA,
23 in violation of California Corporations Code §25110, a felony.

24 **COUNT FORTY-FOUR**

25 **[FRAUD IN THE OFFER OF A SECURITY]**

26 For a further and separate cause of complaint, being a different offense from but
27 connected in its commission with the charges set forth in Counts 1 through 43, the Attorney
28 General further complains and states, on and between December 1, 2005 and December 31, 2005,

1 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
2 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
3 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: MILAGROS RETUTA, by
4 means of a written or oral communication which included an untrue statement of a material fact
5 or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
6 California Corporations Code, a felony.

7 **COUNT FORTY-FIVE**

8 **[GRAND THEFT]**

9 For a further and separate cause of complaint, being a different offense from but
10 connected in its commission with the charges set forth in Counts 1 through 44, the Attorney
11 General further complains and states, on and between December 1, 2005 and December 31, 2005,
12 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
13 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
14 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
15 MILAGROS RETUTA, a violation of California Penal Code §487, subdivision (a), a felony.

16 **COUNT FORTY-SIX**

17 **[SALE OF UNQUALIFIED SECURITY]**

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 1 through 45 the Attorney
20 General further complains and states, on and between September 1, 2005 and October 31, 2005,
21 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
22 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
23 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
24 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JORGE REYES, in
25 violation of California Corporations Code §25110, a felony.

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1 **COUNT FORTY-SEVEN**

2 **[FRAUD IN THE OFFER OF A SECURITY]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 46, the Attorney
5 General further complains and states, on and between September 1, 2005 and October 31, 2005,
6 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
7 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
8 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JORGE REYES, by means
9 of a written or oral communication which included an untrue statement of a material fact or an
10 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
11 Corporations Code, a felony.

12 **COUNT FORTY-EIGHT**

13 **[GRAND THEFT]**

14 For a further and separate cause of complaint, being a different offense from but
15 connected in its commission with the charges set forth in Counts 1 through 47, the Attorney
16 General further complains and states, on and between September 1, 2005 and October 31, 2005,
17 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
18 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
19 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
20 JORGE REYES, a violation of California Penal Code §487, subdivision (a), a felony.

21 **COUNT FORTY-NINE**

22 **[SALE OF UNQUALIFIED SECURITY]**

23 For a further and separate cause of complaint, being a different offense from but
24 connected in its commission with the charges set forth in Counts 1 through 48, the Attorney
25 General further complains and states, on and between July 1, 2005 and September 30, 2006, in
26 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
27 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
28 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations

1 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to FLORENTINA
2 SACOCO, in violation of California Corporations Code §25110, a felony.

3 **COUNT FIFTY**

4 **[FRAUD IN THE OFFER OF A SECURITY]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 49, the Attorney
7 General further complains and states, on and between July 1, 2005 and September 30, 2006, in
8 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
9 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
10 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: FLORENTINA SACOCO
11 TABION, by means of a written or oral communication which included an untrue statement of a
12 material fact or an omission of a material fact, in violation of §§25401 and 25540, subdivision
13 (b), of the California Corporations Code, a felony.

14 **COUNT FIFTY-ONE**

15 **[GRAND THEFT]**

16 For a further and separate cause of complaint, being a different offense from but
17 connected in its commission with the charges set forth in Counts 1 through 50, the Attorney
18 General further complains and states, on and between July 1, 2005 and September 30, 2006, in
19 the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
20 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
21 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
22 FLORENTINA SACOCO TABION, a violation of California Penal Code §487, subdivision (a), a
23 felony.

24 **COUNT FIFTY-TWO**

25 **[SALE OF UNQUALIFIED SECURITY]**

26 For a further and separate cause of complaint, being a different offense from but
27 connected in its commission with the charges set forth in Counts 1 through 51, the Attorney
28 General further complains and states, on and between September 1, 2006 and October 31, 2006,

1 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
2 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
3 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
4 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JULIET TALO, in
5 violation of California Corporations Code §25110, a felony.

