

~~Unsentec~~  
**SECRET**

FILED

09 MAR 27 PM 3:02

CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

REPLY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

February 2009 Grand Jury

**'09CR1209 H —**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DARNELL BELL (1),  
aka D-Bell,  
MICHAEL IVY (2),  
STANLEY GENTRY (3),  
BILLIE BISHOP (4),  
DIANA JAIME (5),  
LATASHIA MCKINNEY (6),  
MARCUS DOZZELL (7),  
aka Kali,  
JORGE CORTEZ (8),  
ESTEBAN VALENZUELA (9),  
LORENA CALLU (10),  
ANTON EWING (11),  
RANDOLPH HIRSCH (12),  
DENNIS TAPIA (13),  
DESIREE HOLIDAY (14),  
aka Desi,  
DEXTER HOLIDAY (15),  
KEITH HOLIDAY (16),  
RAY LOGAN (17),  
aka Jack Nasty,  
DAVID LEWIS (18),  
JOSEPH LEWIS (19),  
GERARD HOLIDAY (20),  
STEVIE FRAZIER (21),  
JORGE MAGANA (22),  
NICOLEE WATSON (23),  
DANIEL WILLIAMS (24),

Defendants.

Case No.

I N D I C T M E N T

Title 18, U.S.C., Sec. 1962(d) -  
Conspiracy to Conduct Enterprise  
Affairs Through A Pattern of  
Racketeering Activity; Title 18,  
U.S.C., Sec. 1963 - Criminal  
Forfeiture

1 The grand jury charges;

2 Count 1

3 THE ENTERPRISE

4 1. At various times material to this indictment:

5 a. Defendants DARNELL BELL, aka D-Bell, MICHAEL IVY,  
6 STANLEY GENTRY, BILLIE BISHOP, DIANA JAIME, LATASHIA MCKINNEY, MARCUS  
7 DOZZELL, aka Kali, JORGE CORTEZ, ESTEBAN VALENZUELA, LORENA CALLU,  
8 ANTON EWING, RANDOLPH HIRSCH, DENNIS TAPIA, DESIREE HOLIDAY, aka Desi,  
9 DEXTER HOLIDAY, KEITH HOLIDAY, RAY LOGAN, aka Jack Nasty, DAVID LEWIS,  
10 JOSEPH LEWIS, GERARD HOLIDAY, STEVIE FRAZIER, JORGE MAGANA, NICOELE  
11 WATSON, DANIEL WILLIAMS (collectively "Defendants"), and others known  
12 and unknown to the grand jury, were members and associates of an  
13 organization whose members engaged in, among other things, conspiracy  
14 to commit bank fraud, conspiracy to commit wire fraud, conspiracy to  
15 launder money, wire fraud, bank fraud and money laundering. At all  
16 relevant times, this organization operated in the Southern District  
17 of California and elsewhere. The organization and the individuals who  
18 associate with it for criminal purposes constitute an "Enterprise,"  
19 as defined by Title 18, United States Code, Section 1961(4)  
20 (hereinafter the "Enterprise"), that is, a group of individuals  
21 associated in fact. The Enterprise constituted an ongoing  
22 organization whose members functioned as a continuing unit for the  
23 common purpose of achieving the objectives of the Enterprise. The  
24 Enterprise was engaged in, and its activities affected, interstate and  
25 foreign commerce.

26 //

27 //

28 //

1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8

2  
3

4  
5  
6  
7

8  
9  
0  
1

2  
3  
4  
5  
6  
7  
8

## 90

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1           a.   Members of the Enterprise used the Multiple Listing  
2 Service ("MLS") and other methods of identifying properties for sale  
3 throughout Southern California that had been on the market for an  
4 extended period of time and/or for which the original asking price had  
5 been reduced.

6           b.   Members of the Enterprise recruited "straw buyers" to  
7 purchase the identified properties, that is, individuals who allowed  
8 their names, credit history and other personal information to be used  
9 to obtain loans and purchase properties in name only on behalf of the  
10 Enterprise.

11           c.   Members of the Enterprise prepared and submitted offers  
12 to purchase the identified properties which substantially exceeded the  
13 asking price for those properties.

14           d.   Members of the Enterprise hired real estate appraisers  
15 to prepare inflated appraisals for the identified properties; the  
16 inflated appraisals were then used to fraudulently induce lenders to  
17 believe that the loans being given to the "straw buyers" would be  
18 fully secured by the value of the properties being purchased.

19           e.   Members of the Enterprise prepared and submitted false  
20 loan applications for the "straw buyers" in order to induce lenders  
21 to make loans to persons and at terms that the lenders otherwise would  
22 not have funded.

23           f.   Members of the Enterprise prepared and submitted false  
24 documents and information in response to lender verification  
25 inquiries, including "CPA letters," verification of employment forms,  
26 verification of rent forms and "discrepancy letters."

27           g.   Members of the Enterprise ensured that the "straw  
28 buyers" purchased the identified properties with mortgages amounting

1 to 100 percent of the purchase price of the property, thus ensuring  
2 that the defendants did not have any money at risk in the fraudulent  
3 transactions.

4 h. Members of the Enterprise arranged to have the amount  
5 of money that exceeded the asking price (i.e., the "kickback amount")  
6 paid at the close of escrow to a shell construction company maintained  
7 by the Enterprise.

8 i. Members of the Enterprise falsely informed the lenders  
9 that the "kickback amount" would be used to pay for construction  
10 upgrades to the identified properties, thereby falsely inducing the  
11 lenders to believe that the entire loan amount would be secured by the  
12 value of the identified properties.

13 j. Members of the Enterprise used the "kickback amount"  
14 for personal enrichment, that is, funds were disbursed from the shell  
15 construction company maintained by the Enterprise to members and  
16 associates of the Enterprise as payment for those individuals'  
17 participation in the fraudulent scheme.

18 k. Members of the Enterprise owned, established and  
19 utilized real estate businesses and escrow companies to facilitate the  
20 purchase of the identified properties by the "straw buyers" and to  
21 generate income for the Enterprise by collecting real estate  
22 transaction fees, that is, credit report fees, broker processing fees,  
23 broker underwriting fees, broker application fees, notary fees, escrow  
24 fees, appraisal fees, broker commissions and transaction coordinator  
25 fees, in connection with the purchase of the identified properties.

26 l. Members of the Enterprise, including the "straw  
27 buyers," would fail to make the required mortgage payments for the  
28 fraudulently purchased properties, thereby allowing those properties

1 to go into foreclosure and which resulted in financial loss to the  
2 lenders.

3 ROLES OF THE DEFENDANTS

4 4. At various times material to this Indictment, the defendants  
5 had the following roles in the Enterprise:

6 a. Defendant DARNELL BELL acted as the leader of the  
7 Enterprise and had oversight responsibility for the recruitment of the  
8 "straw buyers" and their purchase of real property. Defendant BELL  
9 was associated with Ivy House Inc., a business operated by defendant  
10 MICHAEL IVY. Defendant BELL and other members of the Enterprise used  
11 Ivy House Inc. to facilitate the fraudulent purchase of real estate.  
12 In particular, defendant BELL recruited "straw buyers" and had them  
13 use Ivy House Inc. to process their real estate purchases. Following  
14 the closure of Ivy House Inc., defendant BELL and defendant MICHAEL  
15 IVY established a business known as The Real Estate Center of La Mesa,  
16 a subsidiary of The Real Estate Center of Southern California, a  
17 business owned and operated by co-defendant STANLEY GENTRY. Defendant  
18 BELL and other members of the Enterprise then utilized The Real Estate  
19 Center of La Mesa to conduct fraudulent real estate purchases. As the  
20 leader of the Enterprise, defendant BELL also maintained a bank  
21 account in the name of DARNELL BELL, dba Bell Construction. Defendant  
22 BELL and other members of the Enterprise used that account to obtain  
23 and disburse the proceeds of their fraudulent activities. During the  
24 time period of this Indictment, over \$9,000,000 in proceeds from the  
25 illegal activities of the Enterprise were deposited into the above-  
26 noted account maintained by defendant BELL. Defendant BELL also used  
27 his status as a long-standing member of the Lincoln Park street gang

28 //

1 to recruit some of the "straw buyers" and to maintain discipline  
2 within the Enterprise.

3           b. Defendant MICHAEL IVY negotiated for the purchase of  
4 real property on behalf of the Enterprise. During the time period of  
5 this Indictment, defendant IVY obtained over \$200,000 in proceeds from  
6 the fraudulent activities of the Enterprise.

7           c. Defendant STANLEY GENTRY was a real estate broker  
8 licensed by the State of California. For a flat fee of \$10,000 per  
9 month, defendant GENTRY allowed defendants BELL and IVY to gain access  
10 to the MLS and to conduct fraudulent real estate transactions on  
11 behalf of the Enterprise. Defendant GENTRY submitted false  
12 verification of rent forms in connection with some of the fraudulent  
13 real estate transactions. In addition to the \$10,000 monthly payment,  
14 defendant GENTRY also obtained the real estate agent's commission and  
15 broker's fees in connection with real estate purchases made on behalf  
16 of the Enterprise. During the time period of this Indictment,  
17 defendant GENTRY obtained over \$1,000,000 in proceeds from the  
18 fraudulent activities of the Enterprise.

19           d. Defendant BILLIE BISHOP was an employee at BBC Escrow,  
20 the principal escrow company utilized by the Enterprise to process  
21 fraudulent real estate purchases. After leaving BBC Escrow, defendant  
22 BISHOP worked for Ticor Title, a business also used by the Enterprise  
23 to process fraudulent real estate purchases. During the time period  
24 of this Indictment, defendant BISHOP was the escrow officer for over  
25 100 real estate purchases conducted by members of the Enterprise; each  
26 of those transactions included the payment of a "kickback amount" to  
27 a shell construction company maintained by the Enterprise.

28 //

1 e. Defendants LATASHIA MCKINNEY and MARCUS DOZZELL  
2 recruited "straw buyers" for the Enterprise. Among the "straw buyers"  
3 recruited by defendant MCKINNEY were W.M., B.S., A.H. and G.W. Among  
4 the "straw buyers" recruited by defendant DOZZELL were M.S., J.P.,  
5 A.B. and M.W. Defendant MCKINNEY obtained at least \$400,000 from the  
6 Enterprise for her recruitment efforts. Defendant DOZZELL obtained  
7 at least \$100,000 from the Enterprise for his recruitment efforts.

8 f. Defendants DIANA JAIME, JORGE CORTEZ and LORENA CALLU  
9 were employees at real estate businesses in San Diego, California,  
10 which were used by members of the Enterprise to facilitate the  
11 fraudulent purchase of identified properties. As employees at those  
12 businesses, the defendants prepared and submitted false loan  
13 applications on behalf of "straw buyers." The defendants also  
14 prepared and/or submitted false information in response to lender  
15 verification inquiries, including false letters from tax advisers  
16 ("CPA letters"), verification of employment forms, verification of  
17 rent forms and "discrepancy letters."

18 g. Defendants STEVIE FRAZIER, DESIREE HOLIDAY, DEXTER  
19 HOLIDAY, GERARD HOLIDAY, KEITH HOLIDAY, DAVID LEWIS, JOSEPH LEWIS, RAY  
20 LOGAN, JORGE MAGANA, NICOLELE WATSON and DANIEL WILLIAMS acted as  
21 "straw buyers" for the Enterprise. Each defendant signed and caused  
22 to be submitted multiple false mortgage loan applications.

23 h. Defendant ESTEBAN VALENZUELA was a real estate  
24 appraiser licensed by the State of California. During the time period  
25 alleged in this Indictment, defendant VALENZUELA prepared and  
26 submitted over 40 inflated appraisals in support of the Enterprise's  
27 efforts to obtain loans which included a "kickback" amount. Defendant  
28 //



1 VALENZUELA obtained at least \$35,000 for his participation in the  
2 Enterprise.

3 i. Defendants ANTON EWING, RANDOLPH HIRSCH and DENNIS  
4 TAPIA prepared and submitted false documents and information in  
5 response to lender verification inquiries, including "CPA letters" and  
6 verbal verifications of employment.

7 THE RACKETEERING CONSPIRACY

8 5. Beginning in or about January 2005, and continuing up to and  
9 including April 1, 2008, within the Southern District of California  
10 and elsewhere, defendants DARNELL BELL, aka D-Bell, MICHAEL IVY,  
11 STANLEY GENTRY, BILLIE BISHOP, DIANA JAIME, LATASHIA MCKINNEY, MARCUS  
12 DOZZELL, aka Kali, JORGE CORTEZ, ESTEBAN VALENZUELA, LORENA CALLU,  
13 ANTON EWING, RANDOLPH HIRSCH, DENNIS TAPIA, DESIREE HOLIDAY, aka Desi,  
14 DEXTER HOLIDAY, KEITH HOLIDAY, RAY LOGAN, aka Jack Nasty, DAVID LEWIS,  
15 JOSEPH LEWIS, GERARD HOLIDAY, STEVIE FRAZIER, JORGE MAGANA, NICOELE  
16 WATSON, DANIEL WILLIAMS, and others known and unknown to the grand  
17 jury, being persons employed by and associated with the Enterprise (as  
18 defined above), which Enterprise was engaged in, and the activities  
19 of which affected interstate and foreign commerce, did knowingly and  
20 intentionally conspire with each other, and with other persons, to  
21 violate Title 18, United States Code, Section 1962(c), that is, to  
22 conduct and participate, directly and indirectly, in the conduct of  
23 the Enterprise's affairs through a pattern of racketeering activity  
24 involving multiple acts indictable under the following provisions of  
25 federal law:

26 a. Title 18, United States Code, Section 1343 (wire  
27 fraud);

28 //

- 1           b. Title 18, United States Code, Section 1344 (bank  
2           fraud);  
3           c. Title 18, United States Code, Sections 1956(h) and  
4           1957 (conspiracy to launder money); and  
5           d. Title 18, United States Code, Section 1957 (money  
6           laundering).

7           6. It was a further part of the conspiracy that each defendant  
8 agreed that a conspirator would commit at least two acts of  
9 racketeering activity in the conduct of the affairs of the Enterprise.

10                           OVERT ACTS

11           7. In furtherance of the conspiracy and to accomplish the  
12 objects of the conspiracy, the defendants and their coconspirators  
13 committed the following overt acts, among others, in San Diego County,  
14 within the Southern District of California, unless otherwise  
15 specified, on or about the dates set forth below:

- 16           (1) On or about August 4, 2005, defendant BILLIE BISHOP caused  
17           \$25,642.04 to be transferred from an account maintained by  
18           BBC Escrow Inc. to a Washington Mutual account maintained  
19           by defendant DARNELL BELL.  
20           (2) On or about August 26, 2005, defendant DARNELL BELL caused  
21           a check in the amount of \$5,000 to be issued to defendant  
22           MICHAEL IVY.  
23           (3) On or about September 12, 2005, defendant DARNELL BELL  
24           caused a cashier's check in the amount of \$10,000 to be  
25           issued to defendant DESIREE HOLIDAY.  
26           (4) On or about October 18, 2005, defendant DESIREE HOLIDAY  
27           signed and submitted a "Request For Verification Of Rent  
28           Or Mortgage" form for defendant NICOLE WATSON in

1 connection with WATSON's purchase of 6331 Amber Lake  
2 Avenue, San Diego, California.

3 (5) On or about October 26, 2005, defendant NICOLE WATSON  
4 signed and submitted a loan application for the purchase  
5 of 6331 Amber Lake Avenue, San Diego, California, wherein  
6 WATSON stated her gross monthly income was \$10,893.

7 (6) On or about October 28, 2005, defendant NICOLE WATSON  
8 signed and submitted a loan application for the purchase  
9 of 6339 East Thorn Street, San Diego, California, wherein  
10 WATSON stated her gross monthly income was \$9,673.

11 (7) On or about November 2, 2005, defendant DARNELL BELL  
12 caused a check in the amount of \$2,500 to be issued to  
13 defendant MICHAEL IVY.

14 (8) On or about November 2, 2005, defendant DARNELL BELL  
15 caused a second check in the amount of \$2,500 to be issued  
16 to defendant MICHAEL IVY.

17 (9) On or about November 3, 2005, defendant DARNELL BELL  
18 caused a check in the amount of \$553 to be issued to  
19 defendant DESIREE HOLIDAY.

20 (10) On or about November 3, 2005, defendant DARNELL BELL  
21 caused a check in the amount of \$2,500 to be issued to  
22 defendant DESIREE HOLIDAY.

23 (11) On or about November 3, 2005, defendant DARNELL BELL  
24 caused a second check in the amount of \$2,500 to be issued  
25 to defendant DESIREE HOLIDAY.

