

COUNT 2

On or about May 23, 2014 in the above named judicial district, the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully and knowingly procure and offer a false and forged instrument, **Grant Deed #2014-0188271**, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Emma Adel**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Mazen Fazah**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 3

On or about May 23, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Xuemin Zhang** and used that information for an unlawful purpose (**Grant Deed #2014-0188271**) and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Xuemin Zhang.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 4

On or about May 23, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Kimberly Jane Jones** and used that information for an unlawful purpose (**Grant Deed #2014-0188271**) and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Kimberly Jane Jones .

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 5

On or about May 23, 2014 in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, **Preliminary Change of Ownership Report Dated May 23, 2014**, knowing the same to be false, altered, forged and counterfeited.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 6

On or about May 23, 2014 in the above named judicial district, the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully and knowingly procure and offer a false and forged instrument, **Preliminary Change of Ownership Report Dated May 23, 2014**, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 7

On or about May 27, 2014 in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, **(Affidavit- Uninsured Deed dated May 27, 2014)**, knowing the same to be false, altered, forged and counterfeited.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 8

On or about May 27, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Xuemin Zhang** and used that information for an unlawful purpose **(Affidavit- Uninsured Deed dated May 27, 2014)**, and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Xuemin Zhang.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 9

On or about May 27, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Kimberly Jane Jones** and used that information for an unlawful purpose, (**Affidavit-Uninsured Deed dated May 27, 2014**), and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Kimberly Jane Jones.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 10

On or about June 11, 2014 in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, **Grant Deed #2014-0210606**, knowing the same to be false, altered, forged and counterfeited.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 11

On or about June 11, 2014 in the above named judicial district, the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully and knowingly procure and offer a false and forged instrument, **Grant Deed #2014-0210606**, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Emma Adel**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Mazen Fazah**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 12

On or about June 11, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Xuemin Zhang** and used that information for an unlawful purpose (**Grant Deed #2014-0210606**) and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Xuemin Zhang.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 13

On or about June 11, 2014 in the above named judicial district, the crime of **IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did willfully and unlawfully obtain personal identifying information of **Kimberly Jane Jones** and used that information for an unlawful purpose (**Grant Deed #2014-0210606**) and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of Kimberly Jane Jones.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 14

On or about June 11, 2014 in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, **Preliminary Change of Ownership Report-Dated June 11, 2014**, knowing the same to be false, altered, forged and counterfeited.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 15

On or about June 11, 2014 in the above named judicial district, the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully and knowingly procure and offer a false and forged instrument, **Preliminary Change of Ownership Report-Dated June 11, 2014**, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 16

On or about June 25, 2014 in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, **Grant Deed #2014-227866**, knowing the same to be false, altered, forged and counterfeited.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 17

On or about June 25, 2014 in the above named judicial district, the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT, in violation of PENAL CODE SECTION 115(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully and knowingly procure and offer a false and forged instrument, **Grant Deed #2014-227866**, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be filed, registered, and recorded under a law of this state or the United States.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Emma Adel**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Mazen Fazah**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 18

On or about June 25, 2014 in the above named judicial district, the crime of **GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit **Cash in the amount of \$444,802**, the property of Firoz Ali and Tahira Ali.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Emma Adel**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged as to counts 2, 11, 17, 18 that in the commission of the above offenses the said defendant **Mazen Fazah**, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of **Penal Code section 12022.6(a)(2)**.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 19

On or about May 23, 2014 through June 25, 2014, in the above named judicial district, the crime of **CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **PROCURING AND OFFERING FALSE OR FORGED INSTRUMENT**, in violation of **Section 115(a) of the Penal Code**, a felony; that pursuant to and for the purpose of carrying out the

objects and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of San Bernardino:

1. **Emma Adel and Mazen Fazah** met with Jose Hernandez at subject property to sell subject property fo \$450,000.
2. **Emma Adel and Mazen Fazah** signed as officers for the Perkins Trust, the company to which the subject property was illegally transferred.
3. **Emma Adel** provided notarized documents to Palomares Escrow needed for the sale of the subject property.
4. **Mazen Fazah** accompanied **Emma Adel** to Palomares Escrow to assist in the completion of the Seller's Distribution Instructions.
5. **Emma Adel** provided Palomares Escrow with the following forged documents:
 - A. Grant Deed # 2014-0188271
 - B. Affidavit – Uninsured Deed
 - C. Corrected Grant Deed # 2014-0210606
6. Proceeds from the sale of the subject property were sent to an account in the name of **Mazen Fazah**. Information for this account was provided to Palomares Escrow by **Mazen Fazah**.

It is further alleged, pursuant to **Penal Code section 186.11(a)(2)**, that the offenses set forth in counts 1-22 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

COUNT 20

On or about June 26, 2014 in the above named judicial district, the crime of **MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$444,802** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Grand Theft**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

COUNT 21

On or about June 26, 2014 in the above named judicial district, the crime of **MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$100,000** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of criminal activity, to wit: **Grand Theft**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

COUNT 22

On or about July 22, 2014 in the above named judicial district, the crime of **MONEY LAUNDERING, in violation of PENAL CODE SECTION 186.10(a)**, a felony, was committed by **Emma Adel and Mazen Fazah**, who did unlawfully conduct and attempt to conduct a transaction involving a monetary instrument or instruments of a value exceeding **\$100,006** through a financial institution with the intent to promote, manage, establish, carry on, and facilitate the promotion,

management, establishment, and carrying on of criminal activity, to wit: **Grand Theft**, and knowing that the monetary instrument represented the proceeds of, and was derived directly or indirectly from the proceeds of, criminal activity.

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 22 COUNT(S).

Executed at San Bernardino, California, on November 24, 2014.

John Vega

John Vega

DECLARANT AND COMPLAINANT

Agency: District Attorney B of I-REF

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Emma Adel	09/20/1969		A10149904	
Mazen Fazah	07/28/1975		A34250168	