6 **COUNT FIFTY-THREE**

7 **[FRAUD IN THE OFFER OF A SECURITY]**

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 1 through 52, the Attorney
10 General further complains and states, on and between September 1, 2006 and October 31, 2006,
11 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
12 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
13 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JULIET TALO, by means of
14 a written or oral communication which included an untrue statement of a material fact or an
15 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
16 Corporations Code, a felony.

17 **COUNT FIFTY-FOUR**

18 **[GRAND THEFT]**

19 For a further and separate cause of complaint, being a different offense from but
20 connected in its commission with the charges set forth in Counts 1 through 53, the Attorney
21 General further complains and states, on and between September 1, 2006 and October 31, 2006,
22 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
23 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
24 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
25 JULIET TALO, a violation of California Penal Code §487, subdivision (a), a felony.

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COUNT FIFTY-FIVE

[SALE OF UNQUALIFIED SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 54, the Attorney General further complains and states, on and between November 1, 2005 and February 28, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JOSEFINA VALES, in violation of California Corporations Code §25110, a felony.

COUNT FIFTY-SIX

[FRAUD IN THE OFFER OF A SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 55 the Attorney General further complains and states, on and between November 1, 2005 and February 28, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JOSEFINA VALES, by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations Code, a felony.

COUNT FIFTY-SEVEN

[GRAND THEFT]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 56, the Attorney General further complains and states, on and between November 1, 2005 and February 28, 2006, in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.

1 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
2 JOSEFINA VALES, a violation of California Penal Code §487, subdivision (a), a felony.

3 **COUNT FIFTY-EIGHT**

4 **[SALE OF UNQUALIFIED SECURITY]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 57, the Attorney
7 General further complains and states, on and between November 1, 2005 and February 28, 2006,
8 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
9 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
10 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
11 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JOSE AGUIRRE, in
12 violation of California Corporations Code §25110, a felony.

13 **COUNT FIFTY-NINE**

14 **[FRAUD IN THE OFFER OF A SECURITY]**

15 For a further and separate cause of complaint, being a different offense from but
16 connected in its commission with the charges set forth in Counts 1 through 58, the Attorney
17 General further complains and states, on and between November 1, 2005 and February 28, 2006,
18 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
19 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
20 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JOSE AGUIRRE, by means
21 of a written or oral communication which included an untrue statement of a material fact or an
22 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
23 Corporations Code, a felony.

24 **COUNT SIXTY**

25 **[GRAND THEFT]**

26 For a further and separate cause of complaint, being a different offense from but
27 connected in its commission with the charges set forth in Counts 1 through 59, the Attorney
28 General further complains and states, on and between November 1, 2005 and February 28, 2006,

1 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
2 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
3 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
4 JOSE AGUIRRE, a violation of California Penal Code §487, subdivision (a), a felony.

5 **COUNT SIXTY-ONE**

6 **[SALE OF UNQUALIFIED SECURITY]**

7 For a further and separate cause of complaint, being a different offense from but
8 connected in its commission with the charges set forth in Counts 1 through 60, the Attorney
9 General further complains and states, on and between November 1, 2005 and December 31, 2005,
10 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
11 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
12 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
13 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to JOSEFINA FINKEN,
14 in violation of California Corporations Code §25110, a felony.

15 **COUNT SIXTY-TWO**

16 **[FRAUD IN THE OFFER OF A SECURITY]**

17 For a further and separate cause of complaint, being a different offense from but
18 connected in its commission with the charges set forth in Counts 1 through 61, the Attorney
19 General further complains and states, on and between November 1, 2005 and December 31, 2005,
20 in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
21 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in
22 Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: JOSEFINA FINKEN, by
23 means of a written or oral communication which included an untrue statement of a material fact
24 or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the
25 California Corporations Code, a felony.

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1 **COUNT SIXTY-THREE**

2 **[GRAND THEFT]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 62, the Attorney
5 General further complains and states, on and between November 1, 2005 and December 31, 2005,
6 in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III
7 AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc.
8 and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
9 JOSEFINA FINKEN, a violation of California Penal Code §487, subdivision (a), a felony.