26 (12) On or about November 7, 2005, defendant DARNELL BELL  
27 caused a check in the amount of \$3,200 to be issued to  
28 defendant NICOLE WATSON.

- 1 (13) On or about November 15, 2005, defendant DARNELL BELL  
2 caused a check in the amount of \$30,000 to be issued to  
3 defendant NICOLELE WATSON.
- 4 (14) On or about November 16, 2005, defendant DESIREE HOLIDAY  
5 signed and submitted a "Request For Verification Of Rent  
6 Or Mortgage" form for defendant NICOLELE WATSON in  
7 connection with WATSON's purchase of 4309 Harbinson  
8 Avenue, La Mesa, California.
- 9 (15) In or about December 2005, defendant DARNELL BELL caused  
10 a "Letter of Explanation for Terms and Conditions of  
11 Offer" to be sent in connection with the purchase of 3727  
12 Suffolk Drive, San Diego, California, which required a  
13 payment to Bell Construction.
- 14 (16) On or about December 6, 2005, defendant NICOLELE WATSON  
15 signed and submitted a loan application for the purchase  
16 of 3727 Suffolk Drive, San Diego, California, wherein  
17 WATSON stated her gross monthly income was \$11,352.
- 18 (17) On or about December 8, 2005, defendant NICOLELE WATSON  
19 signed and submitted a loan application for the purchase  
20 of 4309 Harbinson Avenue, La Mesa, California, wherein  
21 WATSON stated her gross monthly income was \$9,250.
- 22 (18) On or about December 13, 2005, defendant DESIREE HOLIDAY  
23 signed and submitted a "Request For Verification Of Rent  
24 Or Mortgage" form for defendant NICOLELE WATSON in  
25 connection with WATSON's purchase of 3727 Suffolk Drive,  
26 San Diego, California.

27 //

28 //

- 1 (19) On or about December 28, 2005, defendant DARNELL BELL  
2 caused a check in the amount of \$1,150 to be issued to  
3 defendant DESIREE HOLIDAY.
- 4 (20) On or about December 29, 2005, defendant DARNELL BELL  
5 caused a check in the amount of \$1,000 to be issued to  
6 defendant DESIREE HOLIDAY.
- 7 (21) On or about January 20, 2006, defendant DARNELL BELL  
8 caused a cashier's check in the amount of \$30,000 to be  
9 issued to defendant NICOLE WATSON.
- 10 (22) On or about January 28, 2006, defendant DARNELL BELL  
11 caused a cashier's check in the amount of \$5,305 to be  
12 issued to defendant LORENA CALLU.
- 13 (23) On or about February 2, 2006, defendant STANLEY GENTRY  
14 caused the submission of a "Request For Verification Of  
15 Rent Or Mortgage" form for defendant JOSEPH LEWIS in  
16 connection with LEWIS' purchase of 1216 Sangamon Avenue,  
17 Spring Valley, California.
- 18 (24) On or about February 22, 2006, defendant ESTEBAN  
19 VALENZUELA prepared and submitted an appraisal for 1020 La  
20 Mesa Avenue, Spring Valley, California.
- 21 (25) On or about February 22, 2006, defendant JOSEPH LEWIS  
22 signed and submitted a loan application for the purchase  
23 of 1229 La Mesa Avenue, Spring Valley, California, wherein  
24 LEWIS stated his gross monthly income was \$13,800.
- 25 (26) On or about February 23, 2006, defendant JOSEPH LEWIS  
26 caused a loan application for the purchase of 1216  
27 Sangamon Avenue, Spring Valley, California, to be  
28 //

1 submitted to New American Lending, which contained a  
2 statement that LEWIS' gross monthly income was \$14,754.

3 (27) On or about February 25, 2006, defendant JOSEPH LEWIS  
4 signed and submitted a loan application for the purchase  
5 of 9044 Rosedale Drive, Spring Valley, California, wherein  
6 LEWIS stated his gross monthly income was \$12,500.

7 (28) On or about February 25, 2006, defendant JOSEPH LEWIS  
8 signed and submitted a "Borrower's Certification and  
9 Authorization" form verifying that all information he  
10 provided in connection with the purchase of 9044 Rosedale  
11 Drive, Spring Valley, California, was true and complete.

12 (29) On or about February 25, 2006, defendant JOSEPH LEWIS  
13 signed an occupancy agreement stating that he would be an  
14 owner-occupant of 9044 Rosedale Drive, Spring Valley,  
15 California, following close of escrow.

16 (30) On or about March 1, 2006, defendant DENNIS TAPIA  
17 submitted a CPA letter to The CIT Group for defendant  
18 JOSEPH LEWIS, wherein TAPIA stated that he had reviewed  
19 and verified LEWIS' personal income taxes and that LEWIS  
20 had been the owner/operator of B&J Lawn Service.

21 (31) On or about March 1, 2006, defendant DENNIS TAPIA sent a  
22 CPA letter to Peoples' Choice Home Loans, Inc. for  
23 defendant JOSEPH LEWIS, wherein TAPIA stated that he had  
24 reviewed and verified LEWIS' personal income taxes and  
25 that LEWIS had been the owner/operator of B&J Lawn  
26 Service.

27 (32) On or about March 1, 2006, defendant DENNIS TAPIA sent a  
28 CPA letter to Washington Mutual for defendant JOSEPH

1 LEWIS, wherein TAPIA stated that he had reviewed and  
2 verified LEWIS' personal income taxes and that LEWIS had  
3 been the owner/operator of B&J Lawn Service.

4 (33) On or about March 3, 2006, defendant MICHAEL IVY caused a  
5 credit report to be run for F.A. in connection with F.A.'s  
6 purchase of 3605 Mount Abraham Avenue, San Diego,  
7 California.

8 (34) On or about March 3, 2006, defendant MICHAEL IVY caused a  
9 credit report to be run for F.A. in connection with F.A.'s  
10 purchase of 1615 Buena Vista Avenue, Spring Valley,  
11 California.

12 (35) On or about March 3, 2006, defendant DARNELL BELL caused  
13 a cashier's check in the amount of \$7,000 to be issued to  
14 defendant STANLEY GENTRY.

15 (36) On or about March 6, 2006, defendant STANLEY GENTRY stated  
16 that defendant JOSEPH LEWIS had been a tenant in a  
17 property managed by GENTRY and that LEWIS had paid \$2,200  
18 per month in rent for the past seven years without any  
19 delinquencies.

20 (37) On or about March 9, 2006, defendant DARNELL BELL caused  
21 a cashier's check in the amount of \$30,000 to be issued to  
22 defendant JOSEPH LEWIS.

23 (38) On or about March 10, 2006, defendant ESTEBAN VALENZUELA  
24 prepared and submitted an appraisal for 1307 Maria Avenue,  
25 Spring Valley, California.

26 (39) On or about March 14, 2006, defendant JOSEPH LEWIS signed  
27 and submitted a loan application for the purchase of  
28 //

1 1404 Sangamon Avenue, Spring Valley, California, wherein  
2 LEWIS stated his gross monthly income was \$14,300.

3 (40) On or about March 15, 2006, defendant ESTEBAN VALENZUELA  
4 prepared and submitted an appraisal for 3605 Mount Abraham  
5 Avenue, San Diego, California.

6 (41) On or about March 15, 2006, defendant ESTEBAN VALENZUELA  
7 prepared and submitted an appraisal for 6392 Lake Ariana  
8 Avenue, San Diego, California.

9 (42) On or about March 15, 2006, defendant DARNELL BELL caused  
10 a cashier's check in the amount of \$5,000 to be issued to  
11 defendant STANLEY GENTRY.

12 (43) On or about March 16, 2006, defendant ESTEBAN VALENZUELA  
13 prepared and submitted an appraisal for 4580 Mount Alifan  
14 Drive, San Diego, California.

15 (44) On or about March 16, 2006, defendant JOSEPH LEWIS signed  
16 and submitted a "Borrower's Certification and  
17 Authorization" form verifying that all information he  
18 provided in connection with the purchase of 1404 Sangamon  
19 Avenue, Spring Valley, California, was true and complete.

20 (45) On or about March 17, 2006, defendant STANLEY GENTRY  
21 signed and submitted a "Request For Verification Of Rent  
22 Or Mortgage" form for defendant JOSEPH LEWIS in connection  
23 with LEWIS' purchase of 1229 La Mesa Avenue, La Mesa,  
24 California.

25 (46) On or about March 23, 2006, defendant ESTEBAN VALENZUELA  
26 prepared and submitted an appraisal for 5200 Mary Fellows,  
27 La Mesa, California.

28 //



- 1 (47) On or about March 24, 2006, defendant DARNELL BELL caused  
2 a cashier's check in the amount of \$40,000 to be issued to  
3 defendant JOSEPH LEWIS.
- 4 (48) On or about March 27, 2006, defendant STANLEY GENTRY  
5 signed and submitted a loan application for H.B. in  
6 connection with H.B.'s purchase of 4580 Mount Alifan  
7 Drive, San Diego, California.
- 8 (49) On or about March 27, 2006, defendant DARNELL BELL caused  
9 a cashier's check in the amount of \$30,000 to be issued to  
10 defendant JOSEPH LEWIS.
- 11 (50) On or about March 27, 2006, defendant DARNELL BELL caused  
12 a cashier's check in the amount of \$11,700 to be issued to  
13 defendant NICOLELE WATSON.
- 14 (51) On or about April 1, 2006, defendant MICHAEL IVY caused a  
15 credit report to be run for L.S. in connection with L.S.'s  
16 purchase of 5200 Mary Fellows, La Mesa, California.
- 17 (52) On or about April 4, 2006, defendant ESTEBAN VALENZUELA  
18 prepared and submitted an appraisal for 1615 Buena Vista  
19 Avenue, Spring Valley, California.
- 20 (53) On or about April 7, 2006, defendant ESTEBAN VALENZUELA  
21 prepared and submitted an appraisal for 2104 Valecrest  
22 Lane, Rancho San Diego, California.
- 23 (54) On or about April 12, 2006, defendant MICHAEL IVY caused  
24 a credit report to be run for B.M. in connection with  
25 B.M.'s purchase of 2104 Valecrest Lane, San Diego,  
26 California.
- 27 (55) On or about April 12, 2006, defendant STANLEY GENTRY  
28 signed and submitted a loan application for F.A. in

1 connection with F.A.'s purchase of 3605 Mount Abraham  
2 Avenue, San Diego, California.

3 (56) On or about April 12, 2006, defendant STANLEY GENTRY  
4 signed and submitted a loan application for F.A. in  
5 connection with F.A.'s purchase of 1615 Buena Vista  
6 Avenue, Spring Valley, California.

7 (57) On or about April 12, 2006, defendant STANLEY GENTRY  
8 caused a cashier's check in the amount of \$24,830 to be  
9 issued to defendant DARNELL BELL.

10 (58) On or about April 18, 2006, defendant ESTEBAN VALENZUELA  
11 prepared and submitted an appraisal for 6424 Estelle  
12 Street, San Diego, California.

13 (59) On or about April 20, 2006, defendant BILLIE BISHOP caused  
14 \$60,000 to be transferred from an account maintained by  
15 BBC Escrow Inc. to a Washington Mutual account maintained  
16 by defendant DARNELL BELL.

17 (60) On or about April 21, 2006, defendant ESTEBAN VALENZUELA  
18 prepared and submitted an appraisal for 730 Holly Avenue,  
19 San Diego, California.

20 (61) On or about April 21, 2006, defendant STANLEY GENTRY  
21 caused a cashier's check in the amount of \$10,300 to be  
22 issued to defendant DARNELL BELL.

23 (62) On or about April 24, 2007, defendant ESTEBAN VALENZUELA  
24 prepared and submitted an appraisal for 8066 Skyline  
25 Drive, San Diego, California.

26 (63) On or about April 26, 2007, defendant DARNELL BELL caused  
27 a cashier's check in the amount of \$12,000 to be issued to  
28 defendant MICHAEL IVY.

- 1 (64) On or about April 27, 2006, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$24,225 to be  
3 issued to defendant DARNELL BELL.
- 4 (65) On or about May 5, 2006, defendant DARNELL BELL caused a  
5 check in the amount of \$700 to be issued to defendant  
6 DESIREE HOLIDAY.
- 7 (66) In or about May 2006, defendant MARCUS DOZZELL recruited  
8 M.W. to purchase real property as a "straw buyer."
- 9 (67) On or about May 11, 2006, defendant BILLIE BISHOP caused  
10 \$59,792.78 to be transferred from an account maintained by  
11 BBC Escrow Inc. to a Washington Mutual account maintained  
12 by defendant DARNELL BELL.
- 13 (68) On or about May 12, 2006, defendant STANLEY GENTRY signed  
14 and submitted a loan application for O.G. in connection  
15 with O.G.'s purchase of 730 Holly Avenue, San Diego,  
16 California.
- 17 (69) On or about May 12, 2006, defendant DARNELL BELL caused a  
18 cashier's check in the amount of \$11,000 to be issued to  
19 defendant NICOLELE WATSON.
- 20 (70) On or about May 12, 2006, defendant STANLEY GENTRY caused  
21 a cashier's check in the amount of \$25,555 to be issued to  
22 defendant DARNELL BELL.
- 23 (71) On or about May 15, 2006, defendant DIANA JAIME notarized  
24 documents submitted in support of a loan application  
25 submitted by O.G. for the purchase of 730 Holly Avenue,  
26 San Diego, California.

27 //

28 //

- 1 (72) On or about May 16, 2006, defendant DARNELL BELL caused a  
2 check in the amount of \$600 to be issued to defendant  
3 DENNIS TAPIA.
- 4 (73) On or about May 16, 2006, defendant DARNELL BELL caused a  
5 cashier's check in the amount of \$2,900 to be issued to  
6 defendant MICHAEL IVY.
- 7 (74) On or about May 16, 2006, defendant DARNELL BELL caused a  
8 cashier's check in the amount of \$6,100 to be issued to  
9 defendant DESIREE HOLIDAY.
- 10 (75) On or about May 16, 2006, defendant STANLEY GENTRY caused  
11 a cashier's check in the amount of \$35,800 to be issued to  
12 defendant DARNELL BELL.
- 13 (76) On or about May 17, 2006, defendant DARNELL BELL caused a  
14 check in the amount of \$6,800 to be issued to defendant  
15 DESIREE HOLIDAY.
- 16 (77) On or about May 19, 2006, defendant STANLEY GENTRY signed  
17 and submitted a loan application for B.M. in connection  
18 with B.M.'s purchase of 2104 Valecrest Lane, Rancho  
19 San Diego, California.
- 20 (78) On or about May 19, 2006, defendant DARNELL BELL caused a  
21 cashier's check in the amount of \$3,000 to be issued to  
22 defendant MICHAEL IVY.
- 23 (79) On or about May 19, 2006, defendant DARNELL BELL caused a  
24 cashier's check in the amount of \$5,000 to be issued to  
25 defendant DESIREE HOLIDAY.
- 26 (80) On or about May 19, 2006, defendant STANLEY GENTRY caused  
27 a cashier's check in the amount of \$24,545 to be issued to  
28 defendant DARNELL BELL.

- 1 (81) On or about May 22, 2006, defendant DARNELL BELL caused a  
2 cashier's check in the amount of \$4,900 to be issued to  
3 defendant MICHAEL IVY.
- 4 (82) On or about May 22, 2006, defendant DARNELL BELL caused a  
5 cashier's check in the amount of 48,000 to be issued to  
6 defendant STANLEY GENTRY.
- 7 (83) On or about May 22, 2006, defendant DARNELL BELL caused a  
8 cashier's check in the amount of \$15,000 to be issued to  
9 defendant DESIREE HOLIDAY.
- 10 (84) On or about May 22, 2006, defendant STANLEY GENTRY caused  
11 a cashier's check in the amount of \$9,600 to be issued to  
12 defendant DARNELL BELL.
- 13 (85) On or about May 23, 2006, defendant STANLEY GENTRY caused  
14 a cashier's check in the amount of \$10,715 to be issued to  
15 defendant DARNELL BELL.
- 16 (86) On or about May 24, 2006, defendant DARNELL BELL caused a  
17 cashier's check in the amount of \$6,000 to be issued to  
18 defendant MICHAEL IVY.
- 19 (87) On or about May 25, 2006, defendant MICHAEL IVY caused a  
20 credit report check to be run for defendant DESIREE  
21 HOLIDAY in connection with HOLIDAY's purchase of 1231  
22 Maria Avenue, Spring Valley, California.
- 23 (88) On or about May 25, 2006, defendant MICHAEL IVY caused a  
24 credit report check to be run for defendant DESIREE  
25 HOLIDAY in connection with HOLIDAY's purchase of 1646 La  
26 Presa Avenue, Spring Valley, California.
- 27 (89) On or about May 25, 2006, defendant DARNELL BELL caused a  
28 //

1 cashier's check in the amount of \$1,700 to be issued to  
2 defendant MICHAEL IVY.

