

1 ROB BONTA  
Attorney General of California  
2 JENNIFER EULER  
Chief Assistant Attorney General  
3 JOEL SAMUELS  
Deputy Attorney General  
4 State Bar No. 234574  
Division of Medi-Cal Fraud & Elder Abuse  
5 2329 Gateway Oaks Drive, Suite 200  
Sacramento, CA 95833-4252  
6 Telephone: (916) 621-1822  
Fax: (916) 263-0426  
7 E-mail: Joel.Samuels@doj.ca.gov  
*Attorneys for the People of the State of California*  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SACRAMENTO**  
11  
12

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

15 Plaintiff,

16 v.

17 **RICARDO RIVERA (a.k.a. RICK**  
18 **RIVERA), LOUIS MASER (a.k.a. LOU**  
19 **MASER), CHRISTOPHER JAROMAY,**  
20 **GARRY GERARDO, BERNARD**  
21 **CAMPILAN, CHRISTELA BALUBAR,**  
22 **MATT ROSE, MARINA JAROMAY,**  
**MERITO JAROMAY, GREGORY**  
**PRITCHARD, JUAN MURILLO, THU**  
**DANG, KRISTEL VILLAR, and NELSON**  
**MANMANO,**

Defendants.

Case No.

**FELONY COMPLAINT**

23 The People of the State of California hereby allege that in the County of Sacramento, State  
24 of California and elsewhere, within the State of California, before the making of this criminal  
25 complaint, the above-named defendants, RICARDO RIVERA (a.k.a. RICK RIVERA), LOUIS  
26 MASER (a.k.a. LOU MASER), CHRISTOPHER JAROMAY, GARRY GERARDO, BERNARD  
27 CAMPILAN, CHRISTELA BALUBAR, MATT ROSE, MARINA JAROMAY, MERITO  
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1 JAROMAY, GREGORY PRITCHARD, JUAN MURILLO, THU DANG, KRISTEL VILLAR,  
2 and NELSON MANMANO, committed the following criminal offenses:

3 **COUNT 1**  
4 **PENAL CODE SECTION 182(a)(4) - FELONY**  
5 **16 mos/2yr/3yr (PC 1170(h))**

6 On or about, and between November 13, 2012 and November 19, 2019, in the County of  
7 Sacramento and elsewhere, defendants Ricardo Rivera (also known as Rick Rivera), Lou Maser,  
8 Christopher Jaromay, Garry Gerardo, Bernard Campilan, Christela Balubar, Matt Rose, Marina  
9 Jaromay, Merito Jaromay, Gregory Pritchard, Juan Murillo, Thu Dang, Kristel Villar, and Nelson  
10 Manmano, and other persons whose names are unknown to the Attorney General did conspire,  
11 aid, abet, and agree with at least one other co-defendant and other persons whose names are  
12 unknown to the Attorney General to commit the crime of Conspiracy to Obtain Money or  
13 Property by False Pretenses, in violation of Section 182(a)(4) of the California Penal Code, a  
14 Felony.

15 **OVERT ACTS**

16 The Attorney General of the State of California further charges that pursuant to the above  
17 conspiracy and to carry out the objects thereof, each defendant and co-defendant did, on or about  
18 November 13, 2012 to November 30, 2020, in the County of Sacramento, and elsewhere, in the  
19 State of California, commit various overt acts including, but not limited to, the following:

20 **OVERT ACT #1:** From December of 2015 to November 30, 2020, defendants Larry Dela  
21 Cruz, Rick Rivera, Lou Maser, Christopher Jaromay, Garry Gerardo, Bernard Campilan, Christela  
22 Balubar, Matt Rose, Marina Jaromay, Merito Jaromay, Gregory Pritchard, Juan Murillo, Thu  
23 Dang, Kristel Villar, and Nelson Manmano, and other co-conspirators offered and sold  
24 investments for the financing, construction, and operation of Pagudpud Sands Resort LLC  
25 (hereinafter PSR), a “condotel” resort to be built in the Philippines. In the solicitation, offer, and  
26 sale of PSR, all defendants relied on and used misrepresentations, omissions of material facts, and  
27 a fraudulent scheme to persuade their victims to invest. During this time, PSR’s principal office  
28 was first located at 2973 Fulton Avenue, Suite B, Sacramento, California and later moved to 1010  
Hurley Way, Sacramento, California.

1       **OVERT ACT #2:** On or about, and between December 1, 2015 and January 12, 2016,  
2 Larry Dela Cruz and Christopher Jaromay offered and sold Leilani Bankhardt and Christine  
3 Hansen, an investment in PSR. On January 12, 2016, Leilani Bankhardt wrote a check for  
4 \$25,000 to Rely On Inc. for the purpose of making an investment in PSR. On or about December  
5 8, 2014, Larry Dela Cruz and Ricardo Rivera opened an account at Chase Bank in the name of  
6 Rely On Inc. dba Rely On Veterans Benefits with the address of 2975 Fulton Ave., Sacramento,  
7 California, 95821. Dela Cruz and Rivera were the only signatories for this account, # 669672987,  
8 hereinafter referred to as Rely On account 987.

9       **OVERT ACT #3:** On or about January 14, 2016, Rick Rivera signed checks on Rely On  
10 Inc. account 987 with the memo "Leilani" to pay Christopher Jaromay \$2,000 and to pay Larry  
11 Dela Cruz \$250. The payments to Jaromay and Dela Cruz were for their roles in obtaining Leilani  
12 Bankhardt and Christine Hansen's investment. It was part of PSR's operation to pay a  
13 "commission" to the individuals who were involved in obtaining investments in PSR.

14       **OVERT ACT #4:** On or about March 15, 2016, Larry Dela Cruz and Ricardo Rivera, as  
15 managing members, filed Articles of Organization and registered Pagudpud Sands Resort LLC as  
16 a Domestic Limited Liability Company in the State of Nevada. On March 15, 2016, the State of  
17 Nevada issued a business license to Pagudpud Sands Resort, LLC. In the following years, there  
18 were annual filings for Pagudpud Sands Resort, LLC filed effective March 10, 2017, January 30,  
19 2018, January 03, 2019, January 28, 2020, and March 16, 2021. Nelson Manmano was also a co-  
20 founder of PSR and worked to offer and sell PSR in Hawaii.

21       **OVERT ACT #5:** On or about, March 4, 2016 and April 4, 2016, Larry Dela Cruz,  
22 Ricardo Rivera, Christopher Jaromay, Lou Maser, and Nelson Manmano offered and sold Denise  
23 Tejada (DOB 11/18/1949) an investment in PSR. Denise Tejada invested \$95,000 in PSR on or  
24 about April 14, 2016.

25       **OVERT ACT #6:** On or about, and between March 15, 2016, Larry Dela Cruz offered and  
26 sold Ray Fujii (DOB 11/14/1937) an investment in PSR. On or about March 15, 2016, Fujii  
27 invested \$230,000.

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1           **OVERT ACT #7:** On or about April 4, 2016, Larry Dela Cruz, Rick Rivera, Chris  
2 Jaromay, Lou Maser, and Nelson Manmano offered and sold Denise Tejada (DOB 11/18/1949)  
3 an investment in PSR. On or about April 4, 2016, Denise Tejada invested \$95,000 in PSR.

4           **OVERT ACT #8:** On or about, and between May 4, 2016 and July 31, 2016, Larry Dela  
5 Cruz, Rick Rivera, and Christopher Jaromay offered and sold Eldon Matal (DOB 10/28/1930) an  
6 investment in PSR. Eldon Matal invested \$110,000 on or about and between May 4, 2016 and  
7 July 31, 2016.

8           **OVERT ACT #9:** On May 9, 2016, Rick Rivera signed a check on Rely On account 987  
9 for \$500 to cash with a memo "For PSR. LLC".

10           **OVERT ACT #10:** On May 9, 2016, there was a \$500 deposit made at CitiBank to open  
11 PSR account number 206566853 with an address of 2973 Fulton Avenue, Suite B, Sacramento,  
12 CA 95821.

13           **OVERT ACT #11:** On or about, and from May 9, 2016, Larry Dela Cruz and Ricardo  
14 Rivera established and began using at least two bank accounts, opened and maintained at Citibank  
15 in Sacramento, California, in the name of Pagudpud Sands Resort, LLC, 2973 Fulton Avenue,  
16 Suite B, Sacramento, California (later, 1010 Hurley Way, Sacramento California): Account  
17 number 206564536 (hereinafter referred to as PSR account 536) and account number 206566853  
18 (hereinafter referred to as PSR account 853).

19           **OVERT ACT #12:** On or about June 8, 2016, checks were issued by Citibank with the  
20 remitter "Pagudpud Sands Resort, LLC" and the memo "Tejada" to Larry Dela Cruz for  
21 \$1,391.42, to Rick Rivera for \$1,391.42, and to Nelson Manmano for \$2,782.84.

22           **OVERT ACT #13:** On July 1, 2016 Christopher Jaromay sent an email to Larry Dela Cruz,  
23 Rick Rivera and Garry Gerardo with an attachment of a 25-page Power Point presentation entitled  
24 "Pagudpud Sand [sic] Process For Submitting Qualified Funds to Entrust." Entrust is a Self-  
25 Directed IRA management company. Defendants marketed and sold investments in PSR using the  
26 concept of converting retirement funds into self- directed IRA's as a selling point with potential  
27 investors.

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1       **OVERT ACT #14:** On or about, and between June 28, 2016 and July 21, 2016, in Larry  
2 Dela Cruz offered and sold Jack Hamon, an investment in PSR. Jack Hamon invested \$92,089.19  
3 in PSR on July 21, 2016.

4       **OVERT ACT #15:** On or about and between July 11, 2016 and July 31, 2016, Larry Dela  
5 Cruz, Ricardo Rivera, Nelson Manmano, and Lou Maser offered and sold Efren and Olivia  
6 Guillermo, an investment in PSR. Efren Guillermo invested \$100,000 in PSR on July 11, 2016.

7       **OVERT ACT #16:** On or about July 19, 2016, Rick Rivera signed checks from PSR  
8 account 853 with the memo "Guillermo" to pay Larry Dela Cruz \$1,700 and Rick Rivera \$1,700.