10 **COUNT SIXTY-FOUR**

11 **[SALE OF UNQUALIFIED SECURITY]**

12 For a further and separate cause of complaint, being a different offense from but
13 connected in its commission with the charges set forth in Counts 1 through 63, the Attorney
14 General further complains and states, on and between July 1, 2005 and January 31, 2006, in the
15 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
16 M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had
17 not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit:
18 the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to BRENDENFEL COLLADO, in
19 violation of California Corporations Code §25110, a felony.

20 **COUNT SIXTY-FIVE**

21 **[FRAUD IN THE OFFER OF A SECURITY]**

22 For a further and separate cause of complaint, being a different offense from but
23 connected in its commission with the charges set forth in Counts 1 through 64, the Attorney
24 General further complains and states, on and between July 1, 2005 and January 31, 2006, in the
25 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
26 M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op,
27 Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: BRENDENFEL COLLADO, by means
28 of a written or oral communication which included an untrue statement of a material fact or an

1 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
2 Corporations Code, a felony.

3 **COUNT SIXTY-SIX**

4 **[GRAND THEFT]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 65, the Attorney
7 General further complains and states, on and between July 1, 2005 and January 31, 2006, in the
8 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
9 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
10 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
11 BRENDENFEL COLLADO, a violation of California Penal Code §487, subdivision (a), a felony.

12 **COUNT SIXTY-SEVEN**

13 **[SALE OF UNQUALIFIED SECURITY]**

14 For a further and separate cause of complaint, being a different offense from but
15 connected in its commission with the charges set forth in Counts 1 through 66, the Attorney
16 General further complains and states, on and between April 1, 2006 and September 30, 2006, in
17 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
18 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
19 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
20 Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to VIDAL AND LETICIA
21 DURAN, in violation of California Corporations Code §25110, a felony.

22 **COUNT SIXTY-EIGHT**

23 **[FRAUD IN THE OFFER OF A SECURITY]**

24 For a further and separate cause of complaint, being a different offense from but
25 connected in its commission with the charges set forth in Counts 1 through 67, the Attorney
26 General further complains and states, on and between April 1, 2006 and September 30, 2006, in
27 the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and
28 PATRICK M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in

Big Co-op, Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: VIDAL AND LETICIA DURAN, by means of a written or oral communication which included an untrue statement of a material fact or an omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California Corporations Code, a felony.

COUNT SIXTY-NINE

[GRAND THEFT]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 68, the Attorney General further complains and states, on and between April 1, 2006 and September 30, 2006, in the County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit: VIDAL AND LETICIA DURAN, a violation of California Penal Code §487, subdivision (a), a felony.

COUNT SEVENTY

[SALE OF UNQUALIFIED SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 69, the Attorney General further complains and states, on and between June 1, 2005 and October 31, 2006, in the County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction which had not been qualified under §§25111, 25112 or 25113 of the California Corporations Code, to wit: the sale of stock in Big Co-op, Inc. and/or EZ2WIN.BIZ to RODOLFO LASERNA, in violation of California Corporations Code §25110, a felony.

COUNT SEVENTY-ONE

[FRAUD IN THE OFFER OF A SECURITY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 70, the Attorney General further complains and states, on and between June 1, 2005 and October 31, 2006, in the

1 County of Riverside, State of California, Defendants JAMES A. SWEENEY, II and PATRICK
2 M. RYAN, did willfully and unlawfully offer a security, to wit: the sale of stock in Big Co-op,
3 Inc. and/or EZ2WIN.BIZ, to a person or persons, to wit: RODOLFO LASERNA, by means of a
4 written or oral communication which included an untrue statement of a material fact or an
5 omission of a material fact, in violation of §§25401 and 25540, subdivision (b), of the California
6 Corporations Code, a felony.