3 (90) On or about May 25, 2006, defendant STANLEY GENTRY caused  
4 a cashier's check in the amount of \$11,750 to be issued to  
5 defendant DARNELL BELL.

6 (91) On or about May 25, 2006, defendant STANLEY GENTRY caused  
7 a cashier's check in the amount of \$9,055 to be issued to  
8 defendant DARNELL BELL.

9 (92) On or about May 30, 2006, defendant MICHAEL IVY caused a  
10 credit report check to be run for L.J. in connection with  
11 L.J.'s purchase of 8066 Skyline Drive, San Diego,  
12 California.

13 (93) In or about June 2006, defendant DARNELL BELL caused a  
14 "Letter of Explanation for Terms and Conditions of Offer"  
15 to be sent in connection with the purchase of 1646 La  
16 Presa Avenue, Spring Valley, California, which required a  
17 payment to Bell Construction.

18 (94) In or about June 2006, defendant DARNELL BELL caused a  
19 "Letter of Explanation for Terms and Conditions of Offer"  
20 to be sent in connection with the purchase of 1201 North  
21 3rd Street, El Cajon, California, which required a payment  
22 to Bell Construction.

23 (95) On or about June 1, 2006, defendant ESTEBAN VALENZUELA  
24 prepared and submitted an appraisal for  
25 1414 San Bernardino, Spring Valley, California.

26 (96) On or about June 8, 2006, defendant STANLEY GENTRY caused  
27 a cashier's check in the amount of \$12,245 to be issued to  
28 defendant DARNELL BELL.

- 1 (97) On or about June 8, 2006, defendant STANLEY GENTRY caused  
2 a cashier's check in the amount of \$19,815 to be issued to  
3 defendant DARNELL BELL.
- 4 (98) On or about June 11, 2006, defendant ESTEBAN VALENZUELA  
5 prepared and submitted an appraisal for 8712 Glenhaven  
6 Street, San Diego, California.
- 7 (99) On or about June 13, 2006, defendant MICHAEL IVY caused a  
8 credit report to be run for defendant DEXTER HOLIDAY in  
9 connection with HOLIDAY's purchase of 1414 San Bernardino,  
10 Spring Valley, California.
- 11 (100) On or about June 16, 2006, defendant STANLEY GENTRY caused  
12 a cashier's check in the amount of \$20,160 to be issued to  
13 defendant DARNELL BELL.
- 14 (101) On or about June 21, 2006, defendant DARNELL BELL caused  
15 a check in the amount of \$1,200 to be issued to defendant  
16 ESTEBAN VALENZUELA.
- 17 (102) On or about June 22, 2006, defendant STANLEY GENTRY caused  
18 a cashier's check in the amount of \$10,304.12 to be issued  
19 to defendant DARNELL BELL.
- 20 (103) On or about June 23, 2006, defendant STANLEY GENTRY caused  
21 a cashier's check in the amount of \$11,165 to be issued to  
22 defendant DARNELL BELL.
- 23 (104) On or about June 23, 2006, defendant STANLEY GENTRY caused  
24 a cashier's check in the amount of \$16,500 to be issued to  
25 defendant DARNELL BELL.
- 26 (105) On or about June 26, 2006, defendant DARNELL BELL caused  
27 a check in the amount of \$2,800 to be issued to defendant  
28 RAY LOGAN.

- 1 (106) On or about June 26, 2006, defendant DARNELL BELL caused  
2 a check in the amount of \$1,000 to be issued to defendant  
3 DESIREE HOLIDAY.
- 4 (107) On or about June 27, 2006, defendant DARNELL BELL caused  
5 a check in the amount of \$1,000 to be issued to defendant  
6 DESIREE HOLIDAY.
- 7 (108) On or about June 28, 2006, defendant STANLEY GENTRY caused  
8 a cashier's check in the amount of \$7,371.16 to be issued  
9 to defendant DARNELL BELL.
- 10 (109) On or about June 30, 2006, defendant ESTEBAN VALENZUELA  
11 prepared and submitted an appraisal for 1646 La Presa  
12 Avenue, Spring Valley, California.
- 13 (110) On or about June 30, 2006, defendant STANLEY GENTRY signed  
14 and submitted a loan application for D.D. in connection  
15 with D.D.'s purchase of 823 East Park Avenue, El Cajon,  
16 California.
- 17 (111) In or about July 2006, defendant DARNELL BELL caused a  
18 "Letter of Explanation for Terms and Conditions of Offer"  
19 to be sent in connection with the purchase of 1833 Jasmine  
20 Street, El Cajon, California, which required a payment to  
21 Bell Construction.
- 22 (112) In or about July 2006, defendant DARNELL BELL caused a  
23 "Letter of Explanation for Terms and Conditions of Offer"  
24 to be sent in connection with the purchase of 7230  
25 Juliette Place, La Mesa, California, which required a  
26 payment to Bell Construction.

27 //

28 //



- 1 (113) On or about July 5, 2006, defendant BILLIE BISHOP caused  
2 \$253,273 to be transferred from an account maintained by  
3 BBC Escrow Inc. to a Washington Mutual account maintained  
4 by defendant DARNELL BELL.
- 5 (114) On or about July 6, 2006, defendant STANLEY GENTRY caused  
6 a cashier's check in the amount of \$1,000 to be issued to  
7 defendant DARNELL BELL.
- 8 (115) On or about July 6, 2006, defendant STANLEY GENTRY caused  
9 a cashier's check in the amount of \$18,105 to be issued to  
10 defendant DARNELL BELL.
- 11 (116) On or about July 6, 2006, defendant STANLEY GENTRY caused  
12 a cashier's check in the amount of \$24,615 to be issued to  
13 defendant DARNELL BELL.
- 14 (117) On or about July 7, 2006, defendant DARNELL BELL caused a  
15 check in the amount of \$1,700 to be issued to defendant  
16 RAY LOGAN.
- 17 (118) On or about July 11, 2006, defendant DARNELL BELL caused  
18 a cashier's check in the amount of \$36,800 to be issued to  
19 defendant MICHAEL IVY.
- 20 (119) On or about July 12, 2006, defendant BILLIE BISHOP caused  
21 \$78,395 to be transferred from an account maintained by  
22 BBC Escrow Inc. to a Washington Mutual account maintained  
23 by defendant DARNELL BELL.
- 24 (120) On or about July 12, 2006, defendant STANLEY GENTRY caused  
25 a cashier's check in the amount of \$19,595 to be issued to  
26 defendant DARNELL BELL.
- 27 (121) On or about July 13, 2006, defendant DESIREE HOLIDAY  
28 signed and submitted a "Borrower's Certification and

1 Authorization" form verifying that all information she  
2 provided in connection with the purchase of 1646 La Presa  
3 Avenue, Spring Valley, California, was true and complete.

4 (122) On or about July 13, 2006, defendant DESIREE HOLIDAY  
5 signed an affidavit stating that she would occupy 1646 La  
6 Presa Avenue, Spring Valley, California, following close  
7 of escrow.

8 (123) On or about July 13, 2006, defendant DARNELL BELL caused  
9 a cashier's check in the amount of \$2,000 to be issued to  
10 defendant STEVIE FRAZIER.

11 (124) On or about July 16, 2006, defendant ESTEBAN VALENZUELA  
12 prepared and submitted an appraisal for 7918 Skyline  
13 Drive, San Diego, California.

14 (125) On or about July 17, 2006, defendant MICHAEL IVY caused a  
15 credit report check to be run for defendant RAY LOGAN in  
16 connection with LOGAN's purchase of 7230 Juliette Place,  
17 La Mesa, California.

18 (126) On or about July 17, 2006, defendant MICHAEL IVY caused a  
19 credit report check to be run for defendant RAY LOGAN in  
20 connection with LOGAN's purchase of 417 Sacramento Avenue,  
21 Spring Valley, California.

22 (127) On or about July 19, 2006, defendant DESIREE HOLIDAY  
23 signed and submitted a loan application for the purchase  
24 of 1646 La Presa Avenue, Spring Valley, California,  
25 wherein HOLIDAY stated her gross monthly income was  
26 \$12,200.

27 //

28 //

1 (128) On or about July 19, 2006, defendant STANLEY GENTRY signed  
2 and submitted a loan application for defendant DAVID LEWIS  
3 in connection with LEWIS' purchase of 5461 Grape Street,  
4 San Diego, California.

5 (129) On or about July 19, 2006, defendant STANLEY GENTRY signed  
6 and submitted a loan application for defendant DESIREE  
7 HOLIDAY in connection with HOLIDAY's purchase of 1646 La  
8 Presa Avenue, Spring Valley, California.

9 (130) On or about July 19, 2006, defendant DAVID LEWIS signed  
10 and submitted a loan application for the purchase of 5461  
11 Grape Street, San Diego, California, wherein LEWIS stated  
12 his gross monthly income was \$17,730.

13 (131) On or about July 19, 2006, defendant RANDOLPH HIRSCH  
14 submitted a CPA letter in connection with defendant RAY  
15 LOGAN's purchase of 4890 Manomet Street, San Diego,  
16 California, wherein HIRSCH stated that LOGAN "earns a  
17 substantial income from his business, Logan's Final  
18 Cleanup Services (of which he is 100% owner), as well as  
19 from various other sources . . . It is clear that he will  
20 continue to do well for the years to come, and any loan  
21 commitments applicable to his income can be met without  
22 concern."

23 (132) On or about July 19, 2006, defendant RANDOLPH HIRSCH  
24 submitted a CPA letter in connection with defendant RAY  
25 LOGAN's purchase of 7230 Juliette Place, La Mesa,  
26 California, wherein HIRSCH stated that LOGAN "earns a  
27 substantial income from his business, Logan's Final  
28 Cleanup Services (of which he is 100% owner), as well as

1 from various other sources . . .It is clear that he will  
2 continue to do well for the years to come, and any loan  
3 commitments applicable to his income can be met without  
4 concern."

5 (133) On or about July 20, 2006, defendant MICHAEL IVY caused a  
6 credit report check to be run for M.W. in connection with  
7 M.W.'s purchase of 5765 Jackson Drive, La Mesa,  
8 California.

9 (134) On or about July 21, 2006, defendant RANDOLPH HIRSCH  
10 submitted a CPA letter in connection with L.J.'s purchase  
11 of 8066 Skyline Drive, San Diego, California, wherein  
12 HIRSCH stated that L.J. "earns a substantial income from  
13 his 1099 employment with two companies . . . as well as  
14 from various other sources . . .It is clear that he will  
15 continue to do well for the years to come, and any loan  
16 commitments applicable to his income can be met without  
17 concern."

18 (135) On or about July 21, 2006, defendant STANLEY GENTRY caused  
19 a cashier's check in the amount of \$26,499.28 to be issued  
20 to defendant DARNELL BELL.

21 (136) On or about July 23, 2006, defendant ESTEBAN VALENZUELA  
22 prepared and submitted an appraisal for 7230 Juliette  
23 Place, La Mesa, California.

24 (137) On or about July 25, 2006, defendant BILLIE BISHOP caused  
25 \$78,000 to be transferred from an account maintained by  
26 BBC Escrow Inc. to a Washington Mutual account maintained  
27 by defendant DARNELL BELL.

28 //

- 1 (138) On or about July 26, 2006, defendant BILLIE BISHOP caused  
2 \$48,000 to be transferred from an account maintained by  
3 BBC Escrow Inc. to a Washington Mutual account maintained  
4 by defendant DARNELL BELL.
- 5 (139) On or about July 26, 2006, defendant DARNELL BELL caused  
6 a cashier's check in the amount of \$1,600 to be issued to  
7 defendant DIANA JAIME.
- 8 (140) On or about July 26, 2006, defendant DARNELL BELL caused  
9 a check in the amount of \$45,400 to be issued to defendant  
10 DAVID LEWIS.
- 11 (141) On or about July 26, 2006, defendant STANLEY GENTRY caused  
12 a cashier's check in the amount of \$33,835 to be issued to  
13 defendant DARNELL BELL.
- 14 (142) On or about June 27, 2006, defendant DESIREE HOLIDAY  
15 signed and submitted a loan application for the purchase  
16 of 1231 Maria Avenue, Spring Valley, California, wherein  
17 defendant HOLIDAY stated her gross monthly income was  
18 \$10,189.
- 19 (143) On or about June 27, 2006, defendant DESIREE HOLIDAY  
20 signed an "Occupancy Agreement" stating that she would  
21 occupy 1231 Maria Avenue, Spring Valley, California, after  
22 the loan closing.
- 23 (144) On or about June 27, 2006, defendant STANLEY GENTRY signed  
24 and submitted a loan application for defendant DESIREE  
25 HOLIDAY in connection with HOLIDAY's purchase of 1231  
26 Maria Avenue, Spring Valley, California.

27 //

28 //

- 1 (145) On or about July 27, 2006, defendant DARNELL BELL caused  
2 a check in the amount of \$3,000 to be issued to defendant  
3 MICHAEL IVY.
- 4 (146) On or about July 28, 2006, defendant STANLEY GENTRY signed  
5 and submitted a loan application for defendant DEXTER  
6 HOLIDAY in connection with HOLIDAY's purchase of  
7 6343 Cowles Mountain Boulevard, San Diego, California.
- 8 (147) On or about July 28, 2006, defendant DEXTER HOLIDAY signed  
9 and submitted a loan application for the purchase of  
10 6343 Cowles Mountain Boulevard, San Diego, California,  
11 wherein HOLIDAY stated his gross monthly income was  
12 \$12,875.
- 13 (148) On or about July 28, 2006, defendant DARNELL BELL caused  
14 a \$25,000 wire transfer to be sent to defendant DESIREE  
15 HOLIDAY.
- 16 (149) On or about July 29, 2006, defendant ESTEBAN VALENZUELA  
17 prepared and submitted an appraisal for 1231 San Miguel  
18 Avenue, Spring Valley, California.
- 19 (150) On or about July 30, 2006, defendant ESTEBAN VALENZUELA  
20 prepared and submitted an appraisal for 1029 Capistrano  
21 Avenue, Spring Valley, California.
- 22 (151) In or about August 2006, defendant DARNELL BELL caused a  
23 "Letter of Explanation for Terms and Conditions of Offer"  
24 to be sent in connection with the purchase of 4993 New  
25 Haven Road, San Diego, California, which required a  
26 payment to Bell Construction.

27 //

28 //

- 1 (152) In or about August 2006, defendant DARNELL BELL caused a  
2 "Letter of Explanation for Terms and Conditions of Offer"  
3 to be sent in connection with the purchase of 8636 Alpine  
4 Avenue, La Mesa, California, which required a payment to  
5 Bell Construction.
- 6 (153) In or about August 2006, defendant DARNELL BELL caused a  
7 "Letter of Explanation for Terms and Conditions of Offer"  
8 to be sent in connection with the purchase of 9618 Date  
9 Street, Spring Valley, California, which required a  
10 payment to Bell Construction.
- 11 (154) In or about August 2006, defendant DARNELL BELL caused a  
12 "Letter of Explanation for Terms and Conditions of Offer"  
13 to be sent in connection with the purchase of 410 Maria  
14 Avenue, Spring Valley, California, which required a  
15 payment to Bell Construction.
- 16 (155) In or about August 2006, defendant DARNELL BELL caused a  
17 "Letter of Explanation for Terms and Conditions of Offer"  
18 to be sent in connection with the purchase of  
19 1029 Capistrano Avenue, Spring Valley, California, which  
20 required a payment to Bell Construction.
- 21 (156) In or about August 2006, defendant MARCUS DOZZELL  
22 recruited M.S. to purchase real property as a "straw  
23 buyer."
- 24 (157) On or about August 1, 2006, defendant DEXTER HOLIDAY  
25 signed and submitted a loan application for the purchase  
26 of 1414 San Bernardino Avenue, Spring Valley, California,  
27 wherein defendant HOLIDAY stated his gross monthly income  
28 was \$12,875.

