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SUPERIOR COURT OF CALIFORNIA

COUNTY OF VENTURA

RECEIVED
VENTURA SUPERIOR COURT
FEB 29 2012

THE PEOPLE OF THE STATE OF CALIFORNIA,

vs

SHARON PALMER (04-14-1960)
LARRY OTTING (07-30-1945)
JAMES CECIL STEWART (07-26-1947)

Defendant(s).

VCIJIS Case: 2011013198

Felony Complaint

☐ Complaint Deemed
Information

The undersigned is informed and believes that:

Count 1

On or about February 01, 2008 through April 01, 2009, in the above named Judicial District, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code 182(a)(1), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Ventura:

1. On or about February 25, 2008, SHARON PALMER entered into a lease-purchase option with the owners of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.
2. On or about February 26, 2008, SHARON PALMER opened an escrow account with Lawyer's Title for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.
3. On or about, February 26, 2008, SHARON PALMER and JAMES CECIL STEWART approached LARRY OTTING about using his "credit profile" to act as straw purchaser for the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

4. On or about, February 26, 2008, SHARON PALMER and JAMES CECIL STEWART told LARRY OTTING that SHARON PALMER and JAMES CECIL STEWART did not have the credit to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula, and that if LARRY OTTING agreed to let SHARON PALMER and JAMES CECIL STEWART use LARRY OTTING's credit to purchase the property, SHARON PALMER and JAMES CECIL STEWART would raise all of the down payment monies from investors and make all of the mortgage payments, and LARRY OTTING would receive use of ten acres of the property.

5. On or about April 1, 2008, JAMES CECIL STEWART approached Thomas Elliott about investing in a "co-op" farm in Santa Paula, California. JAMES CECIL STEWART told Thomas Elliott that the farm needed money because the lease was expiring and there was an option to buy.

6. On or about August 16, 2008, LARRY OTTING participated in a loan interview with a representative of Rabobank, N.A., for the purpose of obtaining a loan in his name to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

7. On or about August 16, 2008, LARRY OTTING told a representative of Rabobank, N.A. , that none of the down payment monies used to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula would be borrowed.

8. On or about and between August 16, 2008 and November 18, 2008, SHARON PALMER and LARRY OTTING falsely represented to representatives of Rabobank, N.A. that there was a personal relationship between them so the bank would allow SHARON PALMER to "gift" some of the down payment monies used to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

9. On or about September 8, 2008, JAMES CECIL STEWART, in the guise of "Sustainable Community" sent a solicitation to numerous individuals, including Michael Kirrene, regarding "James Stewart's and Sharon Palmer's Healthy Family Farms," located at 6780 Wheeler Canyon Road in the City of Santa Paula. The e-mail sought four to five investors willing to put up Fifty Thousand Dollars (\$50,000) and claimed they only lacked Two Hundred Thousand Dollars (\$200,000) from the full price to close escrow on the property. The e-mail specified the potential investors were to contact "Sharon or James."

10. On or about September 15, 2008, SHARON PALMER solicited Twenty-Five Thousand Dollars (\$25,000) from Michael Kirrene, telling him that the money would be used for part of the down payment on the property located at 6780 Wheeler Canyon Road in the City of Santa Paula, that the money would be secured by an unsecured promissory note, and that SHARON PALMER would be the purchaser of the property.

11. On September 15, 2008, SHARON PALMER deposited Kirrene's check for Twenty-Five Thousand Dollars (\$25,000) in her bank account for Healthy Family Farms.

12. On or about and between September 15 and September 30, 2008, SHARON PALMER used the Twenty-Five Thousand Dollars (\$25,000) given to her by Michael Kirrene to pay bills and personal expenses.

13. On or about November 10, 2008, JAMES CECIL STEWART, in the guise of "Sustainable Community" sent a solicitation to numerous individuals, including Michael Kirrene, requesting a total investment of \$300,000 for the purchase of the property located at 6780 Wheeler Canyon Road in the City of Santa Paula.

14. On or about and between November 10 and November 14, 2008, SHARON PALMER negotiated a One Hundred Thousand Dollar (\$100,000) loan with Michael Kirrene, telling him that the money would be used for a down payment for the property at 6780 Wheeler Canyon Road in the City of Santa Paula, that the title would be in the name of Healthy Family Farms, and that he would be repaid shortly from a USDA loan that was pending approval.

