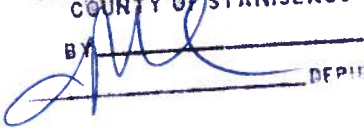


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FILED  
12 DEC 27 AM 9:59  
CLERK OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS  
BY  DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF STANISLAUS  
10

11  
12 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiff,

14 v.

15 **BLAS G. ARREOLA (DOB: 02/03/75),**  
16 **NANCY I. ARREOLA (DOB: 08/29/78),**

17 Defendants.

Case No. 1452797

**FELONY COMPLAINT**

Date: December , 2012

Time:

Dept:

Judge:

Action Filed: December 27, 2012

18  
19 The Attorney General of the State of California hereby accuses Defendants BLAS G.  
20 ARREOLA and NANCY I. ARREOLA, of the following crimes at and in the County of  
21 Stanislaus, State of California:  
22

23 **COUNT ONE**  
24 **[IDENTITY THEFT]**

25 For a cause of action, complainant complains and states:

26 On or about September 7, 2011, in the County of Stanislaus, Defendants did willfully and  
27 unlawfully obtain personal identifying information of Josephine Mirando, to wit, her NAME, and  
28 used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to obtain,

1 and attempt to obtain credit, goods, services, real property, or medical information without the  
2 consent of Josephine Mirando, in violation of Penal Code section 530.5, subdivision (a), a felony.

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4 **COUNT TWO**  
5 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

6 For a further and separate cause of complaint, being a different offense from but connected  
7 in its commission with the charge set forth in Count One, complainant complains and states:

8 On or about September 7, 2011, in the County of Stanislaus, Defendants did unlawfully and  
9 knowingly procure and offer a false and forged instrument, to wit: STANISLAUS COUNTY  
10 RECORDER'S DOCUMENT # 2011-0074064-00, to be filed, registered, and recorded in a  
11 public office within this state, which instrument, if genuine, might be filed, registered, and  
12 recorded under a law of this state or the United States, in violation of Penal Code section 115,  
13 subdivision (a), a felony.

14 **COUNT THREE**  
15 **[IDENTITY THEFT]**

16 For a further and separate cause of complaint, being a different offense from but connected  
17 in its commission with the charges set forth in Counts One and Two, complainant complains and  
18 states:

19 On or about October 7, 2011, in the County of Stanislaus, Defendants did willfully and  
20 unlawfully obtain personal identifying information of Francisco Godinez, to wit, his NAME, and  
21 used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to obtain,  
22 and attempt to obtain credit, goods, services, real property, or medical information without the  
23 consent of Francisco Godinez, in violation of Penal Code section 530.5, subdivision (a), a felony.

24 **COUNT FOUR**  
25 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

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

1 On or about October 7, 2011, in the County of Stanislaus, Defendants did unlawfully and  
2 knowingly procure and offer a false and forged instrument, to wit: STANISLAUS COUNTY  
3 RECORDER'S DOCUMENT # 2011-83532-00, to be filed, registered, and recorded in a public  
4 office within this state, which instrument, if genuine, might be filed, registered, and recorded  
5 under a law of this state or the United States, in violation of Penal Code section 115, subdivision  
6 (a), a felony.

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8 **COUNT FIVE**  
9 **[IDENTITY THEFT]**

10 For a further and separate cause of complaint, being a different offense from but connected  
11 in its commission with the charges set forth in Counts One through Four, complainant complains  
12 and states:

13 On or about November 17, 2011, in the County of Stanislaus, Defendants did willfully and  
14 unlawfully obtain personal identifying information of Heriberta Orozco, to wit, her NAME, and  
15 used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to obtain,  
16 and attempt to obtain credit, goods, services, real property, or medical information without the  
17 consent of Heriberta Orozco, in violation of Penal Code section 530.5, subdivision (a), a felony.

