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12 ANONYMOUS INVESTOR

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15
16 **IN AND FOR THE COUNTY OF RIVERSIDE**

17 ANONYMOUS INVESTOR,)
18 and similarly situated persons)
19 in the public interest,)
20 Plaintiff/Petitioner,)
21 vs.)
22 JOVANE INVESTMENTS,)
23 COMMUNITY FIRST BANK,)
24 GMAC MORTGAGE CORP.,)
25 SUNTRUST MORTGAGE,)
26 AURORA LOAN SERVICES,)
27 HOME EQ SERVICING,)
28 SLS LOAN SERVICING,)
29 SUNBURST FINANCIAL)
30 SYSTEMS, OETTING)
31 ENTERPRISES, INC.,)
32 DOES 1 through 250, Inclusive,)
33 Defendants/Respondents.)
34 _____)

CASE NO. _____

COMPLAINT FOR FRAUD,
UNFAIR BUSINESS PRACTICES,
DISSOLUTION OF PARTNERSHIP
[Corporations Code § 2000], DECLARATORY
RELIEF; FRAUDULENT CONVEYANCE

Unlimited Civil Jurisdiction

35 ***Plaintiff and Petitioner, ANONYMOUS INVESTOR, hereby petitions and***
36 ***alleges as follows:***

- 37 1. ANONYMOUS INVESTOR (“INVESTOR”) is a resident of the City of Temecula,
38 County of Riverside, State of California. INVESTOR is similarly situated to at least
39 400 other victims of the fraud of Defendant JOVANE INVESTMENTS, or related

1 entities, as alleged herein. Plaintiff sues under a pseudonym because notice of the
2 name of the Plaintiff, at this time, will foreseeably cause harm to her and/or her
3 family because of previous perceived threats made by Defendants or persons related
4 to business dealings of the “JOVANE INVESTMENTS” Defendants and the fact that
5 financial privacy is a huge concern in this case. INVESTOR also seeks protective
6 orders as necessary to the protection of her and her family, in the interest of
7 preventing harm to ongoing investigations, and in the interest of preserving assets
8 held by the Defendants. INVESTOR also wants to provide an opportunity for the
9 Riverside County District Attorney, California Attorney General, or United States
10 Attorney (Southern or Central District) to take over all or part of the criminal or civil
11 prosecution of this case.

12 2. Defendants COMMUNITY FIRST BANK, GMAC MORTGAGE CORP., AURORA
13 LOAN SERVICES, HOME EQ SERVICING, SLS LOAN SERVICING, and DOES 1
14 through 20, Inclusive, are mortgage lending companies who have an interest in the
15 adjudication of this matter and who regularly conduct business within the borders
16 of the State of California, and in the County of Riverside. As many as several
17 hundred loans with said mortgage providers, or other lenders, may be affected by
18 this litigation and said lenders have a direct interest in the constructive trust to be
19 established by this Court as against Defendant JOVANE INVESTMENTS and
20 companies/persons related to the same. Most of these hundreds of loans have been
21 originated in the Murrieta/Temecula Valley. The California Department of
22 Corporations, Federal Bureau of Investigation, and Riverside County District
23 Attorney are aware of the true names and capacities of the related entities involved
24 in this extensive alleged real estate fraud case. Protective orders necessary to the
25 disclosure and dissemination of information relating to said investigations or
26 inquiries by law enforcement will be necessary for the adequate prosecution of this
27 case.

28 3. Defendant JOVANE INVESTMENTS, is a business entity of unknown origin or form,

1 that operates within the County of Riverside, State of California. Upon information
2 and belief, it is alleged that JOVANE INVESTMENTS is ostensibly operating from
3 an address commonly known and located at 26555 Mahonia Way, Murrieta, CA
4 92562. Plaintiff will amend this complaint if new or different information comes to
5 light. JOVANE INVESTMENTS, while purporting to be a legitimate business
6 enterprise, has failed to identify its true address, place of business, or location on the
7 Internet. Defendants SUNBURST FINANCIAL SYSTEMS and OETTING
8 ENTERPRISES, INC., are alleged to be business operating within the State of
9 California, but of unknown true form and identity. These two defendants appear
10 throughout JOVANE INVESTMENTS-related activities as documented by
11 INVESTOR and other class members.