7 **COUNT SEVENTY-TWO**

8 **[GRAND THEFT]**

9 For a further and separate cause of complaint, being a different offense from but
10 connected in its commission with the charges set forth in Counts 1 through 71, the Attorney
11 General further complains and states, on and between June 1, 2005 and October 31, 2006, in the
12 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
13 PATRICK RYAN, unlawfully took property, to wit: investment money for Big Co-op, Inc. and/or
14 EZ2WIN.BIZ, of a value in excess of four Hundred Dollars (\$400) from another, to wit:
15 RODOLFO LASERNA, a violation of California Penal Code §487, subdivision (a), a felony.

16 **COUNT SEVENTY-THREE**

17 **[FRAUDULENT SECURITIES SCHEME]**

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 1 through 72, the Attorney
20 General further complains and states, Commencing on or about June 1, 2005 and continuing to on
21 or about February 28, 2007, in the County of Riverside, State of California, Defendants JAMES
22 A. SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully engage in acts,
23 practices and a course of business which operated as a fraud and deceit upon a person or persons
24 in connection with the offer of a security to a person or persons, to wit: persons who purchased
25 stock in Big Co-op, Inc. and/or EZ2WIN.BIZ, in violation of California Corporations Code
26 §§25541 and 25540, subdivision (a), a felony.

1 **COUNT SEVENTY-FOUR**

2 **[ENDLESS CHAIN SCHEME]**

3 For a further and separate cause of complaint, being a different offense from but
4 connected in its commission with the charges set forth in Counts 1 through 73, the Attorney
5 General further complains and states, Commencing on or about June 1, 2005 and continuing to
6 May 31, 2007, in the County of Riverside, State of California, Defendants JAMES A.
7 SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully contrive, prepare, set up,
8 propose, or operate an endless chain scheme, to wit: the operation of EZ2WIN.BIZ, in violation
9 of California Penal Code §327, a felony.

10 **COUNT SEVENTY-FIVE**

11 **[SALE OF UNQUALIFIED SECURITY]**

12 For a further and separate cause of complaint, being a different offense from but
13 connected in its commission with the charges set forth in Counts 1 through 74, the Attorney
14 General further complains and states, on and between June 1, 2005 and continuing to May 31,
15 2007, in the County of Riverside, State of California, Defendants JAMES A . SWEENEY, II and
16 PATRICK M. RYAN, did willfully and unlawfully offer or sell a security in an issuer transaction
17 which had not been qualified under §§25111, 25112 or 25113 of the California Corporations
18 Code, to wit: the sale of memberships in EZ2WIN.BIZ, in violation of California Corporations
19 Code §25110, a felony.

20 **COUNT SEVENTY-SIX**

21 **[FRAUD IN THE OFFER OF A SECURITY]**

22 For separate cause of complaint, being a different offense from but connected in its
23 commission with the charges set forth in Counts 1 through 75, the Attorney General further
24 complains and states, on and between June 1, 2005 and continuing to May 31, 2007, in the
25 County of Riverside, State of California, Defendants JAMES . SWEENEY, II and PATRICK M.
26 RYAN, did willfully and unlawfully offer a security, to wit: the sale of memberships in
27 EZ2WIN.BIZ, to a person or persons, by means of a written or oral communication which
28 ///

1 included an untrue statement of a material fact or an omission of a material fact, in violation of
2 sections 25401 and 25540, subdivision (b), of the Corporations Code, a felony.

3 **COUNT SEVENTY-SEVEN**

4 **[FRAUDULENT SECURITIES SCHEME]**

5 For a further and separate cause of complaint, being a different offense from but
6 connected in its commission with the charges set forth in Counts 1 through 76, the Attorney
7 General further complains and states, Commencing on or about June 1, 2005 and continuing to on
8 or about May 31, 2007, in the County of Riverside, State of California, Defendants JAMES A.
9 SWEENEY, II and PATRICK M. RYAN, did willfully and unlawfully engage in acts, practices
10 and a course of business which operated as a fraud and deceit upon a person or persons in
11 connection with the offer of a security to a person or persons, to wit: persons who purchased
12 memberships in EZ2WIN.BIZ, in violation of California Corporations Code §§25541 and 25540,
13 subdivision (a), a felony.

