

1 EDMUND G. BROWN JR.
Attorney General of California
2 RONALD D. SMETANA
Senior Assistant Attorney General
3 State Bar No. 62818
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004

XRef: 1136801

5 [REDACTED]
6 [REDACTED]
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SACRAMENTO

10
11 **PEOPLE OF THE STATE OF CALIFORNIA,**
12
13 Plaintiff,
14
15 **v.**
16 **WILLIAM ARTHUR SASSMAN, II, AKA**
WILLIAM-ARTHUR: SASSMAN, SECOND
GENERATION©
17 Defendant.

No.

FELONY COMPLAINT

18
19 The People of the State of California upon oath of the undersigned, upon information and
20 belief complain against the defendant above named for the crimes as follows:

21
22 **COUNT ONE**

23 On or about and between October 4, 2004, and September 18, 2009, at and in the County of
24 Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony
25 namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said
26 defendant did unlawfully take money and personal property of a value exceeding Four Hundred
27 Dollars (\$400), to wit, money, the property of [REDACTED]

1 **COUNT TWO**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One hereof: On or about August 20, 2007, at and
4 in the County of Sacramento, State of California, defendant William Arthur Sassman, II did
5 commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code
6 of the State of California, in that said defendant did willfully and unlawfully offer or sell a
7 security to a person or persons to wit: [REDACTED] by means of a written or oral
8 communication which included an untrue statement of a material fact or omitted to state a
9 material fact necessary to make the statement made not misleading in light of the circumstances
10 under which it was made.

11 **COUNT THREE**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One and Two hereof: On or about August 20,
14 2007, at and in the County of Sacramento, State of California, defendant William Arthur
15 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
16 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
17 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 [REDACTED] with the intent to commit larceny and any felony.

19
20 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
21 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

22 **COUNT FOUR**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Three hereof: On or about and
25 between August 31, 2005, and September 18, 2009, at and in the County of Sacramento, State of
26 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
27 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
28

1 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
2 money, the property of [REDACTED]

3
4 **COUNT FIVE**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Four hereof: On or about and
7 between August 31, 2005, and July 30, 2007, at and in the County of Sacramento, State of
8 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
9 Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said
10 defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED]
11 [REDACTED], by means of a written or oral communication which included an untrue statement of a
12 material fact or omitted to state a material fact necessary to make the statement made not
13 misleading in light of the circumstances under which it was made.

14
15 **COUNT SIX**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Counts One through Five hereof: On or about July 30,
18 2007, at and in the County of Sacramento, State of California, defendant William Arthur
19 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
20 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
21 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
22 [REDACTED] with the intent to commit larceny and any felony.

23 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
24 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Six hereof: On or about August 29, 2006, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED].

COUNT EIGHT

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seven hereof: On or about August 29, 2006, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED], by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT NINE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eight hereof: On or about and between October 2, 2006, and September 18, 2009, at and in the County of Sacramento, State of California, defendant [REDACTED] did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED].

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Nine hereof: On or about October 15, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT ELEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Ten hereof: On or about October 17, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by [REDACTED] with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT TWELVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Eleven hereof: On or about and between November 1, 2005, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully

1 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
2 money, the property of [REDACTED]

3
4 **COUNT THIRTEEN**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Twelve hereof: On or about
7 August 1, 2007, at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
9 the Corporations Code of the State of California, in that said defendant did willfully and
10 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
11 written or oral communication which included an untrue statement of a material fact or omitted to
12 state a material fact necessary to make the statement made not misleading in light of the
13 circumstances under which it was made.

14
15 **COUNT FOURTEEN**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Count One through Thirteen hereof: On or about
18 August 1, 2007, at and in the County of Sacramento, State of California, defendant William
19 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
20 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
21 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
22 by [REDACTED] with the intent to commit larceny and any felony.