12 4. JOVANE INVESTMENTS is not known to plaintiffs to be licensed as a securities
13 investment firm, certified financial planning firm, law firm, currency broker, or
14 other licensed entity relating to the type of business, which ordinarily requires a
15 license to operate within the State of California, in which JOVANE INVESTMENTS
16 (“JOVANE”) is currently claims to be engaged.

17 5. DOES 21 through 250 are other persons, agents, representatives, employees,
18 principals, parties acting in concert with, or business entities associated with the
19 tortious and illegal activities of Defendant JOVANE. Each of these DOE defendants
20 conspired with, formulated schemes with, acted with, worked with, or acted in a
21 representative capacity as to the others.

22 6. Serious irreparable harm will occur if the JOVANE-related defendants are not
23 stopped from engaging in the illegal behavior complained of herein.

24 **STATEMENT OF RELEVANT FACTS**

25 **APPLICABLE TO ALL CAUSES OF ACTION**

26 7. Plaintiff hereby incorporates paragraphs 1 through 6 as though fully set forth and
27 alleged herein.

28 8. In fall of 2004, Plaintiff joined an alleged investment group based out of Murrieta.

1 The principals and agents of JOVANE, and related mortgage company
2 representatives, were the entities/persons responsible for establishing the group and
3 finding interested investors. JOVANE is not a licensed real estate company, licensed
4 securities firm, licensed financial institution, or licensed currency broker within the
5 United States or California. The “investment group” is a fraud and Plaintiff did not
6 find out about the same until many months later. The investment group commonly
7 lured investors by sponsoring meetings at a Marie Callendars’ food establishment
8 located on Ynez and Rancho California streets in the City of Temecula, County of
9 Riverside, State of California. Said investor meetings took place in and around fall
10 of 2004 and thereafter. Meetings have occurred as recently as just weeks ago. The
11 purpose of these meetings is to have potential investors become involved in the
12 fraudulent schemes referenced in Exhibits “1” and “2.” The schemes all bear the
13 hallmarks of what the Federal Bureau of Investigation views as “property-flipping”
14 and “skimming” real estate activities. (See Exhibit “4” as sought to be incorporated
15 as though fully set forth herein).

16 9. Many of the persons brought into the “investment” group are of Filipino descent and
17 work within the hospital nursing community in the Temecula-Murrieta area and
18 Northern San Diego County. Rancho Springs Medical Center presently employs
19 many of the victims and at least one perpetrator of the fraud described and alleged
20 herein.

21 10. In or about November 2004, the principals of JOVANE represented to Plaintiff and
22 other similarly situated persons at “investor meetings” that the investors could
23 invest and buy into real estate. Also, at some point in time thereafter, Plaintiff class
24 members gave some kind of power of attorney over to the JOVANE-related
25 defendants who used the power to open hundreds of thousands of dollars in open
26 lines of credit. In late 2006, the victims of what appears to be identity theft or
27 misuse of powers of attorney, were demanded by JOVANE-related companies to
28 cash out all open lines of credit, pay the proceeds to the JOVANE-related

1 defendants, or face imminent foreclosure and financial disaster. Other class
2 members were told to cash out retirement accounts or other accounts or be
3 destroyed financially. The persons who made telephonic threats to this effect were
4 associated with JOVANE. Copies of tape-recorded messages relating to the alleged
5 JOVANE scheme are alleged to be in the possession, custody or control of
6 investigating authorities or will soon be.

7 11. The true facts relating to the scheme are set forth in Attachment "1," a true and
8 correct copy of a letter sent to the Riverside County District Attorney's office by
9 counsel herein. The document is redacted so as not to interfere with ongoing
10 federal, state and local investigations into the individual or related persons involved
11 in the scheme to defraud the Plaintiff and similarly situated persons. All unredacted
12 portions are true and correct and are fully incorporated as though fully alleged and
13 set forth herein. Plaintiff will amend this complaint as necessary to effectuate justice
14 and disclosure as required by the facts or relevant court orders.