14 **COUNT SEVENTY-EIGHT**

15 **[GRAND THEFT]**

16 For a further and separate cause of complaint, being a different offense from but
17 connected in its commission with the charges set forth in Counts 1 through 77, the Attorney
18 General further complains and states, on and between June 1, 2005 and May 31, 2007, in the
19 County of Riverside, State of California, Defendants JAMES ALBERT SWEENEY, III AND
20 PATRICK RYAN, unlawfully took property, to wit: membership fees for EZ2WIN.BIZ, of a
21 value in excess of four Hundred Dollars (\$400) from another, in violation of California Penal
22 Code §487, subdivision (a), a felony.

23 **FIRST SPECIAL ALLEGATION**

24 **[\$3,200,000 EXCESSIVE TAKING]**

25 It is further alleged that the property taken by Defendants JAMES A. SWEENEY, II and
26 PATRICK M. RYAN, in the commission of the felonies charged in Counts 3, 6, 9, 12, 15, 18, 21,
27 24, 27, 30, 33, 36, 39, 42, 45, 48, 51, 54, 57, 60, 63, 66, 69, 72, 73, 77 and 78, which property

28 ///

Defendants intended to take, was of a value in excess of Three Million, Two Hundred Thousand Dollars (\$3,200,000) within the meaning of Penal Code section 12022.6 subdivision (a)(3).

SECOND SPECIAL ALLEGATION

[AGGRAVATED WHITE-COLLAR CRIME IN EXCESS OF \$500,000]

It is further alleged that Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN committed two or more related felonies to wit: Counts 3, 6, 9, 12, 15, 18, 21, 24, 27, 30, 33, 36, 39, 42, 45, 48, 51, 54, 57, 60, 63, 66, 69, 72, 73, 77 and 78, a material element of each of which is fraud, involving a pattern of related felony conduct and the taking of more than Five Hundred Thousand Dollars (\$500,000) within the meaning of California Penal Code §186.11, subdivision (a)(2).

THIRD SPECIAL ALLEGATION


[\$100,000 EXCESSIVE TAKING]

It is further alleged that the property taken by Defendants JAMES A. SWEENEY, II and PATRICK M. RYAN in the commission of the felony offenses charged in Counts 3, 6, 9, 12, 15, 18, 21, 24, 27, 30, 33, 36, 39, 42, 45, 48, 51, 54, 57, 60, 63, 66, 69, 72, 73, 77 and 78, which property Defendants intended to take, was of a value in excess of One Hundred Thousand Dollars (\$100,000), within the meaning of California Penal Code §1203.44, subdivision (d) and 1203.045.

Dated: May 27, 2009

Respectfully Submitted,

EDMUND G. BROWN JR.
Attorney General of California



PATRICIA M. FUSCO
Deputy Attorney General
Attorneys for People

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4100 MAIN STREET, RIVERSIDE, CA 92501

Warrant of Arrest (☒) Felony () Misdemeanor

PEOPLE OF THE STATE OF CALIFORNIA) CASE# RIF150506

vs.)

WARRANT OF ARREST

SWEENEY, JAMES ALBERT

THE PEOPLE OF THE STATE OF CALIFORNIA
TO ANY PEACE OFFICER OF SAID STATE:

Complaint under oath or penalty of perjury having been this day laid
before me, that the crime(s) of violation of section(s):

1) 25110 CC-F, 2) 25540(B) CC-F, 3) 487(A) PC-F, 4) 25110 CC-F
Has been committed, and accusing Defendant,
JAMES ALBERT SWEENEY

YOU ARE THEREFORE COMMANDED FORTHWITH TO ARREST and bring said
Defendant before a Judge of the above entitled Court, or in case
of his absence or inability to act, before the nearest or most
accessible Magistrate in Riverside County.