23 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
24 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

25
26 **COUNT FIFTEEN**

27 For a further and separate cause of action, being a different offense from but connected in
28 its commission as the charges set forth in Counts One through Fourteen hereof: On or about and

1 between January 1, 2005, and September 18, 2009, at and in the County of Sacramento, State of
2 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
3 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
4 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
5 money, the property of [REDACTED]

6
7 **COUNT SIXTEEN**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Count One through Fifteen hereof: On or about and
10 between August 19, 2005, and September 18, 2009, at and in the County of Sacramento, State of
11 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
12 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
13 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
14 money, the property of [REDACTED]

15
16 **COUNT SEVENTEEN**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission as the charges set forth in Counts One through Sixteen hereof: On or about
19 August 1, 2007, at and in the County of Sacramento, State of California, defendant William
20 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
21 the Corporations Code of the State of California, in that said defendant did willfully and
22 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
23 written or oral communication which included an untrue statement of a material fact or omitted to
24 state a material fact necessary to make the statement made not misleading in light of the
25 circumstances under which it was made.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT EIGHTEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Seventeen hereof: On or about August 15, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by [REDACTED] with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

COUNT NINETEEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighteen hereof: On or about and between January 24, 2007, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT TWENTY

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Nineteen hereof: On or about and between January 24, 2007, and August 10,2007 at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement

1 of a material fact or omitted to state a material fact necessary to make the statement made not
2 misleading in light of the circumstances under which it was made.

3
4 **COUNT TWENTY-ONE**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Twenty hereof: On or about
7 January 27, 2007, at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
9 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
10 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
11 by [REDACTED] with the intent to commit larceny and any felony.

12 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
13 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

14
15 **COUNT TWENTY-TWO**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Count One through Twenty-One hereof: On or about
18 and between April 20, 2007, and September 18, 2009, at and in the County of Sacramento, State
19 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
20 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
21 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
22 money, the property of [REDACTED]

23
24 **COUNT TWENTY-THREE**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Counts One through Twenty-Two hereof: On or about
27 April 20, 2007 at and in the County of Sacramento, State of California, defendant William Arthur
28 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the

1 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
2 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or
3 oral communication which included an untrue statement of a material fact or omitted to state a
4 material fact necessary to make the statement made not misleading in light of the circumstances
5 under which it was made.

6
7 **COUNT TWENTY-FOUR**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Count One through Twenty-Three hereof: On or about
10 August 2, 2007, at and in the County of Sacramento, State of California, defendant William
11 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
12 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
13 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
14 by [REDACTED] with the intent to commit larceny and any felony.

15 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
16 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

17
18 **COUNT TWENTY-FIVE**

19 For a further and separate cause of action, being a different offense from but connected in
20 its commission as the charges set forth in Counts One through Twenty-Four hereof: On or about
21 and between July 9, 2007, and September 18, 2009, at and in the County of Sacramento, State of
22 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
23 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
24 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
25 money, the property of [REDACTED]

1 **COUNT TWENTY-SIX**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Count One through Twenty-Five hereof: On or about
4 July 9, 2007 at and in the County of Sacramento, State of California, defendant William Arthur
5 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
6 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
7 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral
8 communication which included an untrue statement of a material fact or omitted to state a
9 material fact necessary to make the statement made not misleading in light of the circumstances
10 under which it was made.

11 **COUNT TWENTY-SEVEN**

12 For a further and separate cause of action, being a different offense from but connected in
13 its commission as the charges set forth in Counts One through Twenty-Six hereof: On or about
14 July 12, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
15 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
16 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
17 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
18 [REDACTED] with the intent to commit larceny and any felony.

19
20 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
21 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

22 **COUNT TWENTY-EIGHT**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Counts One through Twenty-Seven hereof: On or about
25 and between July 12, 2005, and September 18, 2009, at and in the County of Sacramento, State of
26 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
27 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
28

1 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
2 money, the property of [REDACTED]

3
4 **COUNT TWENTY-NINE**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Count One through Twenty-Eight hereof: On or about
7 August 2, 2007 at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
9 the Corporations Code of the State of California, in that said defendant did willfully and
10 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
11 written or oral communication which included an untrue statement of a material fact or omitted to
12 state a material fact necessary to make the statement made not misleading in light of the
13 circumstances under which it was made.

