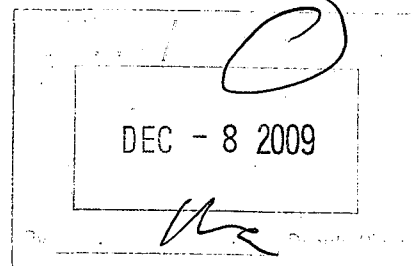


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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SACRAMENTO
10

11 **PEOPLE OF THE STATE OF CALIFORNIA,**

No. 09F08586

12 Plaintiff,

13 v.
14

**FIRST AMENDED FELONY
COMPLAINT**

15 **WILLIAM ARTHUR SASSMAN, II, AKA**
16 **WILLIAM-ARTHUR: SASSMAN, SECOND**
GENERATION©,

17 Defendant.
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 Grace Kodama.
28

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: Grace Kodama, 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

12 **COUNT THREE**

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 Counts One and Two hereof: On or about August 20,
15 2007, at and in the County of Sacramento, State of California, defendant William Arthur
16 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
17 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
18 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
19 Grace Kodama, with the intent to commit larceny and any felony.

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

23 **COUNT FOUR**

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 Three hereof: On or about and
26 between August 31, 2005, and September 18, 2009, at and in the County of Sacramento, State of
27 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
28 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 Ruth Flores.

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: Ruth
11 Flores, 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 Ruth Flores, 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).

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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 Fredrick Anthony Gomez.

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: Fredrick Anthony Gomez, 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 Steven Hamilton 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 Steven Hamilton.

1 **COUNT TEN**

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 Nine hereof: On or about October
4 15, 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: Steven Hamilton, by means of a written or
8 oral 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

12 **COUNT ELEVEN**

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 Counts One through Ten hereof: On or about October
15 17, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
16 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
17 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
18 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
19 Steven Hamilton, with the intent to commit larceny and any felony.

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

23 **COUNT TWELVE**

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 Count One through Eleven hereof: On or about and
26 between November 1, 2005, and September 18, 2009, at and in the County of Sacramento, State
27 of California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
28 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 Doris Burke.

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: Doris Burke, 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 Doris Burke, 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 Constance Gomberg.

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 Paulin Simoni.

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: Paulin Simoni, 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 **COUNT EIGHTEEN**

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 Seventeen hereof: On or about
4 August 15, 2007, at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
6 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
7 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
8 by Paul Simoni, 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 NINETEEN**

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 Counts One through Eighteen hereof: On or about and
15 between January 24, 2007, and September 18, 2009, at and in the County of Sacramento, State of
16 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 Ricardo Garcia.

20
21 **COUNT TWENTY**

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 Nineteen hereof: On or about and
24 between January 24, 2007, and August 10, 2007 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 Sections 25401 and 25540(b) of the Corporations Code of the State of California, in that said
27 defendant did willfully and unlawfully offer or sell a security to a person or persons to wit:
28 Ricardo Garcia, 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 Ricardo Garcia, 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 Heath Charamuga.

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: Heath Charamuga, 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 Heath Charamuga, 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 Caren Bright.

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: Caren Bright, 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
12 **COUNT TWENTY-SEVEN**

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 Counts One through Twenty-Six hereof: On or about
15 July 12, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
16 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
17 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
18 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
19 Caren Bright, with the intent to commit larceny and any felony.

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
23 **COUNT TWENTY-EIGHT**

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 Twenty-Seven hereof: On or about
26 and between July 12, 2005, and September 18, 2009, at and in the County of Sacramento, State of
27 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
28 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 Jackie Smith.

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: Jackie Smith, 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 Jackie Smith, 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 Susanne Howell.

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: Susanne Howell, 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 Susanne Howell, 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).

1 **COUNT THIRTY-FOUR**

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 Thirty-Three hereof: On or about
4 and between May 15, 2006 and September 18, 2009, at and in the County of Sacramento, State of
5 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
6 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
7 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
8 money, the property of David Greenly.

9
10 **COUNT THIRTY-FIVE**

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

20
21 **COUNT THIRTY-SIX**

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 Thirty-Five hereof: On or about
24 and between August 13, 2007, and September 18, 2009, at and in the County of Sacramento, State
25 of 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 Larry Howard.

1 **COUNT THIRTY-SEVEN**

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 Thirty-Six hereof: On or about
4 August 13, 2007 at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
6 the Corporations Code of the State of California, in that said defendant did willfully and
7 unlawfully offer or sell a security to a person or persons to wit: Larry Howard, by means of a
8 written or oral communication which included an untrue statement of a material fact or omitted to
9 state a material fact necessary to make the statement made not misleading in light of the
10 circumstances under which it was made.

