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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ORANGE, CENTRAL DISTRICT

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

13 Plaintiff,

14 v.

15 **MARIANNE CURTIS , MARY ALICE**
16 **YRACEBURU**

17 Defendants.

Case No.

FELONY COMPLAINT

18 The ATTORNEY GENERAL OF THE STATE OF CALIFORNIA accuses defendants
19 MARY YRACEBURU and MARIANNE CURTIS of the following crimes, which are connected
20 to one another in their commission:

21 **COUNT ONE**
22 **[GRAND THEFT]**

23 For a separate cause of complaint, the ATTORNEY GENERAL complains and states,
24 On and between June 21, 2007 and June 27, 2007, in the County of Orange, defendants
25 MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit: money for a
26 fictitious mortgage loan modification program, of a value in excess of Four hundred dollars (\$400)
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1 from another, to wit: Santiago Villesca, in violation of Penal Code section 487, subdivision (a), a
2 felony.

3 **COUNT TWO**
4 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

8 On and between June 21, 2007 and June 27, 2007, in the County of Orange, defendants
9 MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as defined by
10 Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive compensation
11 to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section
12 1695.1 to wit: Santiago Villesca, before fully performing each and every service contracted, or
13 otherwise represented, to be performed in violation of Civil Code section 2945.4, subdivision (a),
14 a felony.

15 **COUNT THREE**
16 **[GRAND THEFT]**

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

20 On or about January 25, 2008, in the County of Orange, defendants MARY YRACEBURU
21 and MARIANNE CURTIS unlawfully took property, to wit: money for a fictitious mortgage loan
22 modification program, of a value in excess of Four hundred dollars (\$400) from another, to wit:
23 Pamela Hardy, in violation of Penal Code section 487, subdivision (a), a felony.

24 **COUNT FOUR**
25 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

1 On and between January 25, 2008 and February 2, 2008, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
3 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
4 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
5 Code section 1695.1 to wit: Pamela Hardy, before fully performing each and every service
6 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
7 subdivision (a), a felony.

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

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

13 On and between August 28, 2007 and November 13, 2007, in the County of Orange,
14 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
15 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
16 dollars (\$400) from another, to wit: Carmelita Llorera, in violation of Penal Code section 487,
17 subdivision (a), a felony.

18 **COUNT SIX**
19 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

23 On and between August 28, 2007 and November 13, 2007, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
25 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
26 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
27 Code section 1695.1 to wit: Carmelita Llorera, before fully performing each and every service
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1 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
2 subdivision (a), a felony.

3 **COUNT SEVEN**
4 **[GRAND THEFT]**

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

8 On and between September 10, 2007 and September 13, 2007, in the County of Orange,
9 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
10 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
11 dollars (\$400) from another, to wit: Manuela Navarro, in violation of Penal Code section 487,
12 subdivision (a), a felony.

13 **COUNT EIGHT**
14 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

18 On and between September 10, 2007 and September 13, 2007, in the County of Orange,
19 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
20 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
21 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
22 Code section 1695.1 to wit: Manuela Navarro, before fully performing each and every service
23 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
24 subdivision (a), a felony.

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1 On and between September 17, 2007 and September 20, 2007, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
3 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
4 dollars (\$400) from another, to wit: Sempha Phathvilay, in violation of Penal Code section 487,
5 subdivision (a), a felony.

6 **COUNT TWELVE**
7 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Eleven, the ATTORNEY
10 GENERAL further complains and states,

11 On and between September 17, 2007 and September 20, 2007, in the County of Orange,
12 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
13 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
14 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
15 Code section 1695.1 to wit: Sempha Phathvilay , before fully performing each and every service
16 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
17 subdivision (a), a felony.

18 **COUNT THIRTEEN**
19 **[GRAND THEFT]**

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

23 On and between October 25, 2007 and December 21, 2007, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
25 money for a fictitious mortgage loan modification program, of a value in excess of four hundred
26 dollars (\$400) from another, to wit: Reyna Gomez and Salvador Arqueta, in violation of Penal
27 Code section 487, subdivision (a), a felony.

1 **COUNT FOURTEEN**
2 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

6 On and between October 25, 2007 and December 21, 2007, in the County of Orange,
7 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
8 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
9 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
10 Code section 1695.1 to wit: Reyna Gomez and Salvador Arqueta, before fully performing each
11 and every service contracted, or otherwise represented, to be performed in violation of Civil Code
12 section 2945.4, subdivision (a), a felony.

