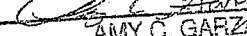


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FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

FEB 24 2014

BY  AMY C. GARZA DEPUTY

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN BERNARDINO**
11 **RANCHO CUCAMONGA JUDICIAL DISTRICT**

13 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

14 Plaintiff,

15 v.

16
17 **NEHAD AYYOUB AYYOUB (AKA NICK**
18 **AYYOUB), GHYDAN RABADI (AKA DAN**
19 **RABADI), ZAID RABADI (ZEE RABADI),**
JAMES CLEMONS, EDDIE MERCADO, WISSAM

20 Defendants.

Case No. FWV1400556

**FIRST AMENDED FELONY
COMPLAINT FOR ARREST
WARRANT**

21
22 The Attorney General of the State of California accuses the above-named defendants of the
23 following offenses, which are connected to each other in their commission:

24 **COUNT 1**

25 On or about or between April 1, 2007, and March 4, 2010. in the counties of San
26 Bernardino, Riverside, Orange, and Los Angeles, the crime of CONSPIRACY in violation of
27 PENAL CODE SECTION 182(a)(1), a Felony, was committed by NICK AYYOUB, DAN
28 RABADI, ZEE RABADI, JAMES CLEMONS, EDDIE MERCADO, WISSAM ISMAIL, and

1 MAJID SAFAIE, who did willfully and unlawfully conspire together with another person or
2 persons to commit the crimes of: GRAND THEFT, a Felony, in violation of PENAL CODE
3 SECTION 487(a), that pursuant to and carrying out the objectives of the aforesaid conspiracy the
4 following overt acts were committed:

5 Overt Act 1

6 On or about December 1, 2006, in the county of San Bernardino, Nick Ayyoub opened or
7 caused to be opened a business bank account for The Firm Loans, Insurance, & Investments, Inc.,
8 at Wells Fargo Bank.

9 Overt Act 2

10 In or about January 1, 2007, in the county of San Bernardino, Nick Ayyoub filed or caused
11 to be filed Articles of Incorporation for the business entity The Firm Loans, Insurance, &
12 investments, Inc.

13 Overt Act 3

14 In or about November 2007, in the county of San Bernardino, Nick Ayyoub, Dan Rabadi,
15 and Zee Rabadi, solicited an advance fee for loan modification services from Debby Hull.

16 Overt Act 4

17 In or about April 2007, in the county of San Bernardino, Nick Ayyoub, opened or caused to
18 be opened a business bank account for The Firm Loans, Insurance, & Investments, Inc., at Bank
19 of America.

20 Overt Act 5

21 In or about February 2008, in the county of San Bernardino, Dan Rabadi solicited an
22 advance fee for loan modification services from Sharon and Paul Prentiss.

23 Overt Act 6

24 In or about February 2008, in the county of San Bernardino, Dan Rabadi solicited an
25 advance fee for loan modification services from Ms. Terry Wallace.

26 Overt Act 7

1 In or about May 2008, in the county of San Bernardino, Dan Rabadi solicited an advance
2 fee for loan modification services from Jose and Cynthia Mendez.

3 Overt Act 8

4 In or about June 2008, in the county of San Bernardino, Zee Rabadi solicited an advance
5 fee for loan modification services from Mayra Gonzalez.

6 Overt Act 9

7 In or about September 2008, in the county of San Bernardino, Dan Rabadi solicited an
8 advance fee for loan modification services from Jose and Maria Godinez.

9 Overt Act 10

10 In or about July 2008, in the county of San Bernardino, Dan Rabadi solicited an advance
11 fee for loan modification services from Susan Larsen.

12 Overt Act 11

13 In or about September 2008, in the county of San Bernardino, Zee Rabadi solicited an
14 advance fee for loan modification services from Brenda Mason.

15 Overt Act 12

16 In or about September 2008, in the county of San Bernardino, James Clemons solicited an
17 advance fee for loan modification services from Leann Fernandez.

18 Overt Act 13

19 In or about September 2009, in the county of San Bernardino, James Clemons solicited an
20 advance fee for loan modification services from Frank and Sylvia Larriva.