9       **OVERT ACT #17:** On or about July 19, 2016, Rick Rivera signed a check on PSR account  
10 853 with the memo "Guillermo" to Nelson Manmano for \$2,550.

11       **OVERT ACT #18:** On or about July 19, 2016, Rick Rivera signed a check on PSR account  
12 853 with the memo "Guillermo/Catalans" to Lou Maser for \$2,850.

13       **OVERT ACT #19:** On or about July 19, 2016, Rick Rivera signed a check on PSR account  
14 853 with the memo "Balignasay" to pay Lou Maser \$2,000.

15       **OVERT ACT #20:** On or about July 19, 2016, Larry Dela Cruz, Rick Rivera, Lou Maser,  
16 and Nelson Manmano offered and sold Virginia Benicta (DOB 12/17/1951) an investment in  
17 PSR. On or about July 19, 2016, Benicta invested \$65,000 in PSR.

18       **OVERT ACT #21:** On or about July 21, 2016, Rick Rivera signed checks on PSR account  
19 853 with the memo "Benicta" to pay Larry Dela Cruz \$900, Rick Rivera \$900, Lou Maser \$600  
20 and Nelson Manmano \$600. Dela Cruz endorsed his check. Rivera endorsed his check. Manmano  
21 endorsed his check.

22       **OVERT ACT #22:** On or about July 28, 2016, Ricardo Rivera signed checks on PSR  
23 account 853 with the memo "MATAL" to pay Christopher Jaromay \$6,000 and Lou Maser  
24 \$6,000.

25       **OVERT ACT #23:** On or about July 31, 2016, Larry Dela Cruz as President/CEO and  
26 Ricard Rivera as Secretary/Treasurer signed and issued Pagudpud Sands Resort, LLC  
27 Membership Certificates to Efren Guillermo, IRA, Jack Hamon, Denise Tejada, Leilani  
28 Bankhardt [sic], and Ray Fuji [sic]

1       **OVERT ACT #24:** On or about, and before August 22, 2016, Larry Dela Cruz, Lou Maser,  
2 Merito Jaromay, and Marina Jaromay offered and sold Ligaya Balignasay (DOB 7/8/1945) an  
3 investment in PSR. Balignasay invested \$105,000 in PSR on or about August 22, 2016.

4       **OVERT ACT #25:** On or about September 9, 2016, Rick Rivera signed a check on PSR  
5 account 853 with the memo "Balignasay" to pay Merito Jaromay \$6,000.

6       **OVERT ACT #26:** On or about September 23, 2016, Larry Dela Cruz, Rick Rivera, and  
7 Nelson Manmano offered and sold an investment in PSR to David Salvatera (DOB 12/08/1956).  
8 On or about September 23, 2016, Salvatera invested \$110,000 in PSR.

9       **OVERT ACT #27:** On or about September 29, 2016, Rick Rivera signed checks on PSR  
10 account 853 with the memo "D. Salvatera" to pay Ricardo Rivera \$1,000 and Nelson Manmano  
11 \$1,000. Rivera and Manmano each endorsed his or her individual check.

12       **OVERT ACT #28:** On or about October 18, 2016, Garry Gerardo, Bernard Campilan,  
13 Christela Balubar, Larry Dela Cruz, Rick Rivera and Lou Maser offered and sold Norma  
14 Villarente (DOB 6/6/1936) an investment in PSR. On or about October 18, 2016, Villarente  
15 invested \$500,000 in PSR.

16       **OVERT ACT #29:** On or about October 19, 2016, Garry Gerardo, Bernard Campilan,  
17 Christela Balubar offered and sold an investment in PSR to Mary Hasselwander (12/18/1952).  
18 Hasselwander invested \$50,000 in PSR on or about October 19, 2016.

19       **OVERT ACT #30:** On or about October 20, 2016, Larry Dela Cruz, Rick Rivera, Lou  
20 Maser, Christopher Jaromay and Marina Jaromay offered and sold Editha Barba (DOB  
21 1/10/1944) an investment in PSR. Editha Barba invested \$100,000 on or about October 20, 2016.  
22 Marina Jaromay took Barba to the PSR office in Sacramento and Larry Dela Cruz and Rick  
23 Rivera presented PSR as an investment opportunity and provided her with a brochure about PSR.

24       **OVERT ACT #31:** On or about October 20, 2016, Christopher Jaromay sent an email to  
25 Larry Dela Cruz, Rick Rivera, Lou Maser and Garry Gerardo referring to investments of  
26 \$500,000 by Norma Villarente and \$50,000 by Mary Hasselwander in PSR.

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1       **OVERT ACT #32:** On or about October 20, 2016, Lorenzo M. DelaCruz [sic] as  
2 President/CEO and Ricardo D. Rivera as Secretary/Treasurer of PSR signed, approved and  
3 accepted Mary Hasselwander's Subscription Agreement and investment in PSR."

4       **OVERT ACT #33:** On or about October 20, 2016 Rick Rivera signed a check on PSR  
5 account 853 with the memo "Norm V. \$500K x 3% = \$15K Advance" to pay Sharp Care Services  
6 \$15,000. Sharp Care Services is a company established by Garry Gerardo, Bernard Campilan, and  
7 Christela Balubar. The check was endorsed by Christela Balubar.

8       **OVERT ACT #34:** On or about October 21, 2016, Rick Rivera signed a check to PSR  
9 account 536 with the memo "Wander 50K" to pay Sharp Care Services \$3,000. The check is  
10 endorsed by Christela Balubar.

11       **OVERT ACT #35:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
12 account 536 with the memo "Barba 100K" to pay Larry Dela Cruz \$1,000. The check was  
13 endorsed by Larry Dela Cruz.

14       **OVERT ACT #36:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
15 account 536 with the memo "Barba 100K" to pay Merito Jaromay \$6,000. The check is endorsed  
16 by Merito Jaromay.

17       **OVERT ACT #37:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
18 account 536 with the memo "Barba 100K" to pay Ricardo Rivera \$1,000. The check is endorsed  
19 by Rick Rivera.

20       **OVERT ACT #38:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
21 account 536 with the memo "Barba 50K" to pay Lou Maser \$2,000.

22       **OVERT ACT #39:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
23 account 536 with the memo "Wander 50K" to pay Larry Dela Cruz \$500. The check is endorsed  
24 by Larry Dela Cruz.

25       **OVERT ACT #40:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
26 account 536 with the memo "Wander 50K" to pay Ricardo Rivera \$500. The check is endorsed  
27 by Rick Rivera.

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1           **OVERT ACT #41:** On or about October 21, 2016, Rick Rivera signed a check on PSR  
2 account 536 with the memo "Wander 50K" to pay Lou Maser \$1,000.

3           **OVERT ACT #42:** On or about October 27, 2016, Rick Rivera signed a check on PSR  
4 account 853 with the memo "Norma V. \$500K x 3% = \$15K Final Commission Pay" to pay  
5 Sharp Care Services \$15,000. Sharp Care Services is owned by Garry Gerardo, Bernard,  
6 Campilan, and Christela Balubar.

7           **OVERT ACT #43:** On or about October 27, 2016 Rick Rivera signed checks on PSR  
8 account 853 with the memo "Villarente 500K" to pay Ricardo Rivera \$5,000, Larry Dela Cruz  
9 \$5,000, and Lou Maser \$10,000.

10           **OVERT ACT #44:** On or about November 3, 2016 Editha Barba wrote a check for  
11 \$50,000 to Pagudpud Sands Resort with a memo "Addl. PSR Initial Deposit". The check was  
12 deposited in PSR account 536 on November 3, 2016.

13           **OVERT ACT #45:** On or about November 7, 2016, Rick Rivera signed a check on PSR  
14 account 536 with the memo "E. B. BARBA NQ" to pay Marina Jaromay \$3,000. The check was  
15 endorsed by Marina Jaromay.

16           **OVERT ACT #46:** On or about and between December 1, 2016 and March 3, 2017, Rick  
17 Rivera, Larry Dela Cruz, and Lou Maser offered and sold Alexander Barba (DOB 7/30/1966)  
18 investment in PSR. Between December 1, of 2016 and March 3, 2017, Alexander Barba invested  
19 \$50,000 in PSR.

20           **OVERT ACT #47:** On or about December 3, 2016, PSR officers, employees and affiliates,  
21 including Larry Dela Cruz, Rick Rivera, Lou Maser, Christopher Jaromay, Garry Gerardo,  
22 Bernard Campilan, Nelson Manmano and others, gathered at a celebration at which investments  
23 in PSR were discussed and offered to potential and existing customers.

24           **OVERT ACT #48:** On or about January 6, 2017, Rick Rivera wrote a check on PSR  
25 account 536 with the memo "Lou Maser- PPM 2<sup>nd</sup> round" to pay Lou Maser \$2,000. Units in PSR  
26 were sold to some investors with documentation that included the use a Private Placement  
27 Memorandum (PPM).

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1           **OVERT ACT #49:** On or about January 26, 2017, Larry Dela Cruz, Rick Rivera, Nelson  
2 Manmano, Christopher Jaromay, and Lou Maser, offered and sold Jasmin Alejandro (DOB  
3 4/15/1952) an investment in PSR. On or about January 26, 2017, Alejandro invested \$150,000 in  
4 PSR.

5           **OVERT ACT #50:** On or about January 26, 2017, in the Larry Dela Cruz, Rick Rivera,  
6 Marina Jaromay, Merito Jaromay, Christopher Jaromay and Lou Maser offered and sold Filipina  
7 Vasquez (DOB 2/14/1947) an investment in PSR. Prior to January 26, 2017, Vasquez attended  
8 meetings focused on PSR run by Larry Dela Cruz and Rick Rivera. On or about January 26, 2017,  
9 Vasquez invested \$50,000 in PSR.

10           **OVERT ACT #51:** On or about February 3, 2017, Rick Rivera signed checks on PSR  
11 account 853 with the memo "Alejandro" to pay Ricardo Rivera \$3,000, Nelson Manmano \$3,000,  
12 and Christopher Jaromay \$250.