13 **COUNT FIFTEEN**
14 **[GRAND THEFT]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Fourteen, the ATTORNEY
17 GENERAL further complains and states,

18 On and between November 2, 2007 and November 5, 2007, in the County of Orange,
19 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
20 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
21 dollars (\$400) from another, to wit: Michael and Geri Bryant, in violation of Penal Code section
22 487, subdivision (a), a felony.

23 **COUNT SIXTEEN**
24 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts One through Fifteen, the ATTORNEY
27 GENERAL further complains and states,
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1 On and between November 2, 2007 and November 5, 2007, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
3 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
4 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
5 Code section 1695.1 to wit: Michael and Geri Bryant , before fully performing each and every
6 service contracted, or otherwise represented, to be performed in violation of Civil Code section
7 2945.4, subdivision (a), a felony.

8 **COUNT SEVENTEEN**
9 **[GRAND THEFT]**

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

13 On and between October 29, 2007 and November 5, 2007, in the County of Orange,
14 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
15 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
16 dollars (\$400) from another, to wit: Terry Pumphrey and Arlene Fontenot, in violation of Penal
17 Code section 487, subdivision (a), a felony.

18 **COUNT EIGHTEEN**
19 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

23 On and between October 29, 2007 and November 5, 2007, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
25 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
26 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
27 Code section 1695.1 to wit: Terry Pumphrey and Arlene Fontenot, before fully performing each
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1 and every service contracted, or otherwise represented, to be performed in violation of Civil Code
2 section 2945.4, subdivision (a), a felony.

3 **COUNT NINETEEN**
4 **[GRAND THEFT]**

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

8 On and between October 30, 2007 and November 5, 2007, in the County of Orange,
9 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
10 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
11 dollars (\$400) from another, to wit: Anthony Quecut, in violation of Penal Code section 487,
12 subdivision (a), a felony.

13 **COUNT TWENTY**
14 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Nineteen, the ATTORNEY
17 GENERAL further complains and states,

18 On and between October 30, 2007 and November 5, 2007, in the County of Orange,
19 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
20 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
21 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
22 Code section 1695.1 to wit: Anthony Quecut , before fully performing each and every service
23 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
24 subdivision (a), a felony.

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**COUNT TWENTY-ONE
[GRAND THEFT]**

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

On and between November 2, 2007 and December 21, 2007, in the County of Orange, defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit: money for a fictitious mortgage loan modification program, of a value in excess of Four hundred dollars (\$400) from another, to wit: Elva and Fernando Gil, in violation of Penal Code section 487, subdivision (a), a felony.

**COUNT TWENTY-TWO
[FORECLOSURE CONSULTANT -PROHIBITED ACTS]**

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

On and between November 2, 2007 and December 21, 2007, in the County of Orange, defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: Elva and Fernando Gil, before fully performing each and every service contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4, subdivision (a), a felony.

**COUNT TWENTY-THREE
[GRAND THEFT]**

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

1 On and between November 7, 2007 and November 16, 2007, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
3 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
4 dollars (\$400) from another, to wit: Maria Neff, in violation of Penal Code section 487,
5 subdivision (a), a felony.

6 **COUNT TWENTY-FOUR**
7 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

11 On and between November 7, 2007 and November 16, 2007, in the County of Orange,
12 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
13 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
14 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
15 Code section 1695.1 to wit: Maria Neff, before fully performing each and every service
16 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
17 subdivision (a), a felony.

18 **COUNT TWENTY-FIVE**
19 **[GRAND THEFT]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts One through Twenty-Four, the
22 ATTORNEY GENERAL further complains and states,

23 On and between November 30, 2007 and December 5, 2007, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
25 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
26 dollars (\$400) from another, to wit: Lizette Woolfolk, in violation of Penal Code section 487,
27 subdivision (a), a felony.

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1 On and between December 4, 2007 and December 21, 2007, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
3 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
4 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
5 Code section 1695.1 to wit: Timothy and Beverly Chavez, before fully performing each and every
6 service contracted, or otherwise represented, to be performed in violation of Civil Code section
7 2945.4, subdivision (a), a felony.

8 **COUNT TWENTY-NINE**
9 **[GRAND THEFT]**

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

13 On and between December 4, 2007 and January 18, 2008, in the County of Orange,
14 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
15 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
16 dollars (\$400) from another, to wit: Delores Chacon, in violation of Penal Code section 487,
17 subdivision (a), a felony.