18 **COUNT SIX**  
19 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

20 For a further and separate cause of complaint, being a different offense from but connected  
21 in its commission with the charges set forth in Counts One through Five, complainant complains  
22 and states:

23 On or about November 17, 2011, in the County of Stanislaus, Defendants did unlawfully  
24 and knowingly procure and offer a false and forged instrument, to wit: STANISLAUS COUNTY  
25 RECORDER'S DOCUMENT # 2011-95210-00, to be filed, registered, and recorded in a public  
26 office within this state, which instrument, if genuine, might be filed, registered, and recorded  
27 under a law of this state or the United States, in violation of Penal Code section 115, subdivision  
28 (a), a felony.

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**COUNT SEVEN  
[IDENTITY THEFT]**

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

On or about November 30, 2011, in the County of Stanislaus, Defendants did willfully and unlawfully obtain personal identifying information of Seddrick Henderson, to wit, his NAME, and used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to obtain, and attempt to obtain credit, goods, services, real property, or medical information without the consent of Seddrick Henderson, in violation of Penal Code section 530.5, subdivision (a), a felony.

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**COUNT EIGHT  
[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

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

On or about November 30, 2011, in the County of Stanislaus, Defendants did unlawfully and knowingly procure and offer a false and forged instrument, to wit: STANISLAUS COUNTY RECORDER'S DOCUMENT # 2011-98164-00, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

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**COUNT NINE  
[COUNTERFEIT SEAL]**

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

1 On or about November 30, 2011, in the County of Stanislaus, Defendants did unlawfully  
2 and with the intent to defraud, forge and counterfeit A NOTARY PUBLIC SEAL registered to  
3 California Notary Mark A. Kleingartner, Commission #1865586, onto a Grant Deed for real  
4 property (Stanislaus County Recorder's Document # 2011-98164-00), and did falsely make,  
5 forge, or counterfeit an impression purporting to be an impression of said seal, and did possess  
6 such counterfeited seal and impression, knowing it to be counterfeited and did conceal the fact  
7 that the seal was counterfeit, in violation of Penal Code section 472, a felony.

8 **COUNT TEN**  
9 **[IDENTITY THEFT]**

10 For a further and separate cause of complaint, being a different offense from but connected  
11 in its commission with the charges set forth in Counts One through Nine, complainant complains  
12 and states:

13 On or about December 20, 2011, in the County of Stanislaus, Defendants did willfully and  
14 unlawfully obtain personal identifying information of Lilia Tapia, to wit, her NAME, and used  
15 that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to obtain, and  
16 attempt to obtain credit, goods, services, real property, or medical information without the  
17 consent of Lilia Tapia, in violation of Penal Code section 530.5, subdivision (a), a felony.

18 **COUNT ELEVEN**  
19 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

20 For a further and separate cause of complaint, being a different offense from but connected  
21 in its commission with the charges set forth in Counts One through Ten, complainant complains  
22 and states:

23 On or about December 20, 2011, in the County of Stanislaus, Defendants did unlawfully  
24 and knowingly procure and offer a false and forged instrument, to wit: STANISLAUS COUNTY  
25 RECORDER'S DOCUMENT # 2011-104144-00, to be filed, registered, and recorded in a public  
26 office within this state, which instrument, if genuine, might be filed, registered, and recorded  
27 under a law of this state or the United States, in violation of Penal Code section 115, subdivision  
28 (a), a felony.

1 **COUNT TWELVE**  
2 **[IDENTITY THEFT]**

3 For a further and separate cause of complaint, being a different offense from but connected  
4 in its commission with the charges set forth in Counts One through Eleven, complainant  
5 complains and states:

6 On or about April 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
7 willfully and unlawfully obtain personal identifying information of Ty Ung, to wit, his NAME,  
8 and used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and to  
9 obtain, and attempt to obtain credit, goods, services, real property, or medical information without  
10 the consent of Ty Ung, in violation of Penal Code section 530.5, subdivision (a), a felony.

11 **COUNT THIRTEEN**  
12 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

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

16 On or about April 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
17 unlawfully and knowingly procure and offer a false and forged instrument, to wit:  
18 STANISLAUS COUNTY RECORDER'S DOCUMENT # 2012-31799-00, to be filed, registered,  
19 and recorded in a public office within this state, which instrument, if genuine, might be filed,  
20 registered, and recorded under a law of this state or the United States, in violation of Penal Code  
21 section 115, subdivision (a), a felony.