13           **OVERT ACT #52:** On or about February 3, 2017, Rick Rivera signed checks on PSR  
14 account 853 with the memo "F. Vasquez" to pay Lou Maser \$1,000, Marina Jaromay \$13,000,  
15 and Christopher Jaromay \$250.

16           **OVERT ACT #53:** On or about February 3, 2017, Larry Dela Cruz, Rick Rivera, Marina  
17 Jaromay, Merito Jaromay, Lou Maser, Christopher Jaromay, Matt Rose offered and sold Lorena  
18 Pascua (DOB 7/9/1950) an investment in PSR. On February 3, 2017, Pascua invested \$195,000 in  
19 PSR.

20           **OVERT ACT #54:** On or about February 15, 2017, Rick Rivera sent an email to Matt Rose  
21 and Larry Dela Cruz discussing how to design and use the PSR website to obtain potential PSR  
22 customers.

23           **OVERT ACT #55:** On or about February 17, 2016, Rick Rivera signed checks on PSR  
24 account 853 with the memo "L. Pascua" to pay Lou Maser \$3,900 and Christopher Jaromay,  
25 \$250.

26           **OVERT ACT #56:** On or about February 17, 2016, Rick Rivera signed a check on PSR  
27 account 853 with the memo "F. Vasquez Bonus & L. Pascua" to pay Marina Jaromay \$14,150.

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1           **OVERT ACT #57:** On or about February 28, 2017, Larry Dela Cruz, as President/CEO  
2 and Ricardo Rivera as Secretary/Treasurer signed and issued Pagudpud Sands Resort, LLC  
3 Membership Certificates to Filipina M. Vasquez, IRA, Editha Figuerres Barba, IRA, Lorenza B.  
4 Pascua, IRA, Alex Barba, IRA, and Jasmine [sic] C. Alejandro, IRA.

5           **OVERT ACT #58:** On or about and shortly before April 14, 2017, Gregory Pritchard  
6 offered and sold an investment in PSR to Pamela Ryan (DOB 2/15/1959). Ryan believed she was  
7 allowing Pritchard to move \$65,000 of her retirement funds to help qualify for Veteran's benefits.  
8 The money was invested in PSR.

9           **OVERT ACT #59:** On or about April 17, 2017, Lou Maser sent an email to Rick Rivera  
10 and Larry Dela Cruz with attached documents related to the sale of investments in PSR. One of  
11 the attached documents lists Larry Dela Cruz as President/CEO, Ricardo D. Rivera as  
12 Secretary/Treasurer, Lou Maser as Chief Financial Consultant, and Garry Gerardo and Nelson  
13 Manmano as members of the Board of Advisors. An attached document also states subscribers  
14 can wire direct deposits to CitiBank, Account No. 206566853. An attached document states that  
15 PSR's company headquarters are located at 2973 Fulton Ave., Suite B, Sacramento, California.  
16 An attached document includes an organization chart showing Rely On, Inc., owned by Rick  
17 Rivera and Larry Dela Cruz, as a parent company to PSR. This chart also shows: Rick Rivera as  
18 President/CEO and Chairman of the Board; Larry Dela Cruz as Vice President and Board of  
19 Director [sic]; and Nelson Manmano as VP Marketing Sales (Hawaii).

20           **OVERT ACT #60:** On or about April 18, 2017, Rick Rivera wrote a check on PSR account  
21 853 with the memo "Pamela R." to pay Greg Pritchard \$3,900.

22           **OVERT ACT #61:** On or about April 18, 2017, Rick Rivera signed a check on PSR  
23 account 853 with a memo "Pascua L. entrust 150K" to pay Lou Maser \$5,000.

24           **OVERT ACT #62:** On or about and between, March 15, 2017 and September 8, 2017,  
25 Larry Dela Cruz, Rick Rivera, Marina Jaromay, Lou Maser, and Christopher Jaromay, offered  
26 and sold Maria Macasaet (DOB 01/7/1964) investments in PSR. Between July 14, 2017 and  
27 September 11, 2017, Maria Macasaet invested \$100,000 and \$165,000, for a total of \$265,000, on  
28 behalf of herself and her husband Ricardo Macasaet (DOB 7/21/1960). Ricardo Macasaet, Larry

1 Dela Cruz and Rick Rivera each signed Subscription Agreements for the Macasaet's investment  
2 in PSR on July 14, 2017 for \$100,000 and September 7, 2017 for \$165,000.

3 **OVERT ACT #63:** On or about May 19, 2017, Rick Rivera signed a check on PSR  
4 account 853 with the memo "Balance/Pascua" to pay Merito Jaromay \$12,950.

5 **OVERT ACT #64:** On July 31, 2017, Ricardo D. Rivera as Secretary/Treasurer and  
6 Lorenzo DelaCruz [sic], President/CEO issued Pagudpud Sands Resort, LLC Membership  
7 Certificates to Ricardo M. Macasaet, IRA.

8 **OVERT ACT #65:** On or about September 22, 2017, Rick Rivera signed checks on PSR  
9 account 853 with the memo "Macasaet 165K" to pay Marina Jaromay \$11,550, Lou Maser  
10 \$3,300, and Christopher Jaromay \$250.

11 **OVERT ACT #66:** On or about December 04, 2017, Larry Dela Cruz, Rick Rivera, Lou  
12 Maser, Chris Jaromay and Marina Jaromay offered and sold PSR to Anita Alonzo (DOB  
13 10/17/1947). On or about December 08, 2017, Alonzo invested \$165,000 in PSR.

14 **OVERT ACT #67:** On or about December 8, 2017, Ricardo Rivera signed a check on PSR  
15 account 853 with the memo "Anita A." to pay Lou Maser \$3,300.

16 **OVERT ACT #68:** On or about December 9, 2017, Ricardo Rivera signed a check on PSR  
17 account 853, with the memo "2017 Bonus & Anita A Processing" to pay Christopher Jaromay  
18 \$1,500.

19 **OVERT ACT #69:** On or about and between December 8, 2017 to December 19, 2017  
20 PSR paid approximately \$12,000 for a celebration for PSR personnel and investors.

21 **OVERT ACT #70:** On or about December 19, 2017, PSR officers, employees, staff and  
22 investors attended a "Gala" at which Larry Dela Cruz, Rick Rivera, Lou Maser, and Christopher  
23 Jaromay offered and solicited investment in PSR. Also attending were Nelson Manmano, Garry  
24 Gerardo, Bernard Campilan, and other co-conspirators and investors.

25 **OVERT ACT #71:** On or about January 2, 2018, Ricardo Rivera signed a check on PSR  
26 account 853 with the memo "Anita Alonzo" to pay Larry Dela Cruz \$8,250.

27 **OVERT ACT #72:** On or about January 24, 2018, Ricardo Rivera signed a check on PSR  
28 account 853 with the memo "Pascua", to pay Larry Dela Cruz \$4,250.

1       **OVERT ACT #73:** On or about April 06, 2018, Rick Rivera, Juan Murillo, Thu Dang,  
2 Kristel Villar and Christopher Jaromay offered and sold Fred Kosenko (DOB 5/5/1972) an  
3 investment in PSR. On April 06, 2018, Kosenko invested \$30,000 in PSR.

4       **OVERT ACT #74:** On or about April 11, 2018, Ricardo Rivera signed a check on PSR  
5 account 853 with the memo "Fred K. Qualified" to pay Juan Murillo \$1,500.

6       **OVERT ACT #75:** On or about April 17, 2018, Ricardo Rivera checks on PSR account  
7 853 with the memo "Kosenko, F" to pay Kristel Villar \$150, and Christopher Jaromay \$100 and  
8 Thu Dang \$100.

9       **OVERT ACT #76:** On or about April 17, 2018, and April 19, 2018 Larry Dela Cruz, Rick  
10 Rivera, Christopher Jaromay, Thu Dang, and Kristel Villar offered and sold Kenneth Jueneman  
11 (DOB 10/18/1937) an investment in PSR. On or about April 17, 2018 Jueneman invested \$50,000  
12 in PSR and on or about April 19, 2018 Jueneman invested \$100,000 in PSR

13       **OVERT ACT #77:** On or about April 27, 2018, Larry Dela Cruz, Rick Rivera, Christopher  
14 Jaromay, Lou Maser, and Marina Jaromay offered and sold Alexander Barba (DOB 7/30/1966) an  
15 investment in PSR. On April 27, 2018, A. Barba invested \$50,000 in PSR.

16       **OVERT ACT #78:** On or about April 30, 2018, Larry Dela Cruz offered and sold Ray  
17 Fujii (DOB 11/14/1937) an investment in PSR. On or about 4/30/2018, Fujii invested \$20,000 in  
18 PSR.

19       **OVERT ACT #79:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR  
20 account 853 with the memo "K Jueneman/May 2018" to pay Larry Dela Cruz \$11,500.

21       **OVERT ACT #80:** On or about May 1, 2018, Ricardo Rivera signed check 1376 on PSR  
22 account 853 with the memo "K Jueneman / May 2018" to pay Ricardo Rivera \$11,500.

23       **OVERT ACT #81:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR  
24 account 853 with the memo "Jueneman/ A Barba" to pay Christopher Jaromay \$4,850.

25       **OVERT ACT #82:** On or about May 1, 2018, Ricardo Rivera signed a check on PSR  
26 account 853 with the memo "May 2018 & Jueneman" to pay Kristel Villar \$1,050.

27       **OVERT ACT #83:** On or about May 1, 2018 Ricardo Rivera signed check 1378 on PSR  
28 account 853 with the memo "April 2018/Jueneman" to pay Thu Dang \$1,100.

1           **OVERT ACT #84:** On or about May 8, 2018, Larry Dela Cruz, Rick Rivera, Christopher  
2 Jaromay, Lou Maser, Marina Jaromay, Merito Jaromay and Matt Rose offered and sold Lorenza  
3 Pascua (DOB 8/9/1950) an investment in PSR. On or about May 8, L. Pascua invested \$100,000  
4 in PSR.

5           **OVERT ACT #85:** On or about May 22, 2018, Kenneth Jueneman a check with the memo  
6 “Additional Investment” to Pagudpud Sands Resort for \$20,000.