21 Overt Act 14

22 In or about August 2008, in the county of San Bernardino, Eddie Mercado solicited an
23 advance fee for loan modification services from Thomas and Sandy Thigpen.

24 Overt Act 15

25 In or about October 2009, in the county of San Bernardino, Eddie Mercado solicited an
26 advance fee for loan modification services from Marlon Espiritu.

27 Overt Act 16

1 In or about September 2008, in the county of San Bernardino, Wissam Ismail solicited an
2 advance fee for loan modification services from Maria Martinez-Godinez.

3 Overt Act 17

4 In or about September 2009, in the county of San Bernardino, Nick Ayyoub solicited an
5 advance fee for loan modification services from Ann Chandler.

6 Overt Act 18

7 In or about October 2009, in the county of San Bernardino, Nick Ayyoub solicited an
8 advance fee for loan modification services from Alexandria Dias.

9 Overt Act 19

10 In or about April 2009, in the county of Orange, Majid Safaie filed or caused to be filed a
11 Fictitious Business Name Statement for the business called Mod By Lawyers.

12 Overt Act 20

13 In or about March 2009, in the county of Orange, Majid Safaie wrote a check on the
14 business bank account of Law Offices of Safaie & Associates at Wells Fargo Bank to First
15 Choice in the amount of \$90,000.00.

16 Overt Act 21

17 In or about May 2009, in the county of Orange, Majid Safaie wrote a check on the business
18 bank account of Law Offices of Safaie & Associates at Wells Fargo Bank to First Choice in the
19 amount of \$40,000.00

20 Overt Act 22

21 In or about May 2009, in the county of Orange, Majid Safaie wrote a check on the business
22 bank account of Law Offices of Safaie & Associates at Wells Fargo Bank to First Choice in the
23 amount of \$22,750.00.

24 Overt Act 23

25 In or about October 2009, in the county of Orange, Majid Safaie wrote a check on the
26 business bank account of Law Offices of Safaie & Associates at Wells Fargo Bank to First
27 Choice in the amount of \$20,000.00.

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COUNT 2

On or about March 31, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Debby Hull, to wit: \$2,800.00.

COUNT 3

On or about and between February 29, 2008, through March 7, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Lisa Cook, to wit: \$4,500.00.

COUNT 4

On or about February 16, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Paul & Sharon Prentiss, to wit: \$3,500.00.

COUNT 5

On or about April 15, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Jack and Cheri Cunningham, to wit: \$7,500.00.

1 COUNT 6

2 On or about and between April 28, 2008, and May 8, 2008, in the County of San
3 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
4 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI,
5 who did willfully and unlawfully and feloniously take money in an amount exceeding nine
6 hundred fifty dollars (\$950) from Ronald and Cheryl Scriven, to wit: \$5,500.00.

7
8 COUNT 7

9 On or about and between June 30 2008, and July 14, 2008, in the County of San
10 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
11 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI,
12 who did willfully and unlawfully and feloniously take money in an amount exceeding nine
13 hundred fifty dollars (\$950) from Sherry Bernard, to wit: \$3,500.00.

14
15 COUNT 8

16 On or about and between June 3, 2008, and July 15, 2008, in the County of San Bernardino,
17 the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was
18 committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did
19 willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty
20 dollars (\$950) from Phillip Moyer, to wit: \$4,500.00.

21
22 COUNT 9

23 On or about and between June 18, 2008, and July 9, 2008, in the County of San Bernardino,
24 the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was
25 committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did
26 willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty
27 dollars (\$950) from Mayra Gonzalez, to wit: \$10,325.00.

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COUNT 10

On or about and between August 2, 2008, and September 5, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, and EDDIE MERCADO, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Thomas and Sandy Thigpen, to wit: \$10,000.00.

COUNT 11

On or about and between September 1, 2008, and October 24, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Brenda Mason, to wit: \$3,845.00.

COUNT 12

On or about September 30, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, and WISSAM ISMAIL, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Mrs. Maria Martinez-Godinez, to wit: \$3,500.00.

COUNT 13

On or about and between October 3, 2008, and November 14, 2008, in the County of San Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, and MAJID SAFAIE, who did willfully and unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Mr. William Staymates, to wit: \$7,200.00.