- 1 (158) On or about August 1, 2006, defendant DARNELL BELL caused  
2 a check in the amount of \$10,000 to be issued to defendant  
3 STANLEY GENTRY.
- 4 (159) On or about August 3, 2006, defendant MICHAEL IVY caused  
5 a credit report check to be run for defendant STEVIE  
6 FRAZIER in connection with FRAZIER's purchase of 1231 San  
7 Miguel Avenue, Spring Valley, California.
- 8 (160) On or about August 3, 2006, defendant MICHAEL IVY caused  
9 a credit report check to be run for defendant STEVIE  
10 FRAZIER in connection with FRAZIER's purchase of 410 Maria  
11 Avenue, Spring Valley, California.
- 12 (161) On or about August 3, 2006, defendant DARNELL BELL caused  
13 a cashier's check in the amount of \$2,000 to be issued to  
14 defendant ESTEBAN VALENZUELA.
- 15 (162) On or about August 3, 2006, defendant STANLEY GENTRY  
16 signed and submitted a loan application for defendant  
17 STEVIE FRAZIER in connection with FRAZIER's purchase of  
18 8636 Alpine Avenue, La Mesa, California.
- 19 (163) On or about August 3, 2006, defendant STEVIE FRAZIER  
20 signed and submitted a loan application for the purchase  
21 of 8636 Alpine Avenue, La Mesa, California, wherein  
22 FRAZIER stated his gross monthly income was \$26,470.
- 23 (164) On or about August 3, 2006, defendant STANLEY GENTRY  
24 caused a cashier's check in the amount of \$18,925 to be  
25 issued to defendant DARNELL BELL.
- 26 (165) On or about August 4, 2006, defendant RAY LOGAN signed an  
27 occupancy agreement stating that he would be an owner-  
28 //



1 occupant of 7230 Juliette Place, La Mesa, California,  
2 following the close of escrow.

3 (166) On or about August 4, 2006, defendant DIANA JAIME  
4 notarized documents submitted in support of a loan  
5 application submitted by defendant RAY LOGAN for the  
6 purchase of 7230 Juliette Place, La Mesa, California.

7 (167) On or about August 4, 2006, defendant DARNELL BELL caused  
8 a \$29,000 wire transfer to be sent to defendant DESIREE  
9 HOLIDAY.

10 (168) On or about August 6, 2006, defendant STANLEY GENTRY  
11 signed and submitted a loan application for defendant RAY  
12 LOGAN in connection with LOGAN's purchase of 7230 Juliette  
13 Place, La Mesa, California.

14 (169) On or about August 6, 2006, defendant RAY LOGAN signed and  
15 submitted a loan application for the purchase of  
16 7230 Juliette Place, La Mesa, California, wherein LOGAN  
17 stated his gross monthly income was \$11,860.

18 (170) On or about August 8, 2006, defendant BILLIE BISHOP caused  
19 \$48,000 to be transferred from an account maintained by  
20 BBC Escrow Inc. to a Washington Mutual account maintained  
21 by defendant DARNELL BELL.

22 (171) On or about August 8, 2006, defendant BILLIE BISHOP caused  
23 \$73,000 to be transferred from an account maintained by  
24 BBC Escrow Inc. to a Washington Mutual account maintained  
25 by defendant DARNELL BELL.

26 (172) On or about August 8, 2006, defendant STANLEY GENTRY  
27 caused a cashier's check in the amount of \$33,995 to be  
28 issued to defendant DARNELL BELL.

- 1 (173) On or about August 10, 2006, defendant BILLIE BISHOP  
2 caused \$1,713.21 to be transferred from an account  
3 maintained by BBC Escrow Inc. to a Washington Mutual  
4 account maintained by defendant DARNELL BELL.
- 5 (174) On or about August 10, 2006, defendant STANLEY GENTRY  
6 signed and submitted a loan application for L.J. in  
7 connection with defendant L.J.'s purchase of 8066 Skyline  
8 Drive, San Diego, California.
- 9 (175) On or about August 10, 2006, defendant STANLEY GENTRY  
10 caused a cashier's check in the amount of \$30,840 to be  
11 issued to defendant DARNELL BELL.
- 12 (176) On or about August 11, 2006, defendant ESTEBAN VALENZUELA  
13 prepared and submitted an appraisal for 410 Maria Avenue,  
14 Spring Valley, California.
- 15 (177) On or about August 12, 2006, defendant STANLEY GENTRY  
16 signed and submitted a loan application for defendant  
17 DEXTER HOLIDAY in connection with HOLIDAY's purchase of  
18 1414 San Bernardino Avenue, Spring Valley, California.
- 19 (178) On or about August 14, 2006, defendant BILLIE BISHOP  
20 caused \$48,000 to be transferred from an account  
21 maintained by BBC Escrow Inc. to a Washington Mutual  
22 account maintained by defendant DARNELL BELL.
- 23 (179) On or about August 14, 2006, defendant DARNELL BELL caused  
24 a check in the amount of \$2,000 to be issued to defendant  
25 ESTEBAN VALENZUELA.
- 26 (180) On or about August 14, 2006, defendant STANLEY GENTRY  
27 caused a cashier's check in the amount of \$20,965 to be  
28 issued to defendant DARNELL BELL.

- 1 (181) On or about August 17, 2006, defendant BILLIE BISHOP  
2 caused \$63,000 to be transferred from an account  
3 maintained by BBC Escrow Inc. to a Washington Mutual  
4 account maintained by defendant DARNELL BELL.
- 5 (182) On or about August 17, 2006, defendant STANLEY GENTRY  
6 caused a cashier's check in the amount of \$20,208 to be  
7 issued to defendant DARNELL BELL.
- 8 (183) On or about August 18, 2006, defendant BILLIE BISHOP  
9 caused \$63,000 to be transferred from an account  
10 maintained by BBC Escrow Inc. to a Washington Mutual  
11 account maintained by defendant DARNELL BELL.
- 12 (184) On or about August 18, 2006, defendant STANLEY GENTRY  
13 signed and submitted a loan application for defendant  
14 STEVIE FRAZIER in connection with FRAZIER's purchase of  
15 410 Maria Avenue, Spring Valley, California.
- 16 (185) On or about August 18, 2006, defendant STEVIE FRAZIER  
17 signed and submitted a loan application for the purchase  
18 of 410 Maria Avenue, Spring Valley, California, wherein  
19 FRAZIER stated his gross monthly income was \$12,800.
- 20 (186) On or about August 18, 2006, defendant STEVIE FRAZIER  
21 signed and submitted a "Borrower Certificate" wherein he  
22 certified that his monthly income was \$12,423.
- 23 (187) On or about August 18, 2006, defendant STEVIE FRAZIER  
24 signed an occupancy agreement stating that he would be an  
25 owner-occupant of 410 Maria Avenue, Spring Valley,  
26 California, following the close of escrow.

27 //

28 //

- 1 (188) On or about August 18, 2006, defendant DARNELL BELL caused  
2 a check in the amount of \$2,000 to be issued to defendant  
3 LORENA CALLU.
- 4 (189) On or about August 18, 2006, defendant STANLEY GENTRY  
5 caused a cashier's check in the amount of \$8,455 to be  
6 issued to defendant DARNELL BELL.
- 7 (190) On or about August 21, 2006, defendant ESTEBAN VALENZUELA  
8 prepared and submitted an appraisal for 5765 Jackson  
9 Drive, La Mesa, California.
- 10 (191) On or about August 22, 2006, defendant MICHAEL IVY caused  
11 a credit report check to be run for W.M. in connection  
12 with W.M.'s purchase of 7900 Normal Avenue, La Mesa,  
13 California.
- 14 (192) On or about August 22, 2006, defendant STANLEY GENTRY  
15 signed and submitted a loan application for defendant  
16 DEXTER HOLIDAY in connection with HOLIDAY's purchase of  
17 7918 Skyline Drive, San Diego, California.
- 18 (193) On or about August 22, 2006, defendant STEVIE FRAZIER  
19 signed an occupancy agreement stating that he would be an  
20 owner-occupant of 1231 San Miguel Avenue, Spring Valley,  
21 California, following the close of escrow.
- 22 (194) On or about August 22, 2006, defendant DEXTER HOLIDAY  
23 signed and submitted a loan application for the purchase  
24 of 7918 Skyline Drive, San Diego, California, wherein  
25 HOLIDAY stated his gross monthly income was \$12,875.
- 26 (195) On or about August 23, 2006, defendant STANLEY GENTRY  
27 signed and submitted a loan application for defendant  
28

//

1 STEVIE FRAZIER in connection with FRAZIER's purchase of  
2 1231 San Miguel Avenue, Spring Valley, California.

3 (196) On or about August 23, 2006, defendant STEVIE FRAZIER  
4 signed and submitted a loan application for the purchase  
5 of 1231 San Miguel Avenue, Spring Valley, California,  
6 wherein FRAZIER stated his gross monthly income was  
7 \$17,500.

8 (197) On or about August 23, 2006, defendant STEVIE FRAZIER  
9 signed and submitted an "Income Certification" wherein he  
10 stated that his monthly income was \$13,500.

11 (198) On or about August 24, 2006, defendant DARNELL BELL caused  
12 a cashier's check in the amount of \$1,200 to be issued to  
13 defendant ESTEBAN VALENZUELA.

14 (199) On or about August 25, 2006, defendant STANLEY GENTRY  
15 signed and submitted a loan application for defendant  
16 STEVIE FRAZIER in connection with FRAZIER's purchase of  
17 9618 Date Street, Spring Valley, California.

18 (200) On or about August 25, 2006, defendant STEVIE FRAZIER  
19 signed and submitted a loan application for the purchase  
20 of 9618 Date Street, Spring Valley, California, wherein  
21 FRAZIER stated his gross monthly income was \$20,471.

22 (201) On or about August 25, 2006, defendant DARNELL BELL caused  
23 a cashier's check in the amount of \$4,000 to be issued to  
24 defendant MICHAEL IVY.

25 (202) On or about August 29, 2006, defendant MICHAEL IVY caused  
26 a credit report check to be run for defendant DEXTER  
27 HOLIDAY in connection with HOLIDAY's purchase of  
28 1624 San Miguel Avenue, Spring Valley, California.

- 1 (203) On or about August 30, 2006, defendant DENNIS TAPIA  
2 submitted a CPA letter to Washington Mutual for defendant  
3 DEXTER HOLIDAY, wherein TAPIA stated that he had reviewed  
4 and verified HOLIDAY's personal income taxes and that  
5 HOLIDAY had been employed by Middle Man Auto for the past  
6 two years.
- 7 (204) On or about August 30, 2006, defendant STANLEY GENTRY  
8 signed and submitted a loan application for defendant RAY  
9 LOGAN in connection with LOGAN's purchase of 4993 New  
10 Haven Road, San Diego, California.
- 11 (205) On or about August 30, 2006, defendant RAY LOGAN signed  
12 and submitted a loan application for the purchase of 4993  
13 New Haven Road, San Diego, California, wherein LOGAN  
14 stated his gross monthly income was \$14,580.
- 15 (206) On or about August 30, 2006, defendant RAY LOGAN signed an  
16 occupancy agreement stating that he would be an owner-  
17 occupant of 4993 New Haven Road, San Diego, California,  
18 following the close of escrow.
- 19 (207) On or about August 30, 2006, defendant STANLEY GENTRY  
20 caused a cashier's check in the amount of \$11,115 to be  
21 issued to defendant DARNELL BELL.
- 22 (208) On or about August 31, 2006, defendant MICHAEL IVY caused  
23 a credit report check to be run for defendant KEITH  
24 HOLIDAY in connection with HOLIDAY's purchase of 1029  
25 Capistrano Avenue, Spring Valley, California.
- 26 (209) On or about August 31, 2006, defendant MICHAEL IVY caused  
27 a credit report check to be run for defendant KEITH  
28 //

1 HOLIDAY in connection with HOLIDAY's purchase of 11829  
2 Calle Del Rio, Lakeside, California.

3 (210) On or about August 31, 2006, defendant BILLIE BISHOP  
4 caused \$88,000 to be transferred from an account  
5 maintained by BBC Escrow Inc. to a Washington Mutual  
6 account maintained by defendant DARNELL BELL.

7 (211) On or about August 31, 2006, defendant BILLIE BISHOP  
8 caused \$68,000 to be transferred from an account  
9 maintained by BBC Escrow Inc. to a Washington Mutual  
10 account maintained by defendant DARNELL BELL.

11 (212) On or about August 31, 2006, defendant DARNELL BELL caused  
12 a check in the amount of \$1,400 to be issued to defendant  
13 ESTEBAN VALENZUELA.

14 (213) On or about August 31, 2006, defendant DARNELL BELL caused  
15 a cashier's check in the amount of \$3,500 to be issued to  
16 defendant MICHAEL IVY.

17 (214) On or about August 31, 2006, defendant STANLEY GENTRY  
18 caused a cashier's check in the amount of \$26,675 to be  
19 issued to defendant DARNELL BELL.

20 (215) In or about September 2006, defendant DARNELL BELL caused  
21 a "Letter of Explanation for Terms and Conditions of  
22 Offer" to be sent in connection with the purchase of 407  
23 Paraiso Avenue, Spring Valley, California, which required  
24 a payment to Bell Construction.

25 (216) In or about September 2006, defendant DARNELL BELL caused  
26 a "Letter of Explanation for Terms and Conditions of  
27 Offer" to be sent in connection with the purchase of  
28 //

1 417 Sacramento Avenue, Spring Valley, which required a  
2 payment to Bell Construction.

3 (217) On or about September 1, 2006, defendant BILLIE BISHOP  
4 caused \$88,000 to be transferred from an account  
5 maintained by BBC Escrow Inc. to a Washington Mutual  
6 account maintained by defendant DARNELL BELL.

7 (218) On or about September 1, 2006, defendant BILLIE BISHOP  
8 caused \$63,000 to be transferred from an account  
9 maintained by BBC Escrow Inc. to a Washington Mutual  
10 account maintained by defendant DARNELL BELL.

11 (219) On or about September 1, 2006, defendant STANLEY GENTRY  
12 caused a cashier's check in the amount of \$44,312 to be  
13 issued to defendant DARNELL BELL.

14 (220) On or about September 5, 2006, defendant DIANA JAIME,  
15 acting on behalf of the Real Estate Center, caused a loan  
16 application for defendant RAY LOGAN to be sent to South  
17 Lake Mortgage Capital, Inc.

18 (221) On or about September 5, 2006, defendant BILLIE BISHOP  
19 caused \$63,000 to be transferred from an account  
20 maintained by BBC Escrow Inc. to a Washington Mutual  
21 account maintained by defendant DARNELL BELL.

22 (222) On or about September 5, 2006, defendant STANLEY GENTRY  
23 signed and submitted a loan application for defendant RAY  
24 LOGAN in connection with LOGAN's purchase of 4890 Manomet  
25 Street, San Diego, California.

26 (223) On or about September 6, 2006, defendant MICHAEL IVY sent  
27 an offer to purchase 417 Sacramento Avenue, Spring Valley,  
28 California, which included a provision for a \$68,000



1 payment to "Bell Construction for Handicap accessing and  
2 property upgrades" and which stated "our Title & Escrow is  
3 mandatory."

4 (224) On or about September 6, 2006, defendant ESTEBAN  
5 VALENZUELA prepared and submitted an appraisal for 7900  
6 Normal Avenue, La Mesa, California.

7 (225) On or about September 6, 2006, defendant DARNELL BELL  
8 caused a check in the amount of \$1,543 to be issued to  
9 defendant JORGE CORTEZ.

10 (226) On or about September 6, 2006, defendant STANLEY GENTRY  
11 caused a cashier's check in the amount of \$49,694.51 to be  
12 issued to defendant DARNELL BELL.

13 (227) On or about September 7, 2006, defendant DEXTER HOLIDAY  
14 signed and submitted a loan application for the purchase  
15 of 1624 San Miguel Avenue, Spring Valley, California,  
16 wherein HOLIDAY stated his gross monthly income was  
17 \$14,000.

18 (228) On or about September 8, 2006, defendant BILLIE BISHOP  
19 caused \$73,000 to be transferred from an account  
20 maintained by BBC Escrow Inc. to a Washington Mutual  
21 account maintained by defendant DARNELL BELL.

22 (229) On or about September 11, 2006, defendant STANLEY GENTRY  
23 caused a cashier's check in the amount of \$10,383.64 to be  
24 issued to defendant DARNELL BELL.

25 (230) On or about September 12, 2006, defendant DARNELL BELL  
26 caused a check in the amount of \$1,200 to be issued to  
27 defendant ESTEBAN VALENZUELA.