11
12 **COUNT THIRTY-EIGHT**

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 Thirty-Seven hereof: On or about
15 and between May 18, 2004, 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 Harlen Maier.

20
21 **COUNT THIRTY-NINE**

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 Thirty-Eight hereof: On or about
24 October 3, 2007 at and in the County of Sacramento, State of California, defendant William
25 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
26 the Corporations Code of the State of California, in that said defendant did willfully and
27 unlawfully offer or sell a security to a person or persons to wit: Harlen Maier by means of a
28 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 Harlen Maier, 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 Julia Magana.

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: Julia Magana 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 Poppy Watson.

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: Poppy Watson 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 **COUNT FORTY-FIVE**

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 Forty-Four hereof: On or about and
4 between April 2, 2007, and September 18, 2009, at and in the County of Sacramento, State of
5 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
6 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
7 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
8 money, the property of Carl Neuhardt.

9
10 **COUNT FORTY-SIX**

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

20
21 **COUNT FORTY-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 Counts One through Forty-Six hereof: On or about
24 April 2, 2007, at and in the County of Sacramento, State of California, defendant William Arthur
25 Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of the
26 State of California, First Degree Residential Burglary, in that said defendant did unlawfully enter
27 an inhabited dwelling house and trailer coach and inhabited portion of a building occupied by
28 Carl Neuhardt, 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 Sherry Cohen.

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: Sherry Cohen 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 Sherry Cohen, 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 Thomas Wolfanger.

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: Thomas Wolfanger 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 Thomas Wolfanger, 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 Marilyn Fisher.

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 Mary Wutzke.

1 **COUNT FIFTY-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 Counts One through Fifty-Five hereof: On or about and
4 between May 11, 2006, and September 18, 2009, at and in the County of Sacramento, State of
5 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
6 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
7 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
8 money, the property of Mark Schroeder.

9
10 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

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

15
16 **COUNT FIFTY-SEVEN**

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 Count One through Fifty-Six hereof: On or about
19 February 11, 2009, 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: Mark Schroeder 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.

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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 Craig Elder.

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: Craig Elder 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 Mark Langford.

1 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

2 It is further alleged as to Count Sixty that in the commission of the above offense the said
3 defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
4 property of a value exceeding \$200,000, within the meaning of Penal Code Sections
5 12022.6(a)(2) and 1203.045.

6
7 **COUNT SIXTY-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 Sixty hereof: On or about
10 December 8, 2008, at and in the County of Sacramento, State of California, defendant William
11 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
12 the Corporations Code of the State of California, in that said defendant did willfully and
13 unlawfully offer or sell a security to a person or persons to wit: Mark Langford by means of a
14 written or oral communication which included an untrue statement of a material fact or omitted to
15 state a material fact necessary to make the statement made not misleading in light of the
16 circumstances under which it was made.

17
18 **COUNT SIXTY-TWO**

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 Sixty-One hereof: On or about
21 December 5, 2008, at and in the County of Sacramento, State of California, defendant William
22 Arthur Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code
23 of the State of California, in that said defendant did unlawfully take money and personal property
24 of a value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Paul Hansen.

25
26 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

27 It is further alleged as to Count Sixty-Two that in the commission of the above offense the
28 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: Paul Hansen 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 David Baca.

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 **COUNT SIXTY-FIVE**

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 Sixty-Four hereof: On or about
4 December 8, 2008, at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
6 the Corporations Code of the State of California, in that said defendant did willfully and
7 unlawfully offer or sell a security to a person or persons to wit: David Baca by means of a written
8 or oral 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
12 **COUNT SIXTY-SIX**

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 Counts One through Sixty-Five hereof: On or about
15 and between January 23, 2008, and September 18, 2009, at and in the County of Sacramento,
16 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
17 violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did
18 unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400),
19 to wit, money, the property of Thomas Galli.

20
21 **COUNT SIXTY-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 Counts One through Sixty-Six hereof: On or about
24 January 23, 2008, at and in the County of Sacramento, State of California, defendant William
25 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
26 the Corporations Code of the State of California, in that said defendant did willfully and
27 unlawfully offer or sell a security to a person or persons to wit: Thomas Galli by means of a
28 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 Thomas Galli, 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 Ryan Sasser.

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: Ryan
3 Sasser 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 Roger Greensfelder.