7           **OVERT ACT #86:** On or about May 22, 2018, Larry Dela Cruz, Rick Rivera, Juan  
8 Murillo, Lou Maser, Christopher Jaromay, Thu Dang, and Kristel Villar offered and sold Glen  
9 Ramos (DOB 4/19/1970) an investment in PSR. On or about May 22, 2018, Ramos invested  
10 \$100,000 in PSR.

11           **OVERT ACT #87:** On or about June 5, 2018, Ricardo Rivera signed a check on PSR  
12 account 853 with the memo “Glenn R” to pay Juan Murillo \$5,000.

13           **OVERT ACT #88:** On or about June 20, 2018, Larry Dela Cruz, Rick Rivera, Lou Maser,  
14 and Christopher Jaromay offered and sold Christine Hansen (DOB 7/16/1951) an investment in  
15 PSR. On or about June 20, 2018, Hansen invested \$60,000 in PSR.

16           **OVERT ACT #89:** On or about July 13, 2018, Ricardo Rivera signed checks on PSR  
17 account 853 with the memo “Glen Ramos” to pay Christopher Jaromay \$100, Thu Dang \$100,  
18 and Kristel Villar \$50.

19           **OVERT ACT #90:** On or about July 16, 2018, Larry Dela Cruz, Rick Rivera, and Chris  
20 Jaromay offered and sold Jerry Hudson (DOB 2/1/1940) an investment in PSR. On or about July  
21 16, 2018, Hudson invested \$43,000 in PSR.

22           **OVERT ACT #91:** On or about July 23, 2018, Ricardo Rivera signed a check on PSR  
23 account 853 with the memo “G Ramos” to pay Lou Maser \$2,000.

24           **OVERT ACT #92:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR  
25 account 853 with the memo “J Hudson & C. Hanson [sic]” to pay Ricardo Rivera \$1,750.

26           **OVERT ACT #93:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR  
27 account 853 with the memo “J Hudodsn [sic] & C. Hanson [sic]” to pay Larry Dela Cruz \$1,750.

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1           **OVERT ACT #94:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR  
2 account 853 with the memo “C. Hanson [sic]” to pay Christopher Jaromay \$1,750.

3           **OVERT ACT #95:** On or about August 6, 2018, Ricardo Rivera signed a check on PSR  
4 account 853 with the memo “C. Hanson [sic]” to pay Lou Maser \$1,200.

5           **OVERT ACT #96:** On or about September 11, 2018, Larry Dela Cruz, Rick Rivera, Lou  
6 Maser, Nelson Manmano, and Christopher Jaromay offered and sold Denise Tejada an investment  
7 PSR. On or about September 11, 2018 Tejada invested \$200,000 in PSR.

8           **OVERT ACT #97:** On or about November 01, 2018, Justin McManus, an attorney  
9 representing Rodney Hamon, the heir to the estate of Jack Hamon, met with Larry Deal Cruz,  
10 Rick Rivera, and Lou Maser to discuss a refund of Jack Hamon’s investment in PSR. During this  
11 meeting, Dela Cruz, Rivera, and Maser made a sales pitch and attempted to convince McManus  
12 to keep Hamon’s investment in PSR and to personally invest in PSR.

13           **OVERT ACT #98:** On or about November 20, 2018, Larry Dela Cruz, Rick Rivera, Lou  
14 Maser, Marina Jaromay, and Chris Jaromay, offered and sold Editha Barba (DOB 01/10/1944) an  
15 investment in PSR. On or about November 20, 2018, Editha Barba invested \$50,000 in PSR.

16           **OVERT ACT #99:** On or about December 21, 2018, Larry Dela Cruz and Rick Rivera  
17 offered to create a Limited Liability Company for Ritchell Tejada (DOB 09/01/1981). On or  
18 about December 21, 2018, R. Tejada provided Dela Cruz and Rivera \$35,000. The \$35,000 was  
19 invested in PSR.

20           **OVERT ACT #100:** On or about February 19, 2019, Larry Dela Cruz, Rick Rivera, Lou  
21 Maser, Marina Jaromay and Merito Jaromay offered and sold Ligaya Balignasay an investment in  
22 PSR. On or about February 19, 2019, Balignasay invested \$50,000 in PSR.

23           **OVERT ACT #101:** On or about February 25, 2019, Larry Dela Cruz, Rick Rivera, Lou  
24 Maser, Marina Jaromay, and Christopher Jaromay, offered and sold an investment in PSR to  
25 Filipina Vasquez (DOB 2/14/1947). On or about February 25, 2019, Vasquez invested \$25,000 in  
26 PSR.

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1       **OVERT ACT #102:** On or about February 26, 2019, Larry Dela Cruz and Rick Rivera  
2 offered and sold Christopher Klimek (DOB 1/21/1955) an investment in PSR. On or about  
3 February 26, 2019, Klimek invested \$200,000 in PSR.

4       **OVERT ACT #103:** On or about March 14, 2019, Rick Rivera signed a check on PSR  
5 account 853 with the memo “Klimek” to pay Ricardo Rivera \$6,000. Rivera endorsed the check.

6       **OVERT ACT #104:** On or about March 14, 2019, Rick Rivera signed a check on PSR  
7 account 853 with the memo “Klimek” to pay Larry Dela Cruz \$6,000.

8       **OVERT ACT #105:** On or about March 17, 2019, Larry Dela Cruz, Rick Rivera, and  
9 Nelson Manmano offered and sold Darren Oki (DOB 12/13/1965) an investment in PSR. On or  
10 about May 27, 2019, Oki invested \$650,000 in PSR.

11       **OVERT ACT #106:** On or about March 26, 2019, Larry Dela Cruz, Rick Rivera, Lou  
12 Maser, Marina Jaromay and Christopher Jaromay offered and sold Anita Alonzo (DOB  
13 10/17/1947) an investment in PSR. On or about March 26, 2019, Anita Alonzo invested \$25,000  
14 in PSR.

15       **OVERT ACT #107:** On May 6, 2019, Rick Rivera signed a check on PSR account 853  
16 with the memo “Oki, Manmano & Yamura – travel & alex” to pay Nelson Manmano \$6,504.68.

17       **OVERT ACT #108:** On or about June 3, 2019, Larry Dela Cruz, Rick Rivera, offered and  
18 sold Maria and Ricardo Macasaet an investment in PSR. On or about June 3, 2019, Maria  
19 Macasaet invested \$60,000 in PSR.

20       **OVERT ACT #109:** On or about June 14, 2019, Rick Rivera signed a check on PSR  
21 account 853 with a memo “Macasaet” to pay Larry Dela Cruz \$3,000.

22       **OVERT ACT #110:** On or about August 10, 2019, Larry Dela Cruz, Rick Rivera, Matt  
23 Rose, and Nelson Manmano offered and sold PSR to Derrick Naone (DOB 10/29/1967). On or  
24 about August 10, 2019, Naone invested \$300,000 in PSR.

25       **OVERT ACT #111:** On or about August 27, 2019, Rick Rivera signed a check on PSR  
26 account 853 with the memo “Derrick N.” to pay Matt Rose \$3,000. The check is endorsed by  
27 Matt Rose.

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1 **OVERT ACT #112:** On or about August 27, 2019, Rick Rivera signed a check on PSR  
2 account 853 with the memo "Derrick N. Less Vangie Airfare" to pay Nelson Manmano \$2,500.

3 **OVERT ACT #113:** On or about September 9, 2019, Rick Rivera, Larry Dela Cruz,  
4 Christopher Jaromay, and Thu Dang had a group text to discuss sales of PSR.

5 **OVERT ACT #114:** On or about October 7, 2019, Larry Dela Cruz offered and sold Ray  
6 Fujii (DOB 11/14/1937) an investment in PSR. On or about October 7, 2019, Fujii invested  
7 \$50,000 in PSR.

8 **OVERT ACT #115:** On or about October 18, 2019, Larry Dela Cruz, Rick Rivera, Lou  
9 Maser, Nelson Manmano and Christopher Jaromay offered and sold Denise Tejada (DOB  
10 11/18/1949) an investment in PSR. On October 18, 2019, D. Tejada invested \$100,000 in PSR.

11 **OVERT ACT #116:** On or about October 28, 2019, Christopher Jaromay and Matt Rose  
12 appeared on a talk show aimed at Filipino-Americans to market and offer PSR to the general  
13 public.

14 **OVERT ACT #117:** On or about January 13, 2020, Larry Dela Cruz sent Ricardo  
15 Macasaet a letter on PSR letterhead with an address of 1010 Hurley Way, Suite 190, Sacramento,  
16 95825, indicating a summary of the interest amounts owed by PSR to the Macasaet account. The  
17 letter closed by stating, "Thank you for being a great investor of Pagudpud Sands Resort, LLC!"

18 **COUNT 2**  
19 **PENAL CODE SECTION 487 - FELONY**  
20 **16mos/2yr/3yr (PC 1170(h))**

21 On or about, and between the dates of April 17, 2018 and May 22, 2018, in the County of  
22 Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF  
23 A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code  
24 Section 484-487(a), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY,  
25 THU DANG, AND KRISTEL VILLAR who did unlawfully take personal property, \$170,000, of  
a value exceeding nine hundred and fifty dollars (\$950), the property of Kenneth Jueneman.

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**COUNT 3**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about and between the dates of April 17, 2018 and May 22, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG, and KRISTEL VILLAR who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Kenneth Jueneman, was an elder and dependent adult.

**COUNT 4**  
**CORPORATIONS CODE SECTION 25110-25540(a) – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of Sacramento, State of California, the crime of SALE OF UNQUALIFIED SECURITY, in violation CORPORATIONS CODE SECTION 25110-25540(a), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG and KRISTEL VILLAR who did knowingly and willingly offer to sell a security in an issuer transaction, to wit: an investment contract, to Kenneth Jueneman, without having first qualified the offer and sale with the Department of Corporations for the State of California.

**COUNT 5**  
**CORPORATIONS CODE SECTION 25401-25540(a)--FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, CHRISTOPHER JAROMAY, THU DANG and KRISTEL VILLAR who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Kenneth Jueneman, by means of communications which include

1 an untrue statement of material fact and omitted to state a material fact necessary in order to make  
2 the statements made, in light of the circumstances under which they were made, not misleading.

