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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES
2022 MAY 25 A 9:30
STEPHEN ANDER
EXECUTIVE DEPUTY CLERK
BY _____

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

PEOPLE OF THE STATE OF CALIFORNIA,

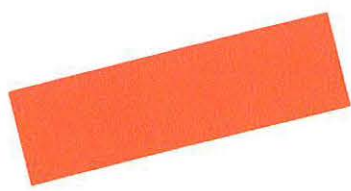
Plaintiff,

v.

1. THOMAS MANEY (5/03/1939)
2. MARIAN DUCREUX (4/11/1954)
3. MARIA ROSALES (6/18/1982)
4. WAYNE PEDERSEN (9/29/1963)
5. ABIE TOIBER (6/19/1975)
6. JEFFREY MCAREE (6/13/1961)
7. NILE ALMUDARRIS (1/29/1958)
8. JOSEPHINE HUANG (11/9/1970)
9. TERRENCE HANSEN (7/9/1940)

Defendants.

Case No. **NA119686**
**FELONY COMPLAINT FOR
ARREST WARRANT
AND EXTRADITION**



1 The Attorney General of the State of California, by this Complaint, accuses the above
2 named defendants of the following crimes:

3 **COUNT ONE**

4 On or between June 1, 2015, and September 24, 2019, in the County of Kern and Los
5 Angeles, State of California, the crime of CONSPIRACY TO COMMIT A CRIME, in violation
6 of Penal Code section 182(a)(1), a Felony, was committed by THOMAS MANEY, MARIA
7 ROSALES, MARIAN DUCREUX, WAYNE PEDERSEN, NILE ALMUDARRIS, JEFFREY
8 MCAREE, ABIE TOIBER, JOSEPHINE HUANG, AND TERRENCE HANSEN who did
9 unlawfully conspire together and with another person and persons whose identity is unknown to
10 commit the crimes of Grand Theft in violation of Penal Code section 487(a), a Felony; Securities
11 Fraud in violation of Corporations Code section 25401, a Felony; Use of a Device, Artifice or
12 Scheme to Defraud in Connection with the Offer or Sale of a Security, in violation of
13 Corporations Code section 25541, a Felony; that pursuant to and for the purpose of carrying out
14 the objects and purposes of aforesaid conspiracy, the said defendants committed the following
15 overt acts in the County of Kern and Los Angeles County:

16 **OVERT ACTS**

17 **I**

18
19 On or about October 2008, TERRENCE HANSEN filed with the California Secretary of
20 State a Certificate of Limited Partnership for the Silver Saddle Commercial Development as a
21 general partner with THOMAS MANEY as the agent for service of process.

22 **II**

23 On or about May 2018, attorney Jeff Hansen filed with the California Secretary of State a
24 Statement of Information for Silver Saddle Ranch and Club, Inc., listing THOMAS MANEY as
25 the Chief Executive Officer, NILE ALMUDARRIS as the Secretary, and MARIA ROSALES as
26 the Chief Financial Officer.

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28

1 III

2 On or about April 1, 2011 to September 24, 2019, THOMAS MANEY, WAYNE
3 PEDERSEN, MARIA ROSALES, MARIAN DUCREUX, NILE ALMUDARRIS, JEFFREY
4 MCAREE, ABIE TOIBER, and JOSEPHINE HUANG with a company called Silver Saddle
5 Commercial Development began selling securities in the form of a one four thousandth
6 fractionalized interest in eight parcels of vacant desert land in Kern County and partial ownership
7 of a Capital Improvement Fund (CIF) consisting of money set aside to improve or develop the
8 eight parcels. The investment entity was called the Galileo Project.

9 IV

10
11 On or about April 1, 2011 to September 24, 2019, THOMAS MANEY, MARIAN
12 DUCREUX, NILE ALMUDARRIS, JEFFREY MCAREE, ABIE TOIBER, JOSEPHINE
13 HUANG, and others deliberately targeted investors from the Chinese, Filipino, and Latino
14 communities, many of whom spoke little or no English and were not able to read the sales
15 documents that accompanied their investment, by having raffles at local markets in Los Angeles
16 County for free dinners that eventually led them to the Silver Saddle Ranch for a sales
17 presentation filled with misrepresentations.