15. On or about and between November 10 and November 14, 2008, SHARON PALMER negotiated a Sixty Thousand Dollar (\$60,000) loan with Eric and Mary Hetherington, telling them that the money would be used for a down payment for the property at 6780 Wheeler Canyon Road in the City of Santa Paula, that the title would be in the name of Healthy Family Farms, and that they would be repaid shortly from a USDA loan that was pending approval.

16. On or about and between November 10 and November 14, 2008, SHARON PALMER negotiated a One hundred fifty Thousand Dollar (\$150,000) loan with Mark Martin and Susan Hagemeister, telling them that the money would be used for a down payment for the property at 6780 Wheeler Canyon Road in the City of Santa Paula, that the title for the property would be in the name of Healthy Family Farms, and that they would be repaid shortly from a USDA loan that was pending approval.

17. On or about and between November 10 and November 14, 2008, SHARON PALMER negotiated a One Hundred Thousand Dollar (\$100,000) loan with The Merc In Golden, LLC, telling representatives of The Merc In Golden, LLC that the money would be used for a down payment for the property at 6780 Wheeler Canyon Road in the City of Santa Paula, that the title would be in the name of Healthy Family Farms, and that they would be repaid shortly from a USDA loan that was pending approval.

18. On or about November 11, 2008, LARRY OTTING signed documents related to the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula. Among the documents he signed under penalty of perjury was a Loan Application that stated that none of the down payment money was borrowed.

19. On or about November 11, 2008, LARRY OTTING signed documents related to the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula. Among the documents he signed under penalty of perjury was a Loan Application that stated that he was providing down payment money of Seven Hundred Sixty-One Thousand Ninety-Four Dollars and Forty-Six Cents (\$761,094.46) and that he was also providing another Three Hundred Eighty-Five Thousand Dollars (\$385,000) which was "gift money from family member."

20. On or about November 13, 2008, SHARON PALMER directed Jack Slovak, to wire One Hundred Fifty Thousand Dollars (\$150,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

21. On or about November 14, 2008, SHARON PALMER directed Michael Kirrene, to wire One Hundred Thousand Dollars (\$100,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

22. On or about November 14, 2008, SHARON PALMER sent Michael Kirrene a document which purports to be a deed of trust for the property at 6780 Wheeler Canyon Road in the City of Santa Paula listed in the name of Healthy Family Farms, which purports to secure the One Hundred Thousand Dollars (\$100,000) given to SHARON PALMER by Michael Kirrene with the Wheeler Canyon property.

23. On or about November 14, 2008, SHARON PALMER directed Mark Martin and Susan Hagemeister, to wire One Hundred Fifty Thousand Dollars (\$150,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

24. On or about November 14, 2008, SHARON PALMER sent Mark Martin and Susan Hagemeister a document which purports to be a deed of trust for the property at 6780 Wheeler Canyon Road in the City of Santa Paula listed in the name of Healthy Family Farms, which purports to secure the One Hundred Fifty Thousand Dollars (\$150,000) given to SHARON PALMER by Mark Martin and Susan Hagemeister with the Wheeler Canyon property.

25. On or about November 14, 2008, SHARON PALMER directed The Merc In Golden, LLC, to wire One Hundred Thousand Dollars (\$100,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

26. On or about November 14, 2008, SHARON PALMER sent The Merc In Golden, LLC, a document which purports to be a deed of trust for the property at 6780 Wheeler Canyon Road in the City of Santa Paula listed in the name of Healthy Family Farms, which purports to secure the One Hundred Thousand Dollars (\$100,000) given to SHARON PALMER by The Merc In Golden, LLC, with the Wheeler Canyon property.

27. On or about November 14, 2008, SHARON PALMER directed Eric and Mary Hetherington, to wire Sixty Thousand Dollars (\$60,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

28. On or about November 14, 2008, SHARON PALMER sent Eric and Mary Hetherington a document which purports to be a deed of trust for the property at 6780 Wheeler Canyon Road in the City of Santa Paula listed in the name of Healthy Family Farms, which purports to secure the Sixty Thousand Dollars (\$60,000) given to SHARON PALMER by Eric and Mary Hetherington with the Wheeler Canyon property.

29. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Thousand Dollars (\$100,000) to be wired back to Michael Kirrene from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

30. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Fifty Thousand Dollars (\$150,000) to be wired back to Mark Martin and Susan Hagemeister from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

31. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Thousand Dollars (\$100,000) to be wired back to The Merc In Golden, LLC, from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

32. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused Sixty Thousand Dollars (\$60,000) to be wired back to Eric and Mary Hetherington from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

33. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties and learning further that money from Jack Slovak had already been disbursed from the escrow account as part of the transaction, SHARON PALMER caused escrow officer Shirley Franks to write third-party instructions allowing for the One Hundred Fifty Thousand Dollars (\$150,000) wired in by Jack Slovak and directed that One Hundred Fifty Thousand Dollars (\$150,000) be wired back to LARRY OTTING'S bank account from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

34. On or about November 17, 2008, SHARON PALMER directed Michael Kirrene, to wire One Hundred Thousand Dollars (\$100,000) to SHARON PALMER'S Healthy Family Farms bank account.

35. On or about November 17, 2008, SHARON PALMER directed Mark Martin and Susan Hagemeister to wire One Hundred Fifty Thousand Dollars (\$150,000) to SHARON PALMER'S Healthy Family Farms bank account.

36. On or about November 17, 2008, SHARON PALMER directed The Merc In Golden, LLC to wire One Hundred Thousand Dollars (\$100,000) to SHARON PALMER'S Healthy Family Farms bank account.

37. On or about November 17, 2008, SHARON PALMER directed Eric and Mary Hetherington, to wire Sixty Thousand Dollars (\$60,000) to SHARON PALMER'S Healthy Family Farms bank account.

38. On or about November 17, 2008, SHARON PALMER wired Two Hundred Ninety-Three Thousand Dollars (\$293,000) from her Healthy Family Farms account to LARRY OTTING'S bank account.

39. On or about November 18, 2008, LARRY OTTING wired Four Hundred Forty-Three Thousand Dollars (\$443,000) from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

40. On or about November 18, 2008, SHARON PALMER deposited four separate cashier's checks with a total value of Two Hundred Forty-Six Thousand Dollars (\$246,000) into the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

Count 2

On or about November 14, 2008, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit One Million One Hundred and Fourteen Thousand Five-Hundred Forty-Two Dollars and Ten Cents (\$1,114,542.10), the property of Rabobank, N.A.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

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Count 3

On or about April 01, 2008, in the above named Judicial District, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code 182(a)(1), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Ventura:

1. On or about February 25, 2008, SHARON PALMER entered into a lease-purchase option with the owners of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.
2. On or about February 26, 2008, SHARON PALMER opened an escrow account with Lawyer's Title for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.
3. On or about, February 26, 2008, SHARON PALMER and JAMES CECIL STEWART approached LARRY OTTING about using his "credit profile" to act as straw purchaser for the property at 6780 Wheeler Canyon Road in the City of Santa Paula
4. On or about, February 26, 2008, SHARON PALMER and JAMES CECIL STEWART told LARRY OTTING that SHARON PALMER and JAMES CECIL STEWART did not have the credit to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula, and that if LARRY OTTING agreed to let SHARON PALMER and JAMES CECIL STEWART use LARRY OTTING's credit to purchase the property, SHARON PALMER and JAMES CECIL STEWART would raise all of the down payment monies from investors and make all of the mortgage payments, and LARRY OTTING would receive use of ten acres of the property.
5. On or about April 1, 2008, JAMES CECIL STEWART approached Thomas Elliott about investing in a "co-op" farm in Santa Paula, California. JAMES CECIL STEWART told Thomas Elliott that the farm needed money because the lease was expiring and there was an option to buy.
6. On or about August 16, 2008, LARRY OTTING participated in a loan interview with a representative of Rabobank, N.A., for the purpose of obtaining a loan in his name to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula.
7. On or about August 16, 2008, LARRY OTTING told a representative of Rabobank, N.A. , that none of the down payment monies used to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula would be borrowed.