22 **COUNT FOURTEEN**  
23 **[FRAUDULENT CONVEYANCE OF LAND WITH INTENT TO DELAY CREDITORS]**

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

1 On or about April 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA  
2 fraudulently conveyed land, to wit: 4640 Crimson Way, Turlock, CA 95382 (Stanislaus County  
3 Recorder's Document # 2011-31799-00) with intent to defeat, hinder, or delay creditors or others  
4 of their just debts, damages, or demands, in violation of Penal Code section 531, a misdemeanor.

5 **COUNT FIFTEEN**  
6 **[IDENTITY THEFT]**

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

10 On or about May 14, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
11 willfully and unlawfully obtain personal identifying information of Pedro Serna, to wit, his  
12 NAME, and used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and  
13 to obtain, and attempt to obtain credit, goods, services, real property, or medical information  
14 without the consent of Pedro Serna, in violation of Penal Code section 530.5, subdivision (a), a  
15 felony.

16 **COUNT SIXTEEN**  
17 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

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

21 On or about May 14, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
22 unlawfully and knowingly procure and offer a false and forged instrument, to wit:  
23 STANISLAUS COUNTY RECORDER'S DOCUMENT # 2012-42260-00, to be filed, registered,  
24 and recorded in a public office within this state, which instrument, if genuine, might be filed,  
25 registered, and recorded under a law of this state or the United States, in violation of Penal Code  
26 section 115, subdivision (a), a felony.

27 **COUNT SEVENTEEN**  
28 **[FRAUDULENT CONVEYANCE OF LAND WITH INTENT TO DELAY CREDITORS]**

1 For a further and separate cause of complaint, being a different offense from but connected  
2 in its commission with the charges set forth in Counts One through Sixteen, complainant  
3 complains and states:

4 On or about May 14, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA  
5 fraudulently conveyed land, to wit: 4640 Crimson Way, Turlock, CA 95382 (Stanislaus County  
6 Recorder's Document # 2011-42260-00) with intent to defeat, hinder, or delay creditors or others  
7 of their just debts, damages, or demands, in violation of Penal Code section 531, a misdemeanor.

8 **COUNT EIGHTEEN**  
9 **[IDENTITY THEFT]**

10 For a further and separate cause of complaint, being a different offense from but connected  
11 in its commission with the charges set forth in Counts One through Seventeen, complainant  
12 complains and states:

13 On or about June 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
14 willfully and unlawfully obtain personal identifying information of Artemio Nuestro, to wit, his  
15 NAME, and used that information for an unlawful purpose, i.e., to commit bankruptcy fraud, and  
16 to obtain, and attempt to obtain credit, goods, services, real property, or medical information  
17 without the consent of Artemio Nuestro, in violation of Penal Code section 530.5, subdivision (a),  
18 a felony.

19 **COUNT NINETEEN**  
20 **[OFFERING FALSE OR FORGED INSTRUMENTS FOR FILING]**

21 For a further and separate cause of complaint, being a different offense from but connected  
22 in its commission with the charges set forth in Counts One through Eighteen, complainant  
23 complains and states:

24 On or about June 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA did  
25 unlawfully and knowingly procure and offer a false and forged instrument, to wit:  
26 STANISLAUS COUNTY RECORDER'S DOCUMENT # 2012-51973-00, to be filed, registered,  
27 and recorded in a public office within this state, which instrument, if genuine, might be filed,  
28

1 registered, and recorded under a law of this state or the United States, in violation of Penal Code  
2 section 115, subdivision (a), a felony.

3 **COUNT TWENTY**  
4 **[FRAUDULENT CONVEYANCE OF LAND WITH INTENT TO DELAY CREDITORS]**

5 For a further and separate cause of complaint, being a different offense from but connected  
6 in its commission with the charges set forth in Counts One through Nineteen, complainant  
7 complains and states:

8 On or about June 12, 2012, in the County of Stanislaus, Defendant BLAS ARREOLA  
9 fraudulently conveyed land, to wit: 4640 Crimson Way, Turlock, CA 95382 (Stanislaus County  
10 Recorder's Document # 2012-51973-00) with intent to defeat, hinder, or delay creditors or others  
11 of their just debts, damages, or demands, in violation of Penal Code section 531, a misdemeanor.