18 V

19 On or about April 1, 2011 to September 24, 2019, THOMAS MANEY and others directed
20 salespersons to state to investors that the Galileo Project Development Account (Capital
21 Improvement Fund (CIF)) would hold \$8,000,000 and that there was an option to own Silver
22 Saddle Ranch at the price of \$500,000. Salespersons further stated that the land was already
23 serviced by paved roads, electricity, telephone, and piped water bordered by thousands of
24 individually zoned residential, multiple family and estate properties as well as new homes and
25 construction.

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VI

April 1, 2011 to September 24, 2019, investors were provided with documentation by THOMAS MANEY, MARIAN DUCREUX, NILE ALMUDARRIS, JEFFREY MCAREE, ABIE TOIBER, and JOSEPHINE HUANG stating that a portion of their money would be set aside for the future development of the Galileo property in a Capital Improvement Fund (CIF). Promotional materials represented that the fund was projected to contain eight million dollars (\$8,000,000) after all four thousand units were sold. However, by May 2018 the CIF balance was close to zero.

VII

Between September 2017 and May 2018, WAYNE PEDERSEN purchased parcels of land from tax auctions in Kern County that were titled in the name of MARIA ROSALES with prices ranging from \$200 to \$400. MARIA ROSALES then deeded those parcels to Silver Saddle Commercial Development. Silver Saddle Ranch and Club as well Silver Saddle Commercial Development could not purchase these lots because they did not pay property taxes that were owed to the county. Those parcels were then sold to investors at prices ranging from approximately \$20,000 to \$40,000.

VIII

Between 2013 and approximately May 2018, THOMAS MANEY and others removed or failed to deposit more than 1.3 million dollars (\$1,300,000) that should have been allocated to the Capital Improvement Fund Bank Account.

IX

Between June 1, 2015, and September 24, 2019, investors were verbally told by MARIAN DUCREUX, NILE ALMUDARRIS, JEFFREY MCAREE, ABIE TOIBER, and JOSEPHINE HUANG that the Galileo land would be developed into commercial and industrial projects. However, investors were not informed that none of the eight parcels making up Galileo land were zoned for commercial or industrial use, or that a portion of the land was zoned for conservation.

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X

On or about June of 2015, investor, Anita Rodal informed THOMAS MANEY in writing that the Galileo land was not zoned for commercial use and that a portion of the land was zoned for conservation. Her written communication was forwarded to MARIA ROSALES and WAYNE PEDERSEN.

XI

On or about approximately May 20, 2019, TERRENCE HANSEN emailed Leonardo Lopez on how the Galileo Association's 2017 balance sheets were adjusted. He stated that the \$736,330 worth of Notes were never transferred into the Association account when the money was transferred out of the account. He then stated in order to balance the books, the amount of \$736,330 was reclassified as a receivable from Silver Saddle Ranch and Club or Silver Saddle Commercial Development. He further states that CIF funds were used in the operations of Silver Saddle Commercial Development.

XII

In the summer of 2017, THOMAS MANEY advised Silver Saddle Commercial Development Controller, Jamie Winton, that he did not want there to be an internet signal at the pavilion where sales presentations occurred, because he did not want guests to research the investment while it was being sold to them.

XIII

In December of 2017, MARIAN DUCREUX and others sold an interest in the Galileo Project to Gemmalyn Baptista representing that the area was commercially and industrially zoned for development. After discovering that the land was not zoned for commercial or industrial use, she informed MARIAN DUCREUX of this fact in writing and asked for a refund. Her written communication was forwarded to MARIA ROSALES and others associated with Silver Saddle Commercial Development.

