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8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF FRESNO

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

13 Plaintiff,

14 v.

15 **CRAIG MERRILL MORTENSEN (DOB**
16 **09/08/53),**
17 **SANDRA ELAINE BARTON**
18 **(DOB 05/03/83),**
19 **CHRISTOPHER SPENCER BARTON**
20 **(DOB 02/04/82),**
21 **CAMBRIA LISA BARTON**
22 **(DOB 01/04/93)**
23 **DANIEL PAUL VEDENOFF**
24 **(DOB 07/29/84), and**
25 **SHELDON WAYNE FEIGEL**
26 **(DOB 07/21/63),**

27 Defendants.

Case No. F14900385

FELONY COMPLAINT

Date:

Time:

Dept.:

Judge:

Action Filed: January 14, 2013

28 The Attorney General of the State of California accuses Defendants CRAIG M.
MORTENSEN, SANDRA E. BARTON, CHRISTOPHER S. BARTON, SPENCER K.
BARTON, CAMBRIA L. BARTON, DANIEL P. VEDENOFF, and SHELDON W. FEIGEL of
the following crimes, which are connected to one another in their commission:

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COUNT 1
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

The ATTORNEY GENERAL complains and states:

On and between November 19 and November 23, 2009, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Merced County Superior Court Case No. CV000655 for Assessor’s Parcel Number (APN) 024-241-004, with a street address of 1416 Joseph Street, Livingston, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 2
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charge set forth in Count 1, the ATTORNEY GENERAL further complains and states:

On and between November 19 and November 23, 2009, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 3
[PERJURY BY DECLARATION]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 and 2, the ATTORNEY GENERAL further complains and states:

1 On or about November 19, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she was the sole owner in fee simple title to certain real property with a street address of 1416
4 Joseph Street located in Livingston, CA and had acquired title to the property by adverse
5 possession under Code of Civil Procedure section 325 by occupying and claiming the property
6 continuously for more than five (5) years prior to the filing of the complaint, as declared in the
7 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Merced County Superior
8 Court Case No. CV000655, in violation of Penal Code section 118, subdivision (a), a felony.

9 **COUNT 4**
10 **[SUBORNATION OF PERJURY]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 3, the ATTORNEY GENERAL
13 further complains and states:

14 On or about November 19, 2009, in the County of Fresno, Defendant CRAIG
15 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
16 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
17 would testify, declare, depose, and certify under penalty of perjury in a case in which such
18 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
19 to wit, the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Merced County
20 Superior Court Case No. CV000655, to willfully state as true a material matter which said person
21 knew to be false, to wit: that SANDRA BARTON was the sole owner in fee simple title to certain
22 real property with a street address of 1416 Joseph Street located in Livingston, CA and had
23 acquired title to the property by adverse possession under Code of Civil Procedure section 325
24 by occupying and claiming the property continuously for more than five (5) years prior to the
25 filing of the complaint, in violation of Penal Code section 127, a felony.

26 **COUNT 5**
27 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**
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1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 4, the ATTORNEY GENERAL
3 further complains and states:

4 On and between November 24 and November 25, 2009, in the County of Fresno,
5 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
6 procure and offer, or cause, a false or forged instrument, to wit: the FIRST AMENDED
7 COMPLAINT TO QUIET TITLE in Merced County Superior Court Case No. CV000655 for
8 APN 024-241-004, with a street address of 1416 Joseph Street, Livingston, CA, to be filed,
9 registered, and recorded in a public office within this state, which instrument, if genuine, might be
10 filed, registered, and recorded under a law of this state or the United States, in violation of Penal
11 Code section 115, subdivision (a), a felony.

12 **COUNT 6**
13 **[PREPARING FALSE EVIDENCE]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 5, the ATTORNEY GENERAL
16 further complains and states:

17 On and between November 24 and November 25, 2009, in the County of Fresno,
18 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or
19 ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to
20 produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and
21 true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
22 section 134, a felony.

23 **COUNT 7**
24 **[PERJURY BY DECLARATION]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 6, the ATTORNEY GENERAL
27 further complains and states:
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1 On or about November 21, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she was the sole owner in fee simple title to certain real property with a street address of 1416
4 Joseph Street located in Livingston, CA and had acquired title to the property by adverse
5 possession under Code of Civil Procedure section 325 by occupying and claiming the property
6 continuously for more than five (5) years prior to the filing of the complaint, as declared in the
7 VERIFICATION attached to the FIRST AMENDED COMPLAINT TO QUIET TITLE in
8 Merced County Superior Court Case No. CV000655, in violation of Penal Code section 118,
9 subdivision (a), a felony.

10 **COUNT 8**
11 **[SUBORNATION OF PERJURY]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 7, the ATTORNEY GENERAL
14 further complains and states:

15 On or about November 21, 2009, in the County of Fresno, Defendant CRAIG
16 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
17 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
18 would testify, declare, depose, and certify under penalty of perjury in a case in which such
19 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
20 to wit, the VERIFICATION attached to the FIRST AMENDED COMPLAINT TO QUIET
21 TITLE in Merced County Superior Court Case No. CV000655, to willfully state as true a material
22 matter which said person knew to be false, to wit: that SANDRA BARTON was the sole owner in
23 fee simple title to certain real property with a street address of 1416 Joseph Street located in
24 Livingston, CA and had acquired title to the property by adverse possession under Code of Civil
25 Procedure section 325 by occupying and claiming the property continuously for more than five
26 (5) years prior to the filing of the complaint, in violation of Penal Code section 127, a felony.

27 **COUNT 9**
28 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 8, the ATTORNEY GENERAL
3 further complains and states:

4 On and between December 15 and December 29, 2009, in the County of Fresno,
5 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
6 procure and offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION
7 FOR ORDER FOR PUBLICATION OF SUMMONS and SUPPORTING DECLARATION in
8 Merced County Superior Court Case No. CV000655 for APN 024-241-004, with a street address
9 of 1416 Joseph Street, Livingston, CA, to be filed, registered, and recorded in a public office
10 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
11 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
12 felony.

13 **COUNT 10**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 9, the ATTORNEY GENERAL
17 further complains and states:

18 On and between December 15 and December 29, 2009, in the County of Fresno,
19 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or
20 ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to
21 produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and
22 true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
23 section 134, a felony.

24 **COUNT 11**
25 **[PERJURY BY DECLARATION]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 10, the ATTORNEY GENERAL
28 further complains and states:

1 On or about December 15, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
4 and Complaint to [decedents] at their last known address would be futile because . . . the real
5 property in question [1416 Joseph Street, Livingston, CA] has been in [her] care, custody, control,
6 and possession for more than six years and neither defendants nor any of their relatives reside
7 there,” as declared in the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF
8 SUMMONS and SUPPORTING DECLARATION in Merced County Superior Court Case No.
9 CV000655, in violation of Penal Code section 118, subdivision (a), a felony.

10 **COUNT 12**
11 **[SUBORNATION OF PERJURY]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 11, the ATTORNEY GENERAL
14 further complains and states:

15 On or about December 15, 2009, in the County of Fresno, Defendant CRAIG
16 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
17 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
18 would testify, declare, depose, and certify under penalty of perjury in a case in which such
19 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
20 to wit, the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS
21 and SUPPORTING DECLARATION in Merced County Superior Court Case No. CV000655, to
22 willfully state as true a material matter which said person knew to be false, to wit: “[s]ubstitute
23 service . . . could not be accomplished because mailing a copy of the Summons and Complaint to
24 [decedents] at their last known address would be futile because . . . the real property in question
25 [1416 Joseph Street, Livingston, CA] has been in [her] care, custody, control, and possession for
26 more than six years and neither defendants nor any of their relatives reside there,” in violation of
27 Penal Code section 127, a felony.

28 **COUNT 13**

1 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

2 For a further and separate cause of complaint, being a different offense from but connected
3 in its commission with the charges set forth in Counts 1 through 12, the ATTORNEY GENERAL
4 further complains and states:

5 On and between April 5 and April 26, 2010, in the County of Fresno, Defendants CRAIG
6 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
7 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
8 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Merced County
9 Superior Court Case No. CV000655 for APN 024-241-004, with a street address of 1416 Joseph
10 Street, Livingston, CA, to be filed, registered, and recorded in a public office within this state,
11 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
12 the United States, in violation of Penal Code section 115, subdivision (a), a felony.

13 **COUNT 14**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 13, the ATTORNEY GENERAL
17 further complains and states:

18 On and between April 5 and April 26, 2010, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
20 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
21 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
22 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
23 felony.

24 **COUNT 15**
25 **[PERJURY BY DECLARATION]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 14, the ATTORNEY GENERAL
3 further complains and states:

4 On or about April 5, 2010, in the County of Fresno, defendant SANDRA BARTON did
5 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
6 that she “moved into it [1416 Joseph Street, Livingston, CA] with the intent of obtaining it
7 through adverse possession” . . . [and] “began to occupy and safeguard the subject house in
8 September of 2004,” as declared in the DECLARATION OF SANDRA BARTON IN SUPPORT
9 OF APPLICATION TO ENTER DEFAULT JUDGMENT in Merced County Superior Court
10 Case No. CV000655, in violation of Penal Code section 118, subdivision (a), a felony.

11 **COUNT 16**
12 **[SUBORNATION OF PERJURY]**

13 For a further and separate cause of complaint, being a different offense from but connected
14 in its commission with the charges set forth in Counts 1 through 15, the ATTORNEY GENERAL
15 further complains and states:

16 On or about April 5, 2012, in the County of Fresno, Defendant CRAIG MORTENSEN did
17 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
18 commit perjury in that he procured said person, who was to take an oath that she would testify,
19 declare, depose, and certify under penalty of perjury in a case in which such testimony,
20 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
21 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
22 DEFAULT JUDGMENT in Merced County Superior Court Case No. CV000655, to willfully
23 state as true a material matter which said person knew to be false, to wit: that SANDRA
24 BARTON “moved into it [1416 Joseph Street, Livingston, CA] with the intent of obtaining it
25 through adverse possession” . . . [and] “began to occupy and safeguard the subject house in
26 September of 2004,” in violation of Penal Code section 127, a felony.

27 **COUNT 17**
28 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 16, the ATTORNEY GENERAL
3 further complains and states:

4 On and between April 15 and April 26, 2010, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
6 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
7 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
8 Merced County Superior Court Case No. CV000655 for APN 024-241-004, with a street address
9 of 1416 Joseph Street, Livingston, CA, to be filed, registered, and recorded in a public office
10 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
11 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
12 felony.

13 **COUNT 18**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 17, the ATTORNEY GENERAL
17 further complains and states:

18 On and between April 15 and April 26, 2010, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
20 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
21 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
22 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
23 felony.

24 **COUNT 19**
25 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 18, the ATTORNEY GENERAL
28 further complains and states:

1 On and between September 29 and October 25, 2010, in the County of Fresno, Defendants
2 SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer,
3 or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE TO REAL
4 PROPERTY in Fresno County Superior Court Case No. 10CECG03751 for APN 471-162-02,
5 commonly known as 4739 E. Orleans Ave., Fresno, CA, to be filed, registered, and recorded in a
6 public office within this state, which instrument, if genuine, might be filed, registered, and
7 recorded under a law of this state or the United States, in violation of Penal Code section 115,
8 subdivision (a), a felony.

9 **COUNT 20**
10 **[PREPARING FALSE EVIDENCE]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 19, the ATTORNEY GENERAL
13 further complains and states:

14 On and between September 29 and October 25, 2010, in the County of Fresno,
15 Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully prepare a false or ante-
16 dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce
17 it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon
18 a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section
19 134, a felony.

20 **COUNT 21**
21 **[PERJURY BY DECLARATION]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 20, the ATTORNEY GENERAL
24 further complains and states:

25 On or about September 29, 2010, in the County of Fresno, Defendant SANDRA BARTON
26 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
27 that beginning on or about February 28, 2004, and continuing to the present time, SANDRA
28 BARTON, and no other party, had been in possession of and had resided in 4739 E. Orleans

1 Ave., Fresno, CA, thereby gaining title by adverse possession under Code of Civil Procedure
2 section 324, as declared in the VERIFICATION attached to the COMPLAINT TO QUIET
3 TITLE TO REAL PROPERTY in Fresno County Superior Court Case No. 10CECG03751, in
4 violation of Penal Code section 118, subdivision (a), a felony.

5 **COUNT 22**
6 **[SUBORNATION OF PERJURY]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 21, the ATTORNEY GENERAL
9 further complains and states:

10 On or about September 29, 2010, in the County of Fresno, Defendant SHELDON FEIGEL
11 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
12 commit perjury in that he procured said person, who was to take an oath that she would testify,
13 declare, depose, and certify under penalty of perjury in a case in which such testimony,
14 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
15 VERIFICATION attached to the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in
16 Fresno County Superior Court Case No. 10CECG03751, to willfully state as true a material
17 matter which said person knew to be false, to wit: that beginning on or about February 28, 2004,
18 and continuing to the present time, SANDRA BARTON, and no other party, had been in
19 possession of and had resided in 4739 E. Orleans Ave., Fresno, CA, thereby gaining title by
20 adverse possession under Code of Civil Procedure section 324, in violation of Penal Code section
21 127, a felony.

22 **COUNT 23**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 22, the ATTORNEY GENERAL
26 further complains and states:

27 On and between July 12 and July 27, 2011, in the County of Fresno, Defendants
28 SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer,

1 or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
2 SUPPORT OF REQUEST FOR DEFAULT JUDGMENT in Fresno County Superior Court Case
3 No. 10CECG03751 for APN 471-162-02, commonly known as 4739 E. Orleans Ave., Fresno,
4 CA, to be filed, registered, and recorded in a public office within this state, which instrument, if
5 genuine, might be filed, registered, and recorded under a law of this state or the United States, in
6 violation of Penal Code section 115, subdivision (a), a felony.

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8 **COUNT 24**
9 **[PREPARING FALSE EVIDENCE]**

10 For a further and separate cause of complaint, being a different offense from but connected
11 in its commission with the charges set forth in Counts 1 through 23, the ATTORNEY GENERAL
12 further complains and states:

13 On and between July 12 and July 27, 2011, in the County of Fresno, Defendants
14 SHELDON FEIGEL and SANDRA BARTON did unlawfully prepare a false or ante-dated book,
15 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
16 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
17 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
18 felony.

19 **COUNT 25**
20 **[PERJURY BY DECLARATION]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 24, the ATTORNEY GENERAL
23 further complains and states:

24 On or about July 12, 2011, in the County of Fresno, Defendant SANDRA BARTON did
25 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
26 that “[o]n or about February 28, 2004, [she] took possession of the real property [4739 E. Orleans
27 Ave., Fresno, CA] and have remained in sole possession since that time” and “no other person has
28 been in possession of the real property, besides myself, since that time,” as declared in the

1 DECLARATION OF SANDRA BARTON IN SUPPORT OF REQUEST FOR DEFAULT
2 JUDGMENT in Fresno County Superior Court Case No. 10CECG03751, in violation of Penal
3 Code section 118, subdivision (a), a felony.

4 **COUNT 26**
5 **[SUBORNATION OF PERJURY]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 25, the ATTORNEY GENERAL
8 further complains and states:

9 On or about July 12, 2011, in the County of Fresno, Defendant SHELDON FEIGEL did
10 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
11 commit perjury in that he procured said person, who was to take an oath that she would testify,
12 declare, depose, and certify under penalty of perjury in a case in which such testimony,
13 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
14 DECLARATION OF SANDRA BARTON IN SUPPORT OF REQUEST FOR DEFAULT
15 JUDGMENT in Fresno County Superior Court Case No. 10CECG03751, to willfully state as true
16 a material matter which said person knew to be false, to wit: “[o]n or about February 28, 2004,
17 [she] took possession of the real property [4739 E. Orleans Ave., Fresno, CA] and have remained
18 in sole possession since that time” and “no other person has been in possession of the real
19 property, besides myself, since that time,” in violation of Penal Code section 127, a felony.

20 **COUNT 27**
21 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 26, the ATTORNEY GENERAL
24 further complains and states:

25 On and between September 26 and September 28, 2012, in the County of Fresno,
26 Defendants SHELDON FEIGEL and CAMBRIA BARTON did unlawfully and knowingly
27 procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET
28 TITLE TO REAL PROPERTY in Fresno County Superior Court Case No. 12CECG03114 for

1 APN 471-162-02, commonly known as 4739 E. Orleans Ave., Fresno, CA, to be filed, registered,
2 and recorded in a public office within this state, which instrument, if genuine, might be filed,
3 registered, and recorded under a law of this state or the United States, in violation of Penal Code
4 section 115, subdivision (a), a felony.

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6 **COUNT 28**
[PREPARING FALSE EVIDENCE]

7
8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts 1 through 27, the ATTORNEY GENERAL
10 further complains and states:

11 On and between September 26 and September 28, 2012, in the County of Fresno,
12 Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully prepare a false or ante-
13 dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce
14 it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon
15 a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section
16 134, a felony.

17 **COUNT 29**
[PERJURY BY DECLARATION]

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 28, the ATTORNEY GENERAL
20 further complains and states:

21 On or about September 27, 2012, in the County of Fresno, Defendant CAMBRIA
22 BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be
23 false, to wit: that beginning on or about January 4, 2006, and continuing to the present time,
24 CAMBRIA BARTON, and no other party, had been in possession of and had resided in 4739 E.
25 Orleans Ave., Fresno, CA, as declared in the VERIFICATION attached to the COMPLAINT TO
26 QUIET TITLE TO REAL PROPERTY in Fresno County Superior Court Case No.
27 12CECG03114, in violation of Penal Code section 118, subdivision (a), a felony.
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COUNT 30
[SUBORNATION OF PERJURY]

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 29, the ATTORNEY GENERAL
5 further complains and states:

6 On or about September 27, 2012, in the County of Fresno, Defendant SHELDON FEIGEL
7 did willfully and unlawfully procure another person, to wit, Defendant CAMBRIA BARTON, to
8 commit perjury in that he procured said person, who was to take an oath that she would testify,
9 declare, depose, and certify under penalty of perjury in a case in which such testimony,
10 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
11 VERIFICATION attached to the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in
12 Fresno County Superior Court Case No. 12CECG03114, to willfully state as true a material
13 matter which said person knew to be false, to wit: that beginning on or about January 4, 2006, and
14 continuing to the present time, CAMBRIA BARTON, and no other party, had been in possession
15 of and had resided in 4739 E. Orleans Ave., Fresno, CA, in violation of Penal Code section 127, a
16 felony.