3 **COUNT 6**  
4 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about and between the dates of April 17, 2018 and May 22, 2018, in the County of  
7 Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO  
8 DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of  
9 Corporate Code SECTION 25541(a) was committed by RICK RIVERA, CHRISTOPHER  
10 JAROMAY, THU DANG and KRISTEL VILLAR who did sell and offer to sell a security in this  
11 state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to  
12 another, Kenneth Jueneman, by means of a device, scheme, or artifice to defraud in the offer,  
13 purchase or sale of said security.

14 **COUNT 7**  
15 **PENAL CODE SECTION 487 – FELONY**  
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, and between the dates of June 28, 2016 and August 4, 2016, in the County of  
18 Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF  
19 A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code  
20 Section 484-487(a), a Felony, was committed by RICK RIVERA, and LOU MASER who did  
21 unlawfully take personal property, \$100,000, of a value exceeding nine hundred and fifty dollars  
22 (\$950), the property of Jack Hamon.

23 **COUNT 8**  
24 **PENAL CODE SECTION 368(d)—FELONY**  
25 **2yr/3yr/4yr (PC 1170(h))**

26 On or about and between the dates of June 28, 2016 and August 4, 2016, in the county of  
27 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL  
28 CODE Section 368(d), a Felony, was committed by RICK RIVERA, and LOU MASER who did  
unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the  
property and personal identifying information of an elder and dependent adult, said property,  
moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew

1 and reasonably should have known that said person, Jack Hamon, was an elder and dependent  
2 adult.

3 **COUNT 9**  
4 **CORPORATIONS CODE SECTION 25110-25540(a)--FELONY**  
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about and between the dates of June 28, 2016 and August 4, 2016, in the County of  
7 Sacramento, State of California, the crime of SALE OF UNQUALIFIED SECURITY, in  
8 violation CORPORATIONS CODE SECTION 25110-25540(a), a Felony, was committed by  
9 RICK RIVERA, and LOU MASER who did knowingly and willingly offer to sell a security in an  
10 issuer transaction, to wit: an investment contract, to Jack Hamon, without having first qualified  
11 the offer and sale with the Department of Corporations for the State of California.

12 **COUNT 10**  
13 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
14 **2yr/3yr/5yr (PC 1170(h))**

15 On or about and between the dates of June 28, 2016 and August 4, 2016, in the County of  
16 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE  
17 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS  
18 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, and LOU  
19 MASER who did sell and offer to sell a security in this state, as defined in CORPORATIONS  
20 CODE SECTION 25109, to wit: an investment contract, to another: Jack Hamon, by means of  
21 communications which include an untrue statement of material fact and omitted to state a material  
22 fact necessary in order to make the statements made, in light of the circumstances under which  
23 they were made, not misleading.

24 **COUNT 11**  
25 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
26 **2yr/3yr/5yr (PC 1170(h))**

27 On or about and between June 28, 2016 and August 4, 2016, in the County of Sacramento,  
28 State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD  
IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code  
SECTION 25541(a) was committed by RICK RIVERA and LOU MASER who did sell and offer  
to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an

1 investment contract, to another, Jack Hamon, by means of a device, scheme, or artifice to defraud  
2 in the offer, purchase or sale of said security.

3 **COUNT 12**  
4 **PENAL CODE SECTION 487 – FELONY**  
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about, and between the dates of March 15, 2016 and October 7, 2019, in the County  
7 of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY  
8 OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code  
9 Section 484-487(a), a Felony, was committed by and RICK RIVERA who did unlawfully take  
10 personal property, \$300,000, of a value exceeding nine hundred and fifty dollars (\$950), the  
11 property of Ray Fujii.

12 **COUNT 13**  
13 **PENAL CODE SECTION 368(d)—FELONY**  
14 **2yr/3yr/4yr (PC 1170(h))**

15 On or about and between the dates of March 15, 2016 and October 7, 2019, in the county of  
16 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL  
17 CODE Section 368(d), a Felony, was committed by RICK RIVERA who did unlawfully carry out  
18 theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal  
19 identifying information of an elder and dependent adult, said property, moneys, labor, good and  
20 services taken and obtained having a value exceeding \$950, and knew and reasonably should  
21 have known that said person, Ray Fujii, was an elder and dependent adult.

22 **COUNT 14**  
23 **PENAL CODE SECTION 487 – FELONY**  
24 **16mos/2yr/3yr (PC 1170(h))**

25 On or about, July 16, 2018, in the County of Sacramento, State of California, the crime of  
26 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND  
27 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by  
28 RICK RIVERA, and CHRISTOPHER JAROMAY who did unlawfully take personal property,  
\$43,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Jerry  
Hudson.

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**COUNT 15**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about July 16, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, and CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Jerry Hudson, was an elder and dependent adult.

**COUNT 16**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about July 16, 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Jerry Hudson, by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 17**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about July 16, 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment

1 contract, to another, Jerry Hudson, by means of a device, scheme, or artifice to defraud in the  
2 offer, purchase or sale of said security.

3 **COUNT 18**  
4 **PENAL CODE SECTION 459/460(a) – FELONY**  
5 **2yr/4yr/6yr (PC 1170(h))**

6 On or about, October 18, 2016, in the County of San Francisco, State of California,  
7 GARRY GERARDO, BERNARD CAMPILAN, and CHRISTELA BALUBAR, did enter an  
8 inhabited dwelling house and inhabited portion of a building occupied by Norma Villarente (DOB  
9 6/6/1936), with the intent to commit larceny and any felony.

10 It is further alleged that the above offense is a violation of Penal Code Section 462(a).

11 It is further alleged that the above offense is a violent felony within the meaning of Penal  
12 Code 667.5(c) in that another person, other than an accomplice, was present in the residence  
13 during the commission of the above offense.

14 It is further alleged that the above offense is a serious felony within the meaning of Penal  
15 Code section 1192.7(c)(18).

16 **COUNT 19**  
17 **PENAL CODE SECTION 487 – FELONY**  
18 **16mos/2yr/3yr (PC 1170(h))**

19 On or about, October 18, 2016, in the County of Sacramento, State of California, the crime  
20 of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED  
21 AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was  
22 committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, RICK  
23 RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully take personal  
24 property, \$500,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of  
25 Norma Villarente (DOB 6/6/1936).

26 **COUNT 20**  
27 **PENAL CODE SECTION 368(d)—FELONY**  
28 **2yr/3yr/4yr (PC 1170(h))**

On or about October 18, 2016, in the county of Sacramento, State of California, the crime  
of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was  
committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, RICK

1 RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully carry out theft,  
2 embezzlement, forgery, fraud and identity theft with respect to the property and personal  
3 identifying information of an elder and dependent adult, said property, moneys, labor, good and  
4 services taken and obtained having a value exceeding \$950, and knew and reasonably should  
5 have known that said person, Norma Villarente (DOB 6/6/1936), was an elder and dependent  
6 adult.

7 **COUNT 21**  
8 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
9 **2yr/3yr/5yr (PC 1170(h))**

10 On or about October 18, 2016, in the County of Sacramento, State of California, the crime  
11 of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
12 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
13 Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA  
14 BALUBAR, RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and  
15 offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to  
16 wit: an investment contract, to another: Norma Villarente (DOB 6/6/1936), by means of  
17 communications which include an untrue statement of material fact and omitted to state a material  
18 fact necessary in order to make the statements made, in light of the circumstances under which  
19 they were made, not misleading.

20 **COUNT 22**  
21 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
22 **2yr/3yr/5yr (PC 1170(h))**

23 On or about October 18, 2016, in the County of Sacramento, State of California, the crime  
24 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,  
25 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)  
26 was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR,  
27 RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and offer to sell  
28 a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an  
investment contract, to another, Norma Villarente (DOB 6/6/1936), by means of a device,  
scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 23**  
**PENAL CODE SECTION 459/460(a) – FELONY**  
**2yr/4yr/6yr (PC 1170(h))**

On or about, October 19, 2016, in the County of San Joaquin, State of California, GARRY GERARDO, BERNARD CAMPILAN, and CHRISTELA BALUBAR, did enter an inhabited dwelling house and inhabited portion of a building occupied by Mary Hasselwander (DOB 12/18/1952), with the intent to commit larceny and any felony.

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code 667.5(c) in that another person, other than an accomplice, was present in the residence during the commission of the above offense.

**COUNT 24**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, October 19, 2016, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, and RICK RIVERA, who did unlawfully take personal property, \$43,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Mary Hasselwander (DOB 12/18/1952).

**COUNT 25**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about October 19, 2016, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR, and RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Mary Hasselwander (DOB 12/18/1952), by means of communications which include an untrue



1 statement of material fact and omitted to state a material fact necessary in order to make the  
2 statements made, in light of the circumstances under which they were made, not misleading.

3 **COUNT 26**  
4 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about October 19, 2016, in the County of Sacramento, State of California, the crime  
7 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,  
8 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)  
9 was committed by GARRY GERARDO, BERNARD CAMPILAN, CHRISTELA BALUBAR,  
10 and RICK RIVERA, who did sell and offer to sell a security in this state as defined in  
11 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Mary  
12 Hasselwander (DOB 12/18/1952), by means of a device, scheme, or artifice to defraud in the  
13 offer, purchase or sale of said security.

14 **COUNT 27**  
15 **PENAL CODE SECTION 487 – FELONY**  
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, July 19, 2016, in the County of Sacramento, State of California, the crime of  
18 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND  
19 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by  
20 RICK RIVERA, LOU MASER, and NELSON MANMANO, who did unlawfully take personal  
21 property, \$65,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of  
22 Virginia Benicta (DOB 12/17/1951).

23 **COUNT 28**  
24 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
25 **2yr/3yr/5yr (PC 1170(h))**

26 On or about July 19, 2016, in the County of Sacramento, State of California, the crime of  
27 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
28 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
29 Felony, was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did  
30 sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION  
31 25109, to wit: an investment contract, to another: Virginia Benicta (DOB 12/17/1951), by means

1 of communications which include an untrue statement of material fact and omitted to state a  
2 material fact necessary in order to make the statements made, in light of the circumstances under  
3 which they were made, not misleading.