///

1 **XIV**

2 In approximately December 2017, Jamie Winton moderated the annual meeting of an
3 association of Galileo investors. THOMAS MANEY ordered her to discuss the Capital
4 Improvement Fund's bank account at the meeting as if it contained \$1,300,000 that was actually
5 missing from the account.
6

7 **XV**

8 On approximately February 13, 2018, THOMAS MANEY instructed Clifford Reynolds to
9 create a replacement value for Silver Saddle Ranch and Club of \$12,000,000 by creating a list of
10 assets when Silver Saddle Ranch and Club was only worth \$500,000. The replacement value of
11 \$12,000,000 was then used by salespersons in presentations to investors.
12

13 **XVI**

14 Between May 2018 and August 2018, after the issuance of the Department of Business
15 Oversight (DBO) Desist and Refrain Order, THOMAS MANEY and MARIA ROSALES asked
16 Jamie Winton to fill the Capital Improvement Fund (CIF) with investment notes to create an
17 appearance that the missing money had been invested on behalf of investors.
18

19 **XVII**

20 Between approximately August 2018 and February 2019, at the direction of THOMAS
21 MANEY, others assigned investment notes to the Galileo Project Capital Improvement Fund
22 (CIF), covering up (in lieu) the absence of funds in its bank account.
23

24 **XVIII**

25 Despite the existence of the DBO Desist and Refrain Order, THOMAS MANEY,
26 MARIAN DUCREUX, ABIE TOIBER, JOSEPHINE HUANG, JEFFREY MCAREE, and others
27 continued selling interests in the Galileo project through at least December 2018.
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XIX

Between approximately August 11, 2018 and October 21, 2018, MARIAN DUCREUX sold interests in the Galileo Project to investors by knowingly stating untrue statements of a material fact and omitting material facts which omissions made statements misleading to investors.

XX

Between approximately May 26, 2018 and December 2, 2018, JEFFREY MCAREE AND THOMAS MANEY sold interests in the Galileo Project to investors by knowingly stating untrue statements of a material fact and omitting material facts which omissions made statements misleading to investors.

XXI

Between approximately August 19, 2018 and October 13, 2018, NILE ALMUDARRIS AND THOMAS MANEY sold interests in the Galileo Project to investors by knowingly stating untrue statements of a material fact and omitting material facts which omissions made statements misleading to investors.

XXII

Between approximately May 13, 2018 and November 11, 2018, ABIE TOIBER sold interests in the Galileo Project to investors by knowingly stating untrue statements of a material fact and omitting material facts which omissions made statements misleading to investors.

XXIII

On or around August 26, 2018 and September 22, 2018, JOSEPHINE HUANG sold interests in the Galileo Project to investors by knowingly stating untrue statements of a material fact and omitting material facts which omissions made statements misleading to investors.

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1 **XXIV**

2 On or around December 9, 2018, JOSEPHINE HUANG and THOMAS MANEY sold an
3 interest in the Galileo Project to Grace Su by knowingly stating untrue statements of a material
4 fact and omitting material facts which omissions made statements misleading to investors.

5 **XXV**

6 On or around January 8, 2019, Debra Nicastro transferred approximately \$302,782 from
7 the Galileo investors' Capital Improvement Fund bank account into a Silver Saddle Commercial
8 Development bank account at the direction of THOMAS MANEY.

9 **XXVI**

10 Between March 15, 2019 and May 30, 2019, Thuy Le and others sent out emails to
11 investors in THOMAS MANEY's name claiming that Silver Saddle personnel would continue to
12 work for the future success of the Galileo Project and encouraging investors to continue making
13 payments on interests that were sold.

14
15 **COUNT TWO**

16 On or around and between June 1, 2015, and September 24, 2019, in the County of Kern
17 and Los Angeles, State of California, the crime of USE OF A DEVICE, ARTIFICE OR
18 SCHEME TO DEFRAUD IN CONNECTION WITH THE SALE OF A SECURITY in violation
19 of Corporations Code section 25541, a Felony was committed by THOMAS MANEY, MARIA
20 ROSALES, MARIAN DUCREUX, WAYNE PEDERSON, ABIE TOIBER, JEFFREY
21 MCAREE, NILE ALMUDARRIS, TERRENCE HANSEN, AND JOSEPHINE HUANG.

22
23 **COUNT THREE**

24 On or around and between June 1, 2015, and September 24, 2019, in the County of Kern
25 State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of
26 Penal Code section 487(a), a Felony was committed by THOMAS MANEY, who did unlawfully
27 take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to
28 wit: money belonging to the Galileo Commercial Property Owners Association, Inc.