14
15 **COUNT THIRTY**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Counts One through Twenty-Nine hereof: On or about
18 August 2, 2007, at and in the County of Sacramento, State of California, defendant William
19 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
20 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
21 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
22 by [REDACTED] with the intent to commit larceny and any felony.

23 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
24 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

25
26 **COUNT THIRTY-ONE**

27 For a further and separate cause of action, being a different offense from but connected in
28 its commission as the charges set forth in Counts One through Thirty hereof: On or about and

1 between April 13, 2007, and September 18, 2009, at and in the County of Sacramento, State of
2 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
3 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
4 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
5 money, the property of [REDACTED]
6

7 **COUNT THIRTY-TWO**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Count One through Thirty-One hereof: On or about
10 April 13, 2007 at and in the County of Sacramento, State of California, defendant William Arthur
11 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
12 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
13 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or
14 oral communication which included an untrue statement of a material fact or omitted to state a
15 material fact necessary to make the statement made not misleading in light of the circumstances
16 under which it was made.
17

18 **COUNT THIRTY-THREE**

19 For a further and separate cause of action, being a different offense from but connected in
20 its commission as the charges set forth in Counts One through Thirty-Two hereof: On or about
21 April 13, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
22 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
23 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
24 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
25 [REDACTED] with the intent to commit larceny and any felony.

26 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
27 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT THIRTY-FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Three hereof: On or about and between May 15, 2006 and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT THIRTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Thirty-Four hereof: On or about March 2, 2007 at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT THIRTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Five hereof: On or about and between August 13, 2007, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT THIRTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Six hereof: On or about August 13, 2007 at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT THIRTY-EIGHT

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Thirty-Seven hereof: On or about and between May 18, 2004, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT THIRTY-NINE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Thirty-Eight hereof: On or about October 3, 2007 at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to

1 state a material fact necessary to make the statement made not misleading in light of the
2 circumstances under which it was made.

3
4 **COUNT FORTY**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Thirty-Nine hereof: On or about
7 October 3 ,2007, at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
9 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
10 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
11 by [REDACTED] with the intent to commit larceny and any felony.

12 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
13 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

14
15 **COUNT FORTY-ONE**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Count One through Forty hereof: On or about and
18 between May 8, 2007, and September 18, 2009, at and in the County of Sacramento, State of
19 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
20 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
21 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
22 money, the property of [REDACTED]

23
24 **COUNT FORTY-TWO**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Counts One through Forty-One hereof: On or about
27 October 3, 2007 at and in the County of Sacramento, State of California, defendant William
28 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of

1 the Corporations Code of the State of California, in that said defendant did willfully and
2 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
3 written or oral communication which included an untrue statement of a material fact or omitted to
4 state a material fact necessary to make the statement made not misleading in light of the
5 circumstances under which it was made.

6
7 **COUNT FORTY-THREE**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Count One through Forty-Two hereof: On or about and
10 between September 25, 2008, and September 18, 2009, at and in the County of Sacramento, State
11 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
12 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
13 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
14 money, the property of [REDACTED]

15
16 **COUNT FORTY-FOUR**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission as the charges set forth in Counts One through Forty-Three hereof: On or about
19 September 25, 2008 at and in the County of Sacramento, State of California, defendant William
20 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
21 the Corporations Code of the State of California, in that said defendant did willfully and
22 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
23 written or oral communication which included an untrue statement of a material fact or omitted to
24 state a material fact necessary to make the statement made not misleading in light of the
25 circumstances under which it was made.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT FORTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Forty-Four hereof: On or about and between April 2, 2007, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT FORTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Forty-Five hereof: On or about April 2, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT FORTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Forty-Six hereof: On or about April 2, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by [REDACTED] with the intent to commit larceny and any felony.