8. On or about and between August 16, 2008 and November 18, 2008, SHARON PALMER and LARRY OTTING falsely represented to representatives of Rabobank, N.A. that there was a personal relationship between them so the bank would allow SHARON PALMER to "gift" some of the down payment monies used to purchase the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

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17. On or about and between November 10 and November 14, 2008, SHARON PALMER negotiated a One Hundred Thousand Dollar (\$100,000) loan with The Merc In Golden, LLC, telling representatives of The Merc In Golden, LLC that the money would be used for a down payment for the property at 6780 Wheeler Canyon Road in the City of Santa Paula, that the title would be in the name of Healthy Family Farms, and that they would be repaid shortly from a USDA loan that was pending approval.

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23. On or about November 14, 2008, SHARON PALMER directed Mark Martin and Susan Hagemeister, to wire One Hundred Fifty Thousand Dollars (\$150,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

24. On or about November 14, 2008, SHARON PALMER sent Mark Martin and Susan Hagemeister a document which purports to be a deed of trust for the property at 6780 Wheeler Canyon Road in the City of Santa Paula listed in the name of Healthy Family Farms, which purports to secure the One Hundred Fifty Thousand Dollars (\$150,000) given to SHARON PALMER by Mark Martin and Susan Hagemeister with the Wheeler Canyon property.

25. On or about November 14, 2008, SHARON PALMER directed The Merc In Golden, LLC, to wire One Hundred Thousand Dollars (\$100,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

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27. On or about November 14, 2008, SHARON PALMER directed Eric and Mary Hetherington, to wire Sixty Thousand Dollars (\$60,000) to the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

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29. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Thousand Dollars (\$100,000) to be wired back to Michael Kirrene from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

30. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Fifty Thousand Dollars (\$150,000) to be wired back to Mark Martin and Susan Hagemeister from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

31. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused One Hundred Thousand Dollars (\$100,000) to be wired back to The Merc In Golden, LLC, from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

32. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties, SHARON PALMER caused Sixty Thousand Dollars (\$60,000) to be wired back to Eric and Mary Hetherington from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

33. On or about November 17, 2008, upon learning that the bank could deny the loan if it was discovered that down payment monies came from third parties and learning further that money from Jack Slovak had already been disbursed from the escrow account as part of the transaction, SHARON PALMER caused escrow officer Shirley Franks to write third-party instructions allowing for the One Hundred Fifty Thousand Dollars (\$150,000) wired in by Jack Slovak and directed that One Hundred Fifty Thousand Dollars (\$150,000) be wired back to LARRY OTTING'S bank account from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

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36. On or about November 17, 2008, SHARON PALMER directed The Merc In Golden, LLC to wire One Hundred Thousand Dollars (\$100,000) to SHARON PALMER'S Healthy Family Farms bank account.

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39. On or about November 18, 2008, LARRY OTTING wired Four Hundred Forty-Three Thousand Dollars (\$443,000) from the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

40. On or about November 18, 2008, SHARON PALMER deposited four separate cashier's checks with a total value of Two Hundred Forty-Six Thousand Dollars (\$246,000) into the escrow account for the purchase of the property at 6780 Wheeler Canyon Road in the City of Santa Paula.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

Count 4

On or about September 15, 2008, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit Twenty-five Thousand Dollars (\$25,000) the property of Michael Kirrene.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

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Count 5

On or about September 15, 2008, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding Four Hundred Dollars (\$400), and knew and reasonably should have known that said person, Michael Kirrene, was an elder and dependent adult.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 6

On or about September 15, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made. This charge is separate and distinct from counts 7 and 8.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 7

On or about September 15, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made. This charge is separate and distinct from counts 6 and 8.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 8

On or about April 01, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made. This charge is separate and distinct from counts 6 and 7.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 9

On or about November 14, 2008, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit One Hundred Thousand Dollars (\$100,000) the property of Michael Kirrene.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 10

On or about November 14, 2008, in the above named Judicial District, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of Penal Code 368(d), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who committed theft and embezzlement with respect to the property of an elder and dependent adult, said property having a value exceeding Four Hundred Dollars (\$400), and knew and reasonably should have known that said person, Michael Kirrene, was an elder and dependent adult.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 11

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 12

On or about February 01, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 13

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Michael Kirrene within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 14

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 15

On or about November 17, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 16

On or about November 17, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 17

On or about November 14, 2008, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit One Hundred Fifty Thousand Dollars (\$150,000) the property of Mark Martin and Susan Hagemeister.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 18