15 12. The loans or mortgage obligations taken out with respect to the properties
16 mentioned in Exhibit "1" were with the other named Defendants or their
17 predecessors. All of these loans are about to go into a default and foreclosure status.
18 The local courts will soon be inundated with hundreds of cases involving failed loans
19 relating to the facts surrounding the instant litigation. During the pendency of the
20 investigation of this case, Plaintiff seeks an injunction preventing the same with
21 related orders allowing all rents or other profits from the properties to be held in
22 constructive trust for the Defendants other than JOVANE.

23 13. JOVANE INVESTMENTS and DOES 21 through 30 are alleged to be currently in
24 possession, custody or control of excess funds received from escrow on the bad loans
25 with the mortgage company/holder Defendants, and any "investment" returns or
26 interest on the money belong to the other mortgage-holder Defendants who have a
27 beneficial, equitable or security interest in the same. JOVANE's funds are alleged
28 to be on deposit with UNION BANK OF CALIFORNIA or other California banking

1 institutions. Funds have and continue to be wired by and through a companies
2 known as SUNBURST FINANCIAL SYSTEMS and OETTING ENTERPRISES, INC.,
3 Both companies are believed to have been involved in prior investigations by private
4 and/or governmental entities. (See Exhibit "5" as incorporated herewith in its
5 entirety as to allegations and alleged facts set forth therein).

6 14. On or about May 31, 2006, JOVANE purports to have purchased Iraqi Dinars on
7 behalf of INVESTOR. Said purchases were allegedly made on and behalf of other
8 plaintiff class members as well. A redacted copy of the fraudulent agreement
9 presented to INVESTOR is provided herewith. INVESTOR never purchased such
10 currency. Exhibit "2" was provided to INVESTOR after the alleged date that dinars
11 were allegedly purchased (mid 2006). The statement of facts/averments contained
12 in Exhibit "2" is a lie. Exhibit "2" has been presented for signatures by licensed
13 notary public Chris Smith, who worked for the JOVANE-related Defendants. Her
14 notary journal is the subject of a written demand to avoid spoliation of evidence.
15 The notary journal contains the names of many other victims who are members of
16 the plaintiff class alleged herein. A notary by the name of "Crystal Fingers" is also
17 alleged to have been involved in the documentation leading up to the bad loans and
18 currency investments described herein.

19 15. JOVANE is not a registered currency exchange representative or authorized agent
20 of the United States Treasury Department or Iraqi government.

21 16. JOVANE is not a registered securities broker.

22 17. JOVANE is not a licensed banking institution.

23 18. JOVANE is not a licensed financial planning entity.

24 19. JOVANE is not registered as a corporation with the Secretary of State.

25 20. JOVANE is related to certain persons engaged in the practice of real estate as set
26 forth in Exhibit "1."

27 21. The current United States Dollar ("USD") to Iraqi Dinar ("ID") currency exchange
28 rate is less than 600USD:1,000,000ID. The reasonable exchange rate has never,

1 since post-war issuance of the dinars, been 25,000USD:1,000,000ID.

2 22. Iraqi dinars have never been delivered to Plaintiff or other class members as
3 indicated in Exhibit “2,” although a purchase was alleged to have occurred in late
4 spring of 2006. Had dinars been provided as promised or represented, they would
5 have appeared substantially similar to the images contained in Exhibit “3” hereto,
6 which a true and correct exemplar of the appearance of current Iraqi dinars put into
7 circulation after the overthrow of Saddam Hussein.

8 23. Money allegedly held by JOVANE was, in part, to be used to pay mortgage payments
9 to the other mortgage-holder Defendants. Alternatively, the money held by JOVANE
10 is purchase money and the other Defendants maintain a security interest in the
11 same. JOVANE or its representatives have represented in loan documentation that
12 the monies in JOVANE INVESTMENTS, SUNBURST FINANCIAL SYSTEMS, or
13 OETTING ENTERPRISES “accounts” are that of Plaintiff’s and there are bank
14 records with wire transfer information *and* loan documentation held by the innocent
15 mortgage-holder co-defendants which confirms the same as well.

16 24. Plaintiff seeks the imposition of a constructive trust as against all assets of JOVANE
17 and any alter-egos, principals, or operators of the JOVANE INVESTMENTS
18 business.