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COUNT 31
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 30, the ATTORNEY GENERAL
21 further complains and states:

22 On and between November 8 and November 14, 2012, in the County of Fresno, Defendants
23 SHELDON FEIGEL and CAMBRIA BARTON did unlawfully and knowingly procure and offer,
24 or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR ORDER FOR
25 PUBLICATION OF SUMMONS in Fresno County Superior Court Case No. 12CECG03114,
26 titled "SANDRA [*sic*] BARTON ... vs. CARL EASTERDAY..." for APN 471-162-02,
27 commonly known as 4739 E. Orleans Ave., Fresno, CA, to be filed, registered, and recorded in a
28 public office within this state, which instrument, if genuine, might be filed, registered, and

1 recorded under a law of this state or the United States, in violation of Penal Code section 115,
2 subdivision (a), a felony.

3
4 **COUNT 32**
[PREPARING FALSE EVIDENCE]

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 31, the ATTORNEY GENERAL
7 further complains and states:

8 On and between November 8 and November 14, 2012, in the County of Fresno, Defendants
9 SHELDON FEIGEL and CAMBRIA BARTON did unlawfully prepare a false or ante-dated
10 book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and
11 to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
12 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
13 felony.

14
15 **COUNT 33**
[PERJURY BY DECLARATION]

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 32, the ATTORNEY GENERAL
18 further complains and states:

19 On or about November 8, 2012, in the County of Fresno, Defendant CAMBRIA BARTON
20 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
21 that she has “been in possession of the property located at 4739 E. Orleans Ave., Fresno, CA,
22 since January 4, 2006,” and has “been unable to make any contact with defendants, or any relative
23 . . . ,” as declared in the DECLARATION OF CAMBRIA BARTON attached as Exhibit B to the
24 EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Fresno
25 County Superior Court Case No. 12CECG03114, titled “SANDRA [*sic*] BARTON ... vs. CARL
26 EASTERDAY...,” in violation of Penal Code section 118, subdivision (a), a felony.

27
28 **COUNT 34**
[SUBORNATION OF PERJURY]

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2 For a further and separate cause of complaint, being a different offense from but connected
3 in its commission with the charges set forth in Counts 1 through 33, the ATTORNEY GENERAL
4 further complains and states:

5 On or about November 8, 2012, in the County of Fresno, Defendant SHELDON FEIGEL
6 did willfully and unlawfully procure another person, to wit, Defendant CAMBRIA BARTON, to
7 commit perjury in that he procured said person, who was to take an oath that she would testify,
8 declare, depose, and certify under penalty of perjury in a case in which such testimony,
9 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
10 DECLARATION OF CAMBRIA BARTON attached as Exhibit B to the EX PARTE
11 APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Fresno County Superior
12 Court Case No. 12CECG03114, titled “SANDRA [*sic*] BARTON ... vs. CARL
13 EASTERDAY...,” to willfully state as true a material matter which said person knew to be false,
14 to wit: that CAMBRIA BARTON has “been in possession of the property located at 4739 E.
15 Orleans Ave., Fresno, CA, since January 4, 2006,” and has “been unable to make any contact
16 with defendants, or any relative . . . ,” in violation of Penal Code section 127, a felony.

17 **COUNT 35**
18 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 34, the ATTORNEY GENERAL
21 further complains and states:

22 On and between May 9 and May 18, 2007, in the County of Fresno, Defendants CRAIG
23 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
24 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Fresno
25 County Superior Court Case No. 07CECG01569 for APN 460-227-14, with a street address of
26 4436 Ball Ave., Fresno, CA, to be filed, registered, and recorded in a public office within this
27 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
28 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

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COUNT 36
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 35, the ATTORNEY GENERAL further complains and states:

On and between May 9 and May 18, 2007, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 37
[PERJURY BY DECLARATION]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 36, the ATTORNEY GENERAL further complains and states:

On or about May 17, 2007, in the County of Fresno, Defendant SANDRA BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: that she had acquired title in fee simple to real property identified as APN 460-227-14, with a street address of 4436 Ball Ave., Fresno, CA, by adverse possession under Code of Civil Procedure section 325 by occupying and claiming the property continuously for more than five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior Court Case No. 07CECG01569, in violation of Penal Code section 118, subdivision (a), a felony.

COUNT 38
[SUBORNATION OF PERJURY]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 37, the ATTORNEY GENERAL
3 further complains and states:

4 On or about May 17, 2007, in the County of Fresno, Defendant CRAIG MORTENSEN did
5 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
6 commit perjury in that he procured said person, who was to take an oath that she would testify,
7 declare, depose, and certify under penalty of perjury in a case in which such testimony,
8 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
9 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior
10 Court Case No. 07CECG01569, to willfully state as true a material matter which said person
11 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
12 identified as APN 460-227-14, with a street address of 4436 Ball Ave., Fresno, CA, under Code
13 of Civil Procedure section 325 by occupying and claiming the property continuously for more
14 than five (5) years prior to the filing of the complaint, in violation of Penal Code section 127, a
15 felony.

16 **COUNT 39**
17 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 38, the ATTORNEY GENERAL
20 further complains and states:

21 On or about January 17, 2008, in the County of Fresno, Defendants CRAIG MORTENSEN
22 and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or
23 forged instrument, to wit: the MEMORANDUM OF POINTS AND AUTHORITIES IN
24 SUPPORT OF APPLICATION FOR JUDGMENT QUIETING TITLE in Fresno County
25 Superior Court Case No. 07CECG01569 for APN 460-227-14, with a street address of 4436 Ball
26 Ave., Fresno, CA, to be filed, registered, and recorded in a public office within this state, which
27 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
28 United States, in violation of Penal Code section 115, subdivision (a), a felony.

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COUNT 40
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 39, the ATTORNEY GENERAL further complains and states:

On or about January 17, 2008, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 41
[PERJURY UNDER OATH]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 40, the ATTORNEY GENERAL further complains and states:

On or about January 24, 2008, in the County of Fresno, Defendant SANDRA BARTON, being a person who, having taken an oath that she would testify, declare, depose, and certify truly before a competent tribunal, officer, and person, to wit, Michele M. Rodriguez, in a case in which such an oath may by law be administered, to wit, HEARING RE DEFAULT PROVE-UP ON A QUIET TITLE ACTION in Fresno County Superior Court Case No. 07CECG01569, did and contrary to such oath state as true a material matter which she knew to be false, to wit: that she “moved in, took control, possession of the subject property [4436 Ball Ave., Fresno, CA] in July of 2002,” [¶] . . . [¶] and “took possession by giving permission to my brother [CHRISTOPHER BARTON] to move into a room above the garage on the property,” and [¶] “had renters in there for three years,” since [¶] . . . [¶] “June of 2005,” in violation of Penal Code section 118, subdivision (a), a felony.

COUNT 42
[SUBORNATION OF PERJURY]

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2 For a further and separate cause of complaint, being a different offense from but connected
3 in its commission with the charges set forth in Counts 1 through 41, the ATTORNEY GENERAL
4 further complains and states:

5 On or about January 24, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN
6 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
7 commit perjury in that he procured said person, who was to take an oath that she would testify,
8 declare, depose, and certify under penalty of perjury in a case in which such testimony,
9 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit,
10 HEARING RE DEFAULT PROVE-UP ON A QUIET TITLE ACTION in Fresno County
11 Superior Court Case No. 07CECG01569, to willfully state as true a material matter which said
12 person knew to be false, to wit: that SANDRA BARTON “moved in, took control, possession of
13 the subject property [4436 Ball Ave., Fresno, CA] in July of 2002,” [¶] . . . [¶] and “took
14 possession by giving permission to my brother [CHRISTOPHER BARTON] to move into a room
15 above the garage on the property,” and [¶] “had renters in there for three years,” since [¶] . . . [¶]
16 “June of 2005,” in violation of Penal Code section 127, a felony.

17 **COUNT 43**
18 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 42, the ATTORNEY GENERAL
21 further complains and states:

22 On and between August 5 and August 6, 2010, in the County of Fresno, Defendants CRAIG
23 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
24 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Fresno
25 County Superior Court Case No. 10CECG02733 for APN 328-172-15, with a street address of
26 2978 S. Clara Ave., Fresno, CA, to be filed, registered, and recorded in a public office within this
27 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
28 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

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COUNT 44
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 43, the ATTORNEY GENERAL further complains and states:

On and between August 5 and August 6, 2010, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 45
[PERJURY BY DECLARATION]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 44, the ATTORNEY GENERAL further complains and states:

On or about August 6, 2010, in the County of Fresno, Defendant SANDRA BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: that she had acquired title in fee simple to real property identified as APN 328-172-15, with a street address of 2978 S. Clara Ave., Fresno, CA, by adverse possession under Code of Civil Procedure section 325 by occupying and claiming the property continuously for more than five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior Court Case No. 10CECG02733, in violation of Penal Code section 118, subdivision (a), a felony.

COUNT 46
[SUBORNATION OF PERJURY]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 45, the ATTORNEY GENERAL
3 further complains and states:

4 On or about August 6, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN
5 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
6 commit perjury in that he procured said person, who was to take an oath that she would testify,
7 declare, depose, and certify under penalty of perjury in a case in which such testimony,
8 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
9 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior
10 Court Case No. 10CECG02733, to willfully state as true a material matter which said person
11 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
12 identified as 328-172-15, with a street address of 2978 S. Clara Ave., Fresno, CA, under Code of
13 Civil Procedure section 325 by occupying and claiming the property continuously for more than
14 five (5) years prior to the filing of the complaint, in violation of Penal Code section 127, a felony.

15 **COUNT 47**
16 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 46, the ATTORNEY GENERAL
19 further complains and states:

20 On and between August 28 and September 9, 2010, in the County of Fresno, Defendants
21 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
22 offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR
23 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Fresno
24 County Superior Court Case No. 10CECG02733 for APN 328-172-15, with a street address of
25 2978 S. Clara Ave., Fresno, CA, to be filed, registered, and recorded in a public office within this
26 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
27 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.
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COUNT 48
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 47, the ATTORNEY GENERAL further complains and states:

On and between August 28 and September 9, 2010, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 49
[PERJURY BY DECLARATION]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 48, the ATTORNEY GENERAL further complains and states:

On or about August 28, 2010, in the County of Fresno, Defendant SANDRA BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons and Complaint to [decedents] at their last known address would be futile because . . . that is the real property in question [2978 S. Clara Ave., Fresno, CA] which is in my custody, control, and possession, and Defendants do not reside there,” as declared in the DECLARATION IN SUPPORT of the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Fresno County Superior Court Case No. 10CECG02733, in violation of Penal Code section 118, subdivision (a), a felony.

COUNT 50
[SUBORNATION OF PERJURY]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 49, the ATTORNEY GENERAL
3 further complains and states:

4 On or about August 28, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN
5 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
6 commit perjury in that he procured said person, who was to take an oath that she would testify,
7 declare, depose, and certify under penalty of perjury in a case in which such testimony,
8 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
9 DECLARATION IN SUPPORT of the EX PARTE APPLICATION FOR ORDER FOR
10 PUBLICATION OF SUMMONS in Fresno County Superior Court Case No. 10CECG02733, to
11 willfully state as true a material matter which said person knew to be false, to wit: that
12 “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons and
13 Complaint to [decedents] at their last known address would be futile because . . . that is the real
14 property in question [2978 S. Clara Ave., Fresno, CA] which is in my custody, control, and
15 possession, and Defendants do not reside there,” in violation of Penal Code section 127, a felony.

16 **COUNT 51**
17 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 50, the ATTORNEY GENERAL
20 further complains and states:

21 On and between January 4 and 18, 2011, in the County of Fresno, Defendants CRAIG
22 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
23 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
24 AUTHORITIES IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT in Fresno
25 County Superior Court Case No. 10CECG02733 for APN 328-172-15, with the street address of
26 2978 S. Clara Ave., Fresno, CA, to be filed, registered, and recorded in a public office within this
27 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
28 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

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COUNT 52
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 51, the ATTORNEY GENERAL further complains and states:

On and between January 4 and January 18, 2011, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records, instruments in writing, and other matters and things, with intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 53
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 52, the ATTORNEY GENERAL further complains and states:

On and between January 4 and January 18, 2011, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno County Superior Court Case No. 10CECG02733 for APN 328-172-15, with the street address of 2978 S. Clara Ave., Fresno, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 54
[PREPARING FALSE EVIDENCE]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 53, the ATTORNEY GENERAL
3 further complains and states:

4 On and between January 4 and January 18, 2011, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 55**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 54, the ATTORNEY GENERAL
14 further complains and states:

15 On or about January 4, 2011, in the County of Fresno, Defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that “in February of 2005 . . . I moved into it [2978 S. Clara Ave., Fresno, CA] . . . and controlled
18 the occupancy of the house with the intent of ultimately obtaining it through adverse possession,”
19 and “began to occupy, maintain, control and safeguard the subject house in February of 2005
20 [and] have done so ever since,” as declared in the DECLARATION OF SANDRA BARTON IN
21 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno County Superior
22 Court Case No. 10CECG02733, in violation of Penal Code section 118, subdivision (a), a felony.

23 **COUNT 56**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 55, the ATTORNEY GENERAL
27 further complains and states:
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1 On or about January 4, 2011, in the County of Fresno, Defendant CRAIG MORTENSEN
2 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
7 DEFAULT JUDGMENT in Fresno County Superior Court Case No. 10CECG02733, to willfully
8 state as true a material matter which said person knew to be false, to wit: that “in February of
9 2005 . . . I moved into it [2978 S. Clara Ave., Fresno, CA] . . . and controlled the occupancy of
10 the house with the intent of ultimately obtaining it through adverse possession,” and “began to
11 occupy, maintain, control and safeguard the subject house in February of 2005 [and] have done so
12 ever since,” in violation of Penal Code section 127, a felony.

13 **COUNT 57**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 56, the ATTORNEY GENERAL
17 further complains and states:

18 On or about July 23, 2009, in the County of Fresno, Defendants CRAIG MORTENSEN
19 and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or
20 forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Fresno County Superior Court
21 Case No. 09CECG02605 for APN 450-032-11, with the street address of 1535 Geraldine Way,
22 Fresno, CA, to be filed, registered, and recorded in a public office within this state, which
23 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
24 United States, in violation of Penal Code section 115, subdivision (a), a felony.

25 **COUNT 58**
26 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 57, the ATTORNEY GENERAL
3 further complains and states:

4 On or about July 23, 2009, in the County of Fresno, Defendants CRAIG MORTENSEN
5 and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records,
6 instruments in writing, and other matters and things, with intent to produce them, and to allow
7 them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
8 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
9 felony.

10 **COUNT 59**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 58, the ATTORNEY GENERAL
14 further complains and states:

15 On or about July 23, 2009, in the County of Fresno, Defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that she had acquired title in fee simple to real property identified as APN 450-032-11, with the
18 street address of 1535 Geraldine Way, Fresno, CA, by adverse possession under Code of Civil
19 Procedure section 325 by occupying and claiming the property continuously for more than five
20 (5) years prior to the filing of the complaint, as declared in the VERIFICATION to the
21 COMPLAINT TO QUIET TITLE in Fresno County Superior Court Case No. 09CECG02605, in
22 violation of Penal Code section 118, subdivision (a), a felony.

23 **COUNT 60**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 59, the ATTORNEY GENERAL
27 further complains and states:
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1 On or about July 23, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did
2 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior
7 Court Case No. 09CECG02605, to willfully state as true a material matter which said person
8 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
9 identified as APN 450-032-11, with the street address of 1535 Geraldine Way, Fresno, CA, by
10 adverse possession under Code of Civil Procedure section 325 by occupying and claiming the
11 property continuously for more than five (5) years prior to the filing of the complaint, in violation
12 of Penal Code section 127, a felony.

13 **COUNT 61**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 60, the ATTORNEY GENERAL
17 further complains and states:

18 On and between August 25 and August 26, 2009, in the County of Fresno, Defendants
19 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
20 offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR
21 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Fresno
22 County Superior Court Case No. 09CECG02605 for APN 450-032-11, with the street address of
23 1535 Geraldine Way, Fresno, CA, to be filed, registered, and recorded in a public office within
24 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
25 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

26 **COUNT 62**
27 **[PREPARING FALSE EVIDENCE]**
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1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 61, the ATTORNEY GENERAL
3 further complains and states:

4 On and between August 25 and August 26, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 63**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 62, the ATTORNEY GENERAL
14 further complains and states:

15 On or about August 25, 2009, in the County of Fresno, Defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
18 and Complaint to [decedent’s daughter] at her last known address would be futile because . . . that
19 is the real property in question [1535 Geraldine Way, Fresno, CA] which is in my custody,
20 control, and possession, and [decedent’s daughter] does not reside there,” as declared in the
21 DECLARATION IN SUPPORT of the EX PARTE APPLICATION FOR ORDER FOR
22 PUBLICATION OF SUMMONS in Fresno County Superior Court Case No. 09CECG02605, in
23 violation of Penal Code section 118, subdivision (a), a felony.

24 **COUNT 64**
25 **[SUBORNATION OF PERJURY]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 63, the ATTORNEY GENERAL
28 further complains and states:

1 On or about August 25, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
2 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 DECLARATION IN SUPPORT of the EX PARTE APPLICATION FOR ORDER FOR
7 PUBLICATION OF SUMMONS in Fresno County Superior Court Case No. 09CECG02605, to
8 willfully state as true a material matter which said person knew to be false, to wit: that
9 “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons and
10 Complaint to [decedent’s daughter] at her last known address would be futile because . . . that is
11 the real property in question [1535 Geraldine Way, Fresno, CA] which is in my custody, control,
12 and possession, and [decedent’s daughter] does not reside there,” in violation of Penal Code
13 section 127, a felony.