4 **COUNT 29**  
5 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about July 19, 2016, in the County of Sacramento, State of California, the crime of  
8 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,  
9 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed  
10 by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did sell and offer to sell a  
11 security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an  
12 investment contract, to another, Virginia Benicta (DOB 12/17/1951), by means of a device,  
13 scheme, or artifice to defraud in the offer, purchase or sale of said security.

14 **COUNT 30**  
15 **PENAL CODE SECTION 487 – FELONY**  
16 **16mos/2yr/3yr (PC 1170(h))**

17 On or about, January 12, 2016 and June 20, 2018, in the County of Sacramento, State of  
18 California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER  
19 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a  
20 Felony, was committed by RICK RIVERA, LOU MASER and CHRISTOPHER JAROMAY  
21 who did unlawfully take personal property, \$85,000, of a value exceeding nine hundred and fifty  
22 dollars (\$950), the property of Christine Hansen (DOB 7/16/1951) and Leilani Bankhardt (DOB  
23 10/19/1942).

24 **COUNT 31**  
25 **PENAL CODE SECTION 368(d)—FELONY**  
26 **2yr/3yr/4yr (PC 1170(h))**

27 On or about January 12, 2016 and June 20, 2018, in the county of Sacramento, State of  
28 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section  
368(d), a Felony, was committed by RICK RIVERA, LOU MASER and CHRISTOPHER  
JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft  
with respect to the property and personal identifying information of an elder and dependent adult,

1 said property, moneys, labor, good and services taken and obtained having a value exceeding  
2 \$950, and knew and reasonably should have known that said person, Christine Hansen (DOB  
3 7/16/1951) and Leilani Bankhardt (DOB 10/19/1942), was an elder and dependent adult.

4 **COUNT 32**  
5 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about January 12, 2016 and June 20, 2018, in the County of Sacramento, State of  
8 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND  
9 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION  
10 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER and  
11 CHRISTOPHER JAROMAY who did sell and offer to sell a security in this state, as defined in  
12 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Christine  
13 Hansen (DOB 7/16/1951) and Leilani Bankhardt (DOB 10/19/1942), by means of  
14 communications which include an untrue statement of material fact and omitted to state a material  
15 fact necessary in order to make the statements made, in light of the circumstances under which  
16 they were made, not misleading.

17 **COUNT 33**  
18 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
19 **2yr/3yr/5yr (PC 1170(h))**

20 On or about January 12, 2016 and June 20, 2018, in the County of Sacramento, State of  
21 California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE  
22 OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION  
23 25541(a) was committed by RICK RIVERA, LOU MASER and CHRISTOPHER JAROMAY,  
24 who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE  
25 SECTION 25109, to wit: an investment contract, to another, Christine Hansen (DOB 7/16/1951)  
26 and Leilani Bankhardt (DOB 10/19/1942) Christine Hansen (DOB 7/16/1951) and Leilani  
27 Bankhardt (DOB 10/19/1942), by means of a device, scheme, or artifice to defraud in the offer,  
28 purchase or sale of said security.

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**COUNT 34**  
**PENAL CODE SECTION 459 – FELONY**  
**2yr/4yr/6yr (PC 1170(h))**

On or about, October 18, 2016, in the County of Yolo, State of California, CHRISTOPHER JAROMAY, did enter an inhabited dwelling house and inhabited portion of a building occupied by Eldon Matal (DOB 10/28/1930), with the intent to commit larceny and any felony.

It is further alleged that the above offense is a violation of Penal Code Section 462(a).

It is further alleged that the above offense is a violent felony within the meaning of Penal Code 667.5(c) in that another person, other than an accomplice, was present in the residence during the commission of the above offense.

It is further alleged that the above offense is a serious felony within the meaning of Penal Code section 1192.7(c)(18).

**COUNT 35**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, May 4, 2016, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY who did unlawfully take personal property, \$110,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Eldon Matal (DOB 10/28/1930).

**COUNT 36**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about May 4, 2016, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew

1 and reasonably should have known that said person, Eldon Matal (DOB 10/28/1930), was an  
2 elder and dependent adult.

3 **COUNT 37**  
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about May 4, 2016, in the County of Sacramento, State of California, the crime of  
7 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
8 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
9 Felony, was committed by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY,  
10 who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE  
11 SECTION 25109, to wit: an investment contract, to another: Eldon Matal (DOB 10/28/1930), by  
12 means of communications which include an untrue statement of material fact and omitted to state  
13 a material fact necessary in order to make the statements made, in light of the circumstances  
14 under which they were made, not misleading.

15 **COUNT 38**  
16 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
17 **2yr/3yr/5yr (PC 1170(h))**

18 On or about May 4, 2016, in the County of Sacramento, State of California, the crime of  
19 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,  
20 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed  
21 by RICK RIVERA, LOU MASER, and CHRISTOPHER JAROMAY, who did sell and offer to  
22 sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an  
23 investment contract, to another, Eldon Matal (DOB 10/28/1930), by means of a device, scheme,  
24 or artifice to defraud in the offer, purchase or sale of said security.

25 **COUNT 39**  
26 **PENAL CODE SECTION 487 – FELONY**  
27 **16mos/2yr/3yr (PC 1170(h))**

28 On or about, April 4, 2016, September 11, 2018, and October 18, 2019, in the County of  
Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF  
A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code  
Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON

1 MANMANO and CHRISTOPHER JAROMAY, who did unlawfully take personal property,  
2 \$395,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Denise  
3 Tejada (DOB 11/18/1949).

4 **COUNT 40**  
5 **PENAL CODE SECTION 368(d)—FELONY**  
6 **2yr/3yr/4yr (PC 1170(h))**

7 On or about April 4, 2016, September 11, 2018, and October 18, 2019, in the county of  
8 Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL  
9 CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON  
10 MANMANO and CHRISTOPHER JAROMAY who did unlawfully carry out theft,  
11 embezzlement, forgery, fraud and identity theft with respect to the property and personal  
12 identifying information of an elder and dependent adult, said property, moneys, labor, good and  
13 services taken and obtained having a value exceeding \$950, and knew and reasonably should  
14 have known that said person, Denise Tejada (DOB 11/18/1949), was an elder and dependent  
15 adult.

16 **COUNT 41**  
17 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about April 4, 2016, September 11, 2018, and October 18, 2019, in the County of  
20 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE  
21 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS  
22 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER,  
23 NELSON MANMANO and CHRISTOPHER JAROMAY who did sell and offer to sell a security  
24 in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment  
25 contract, to another: Denise Tejada (DOB 11/18/1949), by means of communications which  
26 include an untrue statement of material fact and omitted to state a material fact necessary in order  
27 to make the statements made, in light of the circumstances under which they were made, not  
28 misleading.

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**COUNT 42**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about April 4, 2016, September 11, 2018, and October 18, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, NELSON MANMANO and CHRISTOPHER JAROMAY who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Denise Tejada (DOB 11/18/1949), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

**COUNT 43**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, February 3, 2017, April 18, 2017, and May 8, 2018 in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE, who did unlawfully take personal property, \$445,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Lori Pascua DOB (8/9/1950).

**COUNT 44**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about February 3, 2017, April 18, 2017, and May 8, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew

1 and reasonably should have known that said person, Lori Pascua DOB (8/9/1950), was an elder  
2 and dependent adult.

3 **COUNT 45**  
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about February 3, 2017, April 18, 2017, and May 8, 2018, in the County of  
7 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE  
8 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS  
9 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER,  
10 CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE,  
11 who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE  
12 SECTION 25109, to wit: an investment contract, to another: Lori Pascua DOB (8/9/1950), by  
13 means of communications which include an untrue statement of material fact and omitted to state  
14 a material fact necessary in order to make the statements made, in light of the circumstances  
15 under which they were made, not misleading.

16 **COUNT 46**  
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about February 3, 2017, April 18, 2017, and May 8, 2018, in the County of  
20 Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO  
21 DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of  
22 Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER,  
23 CHRISTOPHER JAROMAY, MARINA JAROMAY, MERITO JAROMAY, and MATT ROSE,  
24 who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE  
25 SECTION 25109, to wit: an investment contract, to another, Lori Pascua DOB (8/9/1950), by  
26 means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

27 **COUNT 47**  
28 **PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, January 26, 2017 and February 25, 2019, in the County of Sacramento, State  
of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER



1 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a  
2 Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY,  
3 MARINA JAROMAY, and MERITO JAROMAY who did unlawfully take personal property,  
4 \$75,000 of a value exceeding nine hundred and fifty dollars (\$950), the property of Filipina  
5 Vasquez (DOB 2/17/1947).

6 **COUNT 48**  
7 **PENAL CODE SECTION 368(d)—FELONY**  
8 **2yr/3yr/4yr (PC 1170(h))**

9 On or about January 26, 2017 and February 25, 2019, in the county of Sacramento, State of  
10 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section  
11 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER  
12 JAROMAY, MARINA JAROMAY, and MERITO JAROMAY who did unlawfully carry out  
13 theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal  
14 identifying information of an elder and dependent adult, said property, moneys, labor, good and  
15 services taken and obtained having a value exceeding \$950, and knew and reasonably should  
16 have known that said person, Filipina Vasquez (DOB 2/17/1947), was an elder and dependent  
17 adult.

18 **COUNT 49**  
19 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
20 **2yr/3yr/5yr (PC 1170(h))**

21 On or about January 26, 2017 and February 25, 2019, in the County of Sacramento, State of  
22 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND  
23 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION  
24 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, CHRISTOPHER  
25 JAROMAY, MARINA JAROMAY, and MERITO JAROMAY, who did sell and offer to sell a  
26 security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an  
27 investment contract, to another: Filipina Vasquez (DOB 2/17/1947), by means of communications  
28 which include an untrue statement of material fact and omitted to state a material fact necessary  
in order to make the statements made, in light of the circumstances under which they were made,  
not misleading.

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**COUNT 50**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about January 26, 2017 and February 25, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, CHRISTOPHER JAROMAY, MARINA JAROMAY, and MERITO JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Filipina Vasquez (DOB 2/17/1947), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

**COUNT 51**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, October 20, 2016, November 3, 2016, March 16, 2017, and November 20, 2018, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY who did unlawfully take personal property, \$250,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Editha Barba (DOB 1/10/1944).