COUNT 14

1 On or about October 31, 2008, in the County of San Bernardino, the crime of GRAND
2 THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants
3 NICK AYYOUB, DAN RABADI, and ZEE RABADI, who did willfully and unlawfully and
4 feloniously take money in an amount exceeding nine hundred fifty dollars (\$950) from Ms.
5 Aracely Carcamo, to wit: \$1,500.00.

6 **COUNT 15**

7 On or about and between October 13, 2008 and November 1, 2008, in the County of San
8 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
9 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI,
10 who did willfully and unlawfully and feloniously take money in an amount exceeding nine
11 hundred fifty dollars (\$950) from Thomas Ethans, to wit: \$4,500.00.

12 **COUNT 16**

13 On or about February 5, 2009, in the County of San Bernardino, the crime of GRAND
14 THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants
15 NICK AYYOUB, DAN RABADI, ZEE RABADI, and MAJID SAFAIE, who did willfully and
16 unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950)
17 from Vincent Soltero, to wit: \$1,200.00.

18 **COUNT 17**

19 On or about and between March 20, and May 1, 2009, in the County of San Bernardino, the
20 crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a Felony, was
21 committed by defendants NICK AYYOUB, DAN RABADI, and ZEE RABADI, and MAJID
22 SAFAIE, who did willfully and unlawfully and feloniously take money in an amount exceeding
23 nine hundred fifty dollars (\$950) from Willard Coleman, to wit: \$5,400.00.

24 **COUNT 18**

25 On or about July 24, 2009, in the County of San Bernardino, the crime of GRAND THEFT,
26 a violation of PENAL CODE SECTION 487(a) a Felony, was committed by defendants NICK
27 AYYOUB, DAN RABADI, ZEE RABADI, and MAJID SAFAIE, who did willfully and
28

1 unlawfully and feloniously take money in an amount exceeding nine hundred fifty dollars (\$950)
2 from Kevin & Kathleen Summerfield, to wit: \$3,500.00.

3
4 **COUNT 19**

5 On or about and between September 10, 2009, and October 7, 2009, in the County of San
6 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
7 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, MAJID
8 SAFAIE, and JAMES CLEMONS, who did willfully and unlawfully and feloniously take money
9 in an amount exceeding nine hundred fifty dollars (\$950) from Alex and Leann Fernandez, to wit:
10 \$2,000.00.

11
12 **COUNT 20**

13 On or about and between September 7, 2009, and November 7, 2009, in the County of San
14 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
15 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, MAJID
16 SAFAIE, and JAMES CLEMONS, who did willfully and unlawfully and feloniously take money
17 in an amount exceeding nine hundred fifty dollars (\$950) from Frank and Sylvia Larriva, to wit:
18 \$2,000.00.

19
20 **COUNT 21**

21 On or about and between October 16, 2009 and January 29, 2010, in the County of San
22 Bernardino, the crime of GRAND THEFT, a violation of PENAL CODE SECTION 487(a) a
23 Felony, was committed by defendants NICK AYYOUB, DAN RABADI, ZEE RABADI, EDDIE
24 MERCADO, and MAJID SAFAIE, who did willfully and unlawfully and feloniously take money
25 in an amount exceeding nine hundred fifty dollars (\$950) from Marlon Espiritu, to wit: \$7,000.00.

26
27 **COUNT 22**

28 On or about October 15, 2009, in the County of San Bernardino, defendant NICK
AYYOUB, willfully and unlawfully made and subscribed income tax returns under penalty of
perjury, to wit: California Resident Form 540 for tax year 2008, that he did not believe to be true

1 and correct as to every material matter, in violation of REVENUE & TAXATION CODE
2 SECTION 19705(a)(1).
3

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5 **COUNT 23**

6 On or about September 15, 2009, in the County of San Bernardino, defendant NICK
7 AYYOUB, willfully and unlawfully made and subscribed income tax returns under penalty of
8 perjury, to wit: California Corporation Form 540 for tax year 2008, in violation of REVENUE &
9 TAXATION CODE SECTION 19705(a)(1).
10