14 **COUNT 65**
15 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 64, the ATTORNEY GENERAL
18 further complains and states:

19 On and between November 20 and December 3, 2009, in the County of Fresno, Defendants
20 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
21 offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
22 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
23 Fresno County Superior Court Case No. 09CECG02605 for APN 450-032-11, with the street
24 address of 1535 Geraldine Way, Fresno, CA, to be filed, registered, and recorded in a public
25 office within this state, which instrument, if genuine, might be filed, registered, and recorded
26 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
27 (a), a felony.

28 **COUNT 66**
[PREPARING FALSE EVIDENCE]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 65, the ATTORNEY GENERAL
3 further complains and states:

4 On and between November 20 and December 3, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 67**
11 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 66, the ATTORNEY GENERAL
14 further complains and states:

15 On and between November 20 and December 3, 2009, in the County of Fresno, Defendants
16 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
17 offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA
18 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno
19 County Superior Court Case No. 09CECG02605 for APN 450-032-11, with the street address of
20 1535 Geraldine Way, Fresno, CA, to be filed, registered, and recorded in a public office within
21 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
22 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

23 **COUNT 68**
24 **[PREPARING FALSE EVIDENCE]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 67, the ATTORNEY GENERAL
27 further complains and states:
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1 On and between November 20 and December 3, 2009, in the County of Fresno, Defendants
2 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
3 books, papers, records, instruments in writing, and other matters and things, with intent to
4 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
5 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
6 of Penal Code section 134, a felony.

7 **COUNT 69**
8 **[PERJURY BY DECLARATION]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 68, the ATTORNEY GENERAL
11 further complains and states:

12 On or about November 20, 2009, in the County of Fresno, Defendant SANDRA BARTON
13 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
14 that she “moved into it [1535 Geraldine Way, Fresno, CA] with the intent of obtaining it through
15 adverse possession” and “began to control, maintain and safeguard the subject house in January
16 of 2004,” as declared in the DECLARATION OF SANDRA BARTON IN SUPPORT OF
17 APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno County Superior Court Case
18 No. 09CECG02605, in violation of Penal Code section 118, subdivision (a), a felony.

19 **COUNT 70**
20 **[SUBORNATION OF PERJURY]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 69, the ATTORNEY GENERAL
23 further complains and states:

24 On or about November 20, 2009, in the County of Fresno, Defendant CRAIG
25 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
26 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
27 would testify, declare, depose, and certify under penalty of perjury in a case in which such
28 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,

1 to wit, the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO
2 ENTER DEFAULT JUDGMENT in Fresno County Superior Court Case No. 09CECG02605, to
3 willfully state as true a material matter which said person knew to be false, to wit: that SANDRA
4 BARTON “moved into it [1535 Geraldine Way, Fresno, CA] with the intent of obtaining it
5 through adverse possession” and “began to control, maintain and safeguard the subject house in
6 January of 2004,” in violation of Penal Code section 127, a felony.

7 **COUNT 71**
8 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 70, the ATTORNEY GENERAL
11 further complains and states:

12 On and between January 27 and January 29, 2010, in the County of Fresno, Defendants
13 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
14 offer, or cause, a false or forged instrument, to wit: the SUPPLEMENTAL EX PARTE
15 APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN
16 SUPPORT in Fresno County Superior Court Case No. 09CECG02605 for APN 450-032-11, with
17 the street address of 1535 Geraldine Way, Fresno, CA, to be filed, registered, and recorded in a
18 public office within this state, which instrument, if genuine, might be filed, registered, and
19 recorded under a law of this state or the United States, in violation of Penal Code section 115,
20 subdivision (a), a felony.

21 **COUNT 72**
22 **[PREPARING FALSE EVIDENCE]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 71, the ATTORNEY GENERAL
25 further complains and states:

26 On and between January 27 and January 29, 2010, in the County of Fresno, Defendants
27 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
28 books, papers, records, instruments in writing, and other matters and things, with intent to

1 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
2 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
3 of Penal Code section 134, a felony.

4 **COUNT 73**
5 **[PERJURY BY DECLARATION]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 72, the ATTORNEY GENERAL
8 further complains and states:

9 On or about January 27, 2010, in the County of Fresno, Defendant SANDRA BARTON did
10 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
11 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
12 and Complaint to [decedent’s daughter] at her last known address would be futile because . . . that
13 is the real property in question [1535 Geraldine Way, Fresno, CA] which is in my custody,
14 control, and possession, and [decedent’s daughter] does not reside there,” as declared in the
15 SUPPLEMENTAL DECLARATION IN SUPPORT of the EX PARTE APPLICATION FOR
16 ORDER FOR PUBLICATION OF SUMMONS in Fresno County Superior Court Case No.
17 09CECG02605, in violation of Penal Code section 118, subdivision (a), a felony.

18 **COUNT 74**
19 **[SUBORNATION OF PERJURY]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 73, the ATTORNEY GENERAL
22 further complains and states:

23 On or about January 27, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN
24 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
25 commit perjury in that he procured said person, who was to take an oath that she would testify,
26 declare, depose, and certify under penalty of perjury in a case in which such testimony,
27 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
28 DECLARATION IN SUPPORT of the SUPPLEMENTAL EX PARTE APPLICATION FOR

1 ORDER FOR PUBLICATION OF SUMMONS in Fresno County Superior Court Case No.
2 09CECG02605, to willfully state as true a material matter which said person knew to be false, to
3 wit: that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the
4 Summons and Complaint to [decedent’s daughter] at her last known address would be futile
5 because . . . that is the real property in question [1535 Geraldine Way, Fresno, CA] which is in
6 my custody, control, and possession, and [decedent’s daughter] does not reside there,” in
7 violation of Penal Code section 127, a felony.

8 **COUNT 75**
9 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

10 For a further and separate cause of complaint, being a different offense from but connected
11 in its commission with the charges set forth in Counts 1 through 74, the ATTORNEY GENERAL
12 further complains and states:

13 On and between April 15 and April 20, 2010, in the County of Fresno, Defendants CRAIG
14 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
15 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
16 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
17 Fresno County Superior Court Case No. 09CECG02605 for APN 450-032-11, with the street
18 address of 1535 Geraldine Way, Fresno, CA, to be filed, registered, and recorded in a public
19 office within this state, which instrument, if genuine, might be filed, registered, and recorded
20 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
21 (a), a felony.

22 **COUNT 76**
23 **[PREPARING FALSE EVIDENCE]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 75, the ATTORNEY GENERAL
26 further complains and states:

27 On and between April 15 and April 20, 2010, in the County of Fresno, Defendants CRAIG
28 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,

1 papers, records, instruments in writing, and other matters and things, with intent to produce them,
2 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
3 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
4 section 134, a felony.

5 **COUNT 77**
6 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 76, the ATTORNEY GENERAL
9 further complains and states:

10 On and between April 16 and April 20, 2010, in the County of Fresno, Defendants CRAIG
11 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
12 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
13 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno County Superior
14 Court Case No. 09CECG02605 for APN 450-032-11, with the street address of 1535 Geraldine
15 Way, Fresno, CA, to be filed, registered, and recorded in a public office within this state, which
16 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
17 United States, in violation of Penal Code section 115, subdivision (a), a felony.

18 **COUNT 78**
19 **[PREPARING FALSE EVIDENCE]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 77, the ATTORNEY GENERAL
22 further complains and states:

23 On and between April 16 and April 20, 2010, in the County of Fresno, Defendants CRAIG
24 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
25 papers, records, instruments in writing, and other matters and things, with intent to produce them,
26 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
27 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
28 section 134, a felony.

1 **COUNT 79**
2 **[PERJURY BY DECLARATION]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 78, the ATTORNEY GENERAL
5 further complains and states:

6 On or about April 16, 2010, in the County of Fresno, Defendant SANDRA BARTON did
7 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
8 that she “moved into it [1535 Geraldine Way, Fresno, CA] with the intent of obtaining it through
9 adverse possession” and “began to control, maintain and safeguard the subject house in January
10 of 2004,” as declared in the DECLARATION OF SANDRA BARTON IN SUPPORT OF
11 APPLICATION TO ENTER DEFAULT JUDGMENT in Fresno County Superior Court Case
12 No. 09CECG02605, in violation of Penal Code section 118, subdivision (a), a felony.

13 **COUNT 80**
14 **[SUBORNATION OF PERJURY]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 79, the ATTORNEY GENERAL
17 further complains and states:

18 On or about April 16, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
19 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
20 commit perjury in that he procured said person, who was to take an oath that she would testify,
21 declare, depose, and certify under penalty of perjury in a case in which such testimony,
22 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
23 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
24 DEFAULT JUDGMENT in Fresno County Superior Court Case No. 09CECG02605, to willfully
25 state as true a material matter which said person knew to be false, to wit: that SANDRA
26 BARTON “moved into it [1535 Geraldine Way, Fresno, CA] with the intent of obtaining it
27 through adverse possession” and “began to control, maintain and safeguard the subject house in
28 January of 2004,” in violation of Penal Code section 127, a felony.

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COUNT 81
[PERJURY UNDER OATH]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 80, the ATTORNEY GENERAL further complains and states:

On or about May 18, 2010, in the County of Fresno, Defendant SANDRA BARTON, being a person who, having taken an oath that she would testify, declare, depose, and certify truly before a competent tribunal, officer, and person, to wit, Michele Rodriguez, in a case in which such an oath may by law be administered, to wit, HEARING RE DEFAULT PROVE-UP in Fresno County Superior Court Case No. 09CECG02605, did and contrary to such oath state as true a material matter which she knew to be false, to wit: she “spent approximately \$17,705 in repairing and maintaining the house [1535 Geraldine Way, Fresno, CA] . . . [¶] Over the past six years,” in violation of Penal Code section 118, subdivision (a), a felony.

COUNT 82
[SUBORNATION OF PERJURY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 81, the ATTORNEY GENERAL further complains and states:

On or about May 18, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to commit perjury in that he procured said person, who was to take an oath that she would testify, declare, depose, and certify under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the HEARING RE DEFAULT PROVE-UP in Fresno County Superior Court Case No. 09CECG02605, to willfully state as true a material matter which said person knew to be false, to wit: that SANDRA BARTON “spent approximately \$17,705 in repairing and maintaining the house [1535 Geraldine Way, Fresno, CA] . . . [¶] Over the past six years,” in violation of Penal Code section 127, a felony.

1 **COUNT 83**
2 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 82, the ATTORNEY GENERAL
5 further complains and states:

6 On and between May 9 and May 18, 2007, in the County of Fresno, Defendants CRAIG
7 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
8 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Fresno
9 County Superior Court Case No. 07CECG01568 for APN 447-221-30, with the street address of
10 4737 E. Vassar, Fresno, CA, to be filed, registered, and recorded in a public office within this
11 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
12 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

13 **COUNT 84**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 83, the ATTORNEY GENERAL
17 further complains and states:

18 On and between May 9 and May 18, 2007, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
20 papers, records, instruments in writing, and other matters and things, with intent to produce them,
21 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
22 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
23 section 134, a felony.

24 **COUNT 85**
25 **[PERJURY BY DECLARATION]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 84, the ATTORNEY GENERAL
28 further complains and states:

1 On or about May 17, 2007, in the County of Fresno, Defendant SANDRA BARTON did
2 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she had acquired title in fee simple to real property identified as APN 447-221-30, with the
4 street address of 4737 E. Vassar, Fresno, CA by adverse possession under Code of Civil
5 Procedure section 325 by occupying and claiming the property continuously for more than five
6 (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the
7 COMPLAINT TO QUIET TITLE in Fresno County Superior Court Case No. 07CECG01568, in
8 violation of Penal Code section 118, subdivision (a), a felony.

9 **COUNT 86**
10 **[SUBORNATION OF PERJURY]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 85, the ATTORNEY GENERAL
13 further complains and states:

14 On or about May 17, 2007, in the County of Fresno, Defendant CRAIG MORTENSEN did
15 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
16 commit perjury in that he procured said person, who was to take an oath that she would testify,
17 declare, depose, and certify under penalty of perjury in a case in which such testimony,
18 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
19 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Fresno County Superior
20 Court Case No. 07CECG01568, to willfully state as true a material matter which said person
21 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
22 identified as APN 447-221-30, with the street address of 4737 E. Vassar, Fresno, CA by adverse
23 possession under Code of Civil Procedure section 325 by occupying and claiming the property
24 continuously for more than five (5) years prior to the filing of the complaint, in violation of Penal
25 Code section 127, a felony.

26 **COUNT 87**
27 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 86, the ATTORNEY GENERAL
3 further complains and states:

4 On or about January 17, 2008, in the County of Fresno, Defendants CRAIG MORTENSEN
5 and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or
6 forged instrument, to wit: the MEMORANDUM OF POINTS AND AUTHORITIES IN
7 SUPPORT OF APPLICATION FOR JUDGMENT QUIETING TITLE in Fresno County
8 Superior Court Case No. 07CECG01568 for APN 447-221-30, with the street address of 4737 E.
9 Vassar, Fresno, CA, to be filed, registered, and recorded in a public office within this state, which
10 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
11 United States, in violation of Penal Code section 115, subdivision (a), a felony.

12 **COUNT 88**
13 **[PREPARING FALSE EVIDENCE]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 87, the ATTORNEY GENERAL
16 further complains and states:

17 On or about January 17, 2008, in the County of Fresno, Defendants CRAIG MORTENSEN
18 and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records,
19 instruments in writing, and other matters and things, with intent to produce them, and to allow
20 them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
21 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
22 felony.

23 **COUNT 89**
24 **[PERJURY UNDER OATH]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 88, the ATTORNEY GENERAL
27 further complains and states:
28

1 On or about January 23, 2008, in the County of Fresno, Defendant SANDRA BARTON,
2 being a person who, having taken an oath that she would testify, declare, depose, and certify truly
3 before a competent tribunal, officer, and person, to wit, Nancy Loveless, in a case in which such
4 an oath may by law be administered, to wit, DEFAULT PROVE-UP HEARING in Fresno
5 County Superior Court Case No. 07CECG01568, did and contrary to such oath state as true a
6 material matter which she knew to be false, to wit: that she “moved in [4737 East Vassar Ave.,
7 Fresno, CA] some time in February 2002” [¶] . . . [¶] “[r]eceived mail there” [¶] “[d]eclared it as
8 [her] residence for driver’s license purposes . . . ,” and that neighbors had told her that “nobody
9 had lived there for years,” violation of Penal Code section 118, subdivision (a), a felony.

10 **COUNT 90**
11 **[SUBORNATION OF PERJURY]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 89, the ATTORNEY GENERAL
14 further complains and states:

15 On or about January 23, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN
16 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
17 commit perjury in that he procured said person, who was to take an oath that she would testify,
18 declare, depose, and certify under penalty of perjury in a case in which such testimony,
19 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit,
20 HEARING RE DEFAULT PROVE-UP ON A QUIET TITLE ACTION in Fresno County
21 Superior Court Case No. 07CECG01568, to willfully state as true a material matter which said
22 person knew to be false, to wit: that SANDRA BARTON “moved in [4737 East Vassar Ave.,
23 Fresno, CA] some time in February 2002” [¶] . . . [¶] “[r]eceived mail there” [¶] “[d]eclared it as
24 [her] residence for driver’s license purposes . . . ,” and that neighbors had told her that “nobody
25 had lived there for years,” in violation of Penal Code section 127, a felony.

26 **COUNT 91**
27 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 90, the ATTORNEY GENERAL
3 further complains and states:

4 On and between October 8 and October 15, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
6 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in
7 Sonoma County Superior Court Case No. SCV246072 for APN 072-150-000, with the street
8 address of 14200 Cherry St., Guerneville, CA, to be filed, registered, and recorded in a public
9 office within this state, which instrument, if genuine, might be filed, registered, and recorded
10 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
11 (a), a felony.

12 **COUNT 92**
13 **[PREPARING FALSE EVIDENCE]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 91, the ATTORNEY GENERAL
16 further complains and states:

17 On and between October 8 and October 15, 2009, in the County of Fresno, Defendants
18 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
19 books, papers, records, instruments in writing, and other matters and things, with intent to
20 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
21 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
22 of Penal Code section 134, a felony.

23 **COUNT 93**
24 **[PERJURY BY DECLARATION]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 92, the ATTORNEY GENERAL
27 further complains and states:
28

1 On or about October 15, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she had acquired title in fee simple to real property identified as APN 072-150-000, with the
4 street address of 14200 Cherry St., Guerneville, CA, through adverse possession under Code of
5 Civil Procedure section 325 by occupying and claiming the property continuously for more than
6 five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to
7 the COMPLAINT TO QUIET TITLE in Sonoma County Superior Court Case No. SCV246072,
8 in violation of Penal Code section 118, subdivision (a), a felony.

9 **COUNT 94**
10 **[SUBORNATION OF PERJURY]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 93, the ATTORNEY GENERAL
13 further complains and states:

14 On or about October 15, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
15 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
16 commit perjury in that he procured said person, who was to take an oath that she would testify,
17 declare, depose, and certify under penalty of perjury in a case in which such testimony,
18 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
19 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Sonoma County Superior
20 Court Case No. SCV246072, to willfully state as true a material matter which said person knew to
21 be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
22 identified as APN 072-150-000, with the street address of 14200 Cherry St., Guerneville, CA,
23 through adverse possession under Code of Civil Procedure section 325 by occupying and
24 claiming the property continuously for more than five (5) years prior to the filing of the
25 complaint, in violation of Penal Code section 127, a felony.

26 **COUNT 95**
27 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 94, the ATTORNEY GENERAL
3 further complains and states:

4 On and between November 19 and December 7, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
6 offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR
7 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Sonoma
8 County Superior Court Case No. SCV246072 for APN 072-150-000, with the street address of
9 14200 Cherry St., Guerneville, CA, to be filed, registered, and recorded in a public office within
10 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
11 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

12 **COUNT 96**
13 **[PREPARING FALSE EVIDENCE]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 95, the ATTORNEY GENERAL
16 further complains and states:

17 On and between November 19 and December 7, 2009, in the County of Fresno, Defendants
18 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
19 books, papers, records, instruments in writing, and other matters and things, with intent to
20 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
21 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
22 of Penal Code section 134, a felony.