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Mark Martin and Susan Hagemeister within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 19

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Mark Martin and Susan Hagemeister within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made. This charge is separate and distinct from counts 18 and 20.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 20

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Mark Martin and Susan Hagemeister within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 21

On or about November 17, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 22

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 23

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 24

On or about November 14, 2008, in the above named Judicial District, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit One Hundred Thousand Dollars (\$100,000) the property of The Merc In Golden, LLC.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 25

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to The Merc In Golden, LLC, within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 26

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to The Merc In Golden, LLC, within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 27

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to The Merc In Golden, LLC, within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 28

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 29

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 30

On or about November 17, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding One Hundred Thousand Dollars (\$100,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 31

On or about November 17, 2008, in the above named Judicial District, the crime of GRAND THEFT, in violation of Penal Code 487(a), a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit Sixty Thousand Dollars (\$60,000) the property of Eric and Mary Hetherington.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 32

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Eric Hetherington within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 33

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Eric Hetherington within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 34

On or about November 14, 2008, in the above named Judicial District, the crime of OFFER OR SELL SECURITY, in violation of Corporations Code 25401, a Felony, was committed by SHARON PALMER and JAMES CECIL STEWART, who did willfully and unlawfully offer and sell a security to Eric Hetherington within this state by means of written or oral communication which included an untrue statement of material fact or omitted to state a material fact necessary in order to make the statement made not misleading, in light of the circumstances under which it was made.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

Count 35

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding Sixty Thousand Dollars (\$60,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 36

On or about November 14, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding Sixty Thousand Dollars (\$60,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 37

On or about November 17, 2008, in the above named Judicial District, the crime of MONEY LAUNDERING, in violation of Penal Code 186.10(a), a Felony, was committed by SHARON PALMER and LARRY OTTING and JAMES CECIL STEWART, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding Sixty Thousand Dollars (\$60,000) through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: grand theft, mortgage fraud and securities fraud, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

S/A 1

It is further alleged, pursuant to Penal Code section 186.11(a)(2), that the offenses set forth in counts 1 through 37 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

Notice: An executed sentence for a felony shall be served in state prison pursuant to Penal Code section 1170(h)(3). Pursuant to Penal Code section 1170(f) the above allegation is not subject to dismissal.

S/A 2

It is further alleged that the violations set forth in Counts 1, 3, 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37 were not discovered until August 25, 2010, and that said violations could not have been discovered sooner with the exercise of due diligence. The violations were discovered as follows: LARRY OTTING e-mailed all investors and identified himself as the actual "holder of the first trust deed secured by the farm on Wheeler Canyon Rd in Santa Paula, Calif", within the meaning of Penal Code section 801.5 and 803.

S/A 3

It is further alleged, pursuant to Penal Code 186.10(c)(1)(B), that the violation(s) charged in Count(s) 14, 15, 16, 21, 22, 23, 28, 29, 30, 35, 36 and 37, arose from a common plan or scheme and the aggregate value of the transactions or attempted transactions is of a value exceeding One Hundred Fifty Thousand Dollars (\$150,000) but is less than One Million Dollars (\$1,000,000).

Count 38

On or about February 01, 2008, in the above named Judicial District, the crime of FAILURE TO FILE INCOME TAX RETURNS, in violation of Revenue and Taxation 19706, a Felony, was committed by SHARON PALMER, who, within the time required by the provisions of the Revenue and Taxation Code, willfully and unlawfully failed to file any return or supply any information with intent to evade any tax imposed by Revenue and Taxation Code Parts Ten and Eleven.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 38 COUNTS.

Executed at Ventura, California, on February 27, 2012.