1 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
2 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

3
4 **COUNT FORTY-EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Count One through Forty-Seven hereof: On or about
7 and between March 13, 2007, and September 18, 2009, at and in the County of Sacramento, State
8 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
9 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
10 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
11 money, the property of [REDACTED]

12
13 **COUNT FORTY-NINE**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission as the charges set forth in Counts One through Forty-Eight hereof: On or about
16 March 13, 2007, at and in the County of Sacramento, State of California, defendant William
17 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
18 the Corporations Code of the State of California, in that said defendant did willfully and
19 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
20 written or oral communication which included an untrue statement of a material fact or omitted to
21 state a material fact necessary to make the statement made not misleading in light of the
22 circumstances under which it was made.

23
24 **COUNT FIFTY**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Counts One through Forty-Nine hereof: On or about
27 March 13, 2007, at and in the County of Sacramento, State of California, defendant William
28 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of

1 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
2 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
3 by [REDACTED] with the intent to commit larceny and any felony.

4 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
5 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

6
7 **COUNT FIFTY-ONE**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Count One through Fifty hereof: On or about and
10 between May 9, 2007, and September 18, 2009, at and in the County of Sacramento, State of
11 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
12 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
13 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
14 money, the property of [REDACTED]

15
16 **COUNT FIFTY-TWO**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission as the charges set forth in Counts One through Fifty-One hereof: On or about
19 May 9, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
20 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
21 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
22 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or
23 oral communication which included an untrue statement of a material fact or omitted to state a
24 material fact necessary to make the statement made not misleading in light of the circumstances
25 under which it was made.

1 **COUNT FIFTY-THREE**

2 For a further and separate cause of action, being a different offense from but connected in
3 its commission as the charges set forth in Counts One through Fifty-Two hereof: On or about
4 May 9, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
5 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
6 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
7 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
8 [REDACTED] with the intent to commit larceny and any felony.

9 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
10 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

11
12 **COUNT FIFTY-FOUR**

13 For a further and separate cause of action, being a different offense from but connected in
14 its commission as the charges set forth in Count One through Fifty-Three hereof: On or about
15 and between March 27, 2007, and September 18, 2009, at and in the County of Sacramento, State
16 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
17 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
18 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
19 money, the property of [REDACTED]

20
21 **COUNT FIFTY-FIVE**

22 For a further and separate cause of action, being a different offense from but connected in
23 its commission as the charges set forth in Counts One through Fifty-Four hereof: On or about and
24 between July 5, 2006 and September 18, 2009, at and in the County of Sacramento, State of
25 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
26 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
27 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
28 money, the property of [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT FIFTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-Five hereof: On or about and between May 11, 2006, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

SPECIAL ALLEGATION - EXCESSIVE TAKING

It is further alleged as to Count Fifty-Six that in the commission of the above offense the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Sections 12022.6(a)(2) and 1203.045.

COUNT FIFTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Fifty-Six hereof: On or about February 11, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT FIFTY-EIGHT

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-Seven hereof: On or about and between October 1, 2005, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT FIFTY-NINE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-Eight hereof: On or about January 10, 2006, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT SIXTY

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Fifty-Nine hereof: On or about and between December 5, 2008, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SPECIAL ALLEGATION - EXCESSIVE TAKING

It is further alleged as to Count Sixty that in the commission of the above offense the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Sections 12022.6(a)(2) and 1203.045.

COUNT SIXTY-ONE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Sixty hereof: On or about December 8, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT SIXTY-TWO

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Sixty-One hereof: On or about December 5, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

SPECIAL ALLEGATION - EXCESSIVE TAKING

It is further alleged as to Count Sixty-Two that in the commission of the above offense the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed

1 property of a value exceeding \$200,000, within the meaning of Penal Code Sections
2 12022.6(a)(2) and 1203.045.