19 25. As a result of the actions of JOVANE, the Plaintiff has been personally and severely
20 damaged in an amount far exceeding \$1,000,000.00. It is alleged herein that the
21 total value and economic effect of the fraud against Plaintiff, class members,
22 neighbors of homes in foreclosure or about to be in foreclosure, and the Riverside
23 County Assessor’s office, and the Temecula/Murrieta community (bad loans, stolen
24 money, damaged credit histories, lost retirement accounts, interest in fraudulent
25 credit, foreclosure costs, lost home values, diminution of neighborhood values) likely
26 exceeds \$1,200,000,000.00. The plaintiff class seeks damages in said amount plus
27 punitive damages not to exceed 10 times the value of the case. Plaintiff alleges that
28 there are over 400 investors in JOVANE-related fraud schemes and that each “owns”

1 at least several properties with individual loan values of \$550,000-\$800,000.
2 Conservatively, the fraud value is in the hundreds of millions of dollars. The
3 decreasing value of real property in the region, inventory of available homes for sale,
4 building permits, and continuing activities of the defendants could cause this
5 number to go much higher. It should also be noted that not all JOVANE-related
6 plaintiffs own real estate. Some were defrauded through direct cash investments in
7 JOVANE-related investments. However, the fraud on all anticipated class members
8 bears core similarities in fact and legal analysis. Class certification will be necessary
9 to efficiently dispose of all relevant claims and to prevent inundation of an already
10 overcrowded civil justice system in this Court.

11 26. The conduct of the Defendants was reckless, intentional, fraudulent and done with
12 the desire to oppress the rights of the plaintiff class and its members.

13 **FIRST CAUSE OF ACTION**

14 **FOR FRAUD**

15 **As Against JOVANE INVESTMENTS and DOES 21-250**

16 27. Plaintiff hereby incorporates paragraphs 1 through 26 as though fully set forth
17 herein.

18 28. The statements of fact in Exhibit "2" are completely misleading, false, and intended
19 to induce JOVANE investors into using money borrowed from the mortgage-holder
20 Defendants for investment in alleged Iraqi dinars. JOVANE's principals do not
21 disclose that they intend on keeping the difference between the 25,000.00 USD that
22 they are charging for 1,000,000.00ID and the actual \$400-500.00 value, at best, of
23 the same dinars.

24 29. JOVANE appears to be representing itself as a part of legitimate currency exchange
25 markets and JOVANE has no such qualifications.

26 30. JOVANE, for all intensive purposes, is not a "real" company. However, the
27 principals referenced in Exhibit "1," and whose true names and capacities are known
28 to governmental agencies mentioned herein, are operating the company known as

1 JOVANE INVESTMENTS.

2 31. JOVANE's misrepresentation is intentional and fraudulent.

3 32. Defendant's representations, as effectuated by their notary public representatives
4 and in Exhibit "2," were related to material facts concerning the investments
5 holdings of INVESTOR and other members of the plaintiff class.

6 33. Defendants owed a fiduciary duty to plaintiff class members since Defendant
7 claimed to be financial advisers and currency exchange brokers.

8 34. Each and every averment, statement of fact, and presumed circumstances
9 surrounding the presentation of Exhibit "2" to members of the plaintiff class were
10 and are false.

11 35. Each of the JOVANE-related defendants, knew that the presentation, language,
12 represented legal effect of, and circumstances of Exhibit "2" were false, misleading,
13 and intended to cause financial harm to recipients, including members of the
14 plaintiff class.

15 36. The falsity alleged above was known by relevant defendants at the time the
16 documents were presented to members of the plaintiff class.

17 37. The presentation and explanation of Exhibit "2" and similar documents to class
18 members was made with the intent to defraud the members of the plaintiff class
19 including, but not limited to, INVESTOR.

20 38. The plaintiff class members and INVESTOR were not aware of the falsity of the
21 claims of Defendants at the time representations were made concerning the real
22 estate investment program and JOVANE activities.

23 39. As a direct and foreseeable result of the fraud of the defendants, plaintiffs were
24 sustained damages as alleged above.

25 **SECOND CAUSE OF ACTION**

26 **FOR UNFAIR BUSINESS PRACTICES**

27 **As Against JOVANE INVESTMENTS and DOES 21-250**

28 38. Plaintiff hereby incorporates paragraphs 1 through 39 as though fully set forth

1 herein.