GREGORY D. TOTTEN
District Attorney

CHRISTOPHER S. HARMAN
DECLARANT AND COMPLAINANT

<u>Defendant Name</u>	<u>Agy</u>	<u>Preli</u> <u>m</u>	<u>Bkg #</u>	<u>Next Appearance Date</u>
SHARON PALMER				WARRANT
LARRY OTTING				WARRANT
JAMES CECIL STEWART				WARRANT

STATE OF CALIFORNIA
COUNTY OF VENTURA

FELONY COMPLAINT - ORDER HOLDING TO ANSWER - P.C. SECTION 872

___ It appears to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit :

___ The defendant SHARON PALMER, having waived preliminary hearing to the offense(s) set forth in the complaint.

<u>Count</u>	<u>S/A</u>	<u>Charge</u>	<u>Description</u>
1	0	PC 182(a)(1)	Conspiracy To Commit A Crime
1	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
1	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
2	0	PC 487(a)	Grand Theft Of Personal Property
2	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
3	0	PC 182(a)(1)	Conspiracy To Commit A Crime
3	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
3	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
4	0	PC 487(a)	Grand Theft Of Personal Property
4	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
5	0	PC 368(d)	Theft From Elder Or Dependent Adult
5	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
6	0	CC 25401	Offer or Sell Security
6	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
7	0	CC 25401	Offer or Sell Security
7	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
8	0	CC 25401	Offer or Sell Security
8	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
9	0	PC 487(a)	Grand Theft Of Personal Property
9	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
10	0	PC 368(d)	Theft From Elder Or Dependent Adult
10	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
11	0	CC 25401	Offer or Sell Security
11	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
12	0	CC 25401	Offer or Sell Security
12	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
13	0	CC 25401	Offer or Sell Security

13	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
14	0	PC 186.10(a)	Money Laundering
14	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
14	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
14	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
15	0	PC 186.10(a)	Money Laundering
15	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
15	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
15	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
16	0	PC 186.10(a)	Money Laundering
16	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
16	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
16	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
17	0	PC 487(a)	Grand Theft Of Personal Property
17	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
18	0	CC 25401	Offer or Sell Security
18	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
19	0	CC 25401	Offer or Sell Security
19	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
20	0	CC 25401	Offer or Sell Security
20	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
21	0	PC 186.10(a)	Money Laundering
21	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
21	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
21	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
22	0	PC 186.10(a)	Money Laundering
22	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
22	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
22	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
23	0	PC 186.10(a)	Money Laundering
23	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
23	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
23	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
24	0	PC 487(a)	Grand Theft Of Personal Property
24	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
25	0	CC 25401	Offer or Sell Security

25	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
26	0	CC 25401	Offer or Sell Security
26	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
27	0	CC 25401	Offer or Sell Security
27	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
28	0	PC 186.10(a)	Money Laundering
28	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
28	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
28	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
29	0	PC 186.10(a)	Money Laundering
29	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
29	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
29	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
30	0	PC 186.10(a)	Money Laundering
30	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
30	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
30	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
31	0	PC 487(a)	Grand Theft
31	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
32	0	CC 25401	Offer or Sell Security
32	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
33	0	CC 25401	Offer or Sell Security
33	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
34	0	CC 25401	Offer or Sell Security
34	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
35	0	PC 186.10(a)	Money Laundering
35	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
35	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
36	0	PC 186.10(a)	Money Laundering
36	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
36	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
36	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
37	0	PC 186.10(a)	Money Laundering
37	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
37	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
37	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000

___ The defendant LARRY OTTING, having waived preliminary hearing to the offense(s) set forth in the complaint.

<u>Count</u>	<u>S/A</u>	<u>Charge</u>	<u>Description</u>
1	0	PC 182(a)(1)	Conspiracy To Commit A Crime
1	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
2	0	PC 487(a)	Grand Theft Of Personal Property
14	0	PC 186.10(a)	Money Laundering
14	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
14	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
14	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
15	0	PC 186.10(a)	Money Laundering
15	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
15	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
15	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
16	0	PC 186.10(a)	Money Laundering
16	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
16	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
16	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
21	0	PC 186.10(a)	Money Laundering
21	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
21	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
21	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
22	0	PC 186.10(a)	Money Laundering
22	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
22	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
22	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
23	0	PC 186.10(a)	Money Laundering
23	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
23	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
23	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
28	0	PC 186.10(a)	Money Laundering
28	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
28	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
28	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
29	0	PC 186.10(a)	Money Laundering
29	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over

29	2	PC 801.5	\$500,000 S/A - Statute of Limitation - Fraud Offenses
29	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
30	0	PC 186.10(a)	Money Laundering
30	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
30	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
30	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
35	0	PC 186.10(a)	Money Laundering
35	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
35	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
35	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
36	0	PC 186.10(a)	Money Laundering
36	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
36	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
36	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
37	0	PC 186.10(a)	Money Laundering
37	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
37	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
37	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000