**COUNT 52**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20, 2018, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and

1 services taken and obtained having a value exceeding \$950, and knew and reasonably should  
2 have known that said person, Editha Barba (DOB 1/10/1944), was an elder and dependent adult.

3 **COUNT 53**  
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20,  
7 2018, in the County of Sacramento, State of California, the crime of COMMUNICATIONS  
8 CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in  
9 violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by  
10 RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY, who  
11 did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE  
12 SECTION 25109, to wit: an investment contract, to another: Editha Barba (DOB 1/10/1944), by  
13 means of communications which include an untrue statement of material fact and omitted to state  
14 a material fact necessary in order to make the statements made, in light of the circumstances  
15 under which they were made, not misleading.

16 **COUNT 54**  
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about October 20, 2016, November 3, 2016, March 16, 2017, and November 20,  
20 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE,  
21 SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A  
22 SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK  
23 RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER JAROMAY, who did sell  
24 and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109,  
25 to wit: an investment contract, to another, Editha Barba (DOB 1/10/1944), by means of a device,  
26 scheme, or artifice to defraud in the offer, purchase or sale of said security.

27 **COUNT 55**  
28 **PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, December 4, 2017 and March 26, 2019, in the County of Sacramento, State of  
California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER

1 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a  
2 Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY and  
3 CHRISTOPHER JAROMAY who did unlawfully take personal property, \$190,000, of a value  
4 exceeding nine hundred and fifty dollars (\$950), the property of Anita Alonzo (DOB 10/17/1947).

5 **COUNT 56**  
6 **PENAL CODE SECTION 368(d)—FELONY**  
7 **2yr/3yr/4yr (PC 1170(h))**

8 On or about December 4, 2017 and March 26, 2019, in the county of Sacramento, State of  
9 California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section  
10 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY and  
11 CHRISTOPHER JAROMAY who did unlawfully carry out theft, embezzlement, forgery, fraud  
12 and identity theft with respect to the property and personal identifying information of an elder and  
13 dependent adult, said property, moneys, labor, good and services taken and obtained having a  
14 value exceeding \$950, and knew and reasonably should have known that said person, Anita  
15 Alonzo (DOB 10/17/1947), was an elder and dependent adult.

16 **COUNT 57**  
17 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about December 4, 2017 and March 26, 2019, in the County of Sacramento, State of  
20 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND  
21 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION  
22 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA  
23 JAROMAY and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this  
24 state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to  
25 another: Anita Alonzo (DOB 10/17/1947), by means of communications which include an untrue  
26 statement of material fact and omitted to state a material fact necessary in order to make the  
27 statements made, in light of the circumstances under which they were made, not misleading.

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**COUNT 58**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about December 4, 2017 and March 26, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Anita Alonzo (DOB 10/17/1947), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

**COUNT 59**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, August 19, 2016, and February 2, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did unlawfully take personal property, \$50,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Ligaya Balignasay (DOB 7/8/1945).

**COUNT 60**  
**PENAL CODE SECTION 368(d)—FELONY**  
**2yr/3yr/4yr (PC 1170(h))**

On or about, August 22, 2016 and February 2, 2019, in the county of Sacramento, State of California, the crime of THEFT FROM AN ELDER, in violation of PENAL CODE Section 368(d), a Felony, was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did unlawfully carry out theft, embezzlement, forgery, fraud and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, good and services taken and obtained having a value exceeding \$950, and knew and reasonably should have known that said person, Ligaya Balignasay (DOB 7/8/1945), was an elder and dependent adult.

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**COUNT 61**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about August 22, 2016 and February 2, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Ligaya Balignasay (DOB 7/8/1945), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 62**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about August 22, 2016 and February 2, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, MERITO JAROMAY, and MARINA JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Ligaya Balignasay (DOB 7/8/1945), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

**COUNT 63**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, January 26, 2017, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and CHRISTOPHER

1 JAROMAY who did unlawfully take personal property, \$150,000, of a value exceeding nine  
2 hundred and fifty dollars (\$950), the property of Jasmin Alejandro (DOB 4/15/1952).

3 **COUNT 64**  
4 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
5 **2yr/3yr/5yr (PC 1170(h))**

6 On or about January 26, 2017, in the County of Sacramento, State of California, the crime  
7 of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
8 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
9 Felony, was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and  
10 CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state, as defined in  
11 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Jasmin  
12 Alejandro (DOB 4/15/1952), by means of communications which include an untrue statement of  
13 material fact and omitted to state a material fact necessary in order to make the statements made,  
14 in light of the circumstances under which they were made, not misleading.

15 **COUNT 65**  
16 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
17 **2yr/3yr/5yr (PC 1170(h))**

18 On or about January 26, 2017, in the County of Sacramento, State of California, the crime  
19 of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,  
20 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)  
21 was committed by RICK RIVERA, LOU MASER, NELSON MANMANO, and  
22 CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in  
23 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Jasmin  
24 Alejandro (DOB 4/15/1952), by means of a device, scheme, or artifice to defraud in the offer,  
25 purchase or sale of said security.

26 **COUNT 66**  
27 **PENAL CODE SECTION 487 – FELONY**  
28 **16mos/2yr/3yr (PC 1170(h))**

On or about, September 23, 2016, in the County of Sacramento, State of California, the  
crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE  
HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony,

1 was committed by RICK RIVERA, and NELSON MANMANO, who did unlawfully take  
2 personal property, \$110,000, of a value exceeding nine hundred and fifty dollars (\$950), the  
3 property of David Salvatera (DOB 12/8/1956).

4 **COUNT 67**  
5 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about July 16, 2018, in the County of Sacramento, State of California, the crime of  
8 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
9 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
10 Felony, was committed by RICK RIVERA, and NELSON MANMANO, who did sell and offer  
11 to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit:  
12 an investment contract, to another: David Salvatera (DOB 12/8/1956), by means of  
13 communications which include an untrue statement of material fact and omitted to state a material  
14 fact necessary in order to make the statements made, in light of the circumstances under which  
15 they were made, not misleading.

16 **COUNT 68**  
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about July 16, 2018, in the County of Sacramento, State of California, the crime of  
20 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,  
21 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed  
22 by RICK RIVERA, and NELSON MANMANO, who did sell and offer to sell a security in this  
23 state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to  
24 another, David Salvatera (DOB 12/8/1956), by means of a device, scheme, or artifice to defraud  
25 in the offer, purchase or sale of said security.

26 **COUNT 69**  
27 **PENAL CODE SECTION 487 – FELONY**  
28 **16mos/2yr/3yr (PC 1170(h))**

On or about, May 22, 2018, in the County of Sacramento, State of California, the crime of  
GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND  
FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by



1 RICK RIVERA, LOU MASER, JUAN MURILLO, CHRISTOPHER JAROMAY, THU DANG,  
2 and KRISTEL VILLAR, who did unlawfully take personal property, \$100,000, of a value  
3 exceeding nine hundred and fifty dollars (\$950), the property of Glen Ramos (DOB 4/19/1970).

4 **COUNT 70**  
5 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
6 **2yr/3yr/5yr (PC 1170(h))**

7 On or about May 22, 2018, in the County of Sacramento, State of California, the crime of  
8 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
9 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
10 Felony, was committed by RICK RIVERA, LOU MASER, JUAN MURILLO, CHRISTOPHER  
11 JAROMAY, THU DANG, and KRISTEL VILLAR, who did sell and offer to sell a security in  
12 this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment  
13 contract, to another: Glen Ramos (DOB 4/19/1970), by means of communications which include  
14 an untrue statement of material fact and omitted to state a material fact necessary in order to make  
15 the statements made, in light of the circumstances under which they were made, not misleading.

16 **COUNT 71**  
17 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
18 **2yr/3yr/5yr (PC 1170(h))**

19 On or about May 22, 2018, in the County of Sacramento, State of California, the crime of  
20 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,  
21 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed  
22 by RICK RIVERA, LOU MASER, JUAN MURILLO, CHRISTOPHER JAROMAY, THU  
23 DANG, and KRISTEL VILLAR, who did sell and offer to sell a security in this state as defined  
24 in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Glen  
25 Ramos (DOB 4/19/1970), by means of a device, scheme, or artifice to defraud in the offer,  
26 purchase or sale of said security.

27 **COUNT 72**  
28 **PENAL CODE SECTION 487 – FELONY**  
29 **16mos/2yr/3yr (PC 1170(h))**

30 On or about, July 14, 2017, September 8, 2017, and June 3, 2019, in the County of  
31 Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF

1 A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code  
2 Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA  
3 JAROMAY, and CHRISTOPHER JAROMAY, who did unlawfully take personal property,  
4 \$325,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Ricardo  
5 Macasaet (DOB 7/21/1960) and Maria Macasaet (DOB 1/7/1964).

6 **COUNT 73**  
7 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
8 **2yr/3yr/5yr (PC 1170(h))**

9 On or about July 14, 2017, September 8, 2017, and June 3, 2019, in the County of  
10 Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE  
11 STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS  
12 CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER,  
13 MARINA JAROMAY, and CHRISTOPHER JAROMAY, who did sell and offer to sell a  
14 security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an  
15 investment contract, to another: Ricardo Macasaet (DOB 7/21/1960) and Maria Macasaet (DOB  
16 1/7/1964), by means of communications which include an untrue statement of material fact and  
17 omitted to state a material fact necessary in order to make the statements made, in light of the  
18 circumstances under which they were made, not misleading.

19 **COUNT 74**  
20 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
21 **2yr/3yr/5yr (PC 1170(h))**

22 On or about July 14, 2017, September 8, 2017, and June 3, 2019, State of California, the  
23 crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER,  
24 PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a)  
25 was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and CHRISTOPHER  
26 JAROMAY, who did sell and offer to sell a security in this state as defined in CORPORATIONS  
27 CODE SECTION 25109, to wit: an investment contract, to another, Ricardo Macasaet (DOB  
28 7/21/1960) and Maria Macasaet (DOB 1/7/1964), by means of a device, scheme, or artifice to  
defraud in the offer, purchase or sale of said security.