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COUNT FOUR

On or around August 11, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by MARIAN DUCREUX, who did unlawfully sell a security to Doris Agtarap by means of material misrepresentations or omissions.

COUNT FIVE

On or around August 11, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by MARIAN DUCREUX, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$7,193 belonging to Doris Agtarap.

COUNT SIX

On or around September 22, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by MARIAN DUCREUX, who did unlawfully sell a security to Leticia Regis by means of material misrepresentations or omissions.

COUNT SEVEN

On or around September 22, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by MARIAN DUCREUX, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$26,962.10 belonging to Leticia Regis.

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COUNT EIGHT

On or around October 21, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by MARIAN DUCREUX, who did unlawfully sell a security to Mary Jean Stover by means of material misrepresentations or omissions.

COUNT NINE

On or around October 21, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by MARIAN DUCREUX, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$7,193 belonging to Mary Jean Stover.

COUNT TEN

On or around May 26, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by JEFFREY MCAREE and THOMAS MANEY, who did unlawfully sell a security to Conrado Sese by means of material misrepresentations or omissions.

COUNT ELEVEN

On or around May 26, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by JEFFREY MCAREE AND THOMAS MANEY, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$6,793 belonging to Conrado Sese.

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COUNT TWELVE

On or around September 23, 2018 and December 2, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by JEFFREY MCAREE and THOMAS MANEY, who did unlawfully sell a security to Craig and Cynthia Tognazzini by means of material misrepresentations or omissions.

COUNT THIRTEEN

On or around September 23, 2018 and December 2, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by JEFFREY MCAREE and THOMAS MANEY, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$50,000 belonging to Craig and Cynthia Tognazzini.

COUNT FOURTEEN

On or around August 19, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by NILE ALMUDARRIS and THOMAS MANEY, who did unlawfully sell a security to Aldo Ramirez by means of material misrepresentations or omissions.

COUNT FIFTEEN

On or around August 19, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by NILE ALMUDARRIS AND THOMAS MANEY, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$34,129 belonging to Aldo Ramirez.

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COUNT SIXTEEN

On or around October 13, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by NILE ALMUDARRIS and THOMAS MANEY, who did unlawfully sell a security to Craig and Alicia and Alfredo Huyata by means of material misrepresentations or omissions.

COUNT SEVENTEEN

On or around October 13, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by NILE ALMUDARRIS and THOMAS MANEY, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$29,831 belonging to Alicia and Alfredo Huyata.

COUNT EIGHTEEN

On or around August 4, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by ABIE TOIBER, who did unlawfully sell a security to Chavela Orosco by means of material misrepresentations or omissions.

COUNT NINETEEN

On or around August 4, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by ABIE TOIBER, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$31,323.80 belonging to Chavela Orosco.

COUNT TWENTY

On or around July 1, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was

1 committed by ABIE TOIBER, who did unlawfully sell a security to Carlos Avalos Aviles by
2 means of material misrepresentations or omissions.

3
4 **COUNT TWENTY-ONE**

5 On or around July 1, 2018, in the County of Kern, State of California, the crime of GRAND
6 THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was
7 committed by ABIE TOIBER, who did unlawfully take money and personal property of a value
8 exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$14,296.80 belonging to Carlos Avalos
9 Aviles.

10
11 **COUNT TWENTY-TWO**

12 On or around August 4, 2018, in the County of Kern, State of California, the crime of
13 SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was
14 committed by ABIE TOIBER, who did unlawfully sell a security to Rosa Moran by means of
15 material misrepresentations or omissions.

16
17 **COUNT TWENTY-THREE**

18 On or around August 4, 2018, in the County of Kern, State of California, the crime of
19 GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a
20 Felony was committed by ABIE TOIBER, who did unlawfully take money and personal property
21 of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$15,871.43 belonging to Rosa
22 Moran.

23 **COUNT TWENTY-FOUR**

24 On or around August 18, 2018, in the County of Kern, State of California, the crime of
25 SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was
26 committed by ABIE TOIBER, who did unlawfully sell a security to Salvador Rodriguez by
27 means of material misrepresentations or omissions.
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COUNT TWENTY-FIVE

On or around August 18, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by ABIE TOIBER, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$33,366.67 belonging to Salvador Rodriguez.