18 **COUNT THIRTY**
19 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts One through Twenty-Nine, the
22 ATTORNEY GENERAL further complains and states,

23 On and between December 4, 2007 and January 18, 2008, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
25 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
26 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
27 Code section 1695.1 to wit: Delores Chacon, before fully performing each and every service
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1 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
2 subdivision (a), a felony.

3 **COUNT THIRTY-ONE**
4 **[GRAND THEFT]**

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

8 On and between December 14, 2007 and December 21, 2007, in the County of Orange,
9 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
10 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
11 dollars (\$400) from another, to wit: Charlotte Robinson, in violation of Penal Code section 487,
12 subdivision (a), a felony.

13 **COUNT THIRTY-TWO**
14 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Thirty-One, the ATTORNEY
17 GENERAL further complains and states,

18 On and between December 14, 2007 and December 21, 2007, in the County of Orange,
19 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
20 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
21 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
22 Code section 1695.1 to wit: Charlotte Robinson, before fully performing each and every service
23 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
24 subdivision (a), a felony.

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**COUNT THIRTY-THREE
[GRAND THEFT]**

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts One through Thirty-Two, the ATTORNEY GENERAL further complains and states,

On and between December 14, 2007 and January 18, 2008, in the County of Orange, defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit: money for a fictitious mortgage loan modification program, of a value in excess of Four hundred dollars (\$400) from another, to wit: Elizabeth Bustamantez, in violation of Penal Code section 487, subdivision (a), a felony.

**COUNT THIRTY-FOUR
[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts One through Thirty-Three, the ATTORNEY GENERAL further complains and states,

On and between December 14, 2007 and January 18, 2008, in the County of Orange, defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: Elizabeth Bustamantez, before fully performing each and every service contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4, subdivision (a), a felony.

**COUNT THIRTY-FIVE
[GRAND THEFT]**

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts One through Thirty-Four, the ATTORNEY GENERAL further complains and states,

1 On and between December 15, 2007 and January 18, 2008, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
3 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
4 dollars (\$400) from another, to wit: Mike Robidoux, in violation of Penal Code section 487,
5 subdivision (a), a felony.

6 **COUNT THIRTY-SIX**
7 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts One through Thirty-Five, the ATTORNEY
10 GENERAL further complains and states,

11 On and between December 15, 2007 and January 18, 2008, in the County of Orange,
12 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
13 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
14 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
15 Code section 1695.1 to wit: Mike Robidoux, before fully performing each and every service
16 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
17 subdivision (a), a felony.

18 **COUNT THIRTY-SEVEN**
19 **[GRAND THEFT]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts One through Thirty-Six, the ATTORNEY
22 GENERAL further complains and states,

23 On and between December 17, 2007 and January 18, 2008, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
25 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
26 dollars (\$400) from another, to wit: Juan Gonzalez, in violation of Penal Code section 487,
27 subdivision (a), a felony.

1 On and between January 7, 2008 and January 10, 2008, in the County of Orange,
2 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
3 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
4 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
5 Code section 1695.1 to wit: Charles Cole, before fully performing each and every service
6 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
7 subdivision (a), a felony.

8 **COUNT FORTY-ONE**
9 **[GRAND THEFT]**

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

13 On and between January 9, 2008 and January 18, 2008, in the County of Orange,
14 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
15 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
16 dollars (\$400) from another, to wit: Chuck and Adrienne Styles, in violation of Penal Code
17 section 487, subdivision (a), a felony.

18 **COUNT FORTY-TWO**
19 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

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

23 On and between January 9, 2008 and January 18, 2008, in the County of Orange,
24 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
25 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
26 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
27 Code section 1695.1 to wit: Chuck and Adrienne Styles, before fully performing each and every
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1 service contracted, or otherwise represented, to be performed in violation of Civil Code section
2 2945.4, subdivision (a), a felony.

3 **COUNT FORTY-THREE**
4 **[GRAND THEFT]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts One through Forty-Two, the ATTORNEY
7 GENERAL further complains and states,

8 On and between January 11, 2008 and January 18, 2008, in the County of Orange,
9 defendants MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit:
10 money for a fictitious mortgage loan modification program, of a value in excess of Four hundred
11 dollars (\$400) from another, to wit: Chong Kim, in violation of Penal Code section 487,
12 subdivision (a), a felony.

13 **COUNT FORTY-FOUR**
14 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts One through Forty-Three, the ATTORNEY
17 GENERAL further complains and states,

18 On and between January 11, 2008 and January 18, 2008, in the County of Orange,
19 defendants MARY YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as
20 defined by Civil Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive
21 compensation to wit: money, from the owner of a residence in foreclosure as defined by Civil
22 Code section 1695.1 to wit: Chong Kim, before fully performing each and every service
23 contracted, or otherwise represented, to be performed in violation of Civil Code section 2945.4,
24 subdivision (a), a felony.