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**COUNT 75**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, April 14, 2017, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and GREGORY PRITCHARD who did unlawfully take personal property, \$65,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Pamela Ryan (DOB 2/15/1959).

**COUNT 76**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about April 14, 2017, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA and GREGORY PRITCHARD, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Pamela Ryan (DOB 2/15/1959), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 77**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about December 21, 2018, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA and GREGORY PRITCHARD, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Pamela Ryan (DOB 2/15/1959), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 78**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, who did unlawfully take personal property, \$35,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Ritchell Tejada (DOB 9/1/1989).

**COUNT 79**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Ritchell Tejada (DOB 9/1/1989), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 80**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about December 21, 2018, in the County of Sacramento, State of California, and elsewhere, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Ritchell Tejada (DOB 9/1/1989), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 81**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, February 26, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA who did unlawfully take personal property, \$200,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Christopher Klimek (DOB 1/21/1955).

**COUNT 82**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about February 26, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Christopher Klimek (DOB 1/21/1955), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 83**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about February 26, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by and RICK RIVERA, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Christopher Klimek (DOB 1/21/1955), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 84**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, March 17, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and NELSON MANMANO, who did unlawfully take personal property, \$650,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Darren Oki (DOB 12/13/1965).

**COUNT 85**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about March 17, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA and NELSON MANMANO, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Darren Oki (DOB 12/13/1965), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 86**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about March 17, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA and NELSON MANMANO, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Darren Oki (DOB 12/13/1965), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 87**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, August 10, 2019, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA and NELSON MANMANO, and MATT ROSE, who did unlawfully take personal property, \$300,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Derrick Naone (DOB 10/29/1967).

**COUNT 88**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about August 10, 2019, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, NELSON MANMANO, and MATT ROSE, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Derrick Naone (DOB 10/29/1967), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 89**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about August 10, 2019, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, NELSON MANMANO, and MATT ROSE, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Derrick Naone (DOB 10/29/1967), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of said security.

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**COUNT 90**  
**PENAL CODE SECTION 487 – FELONY**  
**16mos/2yr/3yr (PC 1170(h))**

On or about, July 11, 2016, in the County of Sacramento, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did unlawfully take personal property, \$100,000, of a value exceeding nine hundred and fifty dollars (\$950), the property of Efren Guillermo (DOB 2/13/1961) and Olivia Guillermo (3/5/1962).

**COUNT 91**  
**CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about July 11, 2016, in the County of Sacramento, State of California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did sell and offer to sell a security in this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another: Efren Guillermo (DOB 2/13/1961) and Olivia Guillermo (3/5/1962), by means of communications which include an untrue statement of material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

**COUNT 92**  
**CORPORATIONS CODE SECTION 25541(a)--FELONY**  
**2yr/3yr/5yr (PC 1170(h))**

On or about July 11, 2016, in the County of Sacramento, State of California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed by RICK RIVERA, LOU MASER, and NELSON MANMANO, who did sell and offer to sell a security in this state as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Efren Guillermo (DOB 2/13/1961) and Olivia Guillermo



1 (3/5/1962), by means of a device, scheme, or artifice to defraud in the offer, purchase or sale of  
2 said security.

3 **COUNT 93**  
4 **PENAL CODE SECTION 487 – FELONY**  
5 **16mos/2yr/3yr (PC 1170(h))**

6 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of  
7 GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND  
8 FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a Felony, was committed by  
9 RICK RIVERA, JUAN MURILLO, CHRISTOPHER JAROMAY, THU DANG, and KRISTEL  
10 VILLAR, who did unlawfully take personal property, \$30,000, of a value exceeding nine hundred  
and fifty dollars (\$950), the property of Fred Kosenko (DOB 5/5/1972).

11 **COUNT 94**  
12 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
13 **2yr/3yr/5yr (PC 1170(h))**

14 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of  
15 COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND OMISSIONS OF  
16 MATERIAL FACTS in violation of CORPORATIONS CODE SECTION 25401-25540(b), a  
17 Felony, was committed by RICK RIVERA, and JUAN MURILLO, CHRISTOPHER  
18 JAROMAY, THU DANG, and KRISTEL VILLAR, who did sell and offer to sell a security in  
19 this state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment  
20 contract, to another: Fred Kosenko (DOB 5/5/1972), by means of communications which include  
21 an untrue statement of material fact and omitted to state a material fact necessary in order to make  
the statements made, in light of the circumstances under which they were made, not misleading.

22 **COUNT 95**  
23 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
24 **2yr/3yr/5yr (PC 1170(h))**

25 On or about, April 6, 2018, in the County of Sacramento, State of California, the crime of  
26 USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE OFFER, PURCHASE,  
27 OR SALE OF A SECURITY in violation of Corporate Code SECTION 25541(a) was committed  
28 by RICK RIVERA, JUAN MURILLO, CHRISTOPHER JAROMAY, THU DANG, and  
KRISTEL VILLAR, who did sell and offer to sell a security in this state as defined in

1 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another, Fred  
2 Kosenko (DOB 5/5/1972), by means of a device, scheme, or artifice to defraud in the offer,  
3 purchase or sale of said security.

4 **COUNT 96**  
5 **PENAL CODE SECTION 487 – FELONY**  
6 **16mos/2yr/3yr (PC 1170(h))**

7 On or about, March 3, 2017 and April 27, 2018, in the County of Sacramento, State of  
8 California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER  
9 NINE HUNDRED AND FIFTY DOLLARS, in violation of Penal Code Section 484-487(a), a  
10 Felony, was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and  
11 CHRISTOPHER JAROMAY, who did unlawfully take personal property, \$100,000, of a value  
12 exceeding nine hundred and fifty dollars (\$950), the property of Alexander Barba (DOB  
13 7/30/1966).

14 **COUNT 97**  
15 **CORPORATIONS CODE SECTION 25401-25540(b)--FELONY**  
16 **2yr/3yr/5yr (PC 1170(h))**

17 On or about March 3, 2017, and April 27, 2018, in the County of Sacramento, State of  
18 California, the crime of COMMUNICATIONS CONTAINING UNTRUE STATEMENTS AND  
19 OMISSIONS OF MATERIAL FACTS in violation of CORPORATIONS CODE SECTION  
20 25401-25540(b), a Felony, was committed by RICK RIVERA, LOU MASER, MARINA  
21 JAROMAY, and CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this  
22 state, as defined in CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to  
23 another: Alexander Barba (DOB 7/30/1966), by means of communications which include an  
24 untrue statement of material fact and omitted to state a material fact necessary in order to make  
25 the statements made, in light of the circumstances under which they were made, not misleading.

26 **COUNT 98**  
27 **CORPORATIONS CODE SECTION 25541(a)--FELONY**  
28 **2yr/3yr/5yr (PC 1170(h))**

On or about March 3, 2017, and April 27, 2018, in the County of Sacramento, State of  
California, the crime of USE OF A DEVISE, SCHEME, OR ARTIFICE TO DEFRAUD IN THE  
OFFER, PURCHASE, OR SALE OF A SECURITY in violation of Corporate Code SECTION

1 25541(a) was committed by RICK RIVERA, LOU MASER, MARINA JAROMAY, and  
2 CHRISTOPHER JAROMAY, who did sell and offer to sell a security in this state as defined in  
3 CORPORATIONS CODE SECTION 25109, to wit: an investment contract, to another,  
4 Alexander Barba (DOB 7/30/1966), by means of a device, scheme, or artifice to defraud in the  
5 offer, purchase or sale of said security.

6 **SPECIAL ALLEGATIONS**  
7 **Extended Statute of Limitations – Penal Code Sections 801.5/803(c)**

8 It is further alleged pursuant to Penal Code section 803(c) (Statute of Limitations Tolled)  
9 that the offenses charged in Counts 1 through and including 101 above are felonies, and no  
10 victims of the offenses and no law enforcement agencies chargeable with the investigation and  
11 prosecution of the offenses had actual or constructive knowledge of the offenses prior to the date  
12 of July 29, 2019, when representatives of the California Department of Justice, Division of Medi-  
13 Cal Fraud and Elder Abuse were informed of the existence and identity of the conspiracy to  
14 illegally and fraudulently sell and offer investments in Pagudpud Sands Resort. These offenses  
15 were not discovered earlier because the defendants and others made false statements to the buyers  
16 and investors in the securities, as to the true nature of the transactions and their legality under the  
17 laws of the State of California.

18 **PROBATION LIMITATION**

19 It is further alleged that the offenses set forth in Counts 1 through and including 101 are  
20 thefts of over \$100,000 within the meaning of Penal Code section 1203.045(a).

21 **AGGRAVATED WHITE COLLAR CRIME –LOSS GREATER THAN \$100,000**

22 It is further alleged, pursuant to Penal Code section 186.11(a) that the offenses set forth in  
23 Counts 1 through 101 are related felonies, a material element of which is fraud and  
24 embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony  
25 conduct involves the taking of an aggregate amount of more than One Hundred Thousand Dollars  
26 (\$100,000).

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**PENAL CODE SECTION 12022.6  
To January 1, 2018**

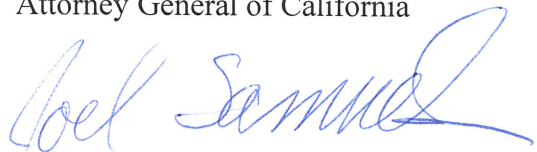
It is further alleged, pursuant to Penal Code section 12022.6 and *People v. Medeiros* (2021) 46 Cal.App 5th 1142, that the offenses in counts 1, 7, 8, 9, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 72, 73, 74, 75, 76, 77, 90, 91, 92, 96, 97, and 98 took place prior to January 1, 2018 and are subject to the enhanced penalties of this section for a taking in an amount greater than \$3,200,000.

I declare under penalty of perjury, on information and belief, pursuant to the laws of the State of California, that the foregoing is true and correct.

Dated: May 20, 2021

Respectfully Submitted,

ROB BONTA  
Attorney General of California



JOEL SAMUELS  
Deputy Attorney General  
*Attorneys for the People of the State of California*