23 **COUNT 97**
24 **[PERJURY BY DECLARATION]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 96, the ATTORNEY GENERAL
27 further complains and states:
28

1 On or about November 19, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she “repeatedly attempted personal service by process server on Patricia Martin at [1117
4 Balour Drive, Ramona, CA] with no success” and that [¶] “[s]ubstitute service . . . could not be
5 accomplished because mailing a copy of the Summons and Complaint to [decedents] at their last
6 known address [14200 Cherry St., Guerneville, CA] would be futile because that is the real
7 property in question which is in my custody, control, and possession, and Defendants do not
8 reside there,” as declared in the EX PARTE APPLICATION FOR ORDER FOR
9 PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Sonoma County
10 Superior Court Case No. SCV246072, in violation of Penal Code section 118, subdivision (a), a
11 felony.

12 **COUNT 98**
13 **[SUBORNATION OF PERJURY]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 97, the ATTORNEY GENERAL
16 further complains and states:

17 On or about November 19, 2009, in the County of Fresno, Defendant CRAIG
18 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
19 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
20 would testify, declare, depose, and certify under penalty of perjury in a case in which such
21 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
22 to wit, the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS
23 and DECLARATION IN SUPPORT in Sonoma County Superior Court Case No. SCV246072, to
24 willfully state as true a material matter which said person knew to be false, to wit: that SANDRA
25 BARTON “repeatedly attempted personal service by process server on Patricia Martin at [1117
26 Balour Drive, Ramona, CA] with no success” and that [¶] “[s]ubstitute service . . . could not be
27 accomplished because mailing a copy of the Summons and Complaint to [decedents] at their last
28 known address [14200 Cherry St., Guerneville, CA] would be futile because that is the real

1 property in question which is in my custody, control, and possession, and Defendants do not
2 reside there,” in violation of Penal Code section 127, a felony.

3 **COUNT 99**
4 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 98, the ATTORNEY GENERAL
7 further complains and states:

8 On or about November 19, 2009, in the County of Fresno, Defendants CRAIG
9 MORTENSEN and DANIEL VEDENOFF did unlawfully and knowingly procure and offer, or
10 cause, a false or forged instrument, to wit: the DECLARATION OF DILIGENCE RE SERVICE
11 OF PROCESS in Sonoma County Superior Court Case No. SCV246072 for APN 072-150-000,
12 with the street address of 14200 Cherry St., Guerneville, CA, to be filed, registered, and recorded
13 in a public office within this state, which instrument, if genuine, might be filed, registered, and
14 recorded under a law of this state or the United States, in violation of Penal Code section 115,
15 subdivision (a), a felony.

16 **COUNT 100**
17 **[PREPARING FALSE EVIDENCE]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 99, the ATTORNEY GENERAL
20 further complains and states:

21 On or about November 19, 2009, in the County of Fresno, Defendants CRAIG
22 MORTENSEN and DANIEL VEDENOFF, did unlawfully prepare false and ante-dated books,
23 papers, records, instruments in writing, and other matters and things, with intent to produce them,
24 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
25 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
26 section 134, a felony.

27 **COUNT 101**
28 **[PERJURY BY DECLARATION]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 100, the ATTORNEY
3 GENERAL further complains and states:

4 On or about November 19, 2009, in the County of Fresno, Defendant DANIEL
5 VEDENOFF did unlawfully, under penalty of perjury, declare as true, that which was known to
6 be false, to wit: that he attempted personal service of process on Patricia Martin at 1117 Balour
7 Dr., Ramona, CA at 7:00 a.m. and 6:30 p.m. on November 11, 2009, as declared in the
8 DECLARATION OF DILIGENCE RE SERVICE OF PROCESS in Sonoma County Superior
9 Court Case No. SCV246072, in violation of Penal Code section 118, subdivision (a), a felony.

10 **COUNT 102**
11 **[SUBORNATION OF PERJURY]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 101, the ATTORNEY
14 GENERAL further complains and states:

15 On or about November 19, 2009, in the County of Fresno, Defendant CRAIG
16 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
17 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
18 would testify, declare, depose, and certify under penalty of perjury in a case in which such
19 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
20 to wit, the DECLARATION OF DILIGENCE RE SERVICE OF PROCESS in Sonoma County
21 Superior Court Case No. SCV246072, to willfully state as true a material matter which said
22 person knew to be false, to wit: that DANIEL VEDENOFF attempted personal service of process
23 on Patricia Martin at 1117 Balour Dr., Ramona, CA at 7:00 a.m. and 6:30 p.m. on November 11,
24 2009, in violation of Penal Code section 127, a felony.

25 **COUNT 103**
26 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 102, the ATTORNEY
3 GENERAL further complains and states:

4 On and between May 30 and July 6, 2010, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
6 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
7 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
8 Sonoma County Superior Court Case No. SCV246072 for APN 072-150-000, with the street
9 address of 14200 Cherry St., Guerneville, CA, to be filed, registered, and recorded in a public
10 office within this state, which instrument, if genuine, might be filed, registered, and recorded
11 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
12 (a), a felony.

13 **COUNT 104**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 103, the ATTORNEY
17 GENERAL further complains and states:

18 On and between May 30 and July 6, 2010, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
20 papers, records, instruments in writing, and other matters and things, with intent to produce them,
21 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
22 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
23 section 134, a felony.

24 **COUNT 105**
25 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 104, the ATTORNEY
28 GENERAL further complains and states:

1 On and between June 22 and July 6, 2009, in the County of Fresno, Defendants CRAIG
2 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
3 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
4 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Sonoma County
5 Superior Court Case No. SCV246072 for APN 072-150-000, with the street address of 14200
6 Cherry St., Guerneville, CA, to be filed, registered, and recorded in a public office within this
7 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
8 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

9 **COUNT 106**
10 **[PREPARING FALSE EVIDENCE]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 105, the ATTORNEY
13 GENERAL further complains and states:

14 On and between June 22 and July 6, 2010, in the County of Fresno, Defendants CRAIG
15 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
16 papers, records, instruments in writing, and other matters and things, with intent to produce them,
17 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
18 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
19 section 134, a felony.

20 **COUNT 107**
21 **[PERJURY BY DECLARATION]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 106, the ATTORNEY
24 GENERAL further complains and states:

25 On and between June 22 and July 6, 2010, in the County of Fresno, Defendant SANDRA
26 BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be
27 false, to wit: she “moved into it [14200 Cherry St., Guerneville, CA] with the intent of obtaining
28 it through adverse possession” and “begun to control, maintain and safeguard the subject house in

1 November of 2004, and have occupied and used the property ever since,” as declared in the
2 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
3 DEFAULT JUDGMENT in Sonoma County Superior Court Case No. SCV246072, in violation
4 of Penal Code section 118, subdivision (a), a felony.

5 **COUNT 108**
6 **[SUBORNATION OF PERJURY]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 107, the ATTORNEY
9 GENERAL further complains and states:

10 On and between June 22 and July 6, 2010, in the County of Fresno, Defendant CRAIG
11 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
12 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
13 would testify, declare, depose, and certify under penalty of perjury in a case in which such
14 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
15 to wit, the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO
16 ENTER DEFAULT JUDGMENT in Sonoma County Superior Court Case No. SCV246072, to
17 willfully state as true a material matter which said person knew to be false, to wit: that SANDRA
18 BARTON “moved into it [14200 Cherry St., Guerneville, CA] with the intent of obtaining it
19 through adverse possession” and had begun “to control, maintain and safeguard the subject house
20 in November of 2004, and have occupied and used the property ever since,” in violation of Penal
21 Code section 127, a felony.

22
23 **COUNT 109**
24 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 108, the ATTORNEY
27 GENERAL further complains and states:
28

1 On and between July 23 and July 24, 2009, in the County of Fresno, Defendants CRAIG
2 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
3 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Los Angeles
4 County Superior Court Case No. GC043429 for APN 5285-019-030, with the street address of
5 7434 Young Ave., Rosemead, CA, to be filed, registered, and recorded in a public office within
6 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
7 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

8 **COUNT 110**
9 **[PREPARING FALSE EVIDENCE]**

10 For a further and separate cause of complaint, being a different offense from but connected
11 in its commission with the charges set forth in Counts 1 through 109, the ATTORNEY
12 GENERAL further complains and states:

13 On and between July 23 and July 24, 2009, in the County of Fresno, Defendants CRAIG
14 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
15 papers, records, instruments in writing, and other matters and things, with intent to produce them,
16 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
17 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
18 section 134, a felony.

19 **COUNT 111**
20 **[PERJURY BY DECLARATION]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 110, the ATTORNEY
23 GENERAL further complains and states:

24 On or about July 23, 2009, in the County of Fresno, Defendant SANDRA BARTON did
25 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
26 that she had acquired title in fee simple to real property identified as APN 5285-019-030, with the
27 street address of 7434 Young Ave., Rosemead, CA, by adverse possession under Code of Civil
28 Procedure section 325 by occupying and claiming the property continuously for more than five

1 (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the
2 COMPLAINT TO QUIET TITLE in Los Angeles County Superior Court Case No. GC043429, in
3 violation of Penal Code section 118, subdivision (a), a felony.

4 **COUNT 112**
5 **[SUBORNATION OF PERJURY]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 111, the ATTORNEY
8 GENERAL further complains and states:

9 On or about July 23, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did
10 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
11 commit perjury in that he procured said person, who was to take an oath that she would testify,
12 declare, depose, and certify under penalty of perjury in a case in which such testimony,
13 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
14 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Los Angeles County
15 Superior Court Case No. GC043429, to willfully state as true a material matter which said person
16 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
17 identified as APN 5285-019-030, with the street address of 7434 Young Ave., Rosemead, CA, by
18 adverse possession under Code of Civil Procedure section 325 by occupying and claiming the
19 property continuously for more than five (5) years prior to the filing of the complaint, in violation
20 of Penal Code section 127, a felony.

21 **COUNT 113**
22 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 112, the ATTORNEY
25 GENERAL further complains and states:

26 On and between August 25 and September 3, 2009, in the County of Fresno, Defendants
27 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
28 offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR

1 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Los
2 Angeles County Superior Court Case No. GC043429 for APN 5285-019-030, with the street
3 address of 7434 Young Ave., Rosemead, CA, to be filed, registered, and recorded in a public
4 office within this state, which instrument, if genuine, might be filed, registered, and recorded
5 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
6 (a), a felony.

7 **COUNT 114**
8 **[PREPARING FALSE EVIDENCE]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 113, the ATTORNEY
11 GENERAL further complains and states:

12 On and between August 25 and September 3, 2009, in the County of Fresno, Defendants
13 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
14 books, papers, records, instruments in writing, and other matters and things, with intent to
15 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
16 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
17 of Penal Code section 134, a felony.

18 **COUNT 115**
19 **[PERJURY BY DECLARATION]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 114, the ATTORNEY
22 GENERAL further complains and states:

23 On or about August 25, 2009, in the County of Fresno, Defendant SANDRA BARTON did
24 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
25 that “[s]ubstitute service . . . could not be accomplished” because “[m]ailing a copy of the
26 Summons and Complaint to [decendent’s] last known address [7434 Young Ave., Rosemead, CA],
27 which is the subject property, would be futile since I am in possession and control of the property
28 and there is no other resident there,” as declared in the EX PARTE APPLICATION FOR

1 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Los
2 Angeles County Superior Court Case No. GC043429, in violation of Penal Code section 118,
3 subdivision (a), a felony.

4 **COUNT 116**
5 **[SUBORNATION OF PERJURY]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 115, the ATTORNEY
8 GENERAL further complains and states:

9 On or about August 25, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
10 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
11 commit perjury in that he procured said person, who was to take an oath that she would testify,
12 declare, depose, and certify under penalty of perjury in a case in which such testimony,
13 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
14 EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS and
15 DECLARATION IN SUPPORT in Los Angeles County Superior Court Case No. GC043429, to
16 willfully state as true a material matter which said person knew to be false, to wit: that SANDRA
17 BARTON declared “[s]ubstitute service . . . could not be accomplished” because “[m]ailing a
18 copy of the Summons and Complaint to [decedent’s] last known address [7434 Young Ave.,
19 Rosemead, CA], which is the subject property, would be futile since I am in possession and
20 control of the property and there is no other resident there,” in violation of Penal Code section
21 127, a felony.

22 **COUNT 117**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 116, the ATTORNEY
26 GENERAL further complains and states:

27 On and between November 24 and December 3, 2009, in the County of Fresno, Defendants
28 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and

1 offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
2 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los
3 Angeles County Superior Court Case No. GC043429 for APN 5285-019-030, with the street
4 address of 7434 Young Ave., CA, to be filed, registered, and recorded in a public office within
5 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
6 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

7 **COUNT 118**
8 **[PREPARING FALSE EVIDENCE]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 117, the ATTORNEY
11 GENERAL further complains and states:

12 On and between November 24 and December 3, 2009, in the County of Fresno, Defendants
13 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
14 books, papers, records, instruments in writing, and other matters and things, with intent to
15 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
16 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
17 of Penal Code section 134, a felony..

18 **COUNT 119**
19 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 118, the ATTORNEY
22 GENERAL further complains and states:

23 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
24 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
25 offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA
26 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los
27 Angeles County Superior Court Case No. GC043429 for APN 5285-019-030, with the street
28 address of 7434 Young Ave., Rosemead, CA, to be filed, registered, and recorded in a public

1 office within this state, which instrument, if genuine, might be filed, registered, and recorded
2 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
3 (a), a felony.

4 **COUNT 120**
5 **[PREPARING FALSE EVIDENCE]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 119, the ATTORNEY
8 GENERAL further complains and states:

9 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
10 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
11 books, papers, records, instruments in writing, and other matters and things, with intent to
12 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
13 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
14 of Penal Code section 134, a felony.

15 **COUNT 121**
16 **[PERJURY BY DECLARATION]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 120, the ATTORNEY
19 GENERAL further complains and states:

20 On or about November 23, 2009, in the County of Fresno, Defendant SANDRA BARTON
21 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
22 that “[s]ince February 2003, me and my family members including my brothers and sisters and
23 parents have repaired and safeguarded the house and property [7434 Young Ave., Rosemead,
24 CA],” as declared in the DECLARATION OF SANDRA BARTON IN SUPPORT OF
25 APPLICATION TO ENTER DEFAULT JUDGMENT in Los Angeles County Superior Court
26 Case No. GC043429, in violation of Penal Code section 118, subdivision (a), a felony.

27 **COUNT 122**
28 **[SUBORNATION OF PERJURY]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 121, the ATTORNEY
3 GENERAL further complains and states:

4 On or about November 23, 2009, in the County of Fresno, Defendant CRAIG
5 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
6 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
7 would testify, declare, depose, and certify under penalty of perjury in a case in which such
8 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
9 to wit, the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO
10 ENTER DEFAULT JUDGMENT in Los Angeles County Superior Court Case No. GC043429, to
11 willfully state as true a material matter which said person knew to be false, to wit: that “[s]ince
12 February 2003, me and my family members including my brothers and sisters and parents have
13 repaired and safeguarded the house and property [7434 Young Ave., Rosemead, CA],” in
14 violation of Penal Code section 127, a felony.

15 **COUNT 123**
16 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 122, the ATTORNEY
19 GENERAL further complains and states:

20 On and between October 2 and October 4, 2012, in the County of Fresno, Defendants
21 SHELDON FEIGEL and CAMBRIA BARTON did unlawfully and knowingly procure and offer,
22 or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Los
23 Angeles County Superior Court Case No. GC050274 for APN 5237-017-003, commonly known
24 as 423 Elevado [aka Elvado] Terrace, Monterey Park, CA, to be filed, registered, and recorded in
25 a public office within this state, which instrument, if genuine, might be filed, registered, and
26 recorded under a law of this state or the United States, in violation of Penal Code section 115,
27 subdivision (a), a felony.

28 **COUNT 124**
[PREPARING FALSE EVIDENCE]

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2 For a further and separate cause of complaint, being a different offense from but connected
3 in its commission with the charges set forth in Counts 1 through 123, the ATTORNEY
4 GENERAL further complains and states:

5 On and between October 2 and October 4, 2012, in the County of Fresno, Defendants
6 SHELDON FEIGEL and CAMBRIA BARTON, did unlawfully prepare false and ante-dated
7 books, papers, records, instruments in writing, and other matters and things, with intent to
8 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
9 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
10 of Penal Code section 134, a felony.

11 **COUNT 125**
12 **[PERJURY BY DECLARATION]**

13 For a further and separate cause of complaint, being a different offense from but connected
14 in its commission with the charges set forth in Counts 1 through 124, the ATTORNEY
15 GENERAL further complains and states:

16 On or about October 3, 2012, in the County of Fresno, Defendant CAMBRIA BARTON
17 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
18 that beginning on or about July 20, 2007, and continuing to the present time, CAMBRIA
19 BARTON, and no other party, has been in possession of and has resided in 423 Elevado [aka
20 Elvado] Terrace, Monterey Park, CA, thereby gaining title by adverse possession under Code of
21 Civil Procedure section 324, as declared in the VERIFICATION attached to the COMPLAINT
22 TO QUIET TITLE in Los Angeles County Superior Court Case No. GC050274, in violation of
23 Penal Code section 118, subdivision (a), a felony.

24 **COUNT 126**
25 **[SUBORNATION OF PERJURY]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 125, the ATTORNEY
28 GENERAL further complains and states:

1 On or about October 3, 2012, in the County of Fresno, Defendant SHELDON FEIGEL did
2 willfully and unlawfully procure another person, to wit, Defendant CAMBRIA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Los Angeles County
7 Superior Court Case No. GC050274, to willfully state as true a material matter which said person
8 knew to be false, to wit: that beginning on or about July 20, 2007, and continuing to the present
9 time, CAMBRIA BARTON, and no other party, has been in possession of and has resided in 423
10 Elevado [aka Elvado] Terrace, Monterey Park, CA, in violation of Penal Code section 127, a
11 felony.