2 39. The practices of the defendants, as alleged above, are in direct violation of *California*
3 *Business & Professions Code* § 17200, 17500, as such acts are unfair, fraudulent, and
4 injurious to California consumers.

5 40. The practices of the defendants, as alleged above, fall squarely within the meaning
6 of *California Business & Professions Code* § 17203, and are subject to immediate
7 injunction with or without bond. Plaintiff also demands that Defendant JOVANE
8 and any related companies be put into receivership immediately, with or without
9 notice. Imposition of a constructive trust in conjunction with the same is sought
10 herewith.

11 41. The practices of the defendants, as alleged above, are subject to restitution to the
12 members of the plaintiff class and the mortgage-holder defendants.

13 42. Plaintiff and class members seek all equitable, legal or other relief appropriate to
14 making them and the mortgage-holder defendants whole.

15 **THIRD CAUSE OF ACTION**

16 **FOR DISSOLUTION OF PARTNERSHIP**

17 **As Against JOVANE INVESTMENTS and DOES 21-250**

18 43. Plaintiff hereby incorporates paragraphs 1 through 39 as though fully set forth
19 herein.

20 44. The real estate fraud scheme perpetrated by JOVANE has the markings of an
21 intended partnership inasmuch as JOVANE and its principals became connected
22 with the plaintiff class and its members for the purpose of doing business with each
23 other for a common purpose.

24 45. To the extent that any partnership or joint venture exists as a matter of law or fact,
25 Plaintiff class members seek, by way of petition, dissolution of any existing
26 partnership pursuant to *California Corporations Code* § 2000 or related provisions
27 of law as may be applicable to this case.

28 46. Plaintiff seeks a receivership of Defendants named in this cause of action and all

1 related companies. Imposition of a constructive trust in conjunction with the same
2 is sought herewith.

3 **FOURTH CAUSE OF ACTION**

4 **FOR DECLARATORY RELIEF & INDEMNITY BY JOVANE**

5 **As Against All Defendants**

6 47. There exists a legitimate controversy over the facts and legal allegations contained
7 in Paragraphs 1 through 46 above.

8 48. There is a legal controversy as to the meaning and legal importance of Exhibit "2"
9 and any executed documents that exist between other class members and the
10 Defendants as related to any happenings with JOVANE or its principals (including
11 mortgage brokers, appraisers, agents, title companies, escrow companies and other
12 related entities).

13 49. The controversy cannot be resolved without judicial intervention.

14 50. Plaintiff and related class members seek a decree as to the rights, obligations,
15 privileges, benefits and meaning of Exhibit "2" and the legal duties of the parties as
16 alleged herein.

17 51. Plaintiff seeks indemnity against Defendant JOVANE and DOES 21-250 with respect
18 to her obligations under any mortgages with any other named defendants herein.

19 52. The mortgage-holder defendants have already given notices to INVESTOR relating
20 to defaults on the loans referenced herein. A total of 10 separate loans, at a loan
21 value exceeding \$5,000,000.00, are affected as to INVESTOR alone. The total
22 number of loans affected by JOVANE-related activities is likely in the hundreds, if
23 not thousands, within the Temecula/Murrieta area. The enforceability and
24 collection of the same are dependent on this Court's rulings and protective orders
25 as sought herein.

26 53. Plaintiff has placed the mortgage-holder defendants on notice of the intent to file
27 this action. This action is necessary to prevent future harm to other investors and
28 to prevent interference with complete investigation and adjudication of all possible

1 claims against the JOVANE-related Defendants.

2 54. Notice has been given to all related persons or parties with respect to the duty to
3 preserve evidence necessary to the prosecution of this matter by Plaintiff,
4 prospective class members, or the mortgage-holder defendants. Judicial relief is
5 sought as to the handling, administration, and scope of release of information to said
6 parties or others.

7 **FIFTH CAUSE OF ACTION**

8 **FOR FRAUDULENT CONVEYANCE**

9 **(As Against JOVANE INVESTMENTS, SUNBURST FINANCIAL SYSTEMS,**
10 **OETTING ENTERPRISES, INC., and DOES 21-200)**

11 55. Plaintiff hereby incorporates paragraphs 1 through 54 as though fully set forth and
12 alleged herein.