3
4 **COUNT SIXTY-THREE**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Count One through Sixty-Two hereof: On or about
7 December 5, 2008, at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
9 the Corporations Code of the State of California, in that said defendant did willfully and
10 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
11 written or oral communication which included an untrue statement of a material fact or omitted to
12 state a material fact necessary to make the statement made not misleading in light of the
13 circumstances under which it was made.

14
15 **COUNT SIXTY-FOUR**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Counts One through Sixty-Three hereof: On or about
18 and between December 8, 2008, and September 18, 2009, at and in the County of Sacramento,
19 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
20 violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did
21 unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400),
22 to wit, money, the property of [REDACTED]

23
24 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

25 It is further alleged as to Count Sixty-Four that in the commission of the above offense the
26 said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
27 property of a value exceeding \$65,000, within the meaning of Penal Code Section 12022.6(a)(1).
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SIXTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Sixty-Four hereof: On or about December 8, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT SIXTY-SIX

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Sixty-Five hereof: On or about and between January 23, 2008, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT SIXTY-SEVEN

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Sixty-Six hereof: On or about January 23, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to

1 state a material fact necessary to make the statement made not misleading in light of the
2 circumstances under which it was made.

3
4 **COUNT SIXTY-EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Sixty-Seven hereof: On or about
7 January 23, 2008, at and in the County of Sacramento, State of California, defendant William
8 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
9 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
10 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
11 by [REDACTED] with the intent to commit larceny and any felony.

12 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
13 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

14
15 **COUNT SIXTY-NINE**

16 For a further and separate cause of action, being a different offense from but connected in
17 its commission as the charges set forth in Count One through Sixty-Eight hereof: On or about
18 and between March 8, 2006, and September 18, 2009, at and in the County of Sacramento, State
19 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
20 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
21 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
22 money, the property of [REDACTED]

23
24 **COUNT SEVENTY**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Counts One through Sixty-Nine hereof: On or about
27 and between May 16, 2008, and July 22, 2008, at and in the County of Sacramento, State of
28 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of

1 Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said
2 defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED]
3 [REDACTED] by means of a written or oral communication which included an untrue statement of a
4 material fact or omitted to state a material fact necessary to make the statement made not
5 misleading in light of the circumstances under which it was made.

6
7 **COUNT SEVENTY-ONE**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Counts One through Seventy: On or about and between
10 January 28, 2008, and September 18, 2009, at and in the County of Sacramento, State of
11 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
12 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
13 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
14 money, the property of [REDACTED]

15
16 **COUNT SEVENTY-TWO**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission as the charges set forth in Counts One through Seventy-One hereof: On or about
19 January 28, 2008, at and in the County of Sacramento, State of California, defendant William
20 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
21 the Corporations Code of the State of California, in that said defendant did willfully and
22 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
23 written or oral communication which included an untrue statement of a material fact or omitted to
24 state a material fact necessary to make the statement made not misleading in light of the
25 circumstances under which it was made.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SEVENTY-THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy-Two hereof: On or about January 28, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by [REDACTED] with the intent to commit larceny and any felony.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a)

COUNT SEVENTY-FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy-Three hereof: On or about and between November 7, 2006, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT SEVENTY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Seventy-Four hereof: On or about April 23, 2007, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a

1 material fact necessary to make the statement made not misleading in light of the circumstances
2 under which it was made.

3
4 **COUNT SEVENTY-SIX**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Seventy-Five hereof: On or about
7 and between June 11, 2008, and September 18, 2009, at and in the County of Sacramento, State
8 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
9 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
10 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
11 money, the property of [REDACTED]

12
13 **COUNT SEVENTY-SEVEN**

14 For a further and separate cause of action, being a different offense from but connected in
15 its commission as the charges set forth in Counts One through Seventy-Six hereof: On or about
16 June 11, 2008, at and in the County of Sacramento, State of California, defendant William Arthur
17 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
18 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
19 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral
20 communication which included an untrue statement of a material fact or omitted to state a
21 material fact necessary to make the statement made not misleading in light of the circumstances
22 under which it was made.