12 **COUNT 127**
13 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 126, the ATTORNEY
16 GENERAL further complains and states:

17 On and between February 27 and March 6, 2013, in the County of Fresno, Defendants
18 SHELDON FEIGEL and CAMBRIA BARTON did unlawfully and knowingly procure and offer,
19 or cause, a false or forged instrument, to wit: the REQUEST FOR ENTRY OF DEFAULT AND
20 EX PARTE JUDGMENT in Los Angeles County Superior Court Case No. GC050274 for APN
21 5237-017-003, commonly known as 423 Elevado [aka Elvado] Terrace, Monterey Park, CA, to be
22 filed, registered, and recorded in a public office within this state, which instrument, if genuine,
23 might be filed, registered, and recorded under a law of this state or the United States, in violation
24 of Penal Code section 115, subdivision (a), a felony.

25 **COUNT 128**
26 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 127, the ATTORNEY
3 GENERAL further complains and states:

4 On and between February 27 and March 6, 2013, in the County of Fresno, Defendants
5 SHELDON FEIGEL and CAMBRIA BARTON, did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 129**
11 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 128, the ATTORNEY
14 GENERAL further complains and states:

15 On and between February 28 and March 6, 2013, in the County of Fresno, Defendants
16 SHELDON FEIGEL and CAMBRIA BARTON did unlawfully and knowingly procure and offer,
17 or cause, a false or forged instrument, to wit: the DECLARATION OF CAMBRIA BARTON IN
18 SUPPORT OF REQUEST FOR DEFAULT AND EX PARTE JUDGMENT in Los Angeles
19 County Superior Court Case No. GC050274 for APN 5237-017-003, commonly known as 423
20 Elevado [aka Elvado] Terrace, Monterey Park, CA, to be filed, registered, and recorded in a
21 public office within this state, which instrument, if genuine, might be filed, registered, and
22 recorded under a law of this state or the United States, in violation of Penal Code section 115,
23 subdivision (a), a felony.

24 **COUNT 130**
25 **[PREPARING FALSE EVIDENCE]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 129, the ATTORNEY
28 GENERAL further complains and states:

1 On and between February 28 and March 6, 2013, in the County of Fresno, Defendants
2 SHELDON FEIGEL and CAMBRIA BARTON, did unlawfully prepare false and ante-dated
3 books, papers, records, instruments in writing, and other matters and things, with intent to
4 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
5 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
6 of Penal Code section 134, a felony.

7 **COUNT 131**
8 **[PERJURY BY DECLARATION]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 130, the ATTORNEY
11 GENERAL further complains and states:

12 On or about February 28, 2013, in the County of Fresno, Defendant CAMBRIA BARTON
13 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
14 that “[o]n or about July 20, 2007, I took possession of the real property [423 Elevado [aka
15 Elvado] Terrace, Monterey Park, CA] and have remained in possession since that time . . . and no
16 other person has been in possession of the real property besides myself, since that time,” as
17 declared in the DECLARATION OF CAMBRIA BARTON IN SUPPORT OF REQUEST FOR
18 DEFAULT AND EX PARTE JUDGMENT in Los Angeles County Superior Court Case No.
19 GC050274, in violation of Penal Code section 118, subdivision (a), a felony.

20 **COUNT 132**
21 **[SUBORNATION OF PERJURY]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 131, the ATTORNEY
24 GENERAL further complains and states:

25 On or about February 28, 2013, in the County of Fresno, Defendant SHELDON FEIGEL
26 did willfully and unlawfully procure another person, to wit, Defendant CAMBRIA BARTON, to
27 commit perjury in that he procured said person, who was to take an oath that she would testify,
28 declare, depose, and certify under penalty of perjury in a case in which such testimony,

1 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
2 DECLARATION OF CAMBRIA BARTON IN SUPPORT OF REQUEST FOR DEFAULT
3 AND EX PARTE JUDGMENT in Los Angeles County Superior Court Case No. GC050274, to
4 willfully state as true a material matter which said person knew to be false, to wit: that “[o]n or
5 about July 20, 2007, I took possession of the real property [423 Elevado [aka Elvado] Terrace,
6 Monterey Park, CA] and have remained in possession since that time . . . and no other person has
7 been in possession of the real property besides myself, since that time,” in violation of Penal
8 Code section 127, a felony.

9 **COUNT 133**
10 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 132, the ATTORNEY
13 GENERAL further complains and states:

14 On and between July 23 and July 27, 2009, in the County of Fresno, Defendants CRAIG
15 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
16 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Los Angeles
17 County Superior Court Case No. MC020677 for APN 3140-007-010, with the street address of
18 850 East Ave., J3, Lancaster, CA, to be filed, registered, and recorded in a public office within
19 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
20 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

21 **COUNT 134**
22 **[PREPARING FALSE EVIDENCE]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 133, the ATTORNEY
25 GENERAL further complains and states:

26 On and between July 23 and July 27, 2009, in the County of Fresno, Defendants CRAIG
27 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
28 papers, records, instruments in writing, and other matters and things, with intent to produce them,

1 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
2 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
3 section 134, a felony.

4 **COUNT 135**
5 **[PERJURY BY DECLARATION]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 134, the ATTORNEY
8 GENERAL further complains and states:

9 On or about July 23, 2009, in the County of Fresno, Defendant SANDRA BARTON did
10 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
11 that she had acquired title in fee simple to real property identified as APN 3140-007-010, with the
12 street address of 850 East Ave., J3, Lancaster, CA, by adverse possession under Code of Civil
13 Procedure section 325 by occupying and claiming the property continuously for more than five
14 (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the
15 COMPLAINT TO QUIET TITLE in Los Angeles County Superior Court Case No. MC020677,
16 in violation of Penal Code section 118, subdivision (a), a felony.

17 **COUNT 136**
18 **[SUBORNATION OF PERJURY]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 135, the ATTORNEY
21 GENERAL further complains and states:

22 On or about July 23, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did
23 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
24 commit perjury in that he procured said person, who was to take an oath that she would testify,
25 declare, depose, and certify under penalty of perjury in a case in which such testimony,
26 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
27 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Los Angeles County
28 Superior Court Case No. MC020677, to willfully state as true a material matter which said person

1 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
2 identified as APN 3140-007-010, with the street address of 850 East Ave., J3, Lancaster, CA, by
3 adverse possession under Code of Civil Procedure section 325 by occupying and claiming the
4 property continuously for more than five (5) years prior to the filing of the complaint, in violation
5 of Penal Code section 127, a felony.

6 **COUNT 137**
7 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts 1 through 136, the ATTORNEY
10 GENERAL further complains and states:

11 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
12 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
13 offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
14 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los
15 Angeles County Superior Court Case No. MC020677 for APN 3140-007-010, with the street
16 address of 7434 Young Ave., CA, to be filed, registered, and recorded in a public office within
17 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
18 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

19 **COUNT 138**
20 **[PREPARING FALSE EVIDENCE]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 137, the ATTORNEY
23 GENERAL further complains and states:

24 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
25 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
26 books, papers, records, instruments in writing, and other matters and things, with intent to
27 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
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1 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
2 of Penal Code section 134, a felony.

3 **COUNT 139**
4 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 138, the ATTORNEY
7 GENERAL further complains and states:

8 On and between January 27 and February 5, 2010, in the County of Fresno, Defendants
9 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
10 offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
11 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los
12 Angeles County Superior Court Case No. MC020677 for APN 3140-007-010, with the street
13 address of 850 East Ave., J3, Lancaster, CA, to be filed, registered, and recorded in a public
14 office within this state, which instrument, if genuine, might be filed, registered, and recorded
15 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
16 (a), a felony.

17 **COUNT 140**
18 **[PREPARING FALSE EVIDENCE]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 139, the ATTORNEY
21 GENERAL further complains and states:

22 On and between January 27 and February 5, 2010, in the County of Fresno, Defendants
23 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
24 books, papers, records, instruments in writing, and other matters and things, with intent to
25 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
26 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
27 of Penal Code section 134, a felony.

28 **COUNT 141**
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 140, the ATTORNEY
3 GENERAL further complains and states:

4 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
6 offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA
7 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los
8 Angeles County Superior Court Case No. MC020677 for APN 3140-007-010, with the street
9 address of 850 East Ave., J3, Lancaster, CA, to be filed, registered, and recorded in a public
10 office within this state, which instrument, if genuine, might be filed, registered, and recorded
11 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
12 (a), a felony.

13 **COUNT 142**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 141, the ATTORNEY
17 GENERAL further complains and states:

18 On and between November 23 and December 3, 2009, in the County of Fresno, Defendants
19 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
20 books, papers, records, instruments in writing, and other matters and things, with intent to
21 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
22 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
23 of Penal Code section 134, a felony.

24 **COUNT 143**
25 **[PERJURY BY DECLARATION]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 142, the ATTORNEY
28 GENERAL further complains and states:

1 On or about November 23, 2009, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 that she “began to control and safeguard the subject house [850 East Ave., J3, Lancaster, CA] in
4 February of 2003,” as declared in the DECLARATION OF SANDRA BARTON IN SUPPORT
5 OF APPLICATION TO ENTER DEFAULT JUDGMENT in Los Angeles County Superior
6 Court Case No. MC020677, in violation of Penal Code section 118, subdivision (a), a felony.

7 **COUNT 144**
8 **[SUBORNATION OF PERJURY]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 143, the ATTORNEY
11 GENERAL further complains and states:

12 On or about November 23, 2009, in the County of Fresno, Defendant CRAIG
13 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
14 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
15 would testify, declare, depose, and certify under penalty of perjury in a case in which such
16 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
17 to wit, the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO
18 ENTER DEFAULT JUDGMENT in Los Angeles County Superior Court Case No. MC020677,
19 to willfully state as true a material matter which said person knew to be false, to wit: that
20 SANDRA BARTON “began to control and safeguard the subject house [850 East Ave., J3,
21 Lancaster, CA] in February of 2003,” in violation of Penal Code section 127, a felony.

22 **COUNT 145**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 144, the ATTORNEY
26 GENERAL further complains and states:

27 On and between November 23, 2009 and February 5, 2010, in the County of Fresno,
28 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly

1 procure and offer, or cause, a false or forged instrument, to wit: the DECLARATION OF
2 SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
3 Los Angeles County Superior Court Case No. MC020677 for APN 3140-007-010, with the street
4 address of 850 East Ave., J3, Lancaster, CA, to be filed, registered, and recorded in a public
5 office within this state, which instrument, if genuine, might be filed, registered, and recorded
6 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
7 (a), a felony.

8 **COUNT 146**
9 **[PREPARING FALSE EVIDENCE]**

10 For a further and separate cause of complaint, being a different offense from but connected
11 in its commission with the charges set forth in Counts 1 through 145, the ATTORNEY
12 GENERAL further complains and states:

13 On and between November 23, 2009 and February 5, 2010, in the County of Fresno,
14 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and
15 ante-dated books, papers, records, instruments in writing, and other matters and things, with
16 intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose,
17 as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in
18 violation of Penal Code section 134, a felony.

19 **COUNT 147**
20 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 146, the ATTORNEY
23 GENERAL further complains and states:

24 On and between November 19 and December 14, 2009, in the County of Fresno,
25 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
26 procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET
27 TITLE in Los Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with
28 the street address of 4904 4th Avenue, Los Angeles, CA, to be filed, registered, and recorded in a

1 public office within this state, which instrument, if genuine, might be filed, registered, and
2 recorded under a law of this state or the United States, in violation of Penal Code section 115,
3 subdivision (a), a felony.

4 **COUNT 148**
5 **[PREPARING FALSE EVIDENCE]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 147, the ATTORNEY
8 GENERAL further complains and states:

9 On and between November 19 and December 14, 2009, in the County of Fresno,
10 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or
11 ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to
12 produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and
13 true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
14 section 134, a felony.

15 **COUNT 149**
16 **[PERJURY BY DECLARATION]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 148, the ATTORNEY GENERAL further
19 complains and states:

20 On or about November 19, 2009, in the County of Fresno, Defendant SANDRA BARTON
21 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
22 that she had acquired title in fee simple to real property identified as APN 5014-026-025, with the
23 street address of 4904 4th Avenue, Los Angeles, CA, by adverse possession under Code of Civil
24 Procedure section 325 by occupying and claiming the property continuously for more than five
25 (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to the
26 COMPLAINT TO QUIET TITLE in Los Angeles County Superior Court Case No. BC428033, in
27 violation of Penal Code section 118, subdivision (a), a felony.

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COUNT 150
[SUBORNATION OF PERJURY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 149, the ATTORNEY GENERAL further complains and states:

On or about November 19, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to commit perjury in that he procured said person, who was to take an oath that she would testify, declare, depose, and certify under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Los Angeles Superior Court Case No. BC428033, to willfully state as true a material matter which said person knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property identified as APN 5014-026-025, with the street address of 4904 4th Avenue, Los Angeles, CA, by adverse possession under Code of Civil Procedure section 325 by occupying and claiming the property continuously for more than five (5) years prior to the filing of the complaint, in violation of Penal Code section 127, a felony.

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COUNT 151
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 150, the ATTORNEY GENERAL further complains and states:

On and between March 4 and March 23, 2010, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Los Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with the street address of 4904 4th Avenue, Los Angeles, CA, to be filed, registered, and recorded in a public office within this state, which instrument, if genuine, might be

1 filed, registered, and recorded under a law of this state or the United States, in violation of Penal
2 Code section 115, subdivision (a), a felony.

3 **COUNT 152**
4 **[PREPARING FALSE EVIDENCE]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 151, the ATTORNEY
7 GENERAL further complains and states:

8 On and between March 4 and March 23, 2010, in the County of Fresno, Defendants CRAIG
9 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
10 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
11 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
12 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
13 felony.

14 **COUNT 153**
15 **[PERJURY BY DECLARATION]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 152, the ATTORNEY
18 GENERAL further complains and states:

19 On or about March 4, 2010, in the County of Fresno, Defendant SANDRA BARTON did
20 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
21 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
22 and Complaint . . . to [decedent’s grandson] at his last known address . . . would be futile . . . ”
23 because “that is the real property in question [4909 *sic* 4th Avenue, Los Angeles, CA] which is
24 in my custody, control, and possession, and [decedent’s grandson] does not reside there,” as
25 declared in the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF
26 SUMMONS in Los Angeles County Superior Court Case No. BC428033, in violation of Penal
27 Code section 118, subdivision (a), a felony.
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1 **COUNT 154**
2 **[SUBORNATION OF PERJURY]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 153, the ATTORNEY
5 GENERAL further complains and states:

6 On or about March 4, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
7 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
8 commit perjury in that he procured said person, who was to take an oath that she would testify,
9 declare, depose, and certify under penalty of perjury in a case in which such testimony,
10 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
11 EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Los
12 Angeles County Superior Court Case No. BC428033, to willfully state as true a material matter
13 which said person knew to be false, to wit: that “[s]ubstitute service . . . could not be
14 accomplished because mailing a copy of the Summons and Complaint . . . to [decedent’s
15 grandson] at his last known address . . . would be futile . . .” because “that is the real property in
16 question [4909 [sic] 4th Avenue, Los Angeles, CA] which is in my custody, control, and
17 possession, and [decedent’s grandson] does not reside there,” in violation of Penal Code section
18 127, a felony.

19 **COUNT 155**
20 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 154, the ATTORNEY
23 GENERAL further complains and states:

24 On and between May 25 and May 28, 2010, in the County of Fresno, Defendants CRAIG
25 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
26 cause, a false or forged instrument, to wit: the FIRST AMENDED COMPLAINT TO QUIET
27 TITLE in Los Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with
28 the street address of 4909 [sic] 4th Avenue, Los Angeles, CA, to be filed, registered, and recorded

1 in a public office within this state, which instrument, if genuine, might be filed, registered, and
2 recorded under a law of this state or the United States, in violation of Penal Code section 115,
3 subdivision (a), a felony.

4 **COUNT 156**
5 **[PREPARING FALSE EVIDENCE]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 155, the ATTORNEY
8 GENERAL further complains and states:

9 On and between May 25 and May 28, 2010, in the County of Fresno, Defendants CRAIG
10 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
11 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
12 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
13 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
14 felony.

15 **COUNT 157**
16 **[PERJURY BY DECLARATION]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 156, the ATTORNEY GENERAL further
19 complains and states:

20 On or about May 25, 2010, in the County of Fresno, Defendant SANDRA BARTON did
21 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
22 that she had acquired title in fee simple to real property identified as APN 5014-026-025, with the
23 street address of 4909 [*sic*] 4th Avenue, Los Angeles, CA, by adverse possession under Code of
24 Civil Procedure section 325 by occupying and claiming the property continuously for more than
25 five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to
26 the FIRST AMENDED COMPLAINT TO QUIET TITLE in Los Angeles County Superior Court
27 Case No. BC428033, in violation of Penal Code section 118, subdivision (a), a felony.

1 **COUNT 158**
2 **[SUBORNATION OF PERJURY]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 157, the ATTORNEY
5 GENERAL further complains and states:

6 On or about May 25, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
7 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
8 commit perjury in that he procured said person, who was to take an oath that she would testify,
9 declare, depose, and certify under penalty of perjury in a case in which such testimony,
10 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
11 VERIFICATION attached to the FIRST AMENDED COMPLAINT TO QUIET TITLE in Los
12 Angeles Superior Court Case No. BC428033, to willfully state as true a material matter which
13 said person knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to
14 real property identified as APN 5014-026-025, with the street address of 4909 [sic] 4th Avenue,
15 Los Angeles, CA, by adverse possession under Code of Civil Procedure section 325 by occupying
16 and claiming the property continuously for more than five (5) years prior to the filing of the
17 complaint, in violation of Penal Code section 127, a felony.