COUNT TWENTY-SIX

On or around September 15, 2018, in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by ABIE TOIBER, who did unlawfully sell a security to Jose Amaya by means of material misrepresentations or omissions.

COUNT TWENTY-SEVEN

On or around September 15, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by ABIE TOIBER, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$11,664.48 belonging to Jose Amaya.

COUNT TWENTY-EIGHT

On or around November 11, 2018 in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by ABIE TOIBER, who did unlawfully sell a security to Mayra Hernandez by means of material misrepresentations or omissions.

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COUNT TWENTY-NINE

On or around November 11, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by ABIE TOIBER, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$43,351.11 belonging to Mayra Hernandez.

COUNT THIRTY

On or around August 26, 2018 in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by JOSEPHINE HUANG, who did unlawfully sell a security to Meng Houn by means of material misrepresentations or omissions.

COUNT THIRTY-ONE

On or around August 26, 2018, in the County of Kern, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a Felony was committed by JOSEPHINE HUANG, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$29,923.00 belonging to Meng Houn.

COUNT THIRTY-TWO

On or around September 22, 2018 in the County of Kern, State of California, the crime of SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was committed by JOSEPHINE HUANG, who did unlawfully sell a security to Junhua Chen by means of material misrepresentations or omissions.

1 **COUNT THIRTY-THREE**

2 On or around September 22, 2018, in the County of Kern, State of California, the crime of
3 GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a
4 Felony was committed by JOSEPHINE HUANG, who did unlawfully take money and personal
5 property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit: \$33,556.11 belonging to
6 Junhua Chen.

7 **COUNT THIRTY-FOUR**

8
9 On or around December 9, 2018 in the County of Kern, State of California, the crime of
10 SECURITIES FRAUD, in violation of Corporations Code section 25401, a Felony was
11 committed by JOSEPHINE HUANG AND THOMAS MANEY, who did unlawfully sell a
12 security to Grace Su by means of material misrepresentations or omissions.

13 **COUNT THIRTY-FIVE**

14
15 On or around December 9, 2018, in the County of Kern, State of California, the crime of
16 GRAND THEFT OF PERSONAL PROPERTY, in violation of Penal Code section 487(a), a
17 Felony was committed by JOSEPHINE HUANG AND THOMAS MANEY, who did unlawfully
18 take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to
19 wit: \$32,831.11 belonging to Grace Su.

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21
22 It is further alleged as to Counts 1-35 that the manner in which the crime was carried out, to
23 wit, the Galileo Project and Capital Improvement Fund (CIF), indicates planning, sophistication,
24 or professionalism, within the meaning of California Rules of Court Rule 4.421(a)(8).

25 It is further alleged as to Counts 1-35 that the crime involved an attempted or actual taking
26 or damage of great monetary value, to wit, \$38,800,000 loss from victims, within the meaning of
27 California Rules of Court Rule 4.421(a)(9).
28

1 **NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print**
2 **impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples**
3 **and impressions is a crime.**

4 **NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the**
5 **county jail shall not be subject to dismissal pursuant to Penal Code § 1385.**

6 **NOTICE: The People of the State of California intend to present evidence and seek jury findings**
7 **regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and**
8 ***Cunningham v. California* (2007) 549 U.S. 270.**

9
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11 **SPECIAL ALLEGATION 1 WHITE COLLAR CRIME ENHANCEMENT**

12 It is further alleged as to Counts 1- 35 pursuant to **Penal Code section 186.11 (a)(2)**, that a
13 material element of the above offenses is fraud and/or embezzlement and that the above offenses
14 involved a pattern of related felony conduct that resulted in the taking of, and loss by another of
15 more than five hundred thousand dollars (\$500,000) dollars.

16
17 **SPECIAL ALLEGATION 2 WHITE COLLAR CRIME ENHANCEMENT**

18 It is further alleged as to Counts 1 – 35 pursuant to **Penal Code section 1203.045 (a)**, that
19 except in unusual cases where the interests of justice would best be served if the person is granted
20 probation, probation shall not be granted to any person convicted of a crime of theft of an amount
21 exceeding one hundred thousand dollars (\$100,000).