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1 **COUNT FORTY-FIVE**
2 **[GRAND THEFT]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts One through Forty-Four, the ATTORNEY
5 GENERAL further complains and states,

6 On or about January 28, 2008, in the County of Orange, defendants MARY YRACEBURU
7 and MARIANNE CURTIS unlawfully took property, to wit: money for a fictitious mortgage loan
8 modification program, of a value in excess of Four hundred dollars (\$400) from another, to wit:
9 John Gallegos, in violation of Penal Code section 487, subdivision (a), a felony.

10 **COUNT FORTY-SIX**
11 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts One through Forty-Five, the ATTORNEY
14 GENERAL further complains and states,

15 On or about January 28, 2008, in the County of Orange, defendants MARY YRACEBURU
16 and MARIANNE CURTIS, being foreclosure consultants as defined by Civil Code section
17 2945.1 did unlawfully claim, demand, charge, collect, or receive compensation to wit: money,
18 from the owner of a residence in foreclosure as defined by Civil Code section 1695.1 to wit: John
19 Gallegos, before fully performing each and every service contracted, or otherwise represented, to
20 be performed in violation of Civil Code section 2945.4, subdivision (a), a felony.

21 **COUNT FORTY-SEVEN**
22 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts One through Forty-Six, the ATTORNEY
25 GENERAL further complains and states,

26 On or about February 15, 2008, in the County of Orange, defendants MARY
27 YRACEBURU and MARIANNE CURTIS, being foreclosure consultants as defined by Civil
28 Code section 2945.1 did unlawfully claim, demand, charge, collect, or receive compensation to

1 wit: money, from the owner of a residence in foreclosure as defined by Civil Code section 1695.1
2 to wit: Jeremiah Anderson, before fully performing each and every service contracted, or
3 otherwise represented, to be performed in violation of Civil Code section 2945.4, subdivision (a),
4 a felony.

5 **COUNT FORTY-EIGHT**
6 **[FORECLOSURE CONSULTANT –PROHIBITED ACTS]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts One through Forty-Seven, the
9 ATTORNEY GENERAL further complains and states,

10 On and between April 16, 2007 and June 13, 2007, in the County of Orange, defendants
11 MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit: money for a
12 fictitious mortgage loan modification program, of a value in excess of Four hundred dollars (\$400)
13 from another, to wit: homeowners identified in bank records for Bank of America account
14 number 0587142631, in violation of Penal Code section 487, subdivision (a), a felony.

15 **COUNT FORTY-NINE**
16 **[GRAND THEFT]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts One through Forty-Eight, the ATTORNEY
19 GENERAL further complains and states,

20 On and between June 15, 2007 and January 31, 2008, in the County of Orange, defendants
21 MARY YRACEBURU and MARIANNE CURTIS unlawfully took property, to wit: money for a
22 fictitious mortgage loan modification program, of a value in excess of Four hundred dollars (\$400)
23 from another, to wit: homeowners identified in bank records for Washington Mutual account
24 number 3124668845, in violation of Penal Code section 487, subdivision (a), a felony.

25 **FIRST SPECIAL ALLEGATION**
26 **[\$65,000 EXCESSIVE TAKING]**

27 It is further alleged that the property taken by defendants MARY YRACEBURU and
28 MARIANNE CURTIS in the commission of the felonies alleged in Counts One through Forty-

1 Nine, which property Defendant intended to take, was of a value in excess of sixty-five thousand
2 dollars (\$65,000) within the meaning of Penal Code sections 12022.6, subdivision (a)(1).

3 **SECOND SPECIAL ALLEGATION**
4 **[\$100,000 EXCESSIVE TAKING]**

5 It is further alleged that the property taken by defendants MARY YRACEBURU and
6 MARIANNE CURTIS in the commission of the felonies alleged in Counts One through Forty-
7 Nine, which property Defendant intended to take, was of a value in excess of one hundred
8 thousand dollars (\$100,000) within the meaning of Penal Code section 1203.045, subdivision (a).

9 **DECLARATION**

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 Dated: March 16, 2009

EDMUND G. BROWN JR.
Attorney General of the State of California

14 By: _____
15 ANGELA K. ROSENAU
16 Deputy Attorney General
17 *Attorneys for Plaintiff*