18 **COUNT 159**
19 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 158, the ATTORNEY
22 GENERAL further complains and states:

23 On and between July 13 and July 16, 2010, in the County of Fresno, Defendants CRAIG
24 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
25 cause, a false or forged instrument, to wit: the AMENDED EX PARTE APPLICATION FOR
26 ORDER FOR PUBLICATION OF SUMMONS in Los Angeles County Superior Court Case No.
27 BC428033 for APN 5014-026-025, with the street address of 4904 4th Avenue, Los Angeles, CA,
28 to be filed, registered, and recorded in a public office within this state, which instrument, if

1 genuine, might be filed, registered, and recorded under a law of this state or the United States, in
2 violation of Penal Code section 115, subdivision (a), a felony.

3 **COUNT 160**
4 **[PREPARING FALSE EVIDENCE]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 159, the ATTORNEY
7 GENERAL further complains and states:

8 On and between July 13 and July 16, 2010, in the County of Fresno, Defendants CRAIG
9 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
10 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
11 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
12 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
13 felony.

14 **COUNT 161**
15 **[PERJURY BY DECLARATION]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 160, the ATTORNEY
18 GENERAL further complains and states:

19 On or about July 13, 2010, in the County of Fresno, Defendant SANDRA BARTON did
20 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
21 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
22 and Complaint . . . to [decedent’s grandson] at his last known address . . . would be futile . . . ”
23 because “that is the real property in question [4909 *sic* 4th Avenue, Los Angeles, CA] which is
24 in my custody, control, and possession, and [decedent’s grandson] does not reside there,” as
25 declared in the AMENDED EX PARTE APPLICATION FOR ORDER FOR PUBLICATION
26 OF SUMMONS in Los Angeles County Superior Court Case No. BC428033, in violation of
27 Penal Code section 118, subdivision (a), a felony.

1 **COUNT 162**
2 **[SUBORNATION OF PERJURY]**

3 For a further and separate cause of complaint, being a different offense from but connected
4 in its commission with the charges set forth in Counts 1 through 161, the ATTORNEY
5 GENERAL further complains and states:

6 On or about July 13, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
7 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
8 commit perjury in that he procured said person, who was to take an oath that she would testify,
9 declare, depose, and certify under penalty of perjury in a case in which such testimony,
10 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
11 EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in Los
12 Angeles County Superior Court Case No. BC428033, to willfully state as true a material matter
13 which said person knew to be false, to wit: that “[s]ubstitute service . . . could not be
14 accomplished because mailing a copy of the Summons and Complaint . . . to [decedent’s
15 grandson] at his last known address . . . would be futile . . .” because “that is the real property in
16 question [4909 *sic* 4th Avenue, Los Angeles, CA] which is in my custody, control, and
17 possession, and [decedent’s grandson] does not reside there,” in violation of Penal Code section
18 127, a felony.

19 **COUNT 163**
20 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 162, the ATTORNEY
23 GENERAL further complains and states:

24 On and between January 4 and May 2, 2011, in the County of Fresno, Defendants CRAIG
25 MORTENSEN and DANIEL VEDENOFF did unlawfully and knowingly procure and offer, or
26 cause, a false or forged instrument, to wit: the PROOF OF SERVICE BY POSTING in Los
27 Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with the street
28 address of 4909 *sic* 4th Avenue, Los Angeles, CA, to be filed, registered, and recorded in a

1 public office within this state, which instrument, if genuine, might be filed, registered, and
2 recorded under a law of this state or the United States, in violation of Penal Code section 115,
3 subdivision (a), a felony.

4 **COUNT 164**
5 **[PREPARING FALSE EVIDENCE]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 163, the ATTORNEY
8 GENERAL further complains and states:

9 On or about January 4, 2011, in the County of Fresno, Defendants CRAIG MORTENSEN
10 and DANIEL VEDENOFF, did unlawfully prepare a false or ante-dated book, paper, record,
11 instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be
12 produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and
13 inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

14 **COUNT 165**
15 **[PERJURY BY DECLARATION]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 164, the ATTORNEY
18 GENERAL further complains and states:

19 On or about January 4, 2011, in the County of Fresno, defendant DANIEL VEDENOFF did
20 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
21 that on September 15, 2011, he had posted a copy of the summons and complaint in this matter
22 near the porch of the real property which is the subject of this case, with a street address of 4909
23 [*sic*] 4th Avenue, Los Angeles, California 90043-1933, as declared in the PROOF OF SERVICE
24 BY POSTING in Los Angeles County Superior Court Case No. BC428033, in violation of Penal
25 Code section 118, subdivision (a), a felony.

26 **COUNT 166**
27 **[SUBORNATION OF PERJURY]**
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1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 165, the ATTORNEY
3 GENERAL further complains and states:

4 On or about January 4, 2011, in the County of Fresno, Defendant CRAIG MORTENSEN
5 did willfully and unlawfully procure another person, to wit, Defendant DANIEL VEDENOFF, to
6 commit perjury in that he procured said person, who was to take an oath that she would testify,
7 declare, depose, and certify under penalty of perjury in a case in which such testimony,
8 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
9 PROOF OF SERVICE BY POSTING in Los Angeles County Superior Court Case No.
10 BC428033, to willfully state as true a material matter which said person knew to be false, to wit:
11 that on September 15, 2011, he had posted a copy of the summons and complaint in this matter
12 near the porch of the real property which is the subject of this case, with a street address of 4909
13 [*sic*] 4th Avenue, Los Angeles, California 90043-1933, in violation of Penal Code section 127, a
14 felony.

15 **COUNT 167**
16 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 166, the ATTORNEY
19 GENERAL further complains and states:

20 On and between January 4 and May 2, 2011, in the County of Fresno, Defendants CRAIG
21 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
22 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
23 AUTHORITIES IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT in Los
24 Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with the street
25 address of 4904 4th Avenue, Los Angeles, CA, to be filed, registered, and recorded in a public
26 office within this state, which instrument, if genuine, might be filed, registered, and recorded
27 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
28 (a), a felony.

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COUNT 168
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 167, the ATTORNEY GENERAL further complains and states:

On and between January 4 and May 2, 2011, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 169
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 168, the ATTORNEY GENERAL further complains and states:

On and between January 4 and May 2, 2011, in the County of Fresno, Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT in Los Angeles County Superior Court Case No. BC428033 for APN 5014-026-025, with the street address of 4904 4th Avenue, Los Angeles, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 170
[PREPARING FALSE EVIDENCE]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 169, the ATTORNEY
3 GENERAL further complains and states:

4 On and between January 4 and May 2, 2011, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
6 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
7 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
8 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
9 felony.

10 **COUNT 171**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 170, the ATTORNEY
14 GENERAL further complains and states:

15 On or about January 4, 2011, in the County of Fresno, defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that she “moved into it [4904 4th Avenue, Los Angeles, CA] with the intent of obtaining it
18 through adverse possession” and “began to occupy, control, and safeguard the house in August of
19 2004, and have done so ever since,” as declared in the DECLARATION OF SANDRA BARTON
20 IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT in Los Angeles County
21 Superior Court Case No. BC428033, in violation of Penal Code section 118, subdivision (a), a
22 felony.

23 **COUNT 172**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 171, the ATTORNEY
27 GENERAL further complains and states:
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1 On or about January 4, 2011, in the County of Fresno, Defendant CRAIG MORTENSEN
2 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION FOR DEFAULT
7 JUDGMENT in Los Angeles County Superior Court Case No. BC428033, to willfully state as
8 true a material matter which said person knew to be false, to wit: that SANDRA BARTON
9 “moved into it [4904 4th Avenue, Los Angeles, CA] with the intent of obtaining it through
10 adverse possession” and “began to occupy, control, and safeguard the house in August of 2004,
11 and have done so ever since,” in violation of Penal Code section 127, a felony.

12 **COUNT 173**
13 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 172, the ATTORNEY
16 GENERAL further complains and states:

17 On and between July 23 and July 24, 2009, in the County of Fresno, Defendants CRAIG
18 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
19 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Los Angeles
20 County Superior Court Case No. LC086316 for APN 2206-031-015, with the street address of
21 15939 Leadwell Street, Van Nuys, CA, to be filed, registered, and recorded in a public office
22 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
23 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
24 felony.

25 **COUNT 174**
26 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 173, the ATTORNEY
3 GENERAL further complains and states:

4 On and between July 23 and July 24, 2009, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated book,
6 paper, record, instrument in writing, or other matter or thing, with intent to produce it, and to
7 allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
8 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
9 felony.

10 **COUNT 175**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 174, the ATTORNEY
14 GENERAL further complains and states:

15 On or about July 23, 2009, in the County of Fresno, defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that she had acquired title in fee simple to real property identified as APN 2206-031-015, with the
18 street address of 15939 Leadwell Street, Van Nuys, CA by adverse possession under Code of
19 Civil Procedure section 325 by occupying and claiming the property continuously for more than
20 five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to
21 the COMPLAINT TO QUIET TITLE in Los Angeles County Superior Court Case No.
22 LC086316, in violation of Penal Code section 118, subdivision (a), a felony.

23 **COUNT 176**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 175, the ATTORNEY
27 GENERAL further complains and states:
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1 On or about July 23, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did
2 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Los Angeles County
7 Superior Court Case No. LC086316, to willfully state as true a material matter which said person
8 knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real property
9 identified as APN 2206-031-015, with the street address of 15939 Leadwell Street, Van Nuys, CA
10 by adverse possession under Code of Civil Procedure section 325 by occupying and claiming the
11 property continuously for more than five (5) years prior to the filing of the complaint, in violation
12 of Penal Code section 127, a felony.

13 **COUNT 177**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 176, the ATTORNEY
17 GENERAL further complains and states:

18 On and between August 25 and October 6, 2009, in the County of Fresno, Defendants
19 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
20 offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR
21 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Los
22 Angeles County Superior Court Case No. LC086316 for APN 2206-031-015, with the street
23 address of 15939 Leadwell Street, Van Nuys, CA, to be filed, registered, and recorded in a public
24 office within this state, which instrument, if genuine, might be filed, registered, and recorded
25 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
26 (a), a felony.

27 **COUNT 178**
28 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 177, the ATTORNEY
3 GENERAL further complains and states:

4 On and between August 25 and October 6, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare a false or ante-dated
6 book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and
7 to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
8 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
9 felony.

10 **COUNT 179**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 178, the ATTORNEY
14 GENERAL further complains and states:

15 On or about August 25, 2009, in the County of Fresno, defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that she “mailed a copy of the Summons and Complaint . . . to Deborah Winkler at her address in
18 Marina Del Rey [4335 Marina City, Drive, Marina Del Rey, CA] with no response or return letter
19 to me,” and she had [¶] “been unable to locate any Defendant . . . despite reasonable efforts and
20 diligence” which included a “personal visit to Jonnie Kimmons’ last known address,” as declared
21 in the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS and
22 DECLARATION IN SUPPORT in Los Angeles County Superior Court Case No. LC086316, in
23 violation of Penal Code section 118, subdivision (a), a felony.

24 **COUNT 180**
25 **[SUBORNATION OF PERJURY]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 179, the ATTORNEY
28 GENERAL further complains and states:

1 On or about August 25, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
2 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION FOR DEFAULT
7 JUDGMENT in Los Angeles County Superior Court Case No. LC086316, to willfully state as
8 true a material matter which said person knew to be false, to wit: that SANDRA BARTON
9 “mailed a copy of the Summons and Complaint . . . to Deborah Winkler at her address in Marina
10 Del Rey [4335 Marina City, Drive, Marina Del Rey, CA] with no response or return letter to me,”
11 and she had [¶] “been unable to locate any Defendant . . . despite reasonable efforts and
12 diligence” which included a “personal visit to Jonnie Kimmons’ last known address,” in violation
13 of Penal Code section 127, a felony.

14 **COUNT 181**
15 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 180, the ATTORNEY
18 GENERAL further complains and states:

19 On and between August 25 and October 6, 2009, in the County of Fresno, Defendants
20 CRAIG MORTENSEN and DANIEL VEDENOFF did unlawfully and knowingly procure and
21 offer, or cause, a false or forged instrument, to wit: the DECLARATION OF DILIGENCE RE
22 SERVICE OF PROCESS ON DEBORAH WINKLER in Los Angeles County Superior Court
23 Case No. LC086316 for APN 2206-031-015, with the street address of 15939 Leadwell Street,
24 Van Nuys, CA, to be filed, registered, and recorded in a public office within this state, which
25 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
26 United States, in violation of Penal Code section 115, subdivision (a), a felony.

27 **COUNT 182**
28 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 181, the ATTORNEY
3 GENERAL further complains and states:

4 On and between August 25 and October 6, 2009, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and DANIEL VEDENOFF, did unlawfully prepare a false or ante-dated
6 book, paper, record, instrument in writing, or other matter or thing, with intent to produce it, and
7 to allow it to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial,
8 proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a
9 felony.

10 **COUNT 183**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 182, the ATTORNEY
14 GENERAL further complains and states:

15 On or about August 25, 2009, in the County of Fresno, defendant DANIEL VEDENOFF
16 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that he attempted personal service of the summons and complaint at 4335 Marina City Drive,
18 Marina Del Rey, CA at 10:00 a.m., 2:00 p.m. on 8/4/09, at 2:45 p.m. on 8/5/09, and at 7:00 a.m.,
19 6:30 p.m. on 8/6/09 with no response and he could not determine if someone was home or not, as
20 declared in the DECLARATION OF DILIGENCE RE SERVICE OF PROCESS ON DEBORAH
21 WINKLER in Los Angeles County Superior Court Case No. LC086316, in violation of Penal
22 Code section 118, subdivision (a), a felony.

23 **COUNT 184**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 183, the ATTORNEY
27 GENERAL further complains and states:
28

1 On or about August 25, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
2 did willfully and unlawfully procure another person, to wit, Defendant DANIEL VEDENOFF, to
3 commit perjury in that he procured said person, who was to take an oath that she would testify,
4 declare, depose, and certify under penalty of perjury in a case in which such testimony,
5 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
6 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION FOR DEFAULT
7 JUDGMENT in Los Angeles County Superior Court Case No. LC086316, to willfully state as
8 true a material matter which said person knew to be false, to wit: that DANIEL VEDENOFF had
9 he attempted personal service of the summons and complaint at 4335 Marina City Drive, Marina
10 Del Rey, CA at 10:00 a.m., 2:00 p.m. on 8/4/09, at 2:45 p.m. on 8/5/09, and at 7:00 a.m., 6:30
11 p.m. on 8/6/09 with no response and he could not determine if someone was home or not, in
12 violation of Penal Code section 127, a felony.

13 **COUNT 185**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 184, the ATTORNEY
17 GENERAL further complains and states:

18 On and between November 12 and November 23, 2009, in the County of Fresno,
19 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
20 procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET
21 TITLE in Madera County Superior Court Case No. MCV049980 for APN 053-203-002, with the
22 street address of 32236 Road 600, Raymond, CA, to be filed, registered, and recorded in a public
23 office within this state, which instrument, if genuine, might be filed, registered, and recorded
24 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
25 (a), a felony.

26 **COUNT 186**
27 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 185, the ATTORNEY
3 GENERAL further complains and states:

4 On and between November 12 and November 23, 2009, in the County of Fresno,
5 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and
6 ante-dated books, papers, records, instruments in writing, and other matters and things, with
7 intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose,
8 as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in
9 violation of Penal Code section 134, a felony.

10 **COUNT 187**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 186, the ATTORNEY
14 GENERAL further complains and states:

15 On or about November 19, 2009, in the County of Fresno, Defendant SANDRA BARTON
16 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that she had acquired title in fee simple to real property identified as APN 053-203-002, with the
18 street address of 32236 Road 600, Raymond, CA, through adverse possession under Code of
19 Civil Procedure section 325 by occupying and claiming the property continuously for more than
20 five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to
21 the COMPLAINT TO QUIET TITLE in Madera County Superior Court Case No. MCV049980,
22 in violation of Penal Code section 118, subdivision (a), a felony.

23 **COUNT 188**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 187, the ATTORNEY
27 GENERAL further complains and states:
28

1 On or about November 19, 2009, in the County of Fresno, Defendant CRAIG
2 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
3 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
4 would testify, declare, depose, and certify under penalty of perjury in a case in which such
5 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
6 to wit, the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Madera County
7 Superior Court Case No. MCV049980, to willfully state as true a material matter which said
8 person knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real
9 property identified as APN 053-203-002, with the street address of 32236 Road 600, Raymond,
10 CA, through adverse possession under Code of Civil Procedure section 325 by occupying and
11 claiming the property continuously for more than five (5) years prior to the filing of the
12 complaint, in violation of Penal Code section 127, a felony.

13 **COUNT 189**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 188, the ATTORNEY
17 GENERAL further complains and states:

18 On and between December 15 and December 30, 2009, in the County of Fresno,
19 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
20 procure and offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION
21 FOR ORDER FOR PUBLICATION OF SUMMONS and SUPPORTING DECLARATION in
22 Madera County Superior Court Case No. MCV049980 for APN 053-203-002, with the street
23 address of 32236 Road 600, Raymond, CA, to be filed, registered, and recorded in a public office
24 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
25 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
26 felony.

27 **COUNT 190**
28 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 189, the ATTORNEY
3 GENERAL further complains and states:

4 On and between December 15 and December 30, 2009, in the County of Fresno,
5 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare false and
6 ante-dated books, papers, records, instruments in writing, and other matters and things, with
7 intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose,
8 as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in
9 violation of Penal Code section 134, a felony.

10 **COUNT 191**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 190, the ATTORNEY
14 GENERAL further complains and states:

15 On or about December 15 2009, in the County of Fresno, Defendant SANDRA BARTON
16 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
17 that “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons
18 and Complaint to Defendants appears to be futile because [32236 Road 600, Raymond, CA] is the
19 subject real property which is in my custody, control, and possession, and defendants do not
20 reside there,” as declared in the EX PARTE APPLICATION FOR ORDER FOR
21 PUBLICATION OF SUMMONS and SUPPORTING DECLARATION IN in Madera County
22 Superior Court Case No. MCV049980, in violation of Penal Code section 118, subdivision (a), a
23 felony.

