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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

REPLY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

February 2009 Grand Jury

**'09CR1209 H**

9 UNITED STATES OF AMERICA,  
10 Plaintiff,

11 v.

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

Defendants.

Case No.

I N D I C T M E N T

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

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TWR:nlv:San Diego  
3/26/09

1 The grand jury charges;

2 Count 1

3 THE ENTERPRISE

4 1. At various times material to this indictment:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3 ROLES OF THE DEFENDANTS

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

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

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

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

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

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

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

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

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

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

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

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

7 THE RACKETEERING CONSPIRACY

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

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

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

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

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

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

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

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

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

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

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

- 1 (13) On or about November 15, 2005, defendant DARNELL BELL  
2 caused a check in the amount of \$30,000 to be issued to  
3 defendant NICOLELE WATSON.
- 4 (14) On or about November 16, 2005, defendant DESIREE HOLIDAY  
5 signed and submitted a "Request For Verification Of Rent  
6 Or Mortgage" form for defendant NICOLELE WATSON in  
7 connection with WATSON's purchase of 4309 Harbinson  
8 Avenue, La Mesa, California.
- 9 (15) In or about December 2005, defendant DARNELL BELL caused  
10 a "Letter of Explanation for Terms and Conditions of  
11 Offer" to be sent in connection with the purchase of 3727  
12 Suffolk Drive, San Diego, California, which required a  
13 payment to Bell Construction.
- 14 (16) On or about December 6, 2005, defendant NICOLELE WATSON  
15 signed and submitted a loan application for the purchase  
16 of 3727 Suffolk Drive, San Diego, California, wherein  
17 WATSON stated her gross monthly income was \$11,352.
- 18 (17) On or about December 8, 2005, defendant NICOLELE WATSON  
19 signed and submitted a loan application for the purchase  
20 of 4309 Harbinson Avenue, La Mesa, California, wherein  
21 WATSON stated her gross monthly income was \$9,250.
- 22 (18) On or about December 13, 2005, defendant DESIREE HOLIDAY  
23 signed and submitted a "Request For Verification Of Rent  
24 Or Mortgage" form for defendant NICOLELE WATSON in  
25 connection with WATSON's purchase of 3727 Suffolk Drive,  
26 San Diego, California.
- 27 //
- 28 //

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1 (64) On or about April 27, 2006, defendant STANLEY GENTRY  
2 caused a cashier's check in the amount of \$24,225 to be  
3 issued to defendant DARNELL BELL.
- 4 (65) On or about May 5, 2006, defendant DARNELL BELL caused a  
5 check in the amount of \$700 to be issued to defendant  
6 DESIREE HOLIDAY.
- 7 (66) In or about May 2006, defendant MARCUS DOZZELL recruited  
8 M.W. to purchase real property as a "straw buyer."
- 9 (67) On or about May 11, 2006, defendant BILLIE BISHOP caused  
10 \$59,792.78 to be transferred from an account maintained by  
11 BBC Escrow Inc. to a Washington Mutual account maintained  
12 by defendant DARNELL BELL.
- 13 (68) On or about May 12, 2006, defendant STANLEY GENTRY signed  
14 and submitted a loan application for O.G. in connection  
15 with O.G.'s purchase of 730 Holly Avenue, San Diego,  
16 California.
- 17 (69) On or about May 12, 2006, defendant DARNELL BELL caused a  
18 cashier's check in the amount of \$11,000 to be issued to  
19 defendant NICOLELE WATSON.
- 20 (70) On or about May 12, 2006, defendant STANLEY GENTRY caused  
21 a cashier's check in the amount of \$25,555 to be issued to  
22 defendant DARNELL BELL.
- 23 (71) On or about May 15, 2006, defendant DIANA JAIME notarized  
24 documents submitted in support of a loan application  
25 submitted by O.G. for the purchase of 730 Holly Avenue,  
26 San Diego, California.
- 27 //
- 28 //

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

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

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

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

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

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

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

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

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

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

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

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

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