28 //

- 1 (231) On or about September 12, 2006, defendant DEXTER HOLIDAY  
2 signed and submitted a "Borrower Certificate" wherein he  
3 certified that his monthly income was \$12,674.
- 4 (232) On or about September 14, 2006, defendant DIANA JAIME  
5 notarized documents submitted in support of a loan  
6 application submitted by defendant RAY LOGAN for the  
7 purchase of 4890 Manomet Street, San Diego, California.
- 8 (233) On or about September 14, 2006, defendant MICHAEL IVY  
9 caused a credit report check to be run for M.S. in  
10 connection with M.S.'s purchase of 5209 Cole Street,  
11 San Diego, California.
- 12 (234) On or about September 14, 2006, defendant RAY LOGAN signed  
13 and submitted a loan application for the purchase of  
14 4890 Manomet Street, San Diego, California, wherein LOGAN  
15 stated his gross monthly income was \$12,519.
- 16 (235) On or about September 15, 2006, defendant MICHAEL IVY  
17 caused a credit report check to be run for B.S. in  
18 connection with B.S.'s purchase of 2722 Coronado Avenue,  
19 San Diego, California.
- 20 (236) On or about September 15, 2006, defendant DARNELL BELL  
21 caused a cashier's check in the amount of \$29,600 to be  
22 issued to defendant JORGE CORTEZ.
- 23 (237) On or about September 18, 2006, defendant BILLIE BISHOP  
24 caused \$113,000 to be transferred from an account  
25 maintained by BBC Escrow Inc. to a Washington Mutual  
26 account maintained by defendant DARNELL BELL.

27 //

28 //

- 1 (238) On or about September 18, 2006, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$20,702.37 to be  
3 issued to defendant DARNELL BELL.
- 4 (239) On or about September 19, 2006, defendant DARNELL BELL  
5 caused a cashier's check in the amount of \$3,000 to be  
6 issued to defendant MICHAEL IVY.
- 7 (240) On or about September 20, 2006, defendant DIANA JAIME,  
8 acting on behalf of Real Estate Solutions, assisted in  
9 processing a loan funded by Fremont Investment and Loan  
10 for the purchase of 417 Sacramento Avenue, Spring Valley,  
11 California.
- 12 (241) On or about September 22, 2006, defendant DARNELL BELL  
13 caused a cashier's check in the amount of \$630 to be  
14 issued to defendant DENNIS TAPIA.
- 15 (242) On or about September 22, 2006, defendant DARNELL BELL  
16 caused a cashier's check in the amount of \$4,000 to be  
17 issued to defendant MICHAEL IVY.
- 18 (243) On or about September 22, 2006, defendant DARNELL BELL  
19 caused a cashier's check in the amount of \$7,200 to be  
20 issued to defendant DIANA JAIME.
- 21 (244) On or about September 22, 2006, defendant DARNELL BELL  
22 caused a cashier's check in the amount of \$3,270 to be  
23 issued to defendant DEXTER HOLIDAY.
- 24 (245) On or about September 22, 2006, defendant STANLEY GENTRY  
25 caused a cashier's check in the amount of \$45,180 to be  
26 issued to defendant DARNELL BELL.
- 27 (246) On or about September 26, 2006, defendant BILLIE BISHOP  
28 sent an email to a Fremont Investment & Loan employee

1           arranging to have \$68,000 paid to Bell Construction in  
2           connection with the sale of 417 Sacramento Avenue, Spring  
3           Valley, California.

4           (247) On or about September 26, 2006, defendant BILLIE BISHOP  
5           caused \$77,000 to be transferred from an account  
6           maintained by BBC Escrow Inc. to a Washington Mutual  
7           account maintained by defendant DARNELL BELL.

8           (248) On or about September 27, 2006, defendant BILLIE BISHOP  
9           caused \$78,000 to be transferred from an account  
10          maintained by BBC Escrow Inc. to a Washington Mutual  
11          account maintained by defendant DARNELL BELL.

12          (249) On or about September 27, 2006, defendant BILLIE BISHOP  
13          caused \$53,352.38 to be transferred from an account  
14          maintained by BBC Escrow Inc. to a Washington Mutual  
15          account maintained by defendant DARNELL BELL.

16          (250) On or about September 27, 2006, defendant ESTEBAN  
17          VALENZUELA prepared and submitted an appraisal for 548  
18          Elkelton Boulevard, Spring Valley, California.

19          (251) On or about September 27, 2006, defendant STANLEY GENTRY  
20          caused a cashier's check in the amount of \$18,500 to be  
21          issued to defendant DARNELL BELL.

22          (252) On or about September 28, 2006, defendant BILLIE BISHOP  
23          caused \$64,777.49 to be transferred from an account  
24          maintained by BBC Escrow Inc. to a Washington Mutual  
25          account maintained by defendant DARNELL BELL.

26          (253) On or about September 28, 2006, defendant DARNELL BELL  
27          caused a check in the amount of \$1,200 to be issued to  
28          defendant ESTEBAN VALENZUELA.

- 1 (254) On or about September 28, 2006, defendant KEITH HOLIDAY  
2 signed and submitted a loan application for the purchase  
3 of 1029 Capistrano Avenue, Spring Valley, California,  
4 wherein HOLIDAY stated his gross monthly income was  
5 \$8,994.
- 6 (255) On or about September 28, 2006, defendant DARNELL BELL  
7 caused a \$115,000 wire transfer to be sent to defendant  
8 MARCUS DOZZELL.
- 9 (256) On or about September 28, 2006, defendant STANLEY GENTRY  
10 caused a cashier's check in the amount of \$54,085.53 to be  
11 issued to defendant DARNELL BELL.
- 12 (257) On or about September 29, 2006, defendant DARNELL BELL  
13 caused a cashier's check in the amount of \$20,500 to be  
14 issued to defendant MICHAEL IVY.
- 15 (258) On or about September 29, 2006, defendant DARNELL BELL  
16 caused a cashier's check in the amount of \$65,000 to be  
17 issued to defendant RAY LOGAN.
- 18 (259) On or about September 29, 2006, defendant DARNELL BELL  
19 caused a cashier's check in the amount of \$10,000 to be  
20 issued to defendant NICOLELE WATSON.
- 21 (260) In or about October 2006, defendant MICHAEL IVY sent an  
22 offer to purchase 11829, Calle Del Rio, Lakeside,  
23 California, which included a provision for a \$88,000  
24 payment to "Bell Construction for Handicap accessing and  
25 property upgrades" and which stated "our Title & Escrow is  
26 mandatory."
- 27 (261) On or about October 2, 2006, defendant MICHAEL IVY sent an  
28 offer to purchase 14 North Kenton Avenue, National City,

1 California, which included a provision for a \$38,000  
2 payment to "Bell Construction for Handicap accessing and  
3 property upgrades" and which stated "our Title & Escrow is  
4 mandatory."

5 (262) On or about October 2, 2006, defendant DIANA JAIME  
6 notarized documents submitted in support of a loan  
7 application submitted by G.W. for the purchase of  
8 407 Paraiso Avenue, Spring Valley, California.

9 (263) On or about October 2, 2006, defendant DARNELL BELL caused  
10 a check in the amount of \$10,000 to be issued to defendant  
11 STANLEY GENTRY.

12 (264) On or about October 3, 2006, defendant DARNELL BELL caused  
13 a cashier's check in the amount of \$8,000 to be issued to  
14 defendant MICHAEL IVY.

15 (265) On or about October 3, 2006, defendant DARNELL BELL caused  
16 a cashier's check in the amount of \$1,600 to be issued to  
17 defendant DIANA JAIME.

18 (266) On or about October 3, 2006, defendant DARNELL BELL caused  
19 a cashier's check in the amount of \$15,000 to be issued to  
20 defendant STEVIE FRAZIER.

21 (267) On or about October 3, 2006, defendant STANLEY GENTRY  
22 caused a cashier's check in the amount of \$99,495.51 to be  
23 issued to defendant DARNELL BELL.

24 (268) On or about October 5, 2006, defendant MICHAEL IVY caused  
25 a credit report check to be run for S.A. in connection  
26 with S.A.'s purchase of 548 Elkelton Boulevard, Spring  
27 Valley, California.

28 //

- 1 (269) On or about October 9, 2006, during a telephone  
2 conversation with an auditor, defendant ANTON EWING stated  
3 that W.M. had been self-employed for two years and that  
4 W.M. had filed a Schedule C with his IRS Form 1040 as a  
5 sole proprietor.
- 6 (270) On or about October 10, 2006, defendant MICHAEL IVY caused  
7 a credit report check to be run for J.O. in connection  
8 with J.O.'s purchase of 927 Carlsbad Street, Spring  
9 Valley, California.
- 10 (271) On or about October 10, 2006, defendant DARNELL BELL  
11 caused a check in the amount of \$800 to be issued to  
12 defendant DIANA JAIME.
- 13 (272) On or about October 11, 2006, defendant BILLIE BISHOP  
14 caused \$53,000 to be transferred from an account  
15 maintained by BBC Escrow Inc. to a Washington Mutual  
16 account maintained by defendant DARNELL BELL.
- 17 (273) On or about October 11, 2006, defendant STANLEY GENTRY  
18 caused a cashier's check in the amount of \$13,624.24 to be  
19 issued to defendant DARNELL BELL.
- 20 (274) On or about October 12, 2006, defendant BILLIE BISHOP  
21 caused \$88,000 to be transferred from an account  
22 maintained by BBC Escrow Inc. to a Washington Mutual  
23 account maintained by defendant DARNELL BELL.
- 24 (275) On or about October 12, 2006, defendant BILLIE BISHOP  
25 caused \$85,000 to be transferred from an account  
26 maintained by BBC Escrow Inc. to a Washington Mutual  
27 account maintained by defendant DARNELL BELL.

28 //

- 1 (276) On or about October 12, 2006, defendant BILLIE BISHOP  
2 caused \$78,000 to be transferred from an account  
3 maintained by BBC Escrow Inc. to a Washington Mutual  
4 account maintained by defendant DARNELL BELL.
- 5 (277) On or about October 12, 2006, defendant BILLIE BISHOP  
6 caused \$88,000 to be transferred from an account  
7 maintained by BBC Escrow Inc. to a Washington Mutual  
8 account maintained by defendant DARNELL BELL.
- 9 (278) On or about October 12, 2006, defendant DARNELL BELL  
10 caused a cashier's check in the amount of \$1,600 to be  
11 issued to defendant ESTEBAN VALENZUELA.
- 12 (279) On or about October 12, 2006, defendant DARNELL BELL  
13 caused a cashier's check in the amount of \$4,550 to be  
14 issued to defendant JORGE CORTEZ.
- 15 (280) On or about October 12, 2006, defendant STANLEY GENTRY  
16 caused a cashier's check in the amount of \$74,625 to be  
17 issued to defendant DARNELL BELL.
- 18 (281) On or about October 12, 2006, defendant DARNELL BELL  
19 caused a cashier's check in the amount of \$4,550 to be  
20 issued to defendant LORENA CALLU.
- 21 (282) On or about October 12, 2006, defendant DARNELL BELL  
22 caused a cashier's check in the amount of \$4,000 to be  
23 issued to defendant DIANA JAIME.
- 24 (283) On or about October 13, 2006, defendant DARNELL BELL  
25 caused a check in the amount of \$2,800 to be issued to  
26 defendant ESTEBAN VALENZUELA.
- 27 (284) On or about October 15, 2006, defendant ANTON EWING  
28 submitted a CPA letter for W.M., wherein EWING stated that



1 he had been W.M.'s "tax adviser" for "several years" and  
2 that W.M. had been self-employed for two years and that  
3 W.M. had filed a Schedule C with his IRS Form 1040 as a  
4 sole proprietor.

5 (285) On or about October 16, 2006, defendant MICHAEL IVY sent  
6 an offer to purchase 428 Felicita Avenue, Spring Valley,  
7 California, which included a provision for a \$58,000  
8 payment to "Bell Construction for Handicap accessing and  
9 property upgrades" and which stated "our Title & Escrow is  
10 mandatory."

11 (286) On or about October 16, 2006, defendant DARNELL BELL  
12 caused a \$76,000 wire transfer to be sent to defendant  
13 LATASHIA MCKINNEY.

14 (287) On or about October 16, 2006, defendant DARNELL BELL  
15 caused a cashier's check in the amount of \$1,600 to be  
16 issued to defendant DIANA JAIME.

17 (288) On or about October 16, 2006, defendant STANLEY GENTRY  
18 caused a cashier's check in the amount of \$31,432.50 to be  
19 issued to defendant DARNELL BELL.

20 (289) On or about October 17, 2006, defendant DENNIS TAPIA  
21 submitted a CPA letter for defendant KEITH HOLIDAY,  
22 wherein TAPIA stated that he had reviewed and verified  
23 HOLIDAY's personal income taxes and that HOLIDAY had been  
24 employed for the last two (2) years as a loan officer with  
25 Dorita Edwards & Company.

26 (290) On or about October 17, 2006, defendant BILLIE BISHOP  
27 caused \$59,000 to be transferred from an account  
28 //

maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(291) On or about October 17, 2006, defendant STANLEY GENTRY signed and submitted a loan application for G.W. in connection with G.W.'s purchase of 4769 Andalusia Avenue, San Diego, California.

(292) On or about October 20, 2006, defendant BILLIE BISHOP caused \$88,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(293) On or about October 20, 2006, defendant DARNELL BELL caused a cashier's check in the amount of \$1,600 to be issued to defendant DIANA JAIME.

(294) On or about October 20, 2006, defendant STANLEY GENTRY caused a cashier's check in the amount of \$49,150 to be issued to defendant DARNELL BELL.

(295) On or about October 23, 2006, defendant BILLIE BISHOP caused \$63,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(296) On or about October 23, 2006, defendant DARNELL BELL caused a check in the amount of \$5,695 to be issued to defendant DEXTER HOLIDAY.

(297) On or about October 25, 2006, defendant STANLEY GENTRY caused a cashier's check in the amount of \$16,175 to be issued to defendant DARNELL BELL.

(298) On or about October 26, 2006, defendant MICHAEL IVY sent an offer to purchase 3432 East Plaza Boulevard, National

1 City, California, which included a provision for a \$78,000  
2 payment to "Bell Construction for Handicap accessing and  
3 property upgrades" and which stated "our Title & Escrow is  
4 mandatory."

5 (299) On or about October 27, 2006, defendant DIANA JAIME  
6 notarized documents submitted in support of a loan  
7 application by defendant GERARD HOLIDAY for the purchase  
8 of 548 Elkelton Boulevard, Spring Valley, California.

9 (300) On or about October 28, 2006, defendant ESTEBAN VALENZUELA  
10 prepared and submitted an appraisal for 2722 Coronado  
11 Avenue, San Diego, California.

12 (301) On or about October 30, 2006, defendant STANLEY GENTRY  
13 signed and submitted a loan application for defendant  
14 KEITH HOLIDAY in connection with HOLIDAY's purchase of  
15 11829 Calle Del Rio, Lakeside, California.

16 (302) On or about October 31, 2006, defendant DARNELL BELL  
17 caused a check in the amount of \$2,000 to be issued to  
18 defendant ESTEBAN VALENZUELA.

19 (303) In or about November 2006, defendant DARNELL BELL caused  
20 a "Letter of Explanation for Terms and Conditions of  
21 Offer" to be sent in connection with the purchase of 1023  
22 West Renette, El Cajon, California, which required a  
23 payment to Bell Construction.

24 (304) In or about November 2006, defendant MARCUS DOZZELL  
25 recruited A.B. to purchase real property as a "straw  
26 buyer."

27 (305) On or about November 1, 2006, defendant MICHAEL IVY caused  
28 a credit report check to be run for A.H. in connection

1 with A.H.'s purchase of 2716 4<sup>th</sup> Street, San Diego,  
2 California.

3 (306) On or about November 2, 2006, defendant DANIEL WILLIAMS  
4 signed and submitted a loan application for the purchase  
5 of 3170 Chelsea Circle, Spring Valley, California, wherein  
6 WILLIAMS stated his gross monthly income was \$9,839.

7 (307) On or about November 2, 2006, defendant DARNELL BELL  
8 caused a check in the amount of \$4,150 to be issued to  
9 defendant MICHAEL IVY.

10 (308) On or about November 3, 2006, defendant BILLIE BISHOP  
11 caused \$88,000 to be transferred from an account  
12 maintained by BBC Escrow Inc. to a Washington Mutual  
13 account maintained by defendant DARNELL BELL.

14 (309) On or about November 3, 2006, defendant STANLEY GENTRY  
15 caused a cashier's check in the amount of \$5,295 to be  
16 issued to defendant DARNELL BELL.

17 (310) On or about November 3, 2006, defendant STANLEY GENTRY  
18 caused a cashier's check in the amount of \$24,847.30 to be  
19 issued to defendant DARNELL BELL.