24 **COUNT 192**
25 **[SUBORNATION OF PERJURY]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 191, the ATTORNEY
28 GENERAL further complains and states:

1 On or about December 15, 2009, in the County of Fresno, Defendant CRAIG
2 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
3 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
4 would testify, declare, depose, and certify under penalty of perjury in a case in which such
5 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
6 to wit, the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS
7 and SUPPORTING DECLARATION in Madera County Superior Court Case No. MCV049980,
8 to willfully state as true a material matter which said person knew to be false, to wit: that
9 “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons and
10 Complaint to Defendants appears to be futile because [32236 Road 600, Raymond, CA] is the
11 subject real property which is in my custody, control, and possession, and defendants do not
12 reside there,” in violation of Penal Code section 127, a felony.

13 **COUNT 193**
14 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 192, the ATTORNEY
17 GENERAL further complains and states:

18 On and between April 15 and April 22, 2010, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
20 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
21 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
22 Madera County Superior Court Case No. MCV049980 for APN 053-203-002, with the street
23 address of 32236 Road 600, Raymond, CA, to be filed, registered, and recorded in a public office
24 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
25 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
26 felony.

27 **COUNT 194**
28 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 193, the ATTORNEY
3 GENERAL further complains and states:

4 On and between April 15 and April 22, 2010, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON did unlawfully prepare false and ante-dated books,
6 papers, records, instruments in writing, and other matters and things, with intent to produce them,
7 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
8 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
9 section 134, a felony.

10 **COUNT 195**
11 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 194, the ATTORNEY
14 GENERAL further complains and states:

15 On and between April 16 and April 22, 2010, in the County of Fresno, Defendants CRAIG
16 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
17 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
18 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Madera County
19 Superior Court Case No. MCV049980 for APN 053-203-002, with the street address of 32236
20 Road 600, Raymond, CA, to be filed, registered, and recorded in a public office within this state,
21 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
22 the United States, in violation of Penal Code section 115, subdivision (a), a felony.

23 **COUNT 196**
24 **[PREPARING FALSE EVIDENCE]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 195, the ATTORNEY
27 GENERAL further complains and states:
28

1 On and between April 16 and April 22, 2010, in the County of Fresno, Defendants CRAIG
2 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
3 papers, records, instruments in writing, and other matters and things, with intent to produce them,
4 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
5 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
6 section 134, a felony.

7 **COUNT 197**
8 **[PERJURY BY DECLARATION]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 196, the ATTORNEY
11 GENERAL further complains and states:

12 On or about April 16, 2010, in the County of Fresno, Defendant SANDRA BARTON did
13 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
14 that she had been looking for properties in “the Fresno [*sic*] area and noticed the subject house
15 [32236 Road 600, Raymond, CA] [¶] . . . [¶] moved into it with the intent of obtaining it through
16 adverse possession” and “began to control, maintain and safeguard the subject house in June of
17 2004” and “paid all of the property taxes up to date for the past six years,” as declared in the
18 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
19 DEFAULT JUDGMENT in Madera County Superior Court Case No. MCV049980, in violation
20 of Penal Code section 118, subdivision (a), a felony.

21 **COUNT 198**
22 **[SUBORNATION OF PERJURY]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 197, the ATTORNEY
25 GENERAL further complains and states:

26 On or about April 16, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
27 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
28 commit perjury in that he procured said person, who was to take an oath that she would testify,

1 declare, depose, and certify under penalty of perjury in a case in which such testimony,
2 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
3 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
4 DEFAULT JUDGMENT in Madera County Superior Court Case No. MCV049980, to willfully
5 state as true a material matter which said person knew to be false, to wit: that SANDRA
6 BARTON had been looking for properties in “the Fresno [*sic*] area and noticed the subject house
7 [32236 Road 600, Raymond, CA] [¶] . . . [¶] moved into it with the intent of obtaining it through
8 adverse possession” and “began to control, maintain and safeguard the subject house in June of
9 2004” and “paid all of the property taxes up to date for the past six years,” in violation of Penal
10 Code section 127, a felony.

11 **COUNT 199**
12 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

13 For a further and separate cause of complaint, being a different offense from but connected
14 in its commission with the charges set forth in Counts 1 through 198, the ATTORNEY
15 GENERAL further complains and states:

16 On and between December 15 and December 21, 2009, in the County of Fresno,
17 Defendants CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly
18 procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET
19 TITLE in Santa Barbara County Superior Court Case No. 1318553 for APN 115-171-09, with the
20 street address of 261 Tognazzini Ave., Guadalupe, CA, to be filed, registered, and recorded in a
21 public office within this state, which instrument, if genuine, might be filed, registered, and
22 recorded under a law of this state or the United States, in violation of Penal Code section 115,
23 subdivision (a), a felony.

24 **COUNT 200**
25 **[PREPARING FALSE EVIDENCE]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 199, the ATTORNEY
28 GENERAL further complains and states:

1 On and between December 15 and December 21, 2009, in the County of Fresno,
2 Defendants CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and
3 ante-dated books, papers, records, instruments in writing, and other matters and things, with
4 intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose,
5 as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in
6 violation of Penal Code section 134, a felony.

7 **COUNT 201**
8 **[PERJURY BY DECLARATION]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 200, the ATTORNEY
11 GENERAL further complains and states:

12 On or about December 15, 2009, in the County of Fresno, Defendant SANDRA BARTON
13 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
14 that she had acquired title in fee simple to real property identified as APN 115-171-09, with the
15 street address of 261 Tognazzini Ave., Guadalupe, CA, through adverse possession under Code of
16 Civil Procedure section 325 by occupying and claiming the property continuously for more than
17 five (5) years prior to the filing of the complaint, as declared in the VERIFICATION attached to
18 the COMPLAINT TO QUIET TITLE in Santa Barbara County Superior Court Case No.
19 1318553, in violation of Penal Code section 118, subdivision (a), a felony.

20 **COUNT 202**
21 **[SUBORNATION OF PERJURY]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 201, the ATTORNEY
24 GENERAL further complains and states:

25 On or about December 15, 2009, in the County of Fresno, Defendant CRAIG
26 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA
27 BARTON, to commit perjury in that he procured said person, who was to take an oath that she
28 would testify, declare, depose, and certify under penalty of perjury in a case in which such

1 testimony, declaration, deposition, and certification is permitted by law under penalty of perjury,
2 to wit, the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Santa Barbara
3 County Superior Court Case No. 1318553, to willfully state as true a material matter which said
4 person knew to be false, to wit: that SANDRA BARTON had acquired title in fee simple to real
5 property identified as 115-171-09, with the street address of 261 Tognazzini Ave., Guadalupe,
6 CA, through adverse possession under Code of Civil Procedure section 325 by occupying and
7 claiming the property continuously for more than five (5) years prior to the filing of the
8 complaint, in violation of Penal Code section 127, a felony.

9
10 **COUNT 203**
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 202, the ATTORNEY
13 GENERAL further complains and states:

14 On and between March 4 and March 8, 2010, in the County of Fresno, Defendants CRAIG
15 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
16 cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR ORDER FOR
17 PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Santa Barbara County
18 Superior Court Case No. 1318553 for APN 115-171-09, with the street address of 261 Tognazzini
19 Ave., Guadalupe, CA, to be filed, registered, and recorded in a public office within this state,
20 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
21 the United States, in violation of Penal Code section 115, subdivision (a), a felony.

22 **COUNT 204**
[PREPARING FALSE EVIDENCE]

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 203, the ATTORNEY
25 GENERAL further complains and states:

26 On and between March 4 and March 8, 2010, in the County of Fresno, Defendants CRAIG
27 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
28

1 papers, records, instruments in writing, and other matters and things, with intent to produce them,
2 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
3 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
4 section 134, a felony.

5 **COUNT 205**
6 **[PERJURY BY DECLARATION]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 204, the ATTORNEY
9 GENERAL further complains and states:

10 On or about March 4, 2010, in the County of Fresno, Defendant SANDRA BARTON did
11 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
12 “[s]ubstitute service . . . could not be accomplished because mailing a copy of the Summons and
13 Complaint to [decedent’s son and his spouse] at their last known address 261 Tognazzini Ave.,
14 Guadalupe, California would be futile because . . . that is the real property in question which is in
15 my custody, control, and possession, and neither [decedent’s son and his spouse] reside there,”
16 and she had been “unable to locate any Defendant, within or outside the State of California,
17 despite reasonable efforts and diligence,” as declared in the EX PARTE APPLICATION FOR
18 ORDER FOR PUBLICATION OF SUMMONS and DECLARATION IN SUPPORT in Santa
19 Barbara County Superior Court Case No. 1318553, in violation of Penal Code section 118,
20 subdivision (a), a felony.

21 **COUNT 206**
22 **[SUBORNATION OF PERJURY]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 205, the ATTORNEY
25 GENERAL further complains and states:

26 On or about March 4, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
27 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
28 commit perjury in that he procured said person, who was to take an oath that she would testify,

1 declare, depose, and certify under penalty of perjury in a case in which such testimony,
2 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
3 EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS and
4 DECLARATION IN SUPPORT in Santa Barbara County Superior Court Case No. 1318553, to
5 willfully state as true a material matter which said person knew to be false, to wit: “[s]ubstitute
6 service . . . could not be accomplished because mailing a copy of the Summons and Complaint to
7 [decedent’s son and his spouse] at their last known address 261 Tognazzini Ave., Guadalupe,
8 California would be futile because . . . that is the real property in question which is in my
9 custody, control, and possession, and neither [decedent’s son and his spouse] reside there,” and
10 she had been “unable to locate any Defendant, within or outside the State of California, despite
11 reasonable efforts and diligence,” in violation of Penal Code section 127, a felony.

12 **COUNT 207**
13 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 206, the ATTORNEY
16 GENERAL further complains and states:

17 On and between April 29 and May 17, 2010, in the County of Fresno, Defendants CRAIG
18 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
19 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
20 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
21 Santa Barbara County Superior Court Case No. 1318553 for APN 115-171-09, with the street
22 address of 261 Tognazzini Ave., Guadalupe, CA, to be filed, registered, and recorded in a public
23 office within this state, which instrument, if genuine, might be filed, registered, and recorded
24 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
25 (a), a felony.

26 **COUNT 208**
27 **[PREPARING FALSE EVIDENCE]**
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 207, the ATTORNEY
3 GENERAL further complains and states:

4 On and between April 29 and May 17, 2010, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
6 papers, records, instruments in writing, and other matters and things, with intent to produce them,
7 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
8 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
9 section 134, a felony.

10 **COUNT 209**
11 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 208, the ATTORNEY
14 GENERAL further complains and states:

15 On and between April 12 and May 17, 2010, in the County of Fresno, Defendants CRAIG
16 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
17 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
18 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Santa Barbara County
19 Superior Court Case No. 1318553 for APN 115-171-09, with the street address of 261 Tognazzini
20 Ave., Guadalupe, CA, to be filed, registered, and recorded in a public office within this state,
21 which instrument, if genuine, might be filed, registered, and recorded under a law of this state or
22 the United States, in violation of Penal Code section 115, subdivision (a), a felony.

23 **COUNT 210**
24 **[PREPARING FALSE EVIDENCE]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 209, the ATTORNEY
27 GENERAL further complains and states:

1 On and between April 12 and May 17, 2010, in the County of Fresno, Defendants CRAIG
2 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
3 papers, records, instruments in writing, and other matters and things, with intent to produce them,
4 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
5 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
6 section 134, a felony.

7 **COUNT 211**
8 **[PERJURY BY DECLARATION]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 210, the ATTORNEY
11 GENERAL further complains and states:

12 On or about April 12, 2010, in the County of Fresno, Defendant SANDRA BARTON did
13 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
14 “moved into it [261 Tognazzini Ave., Guadalupe, CA] with the intent of obtaining it through
15 adverse possession” and “began to control, maintain and safeguard the subject house in January
16 of 2004” and “paid all of the property taxes up to date for the past six years,” as declared in the
17 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
18 DEFAULT JUDGMENT in Santa Barbara County Superior Court Case No. 1318553, in violation
19 of Penal Code section 118, subdivision (a), a felony.

20 **COUNT 212**
21 **[SUBORNATION OF PERJURY]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 211, the ATTORNEY
24 GENERAL further complains and states:

25 On or about April 12, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
26 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
27 commit perjury in that he procured said person, who was to take an oath that she would testify,
28 declare, depose, and certify under penalty of perjury in a case in which such testimony,

1 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
2 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
3 DEFAULT JUDGMENT in Santa Barbara County Superior Court Case No. 1318553, to willfully
4 state as true a material matter which said person knew to be false, to wit: SANDRA BARTON
5 “moved into it [261 Tognazzini Ave., Guadalupe, CA] with the intent of obtaining it through
6 adverse possession” and “began to control, maintain and safeguard the subject house in January
7 of 2004” and “paid all of the property taxes up to date for the past six years,” in violation of Penal
8 Code section 127, a felony.

9 **COUNT 213**
10 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 212, the ATTORNEY
13 GENERAL further complains and states:

14 On and between April 12 and May 17, 2010, in the County of Fresno, Defendants CRAIG
15 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
16 cause, a false or forged instrument, to wit: the PROOF OF SERVICE BY POSTING in Santa
17 Barbara County Superior Court Case No. 1318553 for APN 115-171-09, with the street address
18 of 261 Tognazzini Ave., Guadalupe, CA, to be filed, registered, and recorded in a public office
19 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
20 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
21 felony.

22 **COUNT 214**
23 **[PREPARING FALSE EVIDENCE]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 213, the ATTORNEY
26 GENERAL further complains and states:

27 On and between April 12 and May 17, 2010, in the County of Fresno, Defendants CRAIG
28 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,

1 papers, records, instruments in writing, and other matters and things, with intent to produce them,
2 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
3 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
4 section 134, a felony.

5 **COUNT 215**
6 **[PERJURY BY DECLARATION]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 214, the ATTORNEY
9 GENERAL further complains and states:

10 On or about April 12, 2010, in the County of Fresno, Defendant SANDRA BARTON did
11 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
12 that on March 12, 2010, she had posted a copy of the Summons and Complaint in the matter near
13 the porch of 261 Tognazzini Avenue, Guadalupe, California, 93434 for a period of 30 days, as
14 declared in the PROOF OF SERVICE BY POSTING in Santa Barbara County Superior Court
15 Case No. 1318553, in violation of Penal Code section 118, subdivision (a), a felony.

16 **COUNT 216**
17 **[SUBORNATION OF PERJURY]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 215, the ATTORNEY
20 GENERAL further complains and states:

21 On or about April 12, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
22 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
23 commit perjury in that he procured said person, who was to take an oath that she would testify,
24 declare, depose, and certify under penalty of perjury in a case in which such testimony,
25 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
26 PROOF OF SERVICE BY POSTING in Santa Barbara County Superior Court Case No.
27 1318553, to willfully state as true a material matter which said person knew to be false, to wit:
28 that on March 12, 2010, SANDRA BARTON had posted a copy of the Summons and Complaint

1 in the matter near the porch of 261 Tognazzini Avenue, Guadalupe, California, 93434 for a
2 period of 30 days, in violation of Penal Code section 127, a felony.

3 **COUNT 217**
4 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 216, the ATTORNEY
7 GENERAL further complains and states:

8 On and between November 16 and November 18, 2010, in the County of Fresno,
9 Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure
10 and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE TO
11 REAL PROPERTY in San Mateo County Superior Court Case No. CIV500757 for APN 009-
12 554-010, commonly known as 595 Waverly Place, Pacifica, CA, to be filed, registered, and
13 recorded in a public office within this state, which instrument, if genuine, might be filed,
14 registered, and recorded under a law of this state or the United States, in violation of Penal Code
15 section 115, subdivision (a), a felony.

16 **COUNT 218**
17 **[PREPARING FALSE EVIDENCE]**

18 For a further and separate cause of complaint, being a different offense from but connected
19 in its commission with the charges set forth in Counts 1 through 217, the ATTORNEY
20 GENERAL further complains and states:

21 On and between November 16 and November 18, 2010, in the County of Fresno,
22 Defendants SHELDON FEIGEL and SANDRA BARTON, did unlawfully prepare false and ante-
23 dated books, papers, records, instruments in writing, and other matters and things, with intent to
24 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
25 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
26 of Penal Code section 134, a felony.

27 **COUNT 219**
28 **[PERJURY BY DECLARATION]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 218, the ATTORNEY
3 GENERAL further complains and states:

4 On or about November 17, 2010, in the County of Fresno, Defendant SANDRA BARTON
5 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
6 beginning on or about July 4, 2004, and continuing to the present time, SANDRA BARTON, and
7 no other party, had been in possession of and resided in 595 Waverly Place, Pacifica, CA, thereby
8 gaining title by adverse possession under Code of Civil Procedure section 324, as declared in the
9 VERIFICATION attached to the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in
10 San Mateo County Superior Court Case No. CIV500757, in violation of Penal Code section 118,
11 subdivision (a), a felony.

12 **COUNT 220**
13 **[SUBORNATION OF PERJURY]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 219, the ATTORNEY
16 GENERAL further complains and states:

17 On or about November 17, 2010, in the County of Fresno, Defendant SHELDON FEIGEL
18 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
19 to commit perjury in that he procured said person, who was to take an oath that she would testify,
20 declare, depose, and certify under penalty of perjury in a case in which such testimony,
21 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
22 VERIFICATION attached to the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in
23 San Mateo County Superior Court Case No. CIV500757, to willfully state as true a material
24 matter which said person knew to be false, to wit: beginning on or about July 4, 2004, and
25 continuing to the present time, SANDRA BARTON, and no other party, had been in possession
26 of and resided in 595 Waverly Place, Pacifica, CA, thereby gaining title by adverse possession
27 under Code of Civil Procedure section 324, in violation of Penal Code section 127, a felony.
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COUNT 221
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 220, the ATTORNEY GENERAL further complains and states:

On and between January 7 and January 12, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the EX PARTE APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in San Mateo County Superior Court Case No. CIV500757 for APN 009-554-010, commonly known as 595 Waverly Place, Pacifica, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 222
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 221, the ATTORNEY GENERAL further complains and states:

On and between January 7 and January 12, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records, instruments in writing, and other matters and things, with intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 223
[PERJURY BY DECLARATION]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 222, the ATTORNEY
3 GENERAL further complains and states:

4 On or about January 10, 2011, in the County of Fresno, Defendant SANDRA BARTON did
5 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
6 had “been in possession of the property located at 595 Waverly Place, Pacifica, since July 2004,”
7 and had “been unable to make any contact with defendants, or any relative . . . ,” as declared in
8 the DECLARATION OF SANDRA BARTON attached as EXHIBIT B to the EX PARTE
9 APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in San Mateo County
10 Superior Court Case No. CIV500757, in violation of Penal Code section 118, subdivision (a), a
11 felony.