11 **COUNT 24**

12 On or about March 15, 2010, in the County of San Bernardino, defendant NICK AYYOUB,
13 did willfully and unlawfully fail to file an income tax return under penalty of perjury, to wit:
14 California Corporation Form 540 for tax year 2009, in violation of REVENUE & TAXATION
15 CODE SECTION 19706.
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First Special Allegation

Statute of Limitations – Tolling for Documents Seized from Lawyer Taken to Court for Hearing

(P.C. 1524(c)(1)(C))

From March 4, 2010, until September 28, 2012, the period of limitations to commence this action was tolled pursuant to Penal Code section 1524(c)(1)(C). On March 15, 2010, defendant Nick Ayyoub and attorney Safaie filed in this court an “Ex Parte Application For An Order Recalling Or Modifying The Search Warrant Served March 4, 2010, Ordering Immediate Access To Business And Legal Records, And Ordering Return Of Property Seized But Not Designated In The Warrant And Patently Privileged Material To Wit Bankruptcy Records.” The motion invoked claims of privilege pursuant to Penal Code section 1524(c) and tolled the period of limitations from the date of the search warrant on March 4, 2010 until the issue was resolved on September 28, 2012, when the Honorable Mary E. Fuller issued a final ruling and released all seized documents for review by investigators.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22 nd day of February 2014, at Los Angeles, California.

By: 
EDWARD J. SKELLY
Deputy Attorney General
DECLARANT AND COMPLAINANT

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NOTICE TO DEFENDANT AND ATTORNEY

Pursuant to Penal Code section 1054(b), the People of the State of California hereby informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

NOTICE TO ATTORNEY

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

1 AGENCY: Calif. Dept. of Justice I/O: Investigator, Aaron Ward

PHONE NO:
(213) 576-6958

2 DR NO: _____

OPERATOR:

PRELIM TIME EST: 2 days

3
4

5 <u>DEFENDANT(S)</u>	<u>CII No.</u>	<u>DOB</u>	<u>BOOKING NUMBER</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RET DATE</u>
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6 Nick Ayyoub 6/23/1956 \$75,000.00

7 Dan Rabadi 1/01/1976 \$50,000.00

8 Zaid Rabadi 2/04/1965 \$50,000.00

9 James Clemons 5/20/1958 \$50,000.00

10 Majid Safaie 12/12/1953 \$50,000.00

11 Eddie Mercado 4/16/1956 \$50,000.00

12 Wissam Ismail 6/03/1981 \$50,000.00

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3 SUPERIOR COURT OF CALIFORNIA
4 COUNTY OF SAN BERNARDINO
5 WARRANT OF ARREST

6 The People of the State of California to any peace officer of said State:
7

8 Proof by declaration under penalty of perjury having been made this day to me by
9 Investigator Aaron Ward of the California Department of Justice, I find that there is
10 probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)),
11 Conspiracy (Pen. Code 182(a)(1), Filing a False Tax Return (Revenue and Taxation
12 Code, §19705(a)(1) and Failure to File a Tax Return (Revenue and Taxation Code,
13 §19706 have been committed by the defendant named below.

14 Therefore, you are commanded to arrest NEHAD "NICK" AYYOUB AYYOUB, and
15 to bring the defendant before any magistrate in San Bernardino County pursuant to
16 Sections 821, 825, 826, and 848 of the California Penal Code.

17 Defendant is to be admitted to bail in the sum of \$ _____.
18

19 Dated: _____
20

21 Time Issued: _____ (am/pm)
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23 _____
24 Judge of the Superior Court
25 State of California, County of San Bernardino
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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest GHYDAN "DAN" RABADI, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest ZAID "ZEE" RABADI, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest JAMES CLEMONS, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$_____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest MAJID SAFAIE, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$_____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest EDDIE MERCADO, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ _____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
WARRANT OF ARREST

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

Proof by declaration under penalty of perjury having been made this day to me by Investigator Aaron Ward of the California Department of Justice, I find that there is probable cause to believe that the crimes of Grand Theft, (Pen. Code, §487(a)), and Conspiracy (Pen. Code 182(a)(1)) have been committed by the defendant named below.

Therefore, you are commanded to arrest WISSAM ISMAIL, and to bring the defendant before any magistrate in San Bernardino County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$_____.