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: Roger Greensfelder 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 **COUNT SEVENTY-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 Seventy-Two hereof: On or about
4 January 28, 2008, at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
6 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
7 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
8 by Roger Greensfelder, 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 SEVENTY-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 Counts One through Seventy-Three hereof: On or
15 about and between November 7, 2006, and September 18, 2009, at and in the County of
16 Sacramento, State of California, defendant William Arthur Sassman, II did commit a felony
17 namely: a violation of Section 487(a) of the Penal Code of the State of California, in that said
18 defendant did unlawfully take money and personal property of a value exceeding Four Hundred
19 Dollars (\$400), to wit, money, the property of Eric Curtis.

20
21 **COUNT SEVENTY-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 Seventy-Four hereof: On or about
24 April 23, 2007, 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: Eric Curtis 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 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 Kevin York.

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: Kevin York 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 Christine Wardlow.

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: Christine Wardlow 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 Donald Mandel.

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 **COUNT EIGHTY-ONE**

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 Eighty hereof: On or about
4 December 17, 2008, at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
6 the Corporations Code of the State of California, in that said defendant did willfully and
7 unlawfully offer or sell a security to a person or persons to wit: Donald Mandel by means of a
8 written or oral communication which included an untrue statement of a material fact or omitted to
9 state a material fact necessary to make the statement made not misleading in light of the
10 circumstances under which it was made.

11
12 **COUNT EIGHTY-TWO**

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 Counts One through Eighty-One hereof: On or about
15 and between May 29, 2008, 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 Michael David Sanders.

20
21 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

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

25
26 **COUNT EIGHTY-THREE**

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 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: Michael David Sanders 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 Tara Artau.

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: Tara Artau 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 Hanish Vaghela.

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: Hanish Vaghela 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 William Engle.

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: William Engle 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 **COUNT NINETY**

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 Eighty-Nine hereof: On or about
4 and between July 24, 2008, and September 18, 2009, at and in the County of Sacramento, State of
5 California, defendant William Arthur Sassman, II did commit a felony namely: a violation of
6 Section 487(a) of the Penal Code of the State of California, in that said defendant did unlawfully
7 take money and personal property of a value exceeding Four Hundred Dollars (\$400), to wit,
8 money, the property of Mark True.

9
10 **COUNT NINETY-ONE**

11 For a further and separate cause of action, being a different offense from but connected in
12 its commission as the charges set forth in Count One through Ninety hereof: On or about July 24,
13 2008, at and in the County of Sacramento, State of California, defendant William Arthur
14 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
15 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
16 offer or sell a security to a person or persons to wit: Mark True by means of a written or oral
17 communication which included an untrue statement of a material fact or omitted to state a
18 material fact necessary to make the statement made not misleading in light of the circumstances
19 under which it was made.

20
21 **COUNT NINETY-TWO**

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 Ninety-One hereof: On or about
24 and between October 15, 2008, and September 18, 2009, at and in the County of Sacramento,
25 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
26 violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did
27 unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400),
28 to wit, money, the property of Eric Honig.

1 **SPECIAL ALLEGATION - EXCESSIVE TAKING**

2 It is further alleged as to Count Ninety-Two that in the commission of the above offense the
3 said defendant, William Arthur Sassman, with the intent to do so, took, damaged and destroyed
4 property of a value exceeding \$65,000, within the meaning of Penal Code Sections 12022.6(a)(1).
5

6 **COUNT NINETY-THREE**

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 Count One through Ninety-Two hereof: On or about
9 October 15, 2008, at and in the County of Sacramento, State of California, defendant William
10 Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of
11 the Corporations Code of the State of California, in that said defendant did willfully and
12 unlawfully offer or sell a security to a person or persons to wit: Eric Honig by means of a written
13 or oral communication which included an untrue statement of a material fact or omitted to state a
14 material fact necessary to make the statement made not misleading in light of the circumstances
15 under which it was made.
16

17 **COUNT NINETY-FOUR**

18 For a further and separate cause of action, being a different offense from but connected in
19 its commission as the charges set forth in Counts One through Ninety-Three hereof: On or about
20 and between February 15, 2006, and September 18, 2009, at and in the County of Sacramento,
21 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
22 violation of Section 487(a) of the Penal Code of the State of California, in that said defendant did
23 unlawfully take money and personal property of a value exceeding Four Hundred Dollars (\$400),
24 to wit, money, the property of Edward Guanill.
25

26 **COUNT NINETY-FIVE**

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 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: Edward Guanill 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 Scott Hooper, Robert and Donna Hooper, Roy and Ardella Simalenko.

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: Scott Hooper, Robert and Donna
3 Hooper, Roy and Ardella Simalenko 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 Allan Sasser.