20 (311) On or about November 5, 2006, defendant MICHAEL IVY sent  
21 an offer to purchase 1023 West Renette Avenue, El Cajon,  
22 California, which included a provision for a \$68,000  
23 payment to "Bell Construction for Handicap accessing and  
24 property upgrades" and which stated "our Title & Escrow is  
25 mandatory."

26 (312) On or about November 6, 2006, defendant ANTON EWING  
27 submitted a CPA letter for B.S., wherein EWING stated that  
28 he had been B.S.'s "tax adviser" for "several years" and

1           that B.S. had been self-employed for over three (3) years  
2           as an independent sales executive at Data Quick.

3       (313) On or about November 6, 2006, defendant MICHAEL IVY sent  
4           an offer to purchase 4153 Donna Avenue, San Diego,  
5           California, which included a provision for a \$75,000  
6           payment to "Bell Construction for Handicap accessing and  
7           property upgrades" and which stated "our Title & Escrow is  
8           mandatory."

9       (314) On or about November 6, 2006, defendant MICHAEL IVY caused  
10          a credit report check to be run for defendant GERARD  
11          HOLIDAY in connection with HOLIDAY's purchase of  
12          428 Felicita Avenue, Spring Valley, California.

13       (315) On or about November 7, 2006, defendant DARNELL BELL  
14          caused a cashier's check in the amount of \$2,000 to be  
15          issued to defendant ESTEBAN VALENZUELA.

16       (316) On or about November 10, 2006, defendant ANTON EWING  
17          submitted a CPA letter for defendant GERARD HOLIDAY  
18          wherein EWING stated that he had been HOLIDAY's "tax  
19          adviser" for "several years" and that HOLIDAY had worked  
20          for the last three years as Director of Sales, T&C  
21          Liquidators.

22       (317) On or about November 10, 2006, defendant ANTON EWING  
23          submitted a CPA letter for M.S., wherein EWING stated that  
24          he had that he had been M.S.'s "tax adviser" for "several  
25          years" and that M.S. had two jobs, that is, she worked for  
26          the last three years at Wireless Communications and a  
27          second job at US Promotions.

28    //

- 1 (318) On or about November 10, 2006, defendant ESTEBAN  
2 VALENZUELA prepared and submitted an appraisal for 8034 El  
3 Capitan Drive, La Mesa, California.
- 4 (319) On or about November 14, 2006, defendant ESTEBAN  
5 VALENZUELA prepared and submitted an appraisal for 5209  
6 Cole Street, San Diego, California.
- 7 (320) On or about November 16, 2006, defendant STANLEY GENTRY  
8 signed and submitted a loan application for W.S. in  
9 connection with W.S.'s purchase of 651 Windsor Circle,  
10 Chula Vista, California.
- 11 (321) On or about November 17, 2006, defendant DARNELL BELL  
12 caused a cashier's check in the amount of \$3,300 to be  
13 issued to defendant MICHAEL IVY.
- 14 (322) On or about November 17, 2006, defendant STANLEY GENTRY  
15 caused a cashier's check in the amount of \$38,494.50 to be  
16 issued to defendant DARNELL BELL.
- 17 (323) On or about November 20, 2006, defendant MICHAEL IVY sent  
18 an offer to purchase 651 Windsor Circle, Chula Vista,  
19 California, which included a provision for a \$73,000  
20 payment to "Bell Construction for Handicap accessing and  
21 property upgrades" and which stated "our Title & Escrow is  
22 mandatory."
- 23 (324) On or about November 20, 2006, defendant STANLEY GENTRY  
24 signed and submitted a loan application for defendant  
25 GERARD HOLIDAY in connection with HOLIDAY's purchase of  
26 548 Elkelton Boulevard, Spring Valley, California.
- 27 (325) On or about November 20, 2006, defendant JORGE CORTEZ  
28 signed and submitted a loan application for defendant

1 KEITH HOLIDAY in connection with HOLIDAY's purchase of  
2 2340 Madroncillo Street, San Diego, California.

3 (326) On or about November 20, 2006, defendant KEITH HOLIDAY  
4 signed and submitted a loan application for the purchase  
5 of 2340 Madroncillo Street, San Diego, California, wherein  
6 HOLIDAY stated his gross monthly income was \$11,100.

7 (327) On or about November 20, 2006, defendant KEITH HOLIDAY  
8 signed and submitted a loan application for the purchase  
9 of 11829 Calle Del Rio, Lakeside, California, wherein  
10 HOLIDAY stated his gross monthly income was \$11,100.

11 (328) On or about November 22, 2006, defendant DARNELL BELL  
12 caused a cashier's check in the amount of \$1,000 to be  
13 issued to defendant DIANA JAIME.

14 (329) On or about November 24, 2006, defendant DARNELL BELL  
15 caused a check in the amount of \$1,000 to be issued to  
16 defendant DEXTER HOLIDAY.

17 (330) On or about November 27, 2006, defendant STANLEY GENTRY  
18 signed and submitted a loan application for D.W. in  
19 connection with D.W.'s purchase of 3170 Chelsea Circle,  
20 Spring Valley, California.

21 (331) On or about November 27, 2006, defendant STANLEY GENTRY  
22 signed and submitted a loan application for D.W. in  
23 connection with D.W.'s purchase of 3432 East Plaza  
24 Boulevard, National City, California.

25 (332) On or about November 27, 2006, defendant STANLEY GENTRY  
26 signed and submitted a loan application for D.W. in  
27 connection with D.W.'s purchase of 8034 El Capitan Drive,  
28 La Mesa, California.

1 (333) On or about November 27, 2006, defendant JORGE CORTEZ  
2 signed and submitted a loan application for D.D. in  
3 connection with D.D.'s purchase of 6682 San Miguel Avenue,  
4 Lemon Grove, California.

5 (334) On or about November 27, 2006, defendant DANIEL WILLIAMS  
6 signed and submitted a loan application for the purchase  
7 of 8034 El Capitan Drive, La Mesa, California, wherein  
8 WILLIAMS stated his gross monthly income was \$11,189.

9 (335) On or about November 28, 2006, defendant DIANA JAIME,  
10 acting on behalf of Real Estate Center Solutions, assisted  
11 in processing a loan funded by Ownit Mortgage Solutions  
12 for the purchase of 14 North Kenton Avenue, National City,  
13 California.

14 (336) On or about November 28, 2006, defendant DIANA JAIME  
15 prepared a loan application for defendant GERARD HOLIDAY  
16 in connection with the purchase of 428 Felicita Avenue,  
17 Spring Valley, California.

18 (337) On or about November 28, 2006, defendant BILLIE BISHOP  
19 caused \$63,000 to be transferred from an account  
20 maintained by BBC Escrow Inc. to a Washington Mutual  
21 account maintained by defendant DARNELL BELL.

22 (338) On or about November 28, 2006, defendant ESTEBAN  
23 VALENZUELA prepared and submitted an appraisal for 927  
24 Carlsbad Street, Spring Valley, California.

25 (339) On or about November 28, 2006, defendant JORGE CORTEZ  
26 signed and submitted a loan application for W.M. in  
27 connection with W.M.'s purchase of 1023 West Renette  
28 Avenue, El Cajon, California.



- 1 (340) On or about November 28, 2006, defendant GERARD HOLIDAY  
2 signed and submitted a loan application for the purchase  
3 of 548 Elkelton Boulevard, Spring Valley, California,  
4 wherein HOLIDAY stated his gross monthly income was  
5 \$7,800.
- 6 (341) On or about November 28, 2006, defendant GERARD HOLIDAY  
7 signed an occupancy agreement stating that he would be an  
8 owner-occupant of 548 Elkelton Boulevard, Spring Valley,  
9 California, following the close of escrow.
- 10 (342) On or about November 28, 2006, defendant DARNELL BELL  
11 caused a cashier's check in the amount of \$6,000 to be  
12 issued to defendant MICHAEL IVY.
- 13 (343) On or about November 28, 2006, defendant DARNELL BELL  
14 caused a \$8,500 wire transfer to be sent to defendant  
15 GERARD HOLIDAY.
- 16 (344) On or about November 28, 2006, defendant DARNELL BELL  
17 caused a cashier's check in the amount of \$1,500 to be  
18 issued to defendant DIANA JAIME.
- 19 (345) On or about November 28, 2006, defendant DARNELL BELL  
20 caused a cashier's check in the amount of \$4,500 to be  
21 issued to defendant DEXTER HOLIDAY.
- 22 (346) On or about November 28, 2006, defendant STANLEY GENTRY  
23 caused a cashier's check in the amount of \$11,795 to be  
24 issued to defendant DARNELL BELL.
- 25 (347) On or about November 28, 2006, defendant STANLEY GENTRY  
26 caused a cashier's check in the amount of \$24,400 to be  
27 issued to defendant DARNELL BELL.
- 28 //

1 (348) On or about November 29, 2006, defendant GERARD HOLIDAY  
2 signed and submitted a loan application for the purchase  
3 of 428 Felicita Avenue, Spring Valley, California, wherein  
4 defendant HOLIDAY stated his gross monthly income was  
5 \$7,800.

6 (349) On or about November 29, 2006, during a telephone  
7 conversation with an auditor, defendant ANTON EWING stated  
8 that he had prepared defendant GERARD HOLIDAY's tax  
9 returns for the last two years and that HOLIDAY had worked  
10 for the last three years as Director of Sales, T&C  
11 Liquidators.

12 (350) On or about November 29, 2006, defendant ESTEBAN  
13 VALENZUELA prepared and submitted an appraisal for 4153  
14 Donna Avenue, San Diego, California.

15 (351) On or about November 29, 2006, defendant STANLEY GENTRY  
16 signed and submitted a loan application for defendant  
17 GERARD HOLIDAY in connection with HOLIDAY's purchase of  
18 428 Felicita Avenue, Spring Valley, California.

19 (352) On or about November 30, 2006, defendant BILLIE BISHOP  
20 caused \$78,000 to be transferred from an account  
21 maintained by BBC Escrow Inc. to a Washington Mutual  
22 account maintained by defendant DARNELL BELL.

23 (353) On or about November 30, 2006, defendant BILLIE BISHOP  
24 caused \$38,000 to be transferred from an account  
25 maintained by BBC Escrow Inc. to a Washington Mutual  
26 account maintained by defendant DARNELL BELL.

27 //

28 //

- 1 (354) On or about November 30, 2006, defendant ESTEBAN  
2 VALENZUELA prepared and submitted an appraisal for 6821  
3 Glenroy Street, San Diego, California.
- 4 (355) On or about November 30, 2006, defendant DARNELL BELL  
5 caused a cashier's check in the amount of \$4,000 to be  
6 issued to defendant JORGE CORTEZ.
- 7 (356) On or about November 30, 2006, defendant DARNELL BELL  
8 caused a cashier's check in the amount of \$7,000 to be  
9 issued to defendant MICHAEL IVY.
- 10 (357) On or about November 30, 2006, defendant DARNELL BELL  
11 caused a cashier's check in the amount of \$2,000 to be  
12 issued to defendant DIANA JAIME.
- 13 (358) On or about November 30, 2006, defendant STANLEY GENTRY  
14 caused a cashier's check in the amount of \$22,299.51 to be  
15 issued to defendant DARNELL BELL.
- 16 (359) On or about December 1, 2006, defendant BILLIE BISHOP  
17 caused \$70,000 to be transferred from an account  
18 maintained by BBC Escrow Inc. to a Washington Mutual  
19 account maintained by defendant DARNELL BELL.
- 20 (360) On or about December 1, 2006, defendant BILLIE BISHOP  
21 caused \$73,000 to be transferred from an account  
22 maintained by BBC Escrow Inc. to a Washington Mutual  
23 account maintained by defendant DARNELL BELL.
- 24 (361) On or about December 1, 2006, defendant BILLIE BISHOP  
25 caused \$78,000 to be transferred from an account  
26 maintained by BBC Escrow Inc. to a Washington Mutual  
27 account maintained by defendant DARNELL BELL.

28 //

- 1 (362) On or about December 1, 2006, defendant BILLIE BISHOP  
2 caused \$118,000 to be transferred from an account  
3 maintained by BBC Escrow Inc. to a Washington Mutual  
4 account maintained by defendant DARNELL BELL.
- 5 (363) On or about December 1, 2006, defendant DARNELL BELL  
6 caused a check in the amount of \$2,200 to be issued to  
7 defendant ESTEBAN VALENZUELA.
- 8 (364) On or about December 1, 2006, defendant DARNELL BELL  
9 caused a \$50,000 wire transfer to be sent to defendant  
10 LATASHIA MCKINNEY.
- 11 (365) On or about December 1, 2006, defendant STANLEY GENTRY  
12 caused a cashier's check in the amount of \$9,969.50 to be  
13 issued to defendant DARNELL BELL.
- 14 (366) On or about December 1, 2006, defendant STANLEY GENTRY  
15 caused a cashier's check in the amount of \$23,326.51 to be  
16 issued to defendant DARNELL BELL.
- 17 (367) On or about December 1, 2006, defendant STANLEY GENTRY  
18 caused a cashier's check in the amount of \$89,831.09 to be  
19 issued to defendant DARNELL BELL.
- 20 (368) On or about December 5, 2006, defendant ESTEBAN VALENZUELA  
21 prepared and submitted an appraisal for 1021 Vista Way,  
22 Chula Vista, California.
- 23 (369) On or about December 5, 2006, defendant DARNELL BELL  
24 caused a cashier's check in the amount of \$11,000 to be  
25 issued to defendant NICOLE WATSON.
- 26 (370) On or about December 6, 2006, defendant BILLIE BISHOP  
27 caused \$63,000 to be transferred from an account  
28 //

1 maintained by BBC Escrow Inc. to a Washington Mutual  
2 account maintained by defendant DARNELL BELL.

3 (371) On or about December 7, 2006, defendant DARNELL BELL  
4 caused a \$50,000 wire transfer to be sent to defendant  
5 LATASHIA MCKINNEY.

6 (372) On or about December 7, 2006, defendant BILLIE BISHOP  
7 caused \$58,000 to be transferred from an account  
8 maintained by BBC Escrow Inc. to a Washington Mutual  
9 account maintained by defendant DARNELL BELL.

10 (373) On or about December 7, 2006, defendant STANLEY GENTRY  
11 caused a cashier's check in the amount of \$48,156.51 to be  
12 issued to defendant DARNELL BELL.

13 (374) On or about December 12, 2006, defendant BILLIE BISHOP  
14 caused \$58,000 to be transferred from an account  
15 maintained by BBC Escrow Inc. to a Washington Mutual  
16 account maintained by defendant DARNELL BELL.

17 (375) On or about December 12, 2006, defendant DANIEL WILLIAMS  
18 signed and submitted a loan application for the purchase  
19 of 3432 East Plaza Boulevard, National City, California,  
20 wherein WILLIAMS stated his gross monthly income was  
21 \$10,534.

22 (376) On or about December 12, 2006, defendant STANLEY GENTRY  
23 caused a cashier's check in the amount of \$21,175 to be  
24 issued to defendant DARNELL BELL.

25 (377) On or about December 13, 2006, defendant MICHAEL IVY sent  
26 an offer to purchase 1611 San Bernardino Avenue, Spring  
27 Valley, California, which included a provision for a  
28 \$68,000 payment to "Bell Construction for Handicap

1           accessing and property upgrades" and which stated "our  
2           Title & Escrow is mandatory."

3           (378) On or about December 13, 2006, defendant DARNELL BELL  
4           caused a cashier's check in the amount of \$3,000 to be  
5           issued to defendant MICHAEL IVY.

6           (379) On or about December 14, 2006, defendant JORGE CORTEZ  
7           signed and submitted a loan application for A.B. in  
8           connection with A.B.'s purchase of 3036 Horton Avenue,  
9           San Diego, California.

10          (380) On or about December 15, 2006, defendant STANLEY GENTRY  
11          caused a cashier's check in the amount of \$21,794 to be  
12          issued to defendant DARNELL BELL.

13          (381) On or about December 20, 2006, defendant BILLIE BISHOP  
14          caused \$63,000 to be transferred from an account  
15          maintained by BBC Escrow Inc. to a Washington Mutual  
16          account maintained by defendant DARNELL BELL.

17          (382) On or about December 21, 2006, defendant BILLIE BISHOP  
18          caused \$58,000 to be transferred from an account  
19          maintained by BBC Escrow Inc. to a Washington Mutual  
20          account maintained by defendant DARNELL BELL.