23
24 **COUNT SEVENTY-EIGHT**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Counts One through Seventy-Seven hereof: On or
27 about and between August 29, 2008, and September 18, 2009, at and in the County of
28 Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony

1 namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said
2 defendant did unlawfully take money and personal property of a value exceeding Four Hundred
3 Dollars (\$400), to wit, money, the property of [REDACTED]

4
5 **COUNT SEVENTY-NINE**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Counts One through Seventy-Eight hereof: On or about
8 August 29, 2008, at and in the County of Sacramento, State of California, defendant William
9 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
10 the Corporations Code of the State of California, in that said defendant did willfully and
11 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
12 written or oral communication which included an untrue statement of a material fact or omitted to
13 state a material fact necessary to make the statement made not misleading in light of the
14 circumstances under which it was made.

15
16 **COUNT EIGHTY**

17 For a further and separate cause of action, being a different offense from but connected in
18 its commission as the charges set forth in Counts One through Seventy-Nine hereof: On or about
19 and between December 17, 2008, and September 18, 2009, at and in the County of Sacramento,
20 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
21 violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did
22 unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400),
23 to wit, money, the property of [REDACTED]

24
25 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

26 It is further alleged as to Count Eighty that in the commission of the above offense the said
27 defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
28 property of a value exceeding \$65,000, within the meaning of Penal Code Section 12022.6(a)(1).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT EIGHTY-ONE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighty hereof: On or about December 17, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT EIGHTY-TWO

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighty-One hereof: On or about and between May 29, 2008, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

SPECIAL ALLEGATION - EXCESSIVE TAKING

It is further alleged as to Count Eighty-Two that in the commission of the above offense the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code Section 12022.6(a)(1).

COUNT EIGHTY-THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighty-Two hereof: On or about

1 May 29, 2008, at and in the County of Sacramento, State of California, defendant William Arthur
2 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
3 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
4 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written
5 or oral communication which included an untrue statement of a material fact or omitted to state a
6 material fact necessary to make the statement made not misleading in light of the circumstances
7 under which it was made.

8
9 **COUNT EIGHTY-FOUR**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Eighty-Three hereof: On or about
12 and between August 8, 2007, and September 18, 2009, at and in the County of Sacramento, State
13 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
14 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
15 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
16 money, the property of [REDACTED]

17
18 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

19 It is further alleged as to Count Eighty-Four that in the commission of the above offense the
20 said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
21 property of a value exceeding \$65,000, within the meaning of Penal Code Section 12022.6(a)(1).
22

23 **COUNT EIGHTY-FIVE**

24 For a further and separate cause of action, being a different offense from but connected in
25 its commission as the charges set forth in Counts One through Eighty-Four hereof: On or about
26 August 8, 2007, at and in the County of Sacramento, State of California, defendant William
27 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
28 the Corporations Code of the State of California, in that said defendant did willfully and

1 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written
2 or oral communication which included an untrue statement of a material fact or omitted to state a
3 material fact necessary to make the statement made not misleading in light of the circumstances
4 under which it was made.

5
6 **COUNT EIGHTY-SIX**

7 For a further and separate cause of action, being a different offense from but connected in
8 its commission as the charges set forth in Counts One through Eighty-Five hereof: On or about
9 and between May 13, 2008, and September 18, 2009, at and in the County of Sacramento, State
10 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
11 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
12 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
13 money, the property of [REDACTED]

14 .
15 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

16 It is further alleged as to Count Eighty-Six that in the commission of the above offense the
17 said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
18 property of a value exceeding \$200,000, within the meaning of Penal Code Sections
19 12022.6(a)(2) and 1203.045.

20
21 **COUNT EIGHTY-SEVEN**

22 For a further and separate cause of action, being a different offense from but connected in
23 its commission as the charges set forth in Count One through Eighty-Six hereof: On or about
24 May 13, 2008, at and in the County of Sacramento, State of California, defendant William Arthur
25 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
26 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
27 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral
28 communication which included an untrue statement of a material fact or omitted to state a

1 material fact necessary to make the statement made not misleading in light of the circumstances
2 under which it was made.