13 56. The transfers of excess loan proceeds from transactions, as described in Exhibit "1,"
14 made between JOVANE-related entities and was made with the intent to hinder,
15 delay and defraud the mortgage-holder defendants named herein, who are creditors
16 of Plaintiff INVESTOR and class members.

17 57. At all relevant times Plaintiffs were creditors of JOVANE INVESTMENTS,
18 SUNBURST FINANCIAL SYSTEMS, and OETTING ENTERPRISES, INC., as a
19 matter of law.

20 58. Claims arose before the transfers alleged in this case. Transfers of assets that could
21 have been used to satisfy the lenders or plaintiffs, as creditors, were made without
22 lawful consideration by the Defendants and in conjunction with persons and
23 companies commonly known as Hendrix Montecastro, Helen Montecastro,
24 Stonewood Consulting, James Duncan, Pacific Wealth Management, Rose
25 Valenciano, Nelly Carpo, Chris Smith, Crystal Fingers, Bob Montecastro, Maurice
26 McCloud, Linda Brooks, and one Terri Aime. The exact involvement of these
27 persons is yet unknown as to full scope and effect. Plaintiffs reserve the right to
28 amend this complaint as appropriate depending on the culpability or non-culpability

1 of these persons and entities.

2 59. The transfers alleged herein are avoidable per *California Civil Code* §§ 3439.04(a)
3 and 3439.04(b).

4 60. The transfers alleged herein are avoidable per *California Civil Code* § 3439.05.

5 61. Payments made to JOVANE INVESTMENTS, SUNBURST FINANCIAL SYSTEMS,
6 OETTING ENTERPRISES, INC., or any other Defendant were made without giving
7 reasonably equivalent value in exchange.

8 62. But for the shady transactions mentioned in this complaint, JOVANE
9 INVESTMENTS, was an otherwise insolvent entity.

10 63. Plaintiffs are entitled to damages from each of the defendants in a sum not less than
11 \$1,000,000.00.

12 64. Plaintiff is entitled to interest on principal balance running from Fall 2004 to
13 judgment.

14 65. Plaintiff seeks the imposition of a constructive trust for the benefit of all creditors
15 affected by this action.

16 66. Plaintiff seeks imposition of a receivership over the Defendants named herein for
17 purposes of disgorging any funds received by way of unlawful transfers.

18 **PRAYER FOR RELIEF**

19 ***WHEREFOR, Plaintiff prays for the following relief:***

20 1. Certification of this case as a class action upon proper motion or application. In the
21 alternative a designation of complex or provisionally complex is sought for this case
22 because of the complexity of legal and factual issues and the number of parties and
23 witnesses likely to present herein.

24 2. Dissolution of JOVANE INVESTMENTS and any other companies who are brought
25 into this case by way of later amendment.

26 3. The placement of Defendant JOVANE INVESTMENTS into receivership.

27 4. Issuance of injunctive relief to protect plaintiff, co-defendants, the public, and
28 prospective class members.

- 1 5. Damages in the amount of \$1,200,000,000.00 to be placed in constructive or actual
2 trust to be distributed to victims of the JOVANE-Defendants' fraud and to those
3 governmental agencies who incur costs as a result of the investigation of any matters
4 against the JOVANE-related defendants, whether named or unnamed.
- 5 6. The granting of any requests for intervention by any governmental or regulatory
6 agency who seeks the same in this case, if at all.
- 7 7. Punitive damages as to the first cause of action, not to exceed 10 times the value of
8 any proven fraud herein.
- 9 8. Costs of suit.
- 10 9. Restitution, constructive trust, and rescission where appropriate to make Plaintiff
11 whole on any or all of the causes of action as alleged.
- 12 10. Any and all other relief as necessary or deemed appropriate in this case.
- 13 11. Attorneys' fees pursuant to *California Code of Civil Procedure* § 1021.5 and the
14 provisions of *California Business & Professions Code* § 17200, et seq.

15
16 Respectfully submitted:

17 DATED : 1/6/07

ACKERMAN, COWLES & LINDSLEY

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20
21 RICHARD D. ACKERMAN, ESQ.,
22 STEPHEN A. LINDSLEY, ESQ.,
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