Bail Set at \$8,800,000.00 FELONY WARRANTS MAY BE SERVED DAY OR NIGHT

Upon affixing Judge's initials Misdemeanor warrant may be served
at night (). If not indicated serve Misd warrant day only.
Given under my hand, with court seal affixed 05/29/09

BY ORDER OF THE HONORABLE JUDGE J. J. [Signature], JUDGE OF SAID COURT:

(Seal)

[Signature]
Clerk of the Superior Court

Set court appearance Monday through Friday at 7:30 in Dept
4100 MAIN STREET, RIVERSIDE, CA 92501

=====

INFORMATION CONCERNING DEFENDANT

Defendant's Address: 2850 RIPLEY ISLAND RD #R AFTON, TN 37616
Deft's Business Address: , ,
DOB: 02/02/47 RACE: Caucasian SEX: Male
HT: 600 WT: 185 EYES: Brown HAIR: Gray
DR. LIC#: [REDACTED] VEH LIC & STATE:
CII#: FBI# Social Security No: [REDACTED]

=====

APPEARANCE DATE ON ADMISSION OF BAIL

Bail Posted: \$ _____ Cash) _____ (Surety Bond) _____
For Appearance pm _____ at _____ .m., Dept. _____

=====

DISPOSITION OF WARRANT

Cleared by Arrest _____ Bail Accepted _____ Recalled _____
Other _____ Unable to serve due to _____

Certified By: _____ on _____ Dept. _____

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4100 MAIN STREET, RIVERSIDE, CA 92501

Warrant of Arrest (☒) Felony () Misdemeanor

PEOPLE OF THE STATE OF CALIFORNIA) CASE# RIF150506

vs.)

WARRANT OF ARREST

RYAN, PATRICK M

THE PEOPLE OF THE STATE OF CALIFORNIA
TO ANY PEACE OFFICER OF SAID STATE:

Complaint under oath or penalty of perjury having been this day laid
before me, that the crime(s) of violation of section(s):

1) 25110 CC-F, 2) 25540(B) CC-F, 3) 487(A) PC-F, 4) 25110 CC-F
Has been committed, and accusing Defendant,
PATRICK M RYAN

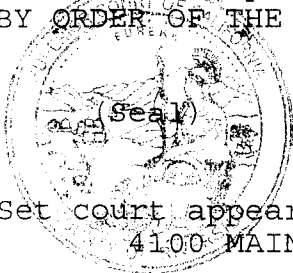
YOU ARE THEREFORE COMMANDED FORTHWITH TO ARREST and bring said
Defendant before a Judge of the above entitled Court, or in case
of his absence or inability to act, before the nearest or most
accessible Magistrate in Riverside County.

Bail Set at \$8,800,000.00 FELONY WARRANTS MAY BE SERVED DAY OR NIGHT

Upon affixing Judge's initials Misdemeanor warrant may be served
at night (). If not indicated serve Misd warrant day only.

Given under my hand, with court seal affixed 05/29/09

BY ORDER OF THE HONORABLE JUDGE JEAN LEONARD, JUDGE OF SAID COURT:



[Signature]
Clerk of the Superior Court

Set court appearance Monday through Friday at 7:30 in Dept
4100 MAIN STREET, RIVERSIDE, CA 92501

=====

INFORMATION CONCERNING DEFENDANT

Defendant's Address: 22684 CALCUTTA DR CANYON LAKE, CA 92587

Deft's Business Address: , ,

DOB: 05/09/75 RACE: Caucasian SEX: Male

HT: 600 WT: 175 EYES: Blue HAIR: Blond

DR. LIC#: [REDACTED] VEH LIC & STATE:

CII#: [REDACTED] FBI# Social Security No: [REDACTED]

=====

APPEARANCE DATE ON ADMISSION OF BAIL

Bail Posted: \$ _____ Cash) _____ (Surety Bond) _____

For Appearance pm _____ at _____ m., Dept. _____

=====

DISPOSITION OF WARRANT

Cleared by Arrest _____ Bail Accepted _____ Recalled _____

Other _____ Unable to serve due to _____

Certified By: _____ on _____ Dept. _____