___ The defendant JAMES CECIL STEWART, having waived preliminary hearing to the offense(s) set forth in the complaint.

<u>Count</u>	<u>S/A</u>	<u>Charge</u>	<u>Description</u>
1	0	PC 182(a)(1)	Conspiracy To Commit A Crime
1	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
1	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
2	0	PC 487(a)	Grand Theft Of Personal Property
2	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
3	0	PC 182(a)(1)	Conspiracy To Commit A Crime
3	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
3	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
4	0	PC 487(a)	Grand Theft Of Personal Property
4	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
5	0	PC 368(d)	Theft From Elder Or Dependent Adult
5	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
6	0	CC 25401	Offer or Sell Security
6	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over

			\$500,000
7	0	CC 25401	Offer or Sell Security
7	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
8	0	CC 25401	Offer or Sell Security
8	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
9	0	PC 487(a)	Grand Theft Of Personal Property
9	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
10	0	PC 368(d)	Theft From Elder Or Dependent Adult
10	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
11	0	CC 25401	Offer or Sell Security
11	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
12	0	CC 25401	Offer or Sell Security
12	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
13	0	CC 25401	Offer or Sell Security
13	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
14	0	PC 186.10(a)	Money Laundering
14	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
14	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
14	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
15	0	PC 186.10(a)	Money Laundering
15	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
15	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
15	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
16	0	PC 186.10(a)	Money Laundering
16	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
16	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
16	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
17	0	PC 487(a)	Grand Theft Of Personal Property
17	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
18	0	CC 25401	Offer or Sell Security
18	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
19	0	CC 25401	Offer or Sell Security
19	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
20	0	CC 25401	Offer or Sell Security
20	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
21	0	PC 186.10(a)	Money Laundering
21	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over

21	2	PC 801.5	\$500,000 S/A - Statute of Limitation - Fraud Offenses
21	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
22	0	PC 186.10(a)	Money Laundering
22	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
22	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
22	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
23	0	PC 186.10(a)	Money Laundering
23	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
23	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
23	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
24	0	PC 487(a)	Grand Theft Of Personal Property
24	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
25	0	CC 25401	Offer or Sell Security
25	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
26	0	CC 25401	Offer or Sell Security
26	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
27	0	CC 25401	Offer or Sell Security
27	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
28	0	PC 186.10(a)	Money Laundering
28	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
28	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
28	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
29	0	PC 186.10(a)	Money Laundering
29	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
29	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
29	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
30	0	PC 186.10(a)	Money Laundering
30	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
30	2	PC 801.5	S/A - Statute of Limitation - Fraud Offenses
30	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
31	0	PC 487(a)	Grand Theft
31	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
32	0	CC 25401	Offer or Sell Security
32	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over \$500,000
33	0	CC 25401	Offer or Sell Security
33	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over

			\$500,000
34	0	CC 25401	Offer or Sell Security
34	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
35	0	PC 186.10(a)	Money Laundering
35	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
35	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
35	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
36	0	PC 186.10(a)	Money Laundering
36	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
36	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
36	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000
37	0	PC 186.10(a)	Money Laundering
37	1	PC 186.11(a)(2)	S/A - Enh - Excessive Loss Over
			\$500,000
37	2	PC 801.5	S/A - Statute of Limitation - Fraud
			Offenses
37	3	PC 186.10(c)(1)(B)	S/A - Excessive Loss-Over \$150,000

Exceptions/ Additions/ Conditions: _____

I order that defendant(s) be held to answer to same.

I order that defendant(s) be held to answer therefore and be admitted to bail in the sum of:

SHARON PALMER _____ Dollars

LARRY OTTING _____ Dollars

JAMES CECIL STEWART _____ Dollars

Date: _____

Magistrate

Judge of the Superior Court, sitting

<u>Defendant</u>	<u>Next Appearance and court room</u>
SHARON PALMER	
LARRY OTTING	
JAMES CECIL STEWART	

In my capacity as Judge of the Superior Court, and pursuant to stipulation by both counsel, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____

Judge of the Superior Court