Dated: _____

Time Issued: _____ (am/pm)

Judge of the Superior Court
State of California, County of San Bernardino

1 Order Holding To Answer - Felony Complaint (P.C. § 872)

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

(Strike out or add as applicable)

	Count	Charge	Charge	Special	Alleg. Effect
	No.	Charge	Range	Allegation	
5					
6		<u>Nick Ayyoub</u>			
7	1.	PC 182(a)(1)	16-2-3		
8	2	PC 487(a)	16-2-3		
9	3	PC 487(a)	16-2-3		
10	4	PC 487(a)	16-2-3		
11	5	PC 487(a)	16-2-3		
12	6	PC 487(a)	16-2-3		
13	7	PC 487(a)	16-2-3		
14	8	PC 487(a)	16-2-3		
15	9	PC 487(a)	16-2-3		
16	10	PC 368(d)	16-2-3		
17	11	PC 487(a)	16-2-3		
18	12	PC 487(a)	16-2-3		
19	13	PC 487(a)	16-2-3		
20	14	PC 487(a)	16-2-3		
21	15	PC 487(a)	16-2-3		
22	16	PC 487(a)	16-2-3		
23	17	PC 487(a)	16-2-3		
24	18	PC 487(a)	16-2-3		
25	19	PC 487(a)	16-2-3		
26	20	PC 487(a)	16-2-3		
27	21	PC 487(a)	16-2-3		
28	22	R&T 19705(a)(1)	16-2-3		
	23	R&T 19705(a)(1)	16-2-3		
	24	R&T 19706	16-2-3		

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	<u>No.</u>	<u>Charge</u>	<u>Range</u>	<u>Allegation</u>	
6 <u>Dan Rabadi</u>	1.	PC 182(a)(1)	16-2-3		
7	2	PC 487(a)	16-2-3		
8	3	PC 487(a)	16-2-3		
9	4	PC 487(a)	16-2-3		
10	5	PC 487(a)	16-2-3		
11	6	PC 487(a)	16-2-3		
12	7	PC 487(a)	16-2-3		
13	8	PC 487(a)	16-2-3		
14	9	PC 487(a)	16-2-3		
15	10	PC 487(a)	16-2-3		
16	11	PC 487(a)	16-2-3		
17	12	PC 487(a)	16-2-3		
18	13	PC 487(a)	16-2-3		
19	14	PC 487(a)	16-2-3		
20	15	PC 487(a)	16-2-3		
21	16	PC 487(a)	16-2-3		
22	17	PC 487(a)	16-2-3		
23	18	PC 487(a)	16-2-3		
24	19	PC487(a)	16-2-3		
25	20	PC487(a)	16-2-3		
26	21	PC 487(a)	16-2-3		

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	<u>No.</u>		<u>Range</u>	<u>Allegation</u>	
6 <u>Zee Rabadi</u>	1.	PC 182(a)(1)	16-2-3		
7	2	PC 487(a)	16-2-3		
8	3	PC 487(a)	16-2-3		
9	4	PC 487(a)	16-2-3		
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	<u>No.</u>	<u>Charge</u>	<u>Range</u>	<u>Allegation</u>	<u>Alleg. Effect</u>
6 <u>James Clemons</u>	1	PC 182(a)(1)	16-2-3		
7	19	PC 487(a)	16-2-3		
8	20	PC 487(a)	16-2-3		

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<u>Eddie Mercado</u>	1	PC 182(a)(1)	16-2-3		
	10	PC 487(a)	16-2-3		
	21	PC 487(a)	16-2-3		

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<u>Wissam Ismail</u>	1	PC 182(a)(1)	16-2-3		
	12	PC 487(a)	16-2-3		

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6		<u>Majid Safaie</u>	1 . PC 182(a)(1)	16-2-3	
7			13 PC 487(a)	16-2-3	
			16 PC 487(a)	16-2-3	
8			17 PC 487(a)	16-2-3	
			18 PC 487(a)	16-2-3	
9			19 PC 487(a)	16-2-3	
			20 PC 487(a)	16-2-3	
10			21 PC 487(a)	16-2-3...	
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