3
4 **COUNT EIGHTY-EIGHT**

5 For a further and separate cause of action, being a different offense from but connected in
6 its commission as the charges set forth in Counts One through Eighty-Seven hereof: On or about
7 and between August 23, 2008, and September 18, 2009, at and in the County of Sacramento, State
8 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
9 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
10 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
11 money, the property of [REDACTED]

12
13 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

14 It is further alleged as to Count Eighty-Eight that in the commission of the above offense
15 the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and
16 destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Sections
17 12022.6(a)(2) and 1203.045.

18
19 **COUNT EIGHTY-NINE**

20 For a further and separate cause of action, being a different offense from but connected in
21 its commission as the charges set forth in Count One through Eighty-Eight hereof: On or about
22 August 23, 2008, at and in the County of Sacramento, State of California, defendant William
23 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
24 the Corporations Code of the State of California, in that said defendant did willfully and
25 unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a
26 written or oral communication which included an untrue statement of a material fact or omitted to
27 state a material fact necessary to make the statement made not misleading in light of the
28 circumstances under which it was made.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT NINETY

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Eighty-Nine hereof: On or about and between July 24, 2008, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT NINETY-ONE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Ninety hereof: On or about July 24, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT NINETY-TWO

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Ninety-One hereof: On or about and between October 15, 2008, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SPECIAL ALLEGATION - EXCESSIVE TAKING

It is further alleged as to Count Ninety-Two that in the commission of the above offense the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed property of a value exceeding \$65,000, within the meaning of Penal Code Sections 12022.6(a)(1).

COUNT NINETY-THREE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Ninety-Two hereof: On or about October 15, 2008, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral communication which included an untrue statement of a material fact or omitted to state a material fact necessary to make the statement made not misleading in light of the circumstances under which it was made.

COUNT NINETY-FOUR

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Counts One through Ninety-Three hereof: On or about and between February 15, 2006, and September 18, 2009, at and in the County of Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of [REDACTED]

COUNT NINETY-FIVE

For a further and separate cause of action, being a different offense from but connected in its commission as the charges set forth in Count One through Ninety-Four hereof: On or about

1 June 7, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
2 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
3 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
4 offer or sell a security to a person or persons to wit: [REDACTED] by means of a written or oral
5 communication which included an untrue statement of a material fact or omitted to state a
6 material fact necessary to make the statement made not misleading in light of the circumstances
7 under which it was made.

8
9 **COUNT NINETY-SIX**

10 For a further and separate cause of action, being a different offense from but connected in
11 its commission as the charges set forth in Counts One through Ninety-Five hereof: On or about
12 and between March 19, 2008, and September 18, 2009, at and in the County of Sacramento, State
13 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
14 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
15 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
16 money, the property of [REDACTED]

17
18 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

19 It is further alleged as to Count Ninety-Six that in the commission of the above offense the
20 said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
21 property of a value exceeding \$200,000, within the meaning of Penal Code Sections
22 12022.6(a)(2) and 1204.045(a).

23
24 **COUNT NINETY-SEVEN**

25 For a further and separate cause of action, being a different offense from but connected in
26 its commission as the charges set forth in Count One through Ninety-Six hereof: On or about
27 October 15, 2008, at and in the County of Sacramento, State of California, defendant William
28 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of

1 the Corporations Code of the State of California, in that said defendant did willfully and
2 unlawfully offer or sell a security to a person or persons to wit: [REDACTED]
3 [REDACTED] by means of a written or oral communication which included
4 an untrue statement of a material fact or omitted to state a material fact necessary to make the
5 statement made not misleading in light of the circumstances under which it was made.

6
7 **COUNT NINETY-EIGHT**

8 For a further and separate cause of action, being a different offense from but connected in
9 its commission as the charges set forth in Counts One through Ninety-Seven hereof: On or about
10 and between June 14, 2007, and September 18, 2009, at and in the County of Sacramento, State
11 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
12 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
13 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
14 money, the property of [REDACTED]

15
16 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

17 It is further alleged as to Count Ninety-Eight that in the commission of the above offense
18 the said defendant, William Arthur Sassman, with the intent to do so, took, damaged and
19 destroyed property of a value exceeding \$200,000, within the meaning of Penal Code Sections
20 12022.6(a)(2) and 1204.045(a).

21
22 **COUNT NINETY-NINE**

23 For a further and separate cause of action, being a different offense from but connected in
24 its commission as the charges set forth in Count One through Ninety-Six hereof: On or about and
25 between June 14, 200, and August 15, 2008, at and in the County of Sacramento, State of
26 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
27 Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said
28 defendant did willfully and unlawfully offer or sell a security to a person or persons to wit: [REDACTED]

1 [REDACTED] by means of a written or oral communication which included an untrue statement of a
2 material fact or omitted to state a material fact necessary to make the statement made not
3 misleading in light of the circumstances under which it was made.
4

5 **COUNT ONE HUNDRED**

6 For a further and separate cause of action, being a different offense from but connected in
7 its commission as the charges set forth in Count One through Ninety-Seven hereof: On or about
8 and between January 1, 2005, and September 18, 2009, at and in the County of Sacramento, State
9 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
10 Sections 25541 of the Corporations Code of the State of California, in that said defendant did
11 willfully and unlawfully engage in acts, practices and a course of business which operated as a
12 fraud and deceit upon a person or persons in connection with the offer of a security to a person or
13 persons, to wit: all investors in Formulating Insurance Agency LLC, Formulating Investments
14 and Systematic Management Services.
15

16 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

17 It is further alleged as to Counts One, Four, Seven, Nine, Twelve, Fifteen, Sixteen,
18 Nineteen, Twenty-Two, Twenty-Five, Twenty-Eight, Thirty-One, Thirty-Four, Thirty-Six, Thirty-
19 Eight, Forty-One, Forty-Three, Forty-Five, Forty-Eight, Fifty-One, Fifty-Four, Fifty-Five, Fifty-
20 Six, Fifty-Eight, Sixty, Sixty-Two, Sixty-Four, Sixty-Six, Sixty-Nine, Seventy-One, Seventy-
21 Four, Seventy-Six, Seventy-Eight, Eighty, Eighty-Two, Eighty-Four, Eighty-Six, Eighty-Eight,
22 Ninety, Ninety-Two, Ninety-Four, Ninety-Six and Ninety-Eight that in the commission of the
23 above offenses the said defendant, William Arthur Sassman II, with the intent to do so, took,
24 damaged and destroyed property of a value exceeding \$3,200,000, within the meaning of Penal
25 Code Sections 12022.6(a)(4) and 1203.045.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SPECIAL ALLEGATION – WHITE COLLAR CRIME ENHANCEMENT

It is further alleged, pursuant to Penal Code 186.11(a)(2), that the offenses set forth in Counts One, Four, Seven, Nine, Twelve, Fifteen, Sixteen, Nineteen, Twenty-Two, Twenty-Five, Twenty-Eight, Thirty-One, Thirty-Four, Thirty-Six, Thirty-Eight, Forty-One, Forty-Three, Forty-Five, Forty-Eight, Fifty-One, Fifty-Four, Fifty-Five, Fifty-Six, Fifty-Eight, Sixty, Sixty-Two, Sixty-Four, Sixty-Six, Sixty-Nine, Seventy-One, Seventy-Four, Seventy-Six, Seventy-Eight, Eighty, Eighty-Two, Eighty-Four, Eighty-Six, Eighty-Eight, Ninety, Ninety-Two, Ninety-Four, Ninety-Six and Ninety-Eight 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).

Dated: November 6, 2009

RONALD D. SMETANA
Senior Assistant Attorney General
Attorney General’s Office
State of California