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DECLARATION

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this complaint consists of 35 counts.

Executed this 25th day of May, 2020, in Los Angeles, California.



PAUL SEO
DECLARANT AND COMPLAINANT

Respectfully Submitted,

ROB BONTA
Attorney General of California
JAMES G. ROOT
Senior Assistant Attorney General
MICHAEL WHITAKER
Supervising Deputy Attorney General

PAUL SEO
GREG WAGNER
Deputy Attorney General
*Attorneys for the People of the
State of California*

AGENCY: CALIFORNIA DEPARTMENT OF JUSTICE, BUREAU OF INVESTIGATION
PRELIM. TIME EST.: 14 days

Pursuant to Penal Code section 1054.5 (b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code section 1054.

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DECLARATION IN SUPPORT OF ARREST WARRANT AND EXTRADITION

(Made under 2015.5 CCP)

The undersigned hereby declares:

That your declarant is currently employed as a Special Agent for the California Department of Justice Bureau of Investigation.

WHEREFORE, your declarant prays that warrants issue for the arrest and extradition of the herein above-named defendants and that said defendants be dealt with according to law.

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th day of May 2022, in Los Angeles, California.

By: 

PAUL RAMIREZ, Special Agent
California Department of Justice

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

WARRANT OF ARREST AND EXTRADITION

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Special Agent Supervisor Paul Ramirez of the California Department of Justice, Bureau of Investigation, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by defendants THOMAS MANEY, MARIA ROSALES, MARIAN DUCREUX, WAYNE PEDERSEN, NILE ALMUDARRIS, JEFFREY MCAREE, ABIE TOIBER, JOSEPHINE HUANG, AND TERRENCE HANSEN: Conspiracy in violation of Penal Code section 182(a)(1), a felony; Grand Theft in violation of Penal Code section 487(a), a felony; Securities Fraud in violation of Corporations Code section 25401, a felony; and Use of a Device, Artifice or Scheme to Defraud in Connection with the Offer or Sale of a Security, in violation of Corporations Code section 25541, a felony.

Therefore, you are commanded to arrest THOMAS MANEY, MARIA ROSALES, MARIAN DUCREUX, WAYNE PEDERSEN, NILE ALMUDARRIS, JEFFREY MCAREE, ABIE TOIBER, JOSEPHINE HUANG, AND TERRENCE HANSEN, and to bring said defendants before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Extradition has been approved on this warrant by the State of California, Office of the Attorney General by Deputy Attorney General Paul Seo on May 25, 2022. Please enter this warrant into NCIC.

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Defendant THOMAS MANEY is to be admitted to bail in the sum of \$ 545,000.

Defendant MARIA ROSALES is to be admitted to bail in the sum of \$ 150,000.

Defendant MARIAN DUCREUX is to be admitted to bail in the sum of \$ 300,000.

Defendant WAYNE PEDERSON is to be admitted to bail in the sum of \$ 150,000.

Defendant NILE ALMUDARRIS is to be admitted to bail in the sum of \$ 250,000.

Defendant JEFFREY MCAREE is to be admitted to bail in the sum of \$ 250,000.

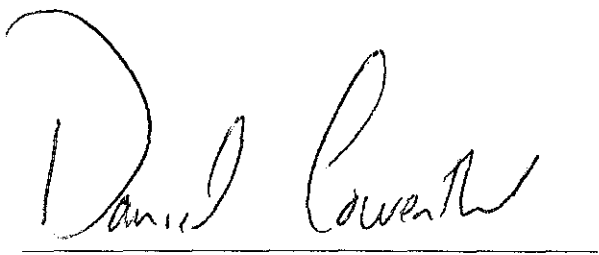
Defendant ABIE TOIBER is to be admitted to bail in the sum of \$ 450,000.

Defendant JOSEPHINE HUANG is to be admitted to bail in the sum of \$ 325,000.

Defendant TERRENCE HANSEN is to be admitted to bail in the sum of \$ 150,000.

Dated: 5-25-22

Time Issued: 9:10 a.m. (am/pm)



JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles