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-Eight hereof: On or about
25 and between June 14, 2007, 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: Allan

1 Sasser 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 Counts One through Ninety-Nine: On or about July 30,
8 2009, at and in the County of Sacramento, State of California, defendant William Arthur
9 Sassman, II did commit a felony namely: a violation of Section 487(a) of the Penal Code of the
10 State of California, in that said defendant did unlawfully take money and personal property of a
11 value exceeding Four Hundred Dollars (\$400), to wit, money, the property of Patricia and Donald
12 Grant.

13
14 **COUNT ONE HUNDRED ONE**

15 For a further and separate cause of action, being a different offense from but connected in
16 its commission as the charges set forth in Counts One through One Hundred hereof: On or about
17 July 30, 2009, at and in the County of Sacramento, State of California, defendant William Arthur
18 Sassman, II did commit a felony namely: a violation of Sections 25401 and 25540(b) of the
19 Corporations Code of the State of California, in that said defendant did willfully and unlawfully
20 offer or sell a security to a person or persons to wit: Patricia and Donald Grant by means of a
21 written or oral communication which included an untrue statement of a material fact or omitted to
22 state a material fact necessary to make the statement made not misleading in light of the
23 circumstances under which it was made.

1 **COUNT ONE HUNDRED 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 Counts One through One Hundred One hereof: On or
4 about July 30, 2009, at and in the County of Sacramento, State of California, defendant William
5 Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal Code of
6 the State of California, First Degree Residential Burglary, in that said defendant did unlawfully
7 enter an inhabited dwelling house and trailer coach and inhabited portion of a building occupied
8 by Patricia and Donald Grant, 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 ONE HUNDRED THREE**

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 Counts One through One Hundred Two hereof: On or
15 about October 9, 2009, at and in the County of Sacramento, State of California, defendant
16 William Arthur Sassman, II did commit a felony namely: a violation of Section 476a(a) of the
17 Penal Code of the State of California, in that said defendant did, with the intent to defraud, make,
18 draw, utter, or deliver a check drawn on the Bank of the West account of Systematic Management
19 SVS, LLC in the amount of \$26,220.28 payable to Security Benefit Trust for the benefit of
20 Donald Grant, knowing at the time of such making, drawing, uttering or delivering said check
21 that there were not sufficient funds on deposit for the payment of said check.

22
23 **COUNT ONE HUNDRED FOUR**

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 One Hundred Three hereof: On or
26 about October 9, 2009, at and in the County of Sacramento, State of California, defendant
27 William Arthur Sassman, II did commit a felony namely: a violation of Section 476a(a) of the
28 Penal Code of the State of California, in that said defendant did, with the intent to defraud, make,

1 draw, utter, or deliver a check drawn on the Bank of the West account of Systematic Management
2 SVS, LLC in the amount of \$28,300.13 payable to Security Benefit Trust for the benefit of
3 Patricia Grant, knowing at the time of such making, drawing, uttering or delivering said check
4 that there were not sufficient funds on deposit for the payment of said check.

5
6 **COUNT ONE HUNDRED FIVE**

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 One Hundred Four hereof: On or
9 about November 13, 2009, at and in the County of Sacramento, State of California, defendant
10 William Arthur Sassman, II did commit a felony namely: a violation of Section 476a(a) of the
11 Penal Code of the State of California, in that said defendant did, with the intent to defraud, make,
12 draw, utter, or deliver a check drawn on the Bank of the West account of Systematic Management
13 SVS, LLC in the amount of \$2,300.00 payable to Ruth Flores, knowing at the time of such
14 making, drawing, uttering or delivering said check that there were not sufficient funds on deposit
15 for the payment of said check.

16
17 **COUNT ONE HUNDRED SIX**

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

24
25 **COUNT ONE HUNDRED SEVEN**

26 For a further and separate cause of action, being a different offense from but connected in
27 its commission as the charges set forth in Counts One through One Hundred Six hereof: On or
28 about October 19, 2009, at and in the County of Sacramento, State of California, defendant

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

7
8 **COUNT ONE HUNDRED EIGHT**

9 For a further and separate cause of action, being a different offense from but connected in
10 its commission as the charges set forth in Counts One through One Hundred Seven hereof: On or
11 about October 19, 2009, at and in the County of Sacramento, State of California, defendant
12 William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of the Penal
13 Code of the State of California, First Degree Residential Burglary, in that said defendant did
14 unlawfully enter an inhabited dwelling house and trailer coach and inhabited portion of a building
15 occupied by Jeffrey Smith, with the intent to commit larceny and any felony.

16 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
17 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

18
19 **COUNT ONE HUNDRED 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 Counts One through One Hundred Eight hereof: On or
22 about September 18, 2009, at and in the County of Sacramento, State of California, defendant
23 William Arthur Sassman, II did commit a felony namely: a violation of Sections 25401 and
24 25540(b) of the Corporations Code of the State of California, in that said defendant did willfully
25 and unlawfully offer or sell a security to a person or persons to wit: George Schmidt by means of
26 a written or oral communication which included an untrue statement of a material fact or omitted
27 to state a material fact necessary to make the statement made not misleading in light of the
28 circumstances under which it was made.

1 **COUNT ONE HUNDRED TEN**

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 One Hundred One Nine hereof:
4 On or about September 18, 2009, at and in the County of Sacramento, State of California,
5 defendant William Arthur Sassman, II did commit a felony namely: a violation of Section 459 of
6 the Penal Code of the State of California, First Degree Residential Burglary, in that said
7 defendant did unlawfully enter an inhabited dwelling house and trailer coach and inhabited
8 portion of a building occupied by George Schmidt, with the intent to commit larceny and any
9 felony.

10 "NOTICE: The above offense is a serious felony within the meaning of Penal Code Section
11 1192.7(c)." It is further alleged that the above offense is a violation of Penal Code Section 462(a).

12
13 **COUNT ONE HUNDRED ELEVEN**

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 Count One through One Hundred Ten hereof: On or
16 about and between January 1, 2005, and October 19, 2009, at and in the County of Sacramento,
17 State of California, defendant William Arthur Sassman, II did commit a felony namely: a
18 violation of Sections 25541 of the Corporations Code of the State of California, in that said
19 defendant did willfully and unlawfully engage in acts, practices and a course of business which
20 operated as a fraud and deceit upon a person or persons in connection with the offer of a security
21 to a person or persons, to wit: all investors in Formulating Insurance Agency LLC, Formulating
22 Investments and Systematic Management Services.

23
24 **SPECIAL ALLEGATION - EXCESSIVE TAKING**


25 It is further alleged as to Counts One, Four, Seven, Nine, Twelve, Fifteen, Sixteen,
26 Nineteen, Twenty-Two, Twenty-Five, Twenty-Eight, Thirty-One, Thirty-Four, Thirty-Six, Thirty-
27 Eight, Forty-One, Forty-Three, Forty-Five, Forty-Eight, Fifty-One, Fifty-Four, Fifty-Five, Fifty-
28 Six, Fifty-Eight, Sixty, Sixty-Two, Sixty-Four, Sixty-Six, Sixty-Nine, Seventy-One, Seventy-

1 Four, Seventy-Six, Seventy-Eight, Eighty, Eighty-Two, Eighty-Four, Eighty-Six, Eighty-Eight,
2 Ninety, Ninety-Two, Ninety-Four, Ninety-Six, Ninety-Eight, One Hundred and One Hundred Six
3 that in the commission of the above offenses the said defendant, William Arthur Sassman II, with
4 the intent to do so, took, damaged and destroyed property of a value exceeding \$3,200,000,
5 within the meaning of Penal Code Sections 12022.6(a)(4) and 1203.045.

6
7 **SPECIAL ALLEGATION – WHITE COLLAR CRIME ENHANCEMENT**

8 It is further alleged, pursuant to Penal Code 186.11(a)(2), that the offenses set forth in
9 Counts One, Four, Seven, Nine, Twelve, Fifteen, Sixteen, Nineteen, Twenty-Two, Twenty-Five,
10 Twenty-Eight, Thirty-One, Thirty-Four, Thirty-Six, Thirty-Eight, Forty-One, Forty-Three, Forty-
11 Five, Forty-Eight, Fifty-One, Fifty-Four, Fifty-Five, Fifty-Six, Fifty-Eight, Sixty, Sixty-Two,
12 Sixty-Four, Sixty-Six, Sixty-Nine, Seventy-One, Seventy-Four, Seventy-Six, Seventy-Eight,
13 Eighty, Eighty-Two, Eighty-Four, Eighty-Six, Eighty-Eight, Ninety, Ninety-Two, Ninety-Four,
14 Ninety-Six, Ninety-Eight, One Hundred and One Hundred Six are related felonies, a material
15 element of which is fraud and embezzlement, which involve a pattern of related felony conduct,
16 and the pattern of related felony conduct involves the taking of more than five hundred thousand
17 dollars (\$500,000).

18
19 Dated: November 30, 2009



20 RONALD D. SMETANA
21 Senior Assistant Attorney General
22 Attorney General's Office
23 State of California
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28