21          (383) On or about December 22, 2006, defendant DARNELL BELL  
22          caused a cashier's check in the amount of \$2,369 to be  
23          issued to defendant JORGE CORTEZ.

24          (384) On or about December 22, 2006, defendant DARNELL BELL  
25          caused a cashier's check in the amount of \$1,869 to be  
26          issued to defendant LORENA CALLU.

27        //

28        //

- 1 (385) On or about December 22, 2006, defendant DARNELL BELL  
2 caused a cashier's check in the amount of \$6,000 to be  
3 issued to defendant MICHAEL IVY.
- 4 (386) On or about December 22, 2006, defendant DARNELL BELL  
5 caused a cashier's check in the amount of \$7,290 to be  
6 issued to defendant DIANA JAIME.
- 7 (387) On or about December 22, 2006, defendant STANLEY GENTRY  
8 caused a cashier's check in the amount of \$41,626.51 to be  
9 issued to defendant DARNELL BELL.
- 10 (388) On or about December 26, 2006, defendant ANTON EWING  
11 submitted a CPA letter for M.S., wherein EWING stated that  
12 he had that he had been M.S.'s "tax adviser" for "several  
13 years" and that M.S. had worked for the last three years  
14 at Wireless Communications.
- 15 (389) On or about December 30, 2006, defendant JORGE CORTEZ  
16 signed and submitted a loan application for A.B. in  
17 connection with A.B.'s purchase of 7939 San Carlos Drive,  
18 San Diego, California.
- 19 (390) On or about January 2, 2007, defendant BILLIE BISHOP  
20 caused \$73,000 to be transferred from an account  
21 maintained by BBC Escrow Inc. to a Washington Mutual  
22 account maintained by defendant DARNELL BELL.
- 23 (391) On or about January 3, 2007, defendant ESTEBAN VALENZUELA  
24 prepared and submitted an appraisal for 5139 Reynolds  
25 Street, San Diego, California.
- 26 (392) On or about January 4, 2007, defendant BILLIE BISHOP  
27 caused \$88,000 to be transferred from an account

28 //

maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(393) On or about January 4, 2007, defendant STANLEY GENTRY caused a cashier's check in the amount of \$24,490.35 to be issued to defendant DARNELL BELL.

(394) On or about January 4, 2007, defendant STANLEY GENTRY caused a cashier's check in the amount of \$34,001.51 to be issued to defendant DARNELL BELL.

(395) On or about January 5, 2007, defendant MICHAEL IVY sent an offer to purchase 452 Billow Drive, San Diego, California, which included a provision for a \$63,000 payment to "Bell Construction for Handicap accessing and property upgrades" and which stated "our Title & Escrow is mandatory."

(396) On or about January 6, 2007, defendant ESTEBAN VALENZUELA prepared and submitted an appraisal for 231 South Gregory Street, San Diego, California.

(397) On or about January 9, 2007, defendant BILLIE BISHOP caused \$88,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(398) On or about January 9, 2007, defendant BILLIE BISHOP caused \$22,280.08 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(399) On or about January 9, 2007, defendant STANLEY GENTRY caused a cashier's check in the amount of \$46,888.05 to be issued to defendant DARNELL BELL.

//



1 (400) On or about January 9, 2007, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$114,582.43 to  
3 be issued to defendant DARNELL BELL.

4 (401) On or about January 11, 2007, defendant BILLIE BISHOP  
5 caused \$90,500 to be transferred from an account  
6 maintained by BBC Escrow Inc. to a Washington Mutual  
7 account maintained by defendant DARNELL BELL.

8 (402) On or about January 11, 2007, defendant STANLEY GENTRY  
9 caused a cashier's check in the amount of \$13,131.78 to be  
10 issued to defendant DARNELL BELL.

11 (403) On or about January 11, 2007, defendant STANLEY GENTRY  
12 caused a cashier's check in the amount of \$15,611.51 to be  
13 issued to defendant DARNELL BELL.

14 (404) On or about January 12, 2007, defendant DARNELL BELL  
15 caused a check in the amount of \$3,400 to be issued to  
16 defendant ESTEBAN VALENZUELA.

17 (405) On or about January 16, 2007, defendant DARNELL BELL  
18 caused a check in the amount of \$2,000 to be issued to  
19 defendant JORGE CORTEZ.

20 (406) On or about January 16, 2007, defendant STANLEY GENTRY  
21 signed and submitted a loan application for A.H. in  
22 connection with A.H.'s purchase of 2716 46<sup>th</sup> Street,  
23 San Diego, California.

24 (407) On or about January 17, 2007, defendant MICHAEL IVY sent  
25 an offer to purchase 8937 Idyllwild Lane, San Diego,  
26 California, which included a provision for a \$68,000  
27 payment to "Bell Construction for Handicap accessing and  
28 //

1 property upgrades" and which stated "our Title & Escrow is  
2 mandatory."

3 (408) On or about January 18, 2007, defendant DARNELL BELL  
4 caused a cashier's check in the amount of \$5,000 to be  
5 issued to defendant ESTEBAN VALENZUELA.

6 (409) On or about January 19, 2007, defendant BILLIE BISHOP  
7 caused \$108,000 to be transferred from an account  
8 maintained by BBC Escrow Inc. to a Washington Mutual  
9 account maintained by defendant DARNELL BELL.

10 (410) On or about January 19, 2007, defendant STANLEY GENTRY  
11 caused a cashier's check in the amount of \$23,985 to be  
12 issued to defendant DARNELL BELL.

13 (411) On or about January 20, 2007, defendant ESTEBAN VALENZUELA  
14 prepared and submitted an appraisal for 7362 Stanford  
15 Street, La Mesa, California.

16 (412) On or about January 22, 2007, defendant DARNELL BELL  
17 caused a \$62,000 wire transfer to be sent to defendant  
18 LATASHIA MCKINNEY.

19 (413) On or about January 23, 2007, defendant BILLIE BISHOP  
20 caused \$65,000 to be transferred from an account  
21 maintained by BBC Escrow Inc. to a Washington Mutual  
22 account maintained by defendant DARNELL BELL.

23 (414) On or about January 24, 2007, defendant ESTEBAN VALENZUELA  
24 prepared and submitted an appraisal for 452 Billow Drive,  
25 San Diego, California.

26 (415) On or about January 24, 2007, defendant DARNELL BELL  
27 caused a cashier's check in the amount of \$3,000 to be  
28 issued to defendant ESTEBAN VALENZUELA.

- 1 (416) On or about January 24, 2007, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$8,500 to be  
3 issued to defendant DARNELL BELL.
- 4 (417) On or about January 24, 2007, defendant STANLEY GENTRY  
5 caused a cashier's check in the amount of \$45,941.02 to be  
6 issued to defendant DARNELL BELL.
- 7 (418) On or about January 26, 2007, defendant ESTEBAN VALENZUELA  
8 prepared and submitted an appraisal for 8937 Idyllwild  
9 Lane, San Diego, California.
- 10 (419) On or about January 30, 2007, defendant STANLEY GENTRY  
11 signed and submitted a loan application for R.V. in  
12 connection with R.V.'s purchase of 1021 Vista Way, Chula  
13 Vista, California.
- 14 (420) On or about January 31, 2007, defendant BILLIE BISHOP  
15 caused \$50,000 to be transferred from an account  
16 maintained by BBC Escrow Inc. to a Washington Mutual  
17 account maintained by defendant DARNELL BELL.
- 18 (421) On or about February 1, 2007, defendant BILLIE BISHOP  
19 caused \$50,000 to be transferred from an account  
20 maintained by BBC Escrow Inc. to a Washington Mutual  
21 account maintained by defendant DARNELL BELL.
- 22 (422) On or about February 1, 2007, defendant BILLIE BISHOP  
23 caused \$83,000 to be transferred from an account  
24 maintained by BBC Escrow Inc. to a Washington Mutual  
25 account maintained by defendant DARNELL BELL.
- 26 (423) On or about February 1, 2007, defendant BILLIE BISHOP  
27 caused \$50,000 to be transferred from an account  
28

//

1 maintained by BBC Escrow Inc. to a Washington Mutual  
2 account maintained by defendant DARNELL BELL.

3 (424) On or about February 1, 2007, defendant STANLEY GENTRY  
4 signed and submitted a loan application for A.H. in  
5 connection with A.H.'s purchase of 7362 Stanford Avenue,  
6 La Mesa, California.

7 (425) On or about February 1, 2007, defendant JORGE MAGANA  
8 signed and submitted a "Borrower Certificate" wherein  
9 MAGANA certified that his monthly income was \$10,868.71.

10 (426) On or about February 1, 2007, defendant JORGE MAGANA  
11 signed an occupancy agreement stating that he would be an  
12 owner-occupant of 5139 Reynolds Street, San Diego,  
13 California, following the close of escrow.

14 (427) On or about February 5, 2007, defendant BILLIE BISHOP  
15 caused \$73,000 to be transferred from an account  
16 maintained by BBC Escrow Inc. to a Washington Mutual  
17 account maintained by defendant DARNELL BELL.

18 (428) On or about February 5, 2007, defendant JORGE MAGANA  
19 signed and submitted a loan application for the purchase  
20 of 5139 Reynolds Street, San Diego, California, wherein  
21 MAGANA stated his gross monthly income was \$10,868.71.

22 (429) On or about February 6, 2007, defendant BILLIE BISHOP  
23 caused \$45,000 to be transferred from an account  
24 maintained by BBC Escrow Inc. to a Washington Mutual  
25 account maintained by defendant DARNELL BELL.

26 (430) On or about February 6, 2007, defendant STANLEY GENTRY  
27 caused a cashier's check in the amount of \$30,381.02 to be  
28 issued to defendant DARNELL BELL.

- 1 (431) On or about February 6, 2007, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$48,911 to be  
3 issued to defendant DARNELL BELL.
- 4 (432) On or about February 7, 2007, defendant BILLIE BISHOP  
5 caused \$88,000 to be transferred from an account  
6 maintained by BBC Escrow Inc. to a Washington Mutual  
7 account maintained by defendant DARNELL BELL.
- 8 (433) On or about February 7, 2007, defendant STANLEY GENTRY  
9 caused a cashier's check in the amount of \$66,829.49 to be  
10 issued to defendant DARNELL BELL.
- 11 (434) On or about February 8, 2007, defendant STANLEY GENTRY  
12 signed and submitted a loan application for O.W. in  
13 connection with O.W.'s purchase of 1399 Rex Lane, El  
14 Cajon, California.
- 15 (435) On or about February 8, 2007, defendant STANLEY GENTRY  
16 caused a cashier's check in the amount of \$31,232.35 to be  
17 issued to defendant DARNELL BELL.
- 18 (436) On or about February 9, 2007, defendant BILLIE BISHOP  
19 caused \$57,000 to be transferred from an account  
20 maintained by BBC Escrow Inc. to a Washington Mutual  
21 account maintained by defendant DARNELL BELL.
- 22 (437) On or about February 9, 2007, defendant DARNELL BELL  
23 caused a cashier's check in the amount of \$5,270.50 to be  
24 issued to defendant JORGE CORTEZ.
- 25 (438) On or about February 9, 2007, defendant DARNELL BELL  
26 caused a cashier's check in the amount of \$5,270.50 to be  
27 issued to defendant LORENA CALLU.

28 //

- 1 (439) On or about February 9, 2007, defendant DARNELL BELL  
2 caused a cashier's check in the amount of \$4,000 to be  
3 issued to defendant DIANA JAIME.
- 4 (440) On or about February 9, 2007, defendant DARNELL BELL  
5 caused a check in the amount of \$48,000 to be issued to  
6 defendant JORGE MAGANA.
- 7 (441) On or about February 9, 2007, defendant STANLEY GENTRY  
8 caused a cashier's check in the amount of \$31,802 to be  
9 issued to defendant DARNELL BELL.
- 10 (442) On or about February 12, 2007, defendant DIANA JAIME sent  
11 an email message to defendant BILLIE BISHOP wherein JAIME  
12 asked about the "Bell construction amount" in relation to  
13 the purchase of 231 South Gregory Street, San Diego,  
14 California.
- 15 (443) On or about February 12, 2007, defendant STANLEY GENTRY  
16 caused a cashier's check in the amount of \$8,200 to be  
17 issued to defendant DARNELL BELL.
- 18 (444) On or about February 15, 2007, defendant DARNELL BELL  
19 caused a check in the amount of \$5,000 to be issued to  
20 defendant MICHAEL IVY.
- 21 (445) On or about February 16, 2007, defendant JORGE MAGANA  
22 signed and submitted a loan application for the purchase  
23 of 4153 Donna Avenue, San Diego, California, wherein  
24 MAGANA stated his gross monthly income was \$11,650.00.
- 25 (446) On or about February 16, 2007, defendant STANLEY GENTRY  
26 signed and submitted a loan application for defendant  
27 JORGE MAGANA in connection with MAGANA's purchase of 4153  
28 Donna Avenue, San Diego, California.

1 (447) On or about February 16, 2007, defendant JORGE MAGANA  
2 signed an occupancy agreement stating that he would be an  
3 owner-occupant of 4153 Donna Avenue, San Diego,  
4 California, following the close of escrow.

5 (448) On or about February 22, 2007, defendant STANLEY GENTRY  
6 caused a wire transfer in the amount of \$56,296.40 to be  
7 sent to a Washington Mutual account maintained by  
8 defendant DARNELL BELL.

9 (449) On or about February 23, 2007, defendant BILLIE BISHOP  
10 caused \$56,296.40 to be transferred from an account  
11 maintained by BBC Escrow Inc. to a Washington Mutual  
12 account maintained by defendant DARNELL BELL.

13 (450) On or about February 23, 2007, defendant BILLIE BISHOP  
14 caused \$65,000 to be transferred from an account  
15 maintained by BBC Escrow Inc. to a Washington Mutual  
16 account maintained by defendant DARNELL BELL.

17 (451) On or about February 23, 2007, defendant JORGE CORTEZ  
18 signed and submitted a loan application for J.P. in  
19 connection with J.P.'s purchase of 8937 Idyllwild Lane,  
20 San Diego, California.

21 (452) On or about February 23, 2007, defendant STANLEY GENTRY  
22 caused a cashier's check in the amount of \$1,000 to be  
23 issued to defendant DARNELL BELL.

24 (453) On or about February 27, 2007, defendant BILLIE BISHOP  
25 caused \$58,000 to be transferred from an account  
26 maintained by BBC Escrow Inc. to a Washington Mutual  
27 account maintained by defendant DARNELL BELL.

28 //

- 1 (454) On or about February 27, 2007, defendant DARNELL BELL  
2 caused a check in the amount of \$2,000 to be issued to  
3 defendant JORGE CORTEZ.
- 4 (455) In or about March 2007, defendant MARCUS DOZZELL recruited  
5 J.P. to purchase real property as a "straw buyer."
- 6 (456) On or about March 1, 2007, defendant DARNELL BELL caused  
7 a check in the amount of \$18,000 to be issued to defendant  
8 DESIREE HOLIDAY.
- 9 (457) On or about March 2, 2007, defendant BILLIE BISHOP caused  
10 \$63,000 to be transferred from an account maintained by  
11 BBC Escrow Inc. to a Washington Mutual account maintained  
12 by defendant DARNELL BELL.
- 13 (458) On or about March 2, 2007, defendant BILLIE BISHOP caused  
14 \$50,000 to be transferred from an account maintained by  
15 BBC Escrow Inc. to a Washington Mutual account maintained  
16 by defendant DARNELL BELL.
- 17 (459) On or about March 2, 2007, defendant DARNELL BELL caused  
18 a cashier's check in the amount of \$3,300 to be issued to  
19 defendant LORENA CALLU.
- 20 (460) On or about March 5, 2007, defendant DARNELL BELL caused  
21 a check in the amount of \$3,900 to be issued to defendant  
22 ESTEBAN VALENZUELA.
- 23 (461) On or about March 5, 2007, defendant DARNELL BELL caused  
24 a check in the amount of \$500 to be issued to defendant  
25 DESIREE HOLIDAY.
- 26 (462) On or about March 6, 2007, defendant BILLIE BISHOP caused  
27 \$50,000 to be transferred from an account maintained by  
28 //



1 BBC Escrow Inc. to a Washington Mutual account maintained  
2 by defendant DARNELL BELL.

3 (463) On or about March 7, 2007, defendant MICHAEL IVY sent an  
4 offer to purchase 837 Dominion Street, San Diego,  
5 California, which included a provision for a \$83,000  
6 payment to "Bell Construction for Handicap accessing and  
7 property upgrades" and which stated "our Title & Escrow is  
8 mandatory."