12 **COUNT TWENTY-ONE**  
13 **[FRAUDULENT CONVEYANCE OF LAND WITH INTENT TO DELAY CREDITORS]**

14 For a further and separate cause of complaint, being a different offense from but connected  
15 in its commission with the charges set forth in Counts One through Twenty, complainant  
16 complains and states:

17 On or about August 27, 2012, in the County of Stanislaus, Defendants fraudulently  
18 conveyed land, to wit: 4640 Crimson Way, Turlock, CA 95382 (Stanislaus County Recorder's  
19 Document # 2012-75952-00) with intent to defeat, hinder, or delay creditors or others of their just  
20 debts, damages, or demands, in violation of Penal Code section 531, a misdemeanor.

21  
22 **COUNT TWENTY-TWO**  
23 **[FRAUDULENT CONVEYANCE OF LAND WITH INTENT TO DELAY CREDITORS]**

24 For a further and separate cause of complaint, being a different offense from but connected  
25 in its commission with the charges set forth in Counts One through Twenty-One, complainant  
26 complains and states:  
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1 On or about August 29, 2012, in the County of Stanislaus, Defendants fraudulently  
2 conveyed land, to wit: 400 Hedstrom Road, Turlock, CA 95382 (Stanislaus County Recorder's  
3 Document # 2012-76890-00) with intent to defeat, hinder, or delay creditors or others of their just  
4 debts, damages, or demands, in violation of Penal Code section 531, a misdemeanor.

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6 **COUNT TWENTY-THREE**  
7 **[CONSPIRACY TO FRAUDULENTLY CONVEY LAND WITH INTENT TO DELAY**  
8 **CREDITORS]**

9 For a further and separate cause of complaint, being a different offense from but connected  
10 in its commission with the charges set forth in Counts One through Twenty-Two, complainant  
11 complains and states:

12 On and between September 7, 20<sup>1</sup>01 and August 29, 2012, in the County of Stanislaus,  
13 Defendants BLAS G. ARREOLA and NANCY I. ARREOLA did unlawfully conspire together  
14 and with another person and persons whose identity is unknown to FRAUDULENTLY  
15 CONVEY LAND WITH INTENT TO DELAY CREDITORS, in violation of Penal Code  
16 sections 182, subdivision (a)/531, a felony; and, pursuant to and for the purpose of carrying out  
17 the objectives and purposes of the conspiracy, Defendants committed one or more of the  
18 following overt acts at and in the County of Stanislaus:

19 OVERT ACT ONE as to Defendants

20 Recorded a Grant Deed conveying an interest in real property to Josephine Mirando, a  
21 person in bankruptcy.

22 OVERT ACT TWO as to Defendants

23 Recorded a Grant Deed conveying an interest in real property to Francisco Godinez, a  
24 person in bankruptcy.

25 OVERT ACT THREE as to Defendants

26 Recorded a Grant Deed conveying an interest in real property to Heriberta Orozco, a person  
27 in bankruptcy.

28 OVERT ACT FOUR as to Defendants

1 Recorded a Grant Deed conveying an interest in real property to Seddrick Henderson, a  
2 person in bankruptcy.

3 OVERT ACT FIVE as to Defendants

4 Recorded a Grant Deed conveying an interest in real property to Lilia Tapia, a person in  
5 bankruptcy.

6 OVERT ACT SIX as to Defendants

7 Recorded a Grant Deed conveying an interest in real property to Ty Ung, a person in  
8 bankruptcy.

9 OVERT ACT SEVEN as to Defendants

10 Recorded a Grant Deed conveying an interest in real property to Pedro Serna, a person in  
11 bankruptcy.

12 OVERT ACT EIGHT as to Defendants

13 Recorded a Grant Deed conveying an interest in real property to Artemio Nuestro, a person  
14 in bankruptcy.

15 OVERT ACT NINE as to Defendants

16 Recorded a Grant Deed conveying an interest in real property to Black's Edition, LLC on  
17 August 27, 2012.

18 OVERT ACT TEN as to Defendants

19 Recorded a Grant Deed conveying an interest in real property to Black's Edition, LLC on  
20 August 29, 2012.

21  
22 **COUNT TWENTY-FOUR**  
23 **[ATTEMPTING TO OFFER FALSE OR FORGED INSTRUMENTS FOR FILING]**

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

27 On or about August 27, 2012, in the County of Stanislaus, Defendants did unlawfully and  
28 knowingly attempt to procure and offer false and forged instruments, to wit: REVOCATIONS

1 OF DEED (for previously recorded Stanislaus County Recorder's Document Nos. 2011-74064-  
2 00, 2011-83532-00, 2011-95210-00, 2011-98164-00, 2011-104144-00, 2012-31799-00, 2012-  
3 42260-00, and 2012-51973-00), to be filed, registered, and recorded in a public office within this  
4 state, which instruments, if genuine, might be filed, registered, and recorded under a law of this  
5 state or the United States, in violation of Penal Code sections 664/115, subdivision (a), a felony.

6 **SPECIAL ALLEGATION ONE--FILING FALSE DOCUMENTS RELATING TO**  
7 **SINGLE-FAMILY RESIDENCES**

8 It is further alleged as to Counts Two, Four, Six, Eight, and Eleven that Defendants filed  
9 and forged a document or instrument with the county recorder which affected title to, placed an  
10 encumbrance on, and placed an interest secured by a mortgage and deed of trust on, real property,  
11 Assessor's Parcel Number 087-018-024 assigned to real property located at 4640 Crimson Way,  
12 Turlock, CA 95382, which consisted of not more than four dwelling units, with knowledge that  
13 the document was false and forged, as set forth in Penal Code section 115.5.

14 **SPECIAL ALLEGATION TWO--FILING FALSE DOCUMENTS RELATING TO**  
15 **SINGLE-FAMILY RESIDENCES**

16 It is further alleged as to Counts Thirteen, Sixteen, and Nineteen that Defendant BLAS  
17 ARREOLA filed and forged a document or instrument with the county recorder which affected  
18 title to, placed an encumbrance on, and placed an interest secured by a mortgage and deed of trust  
19 on, real property, Assessor's Parcel Number 087-018-024 assigned to real property located at  
20 4640 Crimson Way, Turlock, CA 95382, which consisted of not more than four dwelling units,  
21 with knowledge that the document was false and forged, as set forth in Penal Code section 115.5.

22 **SPECIAL ALLEGATION THREE—OFFENSE WHILE ON BAIL OR OWN**  
23 **RECOGNIZANCE**

24 It is further alleged that at the time of the commission of the offenses charged in Counts  
25 Twenty-One, Twenty-Two, and Twenty-Four Defendant BLAS ARREOLA, was released from  
26 custody on bail on June 28, 2012, following an arrest the same day for felony violations of Penal  
27 Code Sections 460(b), 115(a), and 470(a), Booking Number 1306565, within the meaning of  
28 Penal Code section 12022.1.

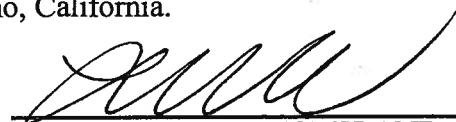
1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 18th day of December, 2012, at Fresno, California.

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5



LESLIE W. WESTMORELAND  
Deputy Attorney General  
Mortgage Fraud Strike Force

6

BAIL RECOMMENDATION: \$412,000 as to BLAS ARREOLA; \$201,000 as to NANCY

7

8

ARREOLA.

9

DISCOVERY REQUEST

10

Pursuant to the provisions of Penal Code sections 1054.5(b) and 1054.3, it is hereby  
11 requested that all materials and information as set forth in Penal Code section 1054.3 (a) and (b)  
12 be provided to the People.

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