9 (464) On or about March 7, 2007, defendant STANLEY GENTRY signed  
10 and submitted a loan application for M.C. in connection  
11 with M.C.'s purchase of 4101 Avenida Arroyo, National  
12 City, California.

13 (465) On or about March 9, 2007, defendant STANLEY GENTRY signed  
14 and submitted a loan application for D.D. in connection  
15 with D.D.'s purchase of 452 Billow Drive, San Diego,  
16 California.

17 (466) On or about March 9, 2007, defendant DARNELL BELL caused  
18 a cashier's check in the amount of \$1,300 to be issued to  
19 defendant JORGE CORTEZ.

20 (467) On or about March 9, 2007, defendant DARNELL BELL caused  
21 a cashier's check in the amount of \$1,300 to be issued to  
22 defendant LORENA CALLU.

23 (468) On or about March 9, 2007, defendant DARNELL BELL caused  
24 a check in the amount of \$5,000 to be issued to defendant  
25 MICHAEL IVY.

26 (469) On or about March 15, 2007, defendant BILLIE BISHOP caused  
27 \$78,000 to be transferred from an account maintained by  
28 //

BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(470) On or about March 15, 2007, defendant DARNELL BELL caused a check in the amount of \$5,000 to be issued to defendant MICHAEL IVY.

(471) On or about March 16, 2007, defendant DARNELL BELL caused a cashier's check in the amount of \$2,000 to be issued to defendant DIANA JAIME.

(472) On or about March 20, 2007, defendant BILLIE BISHOP caused \$45,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(473) On or about March 21, 2007, defendant BILLIE BISHOP caused \$45,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(474) On or about March 23, 2007, defendant BILLIE BISHOP caused \$53,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(475) On or about March 23, 2007, defendant BILLIE BISHOP caused \$50,000 to be transferred from an account maintained by BBC Escrow Inc. to a Washington Mutual account maintained by defendant DARNELL BELL.

(476) On or about March 23, 2007, defendant DARNELL BELL caused a check in the amount of \$10,000 to be issued to defendant MICHAEL IVY.

//

- 1 (477) On or about March 27, 2007, defendant BILLIE BISHOP caused  
2 \$63,000 to be transferred from an account maintained by  
3 BBC Escrow Inc. to a Washington Mutual account maintained  
4 by defendant DARNELL BELL.
- 5 (478) On or about March 27, 2007, defendant DARNELL BELL caused  
6 a cashier's check in the amount of \$15,300 to be issued to  
7 defendant DESIREE HOLIDAY.
- 8 (479) On or about April 2, 2007, defendant DARNELL BELL caused  
9 a cashier's check in the amount of \$1,800 to be issued to  
10 defendant DIANA JAIME.
- 11 (480) On or about April 3, 2007, defendant DARNELL BELL caused  
12 a check in the amount of \$2,750 to be issued to defendant  
13 MICHAEL IVY.
- 14 (481) On or about April 10, 2007, defendant DARNELL BELL caused  
15 a check in the amount of \$6,350 to be issued to defendant  
16 DIANA JAIME.
- 17 (482) On or about April 11, 2007, defendant DARNELL BELL caused  
18 a cashier's check in the amount of \$4,380 to be issued to  
19 defendant DIANA JAIME.
- 20 (483) On or about April 12, 2007, defendant DARNELL BELL caused  
21 a check in the amount of \$5,150 to be issued to defendant  
22 DIANA JAIME.
- 23 (484) On or about April 17, 2007, defendant DARNELL BELL caused  
24 a check in the amount of \$5,850 to be issued to defendant  
25 DIANA JAIME.
- 26 (485) On or about April 26, 2007, defendant DARNELL BELL caused  
27 a check in the amount of \$3,000 to be issued to defendant  
28 DESIREE HOLIDAY.

- 1 (486) On or about May 2, 2007, defendant ESTEBAN VALENZUELA  
2 prepared and submitted an appraisal for 40021 Zamura  
3 Court, Murietta, California.
- 4 (487) On or about May 2, 2007, defendant DARNELL BELL caused a  
5 check in the amount of \$500 to be issued to defendant  
6 JORGE CORTEZ.
- 7 (488) On or about May 2, 2006, defendant DARNELL BELL caused a  
8 check in the amount of \$6,000 to be issued to defendant  
9 JORGE CORTEZ.
- 10 (489) On or about May 3, 2007, defendant DARNELL BELL caused a  
11 check in the amount of \$6,000 to be issued to defendant  
12 MICHAEL IVY.
- 13 (490) On or about May 4, 2006, defendant BILLIE BISHOP caused  
14 \$60,000 to be transferred from an account maintained by  
15 Ticor Title Company of California to a Washington Mutual  
16 account maintained by defendant DARNELL BELL.
- 17 (491) On or about May 8, 2007, defendant DARNELL BELL caused a  
18 check in the amount of \$12,693.31 to be issued to  
19 defendant STANLEY GENTRY.
- 20 (492) On or about May 8, 2007, defendant BILLIE BISHOP caused  
21 \$57,000 to be transferred from an account maintained by  
22 Ticor Title Company of California to a Washington Mutual  
23 account maintained by defendant DARNELL BELL.
- 24 (493) On or about May 10, 2007, defendant BILLIE BISHOP caused  
25 \$30,000 to be transferred from an account maintained by  
26 Ticor Title Company of California to a Washington Mutual  
27 account maintained by defendant DARNELL BELL.

28 //

- 1 (494) On or about May 10, 2007, defendant BILLIE BISHOP caused  
2 \$36,000 to be transferred from an account maintained by  
3 Ticor Title Company of California to a Washington Mutual  
4 account maintained by defendant DARNELL BELL.
- 5 (495) On or about May 15, 2007, defendant DARNELL BELL caused a  
6 check in the amount of \$1,000 to be issued to defendant  
7 ESTEBAN VALENZUELA.
- 8 (496) On or about May 16, 2007, defendant DARNELL BELL caused a  
9 check in the amount of \$9,200 to be issued to defendant  
10 DESIREE HOLIDAY.
- 11 (497) On or about May 29, 2007, defendant DARNELL BELL caused a  
12 cashier's check in the amount of \$5,900 to be issued to  
13 defendant MICHAEL IVY.
- 14 (498) On or about June 1, 2007, defendant DARNELL BELL caused a  
15 cashier's check in the amount of \$10,000 to be issued to  
16 defendant LATASHIA MCKINNEY.
- 17 (499) On or about June 4, 2007, defendant DARNELL BELL caused a  
18 cashier's check in the amount of \$2,500 to be issued to  
19 defendant LATASHIA MCKINNEY.
- 20 (500) On or about June 7, 2007, defendant BILLIE BISHOP caused  
21 \$55,000 to be transferred from an account maintained by  
22 Ticor Title Company of California to a Washington Mutual  
23 account maintained by defendant DARNELL BELL.
- 24 (501) On or about June 8, 2007, defendant DARNELL BELL caused a  
25 cashier's check in the amount of \$13,000 to be issued to  
26 defendant MICHAEL IVY.

27 //

28 //

- 1 (502) On or about June 11, 2007, defendant DARNELL BELL caused  
2 a check in the amount of \$8,000 to be issued to defendant  
3 DIANA JAIME.
- 4 (503) On or about June 12, 2007, defendant DARNELL BELL caused  
5 a cashier's check in the amount of \$8,000 to be issued to  
6 defendant MICHAEL IVY.
- 7 (504) On or about June 12, 2007, defendant DARNELL BELL caused  
8 a check in the amount of \$3,577.96 to be issued to  
9 defendant STANLEY GENTRY.
- 10 (505) On or about June 13, 2007, defendant DARNELL BELL caused  
11 a check in the amount of \$1,000 to be issued to defendant  
12 LORENA CALLU.
- 13 (506) On or about June 15, 2007, defendant BILLIE BISHOP caused  
14 \$78,000 to be transferred from an account maintained by  
15 Ticor Title Company of California to a Washington Mutual  
16 account maintained by defendant DARNELL BELL.
- 17 (507) On or about June 27, 2007, defendant DARNELL BELL caused  
18 a cashier's check in the amount of \$7,000 to be issued to  
19 defendant MICHAEL IVY.
- 20 (508) On or about June 27, 2007, defendant DARNELL BELL caused  
21 a check in the amount of \$989.03 to be issued to defendant  
22 STANLEY GENTRY.
- 23 (509) On or about June 27, 2007, defendant DARNELL BELL caused  
24 a cashier's check in the amount of \$25,000 to be issued to  
25 defendant DEXTER HOLIDAY.
- 26 (510) On or about June 19, 2007, defendant DARNELL BELL caused  
27 a cashier's check in the amount of \$30,000 to be issued to  
28 defendant DEXTER HOLIDAY.

- 1 (511) On or about July 3, 2007, defendant DARNELL BELL caused a  
2 check in the amount of \$1,000 to be issued to defendant  
3 LORENA CALLU.
- 4 (512) On or about July 31, 2007, defendant DARNELL BELL caused  
5 a \$73,597.92 wire transfer to be sent to defendant  
6 LATASHIA MCKINNEY.
- 7 (513) On or about July 31, 2007, defendant DARNELL BELL caused  
8 a cashier's check in the amount of \$78,597.92 to be issued  
9 to defendant LATASHIA MCKINNEY.
- 10 (514) On or about August 16, 2007, defendant DARNELL BELL caused  
11 a cashier's check in the amount of \$54,000 to be issued to  
12 defendant DESIREE HOLIDAY.
- 13 (515) On or about August 23, 2007, defendant DARNELL BELL caused  
14 a cashier's check in the amount of \$44,515.68 to be issued  
15 to defendant DESIREE HOLIDAY.
- 16 (516) On or about August 30, 2007, defendant DARNELL BELL caused  
17 a cashier's check in the amount of \$54,000 to be issued to  
18 defendant DESIREE HOLIDAY.
- 19 (517) On or about October 1, 2007, defendant DARNELL BELL caused  
20 a cashier's check in the amount of \$49,100 to be issued to  
21 defendant DESIREE HOLIDAY.
- 22 (518) On or about October 2, 2007, defendant DARNELL BELL caused  
23 a cashier's check in the amount of \$8,800 to be issued to  
24 defendant DESIREE HOLIDAY.
- 25 (519) On or about October 12, 2007, defendant DARNELL BELL  
26 caused a cashier's check in the amount of \$69,100 to be  
27 issued to defendant DESIREE HOLIDAY.

28 //

1 (520) On or about October 12, 2007, defendant DARNELL BELL  
2 caused a cashier's check in the amount of \$142,500 to be  
3 issued to defendant DESIREE HOLIDAY.

4 (521) On or about October 26, 2007, defendant DARNELL BELL  
5 caused a cashier's check in the amount of \$35,000 to be  
6 issued to defendant DESIREE HOLIDAY.

7 (522) On or about October 26, 2007, defendant DARNELL BELL  
8 caused a cashier's check in the amount of \$35,000 to be  
9 issued to defendant DESIREE HOLIDAY.

10 (523) On or about October 26, 2007, defendant DARNELL BELL  
11 caused a second cashier's check in the amount of \$6,000 to  
12 be issued to defendant DESIREE HOLIDAY.

13 All in violation of Title 18, United States Code, Section 1962(d).

14 Forfeiture Allegation

15 8. All of the allegations contained in Count One of this  
16 Indictment are hereby realleged and incorporated by reference herein  
17 as though fully set forth for the purpose of alleging forfeiture  
18 pursuant to the provisions of Title 18, United States Code,  
19 Section 1963. Pursuant to Federal Rules of Criminal Procedure,  
20 Rule 32.2, notice is hereby given to the above-named defendants that  
21 the United States will seek forfeiture as part of any sentence in  
22 accordance with Title 18, United States Code, Section 1963 in the  
23 event of any defendant's conviction under Count One of this  
24 Indictment.

25 a. Any and all interests defendants DARNELL BELL, aka D-  
26 Bell, MICHAEL IVY, STANLEY GENTRY, BILLIE BISHOP, DIANA JAIME,  
27 LATASHIA MCKINNEY, MARCUS DOZZELL, aka Kali, JORGE CORTEZ, ESTEBAN  
28 VALENZUELA, LORENA CALLU, ANTON EWING, RANDOLPH HIRSCH, DENNIS TAPIA,



1 DESIREE HOLIDAY, aka Desi, DEXTER HOLIDAY, KEITH HOLIDAY, RAY LOGAN,  
2 aka Jack Nasty, DAVID LEWIS, JOSEPH LEWIS, GERARD HOLIDAY, STEVIE  
3 FRAZIER, JORGE MAGANA, NICOLEE WATSON and DANIEL WILLIAMS have  
4 acquired and maintained in violation of Title 18, United States Code,  
5 Section 1962, which interests are subject to forfeiture to the United  
6 States pursuant to Title 18, United States Code, Section 1963(a)(1);  
7 and

8           b. Any and all interest in, security of, claims against,  
9 property or contractual rights of any kind affording a source of  
10 influence over, of defendants DARNELL BELL, aka D-Bell, MICHAEL IVY,  
11 STANLEY GENTRY, BILLIE BISHOP, DIANA JAIME, LATASHIA MCKINNEY, MARCUS  
12 DOZZELL, aka Kali, JORGE CORTEZ, ESTEBAN VALENZUELA, LORENA CALLU,  
13 ANTON EWING, RANDOLPH HIRSCH, DENNIS TAPIA, DESIREE HOLIDAY, aka Desi,  
14 DEXTER HOLIDAY, KEITH HOLIDAY, RAY LOGAN, aka Jack Nasty, DAVID LEWIS,  
15 JOSEPH LEWIS, GERARD HOLIDAY, STEVIE FRAZIER, JORGE MAGANA, NICOLEE  
16 WATSON and DANIEL WILLIAMS which afford a source of influence over,  
17 the enterprise described herein which the defendants established,  
18 operated, controlled, conducted, and participated in the conduct of,  
19 in violation of Title 18, United States Code, Section 1962, which  
20 interests, securities, claims, and rights are subject to forfeiture  
21 to the United States pursuant to Title 18, United States Code, Section  
22 1963(a)(2); and

23           c. Any and all property of defendants DARNELL BELL, aka  
24 D-Bell, MICHAEL IVY, STANLEY GENTRY, BILLIE BISHOP, DIANA JAIME,  
25 LATASHIA MCKINNEY, MARCUS DOZZELL, aka Kali, JORGE CORTEZ, ESTEBAN  
26 VALENZUELA, LORENA CALLU, ANTON EWING, RANDOLPH HIRSCH, DENNIS TAPIA,  
27 DESIREE HOLIDAY, aka Desi, DEXTER HOLIDAY, KEITH HOLIDAY, RAY LOGAN,  
28 aka Jack Nasty, DAVID LEWIS, JOSEPH LEWIS, GERARD HOLIDAY, STEVIE

1 FRAZIER, JORGE MAGANA, NICOLELE WATSON and DANIEL WILLIAMS constituting  
2 and derived from proceeds obtained, directly and indirectly, from the  
3 racketeering activity described in this Indictment, in violation of  
4 Title 18, United States Code, Section 1962, which property is subject  
5 to forfeiture to the United States pursuant to Title 18, United States  
6 Code, Section 1963(a)(3).

7 9. The interests of the defendants subject to forfeiture to  
8 the United States pursuant to Title 18, United States Code,  
9 Sections 1963(a)(1), (a)(2) and (a)(3), include but are not limited  
10 to all interests and proceeds traceable thereto, including  
11 approximately \$11,000,000.00.

12 10. Each of the defendants are jointly and severally liable  
13 for the forfeiture obligations alleged above.

14 11. If any of the above-described forfeitable property, as a  
15 result of any act or omission of the defendants:

- 16 a. cannot be located upon the exercise of due diligence;
- 17 b. has been transferred or sold to, or deposited with, a  
18 third person;
- 19 c. has been placed beyond the jurisdiction of the Court;
- 20 d. has been substantially diminished in value; or
- 21 e. has been commingled with other property which cannot  
22 be subdivided without difficulty,

23 //

24 //

25 //

26 //

27 //

28 //

1 it is the intent of the United States, pursuant to Title 18, United  
2 States Code, Section 1963(m), to seek forfeiture of any other property  
3 of said defendants up to the value of the above forfeitable property.  
4 All pursuant to Title 18, United States Code, Section 1963.

5 DATED: March 27, 2009.

6 A TRUE BILL:

7  
8  
9 Foreperson

10 KAREN P. HEWITT  
11 United States Attorney

12  
13 By: TODD W. ROBINSON  
14 Assistant U.S. Attorney

15  
16 By: NICOLE A. JONES  
17 Assistant U.S. Attorney