12 **COUNT 224**
13 **[SUBORNATION OF PERJURY]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 223, the ATTORNEY
16 GENERAL further complains and states:

17 On or about January 10, 2011, in the County of Fresno, Defendant SHELDON FEIGEL did
18 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to
19 commit perjury in that he procured said person, who was to take an oath that she would testify,
20 declare, depose, and certify under penalty of perjury in a case in which such testimony,
21 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
22 DECLARATION OF SANDRA BARTON attached as EXHIBIT B to the EX PARTE
23 APPLICATION FOR ORDER FOR PUBLICATION OF SUMMONS in San Mateo County
24 Superior Court Case No. CIV500757, to willfully state as true a material matter which said person
25 knew to be false, to wit: that SANDRA BARTON had “been in possession of the property located
26 at 595 Waverly Place, Pacifica, since July 2004,” and had “been unable to make any contact with
27 defendants, or any relative . . . ,” as in violation of Penal Code section 127, a felony.
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COUNT 225
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 224, the ATTORNEY GENERAL further complains and states:

On and between November 18 and December 6, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in San Mateo County Superior Court Case No. CIV507780 for APN 007-555-110, commonly known as 25 Gladys Ave., Brisbane, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 226
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 225, the ATTORNEY GENERAL further complains and states:

On and between November 18 and December 6, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records, instruments in writing, and other matters and things, with intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 227
[PERJURY BY DECLARATION]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 226, the ATTORNEY
3 GENERAL further complains and states:

4 On or about August 16, 2011, in the County of Fresno, Defendant SANDRA BARTON did
5 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
6 she was the sole owner in fee simple title to 25 Gladys, City of Brisbane, County of San Mateo,
7 State of California, and had acquired title to the property by adverse possession under Code of
8 Civil Procedure section 325 by occupying and claiming the property continuously for more than
9 five (5) years prior to the filing of the complaint,” as declared in the VERIFICATION attached to
10 the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in San Mateo County Superior
11 Court Case No. CIV500757, in violation of Penal Code section 118, subdivision (a), a felony.

12 **COUNT 228**
13 **[SUBORNATION OF PERJURY]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 227, the ATTORNEY
16 GENERAL further complains and states:

17 On or about November 17, 2010, in the County of Fresno, Defendant SHELDON FEIGEL
18 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
19 to commit perjury in that he procured said person, who was to take an oath that she would testify,
20 declare, depose, and certify under penalty of perjury in a case in which such testimony,
21 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
22 VERIFICATION attached to the COMPLAINT TO QUIET TITLE TO REAL PROPERTY in
23 San Mateo County Superior Court Case No. CIV500757, to willfully state as true a material
24 matter which said person knew to be false, to wit: SANDRA BARTON was the sole owner in fee
25 simple title to 25 Gladys, City of Brisbane, County of San Mateo, State of California, and had
26 acquired title to the property by adverse possession under Code of Civil Procedure section 325
27 by occupying and claiming the property continuously for more than five (5) years prior to the
28 filing of the complaint,” in violation of Penal Code section 127, a felony.

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COUNT 229
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 228, the ATTORNEY GENERAL further complains and states:

On and between November 18 and December 6, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT in San Mateo County Superior Court Case No. CIV507780 for APN 007-555-110, commonly known as 25 Gladys Ave., Brisbane, CA, 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, in violation of Penal Code section 115, subdivision (a), a felony.

COUNT 230
[PREPARING FALSE EVIDENCE]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 229, the ATTORNEY GENERAL further complains and states:

On and between November 18 and December 6, 2011, in the County of Fresno, Defendants SHELDON FEIGEL and SANDRA BARTON, did unlawfully prepare false and ante-dated books, papers, records, instruments in writing, and other matters and things, with intent to produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code section 134, a felony.

COUNT 231
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 230, the ATTORNEY GENERAL further complains and states:

1 On and between November 18 and December 6, 2011, in the County of Fresno, Defendants
2 SHELDON FEIGEL and SANDRA BARTON did unlawfully and knowingly procure and offer,
3 or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
4 SUPPORT OF EX PARTE APPLICATION FOR DEFAULT JUDGMENT in San Mateo County
5 Superior Court Case No. CIV507780 for APN 007-555-110, commonly known as 25 Gladys
6 Ave., Brisbane, CA, to be filed, registered, and recorded in a public office within this state, which
7 instrument, if genuine, might be filed, registered, and recorded under a law of this state or the
8 United States, in violation of Penal Code section 115, subdivision (a), a felony.

9 **COUNT 232**
10 **[PREPARING FALSE EVIDENCE]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 231, the ATTORNEY
13 GENERAL further complains and states:

14 On and between November 18 and December 6, 2011, in the County of Fresno, Defendants
15 SHELDON FEIGEL and SANDRA BARTON, did unlawfully prepare false and ante-dated
16 books, papers, records, instruments in writing, and other matters and things, with intent to
17 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
18 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
19 of Penal Code section 134, a felony.

20 **COUNT 233**
21 **[PERJURY BY DECLARATION]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 232, the ATTORNEY
24 GENERAL further complains and states:

25 On or about November 18, 2011, in the County of Fresno, Defendant SANDRA BARTON
26 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
27 she “moved into it [25 Gladys Ave., Brisbane, CA] . . . and controlled the occupancy of the house
28 with the intent of ultimately obtaining it through adverse possession” and “began to occupy,

1 maintain, and safeguard the subject house in January of 2006 and have done so ever since,” as
2 declared in the DECLARATION OF SANDRA BARTON IN SUPPORT OF EX PARTE
3 APPLICATION FOR DEFAULT JUDGMENT in San Mateo County Superior Court Case No.
4 CIV500757, in violation of Penal Code section 118, subdivision (a), a felony.

5
6 **COUNT 234**
[SUBORNATION OF PERJURY]

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 233, the ATTORNEY
9 GENERAL further complains and states:

10 On or about November 18, 2011, in the County of Fresno, Defendant SHELDON FEIGEL
11 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
12 to commit perjury in that he procured said person, who was to take an oath that she would testify,
13 declare, depose, and certify under penalty of perjury in a case in which such testimony,
14 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
15 DECLARATION OF SANDRA BARTON IN SUPPORT OF EX PARTE APPLICATION FOR
16 DEFAULT JUDGMENT in San Mateo County Superior Court Case No. CIV500757, to willfully
17 state as true a material matter which said person knew to be false, to wit: SANDRA BARTON
18 “moved into it [25 Gladys Ave., Brisbane, CA] . . . and controlled the occupancy of the house
19 with the intent of ultimately obtaining it through adverse possession” and “began to occupy,
20 maintain, and safeguard the subject house in January of 2006 and have done so ever since,” in
21 violation of Penal Code section 127, a felony.

22 **COUNT 235**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 234, the ATTORNEY
26 GENERAL further complains and states:

27 On and between November 19 and December 2, 2009, in the County of Fresno, Defendants
28 CRAIG MORTENSEN and CHRISTOPHER BARTON did unlawfully and knowingly procure

1 and offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in
2 Tulare County Superior Court Case No. VCU235358 for APN 251-314-008, with a street address
3 of 222 N. Beverly St., Porterville, CA, to be filed, registered, and recorded in a public office
4 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
5 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
6 felony.

7 **COUNT 236**
8 **[PREPARING FALSE EVIDENCE]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 235, the ATTORNEY
11 GENERAL further complains and states:

12 On and between November 19 and December 2, 2009, in the County of Fresno, Defendants
13 CRAIG MORTENSEN and CHRISTOPHER BARTON did unlawfully prepare false and ante-
14 dated books, papers, records, instruments in writing, and other matters and things, with intent to
15 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
16 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
17 of Penal Code section 134, a felony.

18 **COUNT 237**
19 **[PERJURY BY DECLARATION]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 236, the ATTORNEY
22 GENERAL further complains and states:

23 On or about November 19, 2009, in the County of Fresno, Defendant CHRISTOPHER
24 BARTON did unlawfully, under penalty of perjury, declare as true, that which was known to be
25 false, to wit: he was the sole owner in fee simple title to 222 North Beverly Street, Porterville, CA
26 93257, and had acquired title to the property by adverse possession under Code of Civil
27 Procedure section 325 by occupying and claiming the property continuously for more than five
28 (5) years prior to the filing of the complaint,” as declared in the VERIFICATION attached to the

1 COMPLAINT TO QUIET TITLE TO REAL PROPERTY in Tulare County Superior Court Case
2 No. VCU235358, in violation of Penal Code section 118, subdivision (a), a felony.

3 **COUNT 238**
4 **[SUBORNATION OF PERJURY]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 237, the ATTORNEY
7 GENERAL further complains and states:

8 On or about November 18, 2011, in the County of Fresno, Defendant CRAIG
9 MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant
10 CHRISTOPHER BARTON, to commit perjury in that he procured said person, who was to take
11 an oath that she would testify, declare, depose, and certify under penalty of perjury in a case in
12 which such testimony, declaration, deposition, and certification is permitted by law under penalty
13 of perjury, to wit, the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in
14 Tulare County Superior Court Case No. VCU235358, to willfully state as true a material matter
15 which said person knew to be false, to wit: that CHRISTOPHER BARTON was the sole owner in
16 fee simple title to 222 North Beverly Street, Porterville, CA 93257, and had acquired title to the
17 property by adverse possession under Code of Civil Procedure section 325 by occupying and
18 claiming the property continuously for more than five (5) years prior to the filing of the
19 complaint,” in violation of Penal Code section 127, a felony.

20 **COUNT 239**
21 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 238, the ATTORNEY
24 GENERAL further complains and states:

25 On and between July 23 and July 26, 2010, in the County of Fresno, Defendants CRAIG
26 MORTENSEN and CHRISTOPHER BARTON did unlawfully and knowingly procure and offer,
27 or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
28 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in

1 Tulare County Superior Court Case No. VCU235358 for APN 251-314-008, with a street address
2 of 222 N. Beverly St., Porterville, CA, to be filed, registered, and recorded in a public office
3 within this state, which instrument, if genuine, might be filed, registered, and recorded under a
4 law of this state or the United States, in violation of Penal Code section 115, subdivision (a), a
5 felony.

6 **COUNT 240**
7 **[PREPARING FALSE EVIDENCE]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts 1 through 239, the ATTORNEY
10 GENERAL further complains and states:

11 On and between July 23 and July 26, 2010, in the County of Fresno, Defendants CRAIG
12 MORTENSEN and CHRISTOPHER BARTON did unlawfully prepare false and ante-dated
13 books, papers, records, instruments in writing, and other matters and things, with intent to
14 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
15 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
16 of Penal Code section 134, a felony.

17 **COUNT 241**
18 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 240, the ATTORNEY
21 GENERAL further complains and states:

22 On and between July 23 and July 26, 2010, in the County of Fresno, Defendants CRAIG
23 MORTENSEN and CHRISTOPHER BARTON did unlawfully and knowingly procure and offer,
24 or cause, a false or forged instrument, to wit: the DECLARATION OF CHRISTOPHER S.
25 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Tulare
26 County Superior Court Case No. VCU235358 for APN 251-314-008, with a street address of 222
27 N. Beverly St., Porterville, CA, to be filed, registered, and recorded in a public office within this
28

1 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
2 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

3 **COUNT 242**
4 **[PREPARING FALSE EVIDENCE]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 241, the ATTORNEY
7 GENERAL further complains and states:

8 On and between July 23 and July 26, 2010, in the County of Fresno, Defendants CRAIG
9 MORTENSEN and CHRISTOPHER BARTON did unlawfully prepare false and ante-dated
10 books, papers, records, instruments in writing, and other matters and things, with intent to
11 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
12 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
13 of Penal Code section 134, a felony.

14 **COUNT 243**
15 **[PERJURY BY DECLARATION]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 242, the ATTORNEY
18 GENERAL further complains and states:

19 On or about July 23, 2010, in the County of Fresno, Defendant CHRISTOPHER BARTON
20 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
21 he “moved into it [222 N. Beverly St., Porterville, CA] with the intent of obtaining it through
22 adverse possession” and “began to occupy and safeguard the subject house in March 2004,” as
23 declared in the DECLARATION OF CHRISTOPHER S. BARTON IN SUPPORT OF
24 APPLICATION TO ENTER DEFAULT JUDGMENT in Tulare County Superior Court Case
25 No.VCU235358, in violation of Penal Code section 118, subdivision (a), a felony.

26 **COUNT 244**
27 **[SUBORNATION OF PERJURY]**
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 243, the ATTORNEY
3 GENERAL further complains and states:

4 On or about July 23, 2010, in the County of Fresno, Defendant CRAIG MORTENSEN did
5 willfully and unlawfully procure another person, to wit, Defendant CHRISTOPHER BARTON,
6 to commit perjury in that he procured said person, who was to take an oath that she would testify,
7 declare, depose, and certify under penalty of perjury in a case in which such testimony,
8 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
9 DECLARATION OF CHRISTOPHER S. BARTON IN SUPPORT OF APPLICATION TO
10 ENTER DEFAULT JUDGMENT in Tulare County Superior Court Case No.VCU235358, to
11 willfully state as true a material matter which said person knew to be false, to wit:
12 CHRISTOPHER BARTON “moved into it [222 N. Beverly St., Porterville, CA] with the intent
13 of obtaining it through adverse possession” and “began to occupy and safeguard the subject house
14 in March 2004,” in violation of Penal Code section 127, a felony.

15 **COUNT 245**
16 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 244, the ATTORNEY
19 GENERAL further complains and states:

20 On and between August 3 and August 14, 2007, in the County of Fresno, Defendants
21 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
22 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in
23 Tulare County Superior Court Case No. VCU07-224834 for APN 310-160-32, with no street
24 address, to be filed, registered, and recorded in a public office within this state, which instrument,
25 if genuine, might be filed, registered, and recorded under a law of this state or the United States,
26 in violation of Penal Code section 115, subdivision (a), a felony.

27 **COUNT 246**
28 **[PREPARING FALSE EVIDENCE]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 245, the ATTORNEY
3 GENERAL further complains and states:

4 On and between August 3 and August 14, 2007, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 247**
11 **[PERJURY BY DECLARATION]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 246, the ATTORNEY
14 GENERAL further complains and states:

15 On or about August 7, 2007, in the County of Fresno, Defendant SANDRA BARTON did
16 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
17 was the sole owner in fee simple title to APN 310-160-32 located in the County of Tulare,
18 California, with no street address, and had acquired title to the property by adverse possession
19 under Code of Civil Procedure section 325 by occupying and claiming the property continuously
20 for more than five years prior to the filing of the complaint, as declared in the VERIFICATION
21 attached to the COMPLAINT TO QUIET TITLE in Tulare County Superior Court Case No.
22 VCU07-224834, in violation of Penal Code section 118, subdivision (a), a felony.

23 **COUNT 248**
24 **[SUBORNATION OF PERJURY]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 247, the ATTORNEY
27 GENERAL further complains and states:
28

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 249, the ATTORNEY
3 GENERAL further complains and states:

4 On and between February 11 and February 13, 2007, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully prepare false and ante-dated
6 books, papers, records, instruments in writing, and other matters and things, with intent to
7 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
8 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
9 of Penal Code section 134, a felony.

10 **COUNT 251**
11 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

12 For a further and separate cause of complaint, being a different offense from but connected
13 in its commission with the charges set forth in Counts 1 through 250, the ATTORNEY
14 GENERAL further complains and states:

15 On and between January 7 and January 22, 2008, in the County of Fresno, Defendants
16 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
17 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Kern
18 County Superior Court Case No. S-1500-CV-262828 for APN 230-116-04 and APN 230-116-00-
19 3, with the street address of 16947 Glendower Ave., North Edwards, CA, to be filed, registered,
20 and recorded in a public office within this state, which instrument, if genuine, might be filed,
21 registered, and recorded under a law of this state or the United States, in violation of Penal Code
22 section 115, subdivision (a), a felony.

23 **COUNT 252**
24 **[PREPARING FALSE EVIDENCE]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 251, the ATTORNEY
27 GENERAL further complains and states:

28 On and between January 7 and January 22, 2008, in the County of Fresno, Defendants
CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated

1 books, papers, records, instruments in writing, and other matters and things, with intent to
2 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
3 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
4 of Penal Code section 134, a felony.

5 **COUNT 253**
6 **[PERJURY BY DECLARATION]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 252, the ATTORNEY
9 GENERAL further complains and states:

10 On or about January 15, 2008, in the County of Fresno, Defendant SANDRA BARTON did
11 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
12 was the sole owner in fee simple title to 16947 Glendower Ave., North Edwards, CA Kern,
13 California, and had acquired title to the property by adverse possession under Code of Civil
14 Procedure section 325 by occupying and claiming the property continuously for more than five
15 years (5) prior to the filing of the complaint, as declared in the VERIFICATION attached to the
16 COMPLAINT TO QUIET TITLE in Kern County Superior Court Case No. S-1500-CV-262828,
17 in violation of Penal Code section 118, subdivision (a), a felony.

18 **COUNT 254**
19 **[SUBORNATION OF PERJURY]**

20 For a further and separate cause of complaint, being a different offense from but connected
21 in its commission with the charges set forth in Counts 1 through 253, the ATTORNEY
22 GENERAL further complains and states:

23 On or about January 15, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN
24 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
25 to commit perjury in that he procured said person, who was to take an oath that she would testify,
26 declare, depose, and certify under penalty of perjury in a case in which such testimony,
27 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
28 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior

1 Court Case No. S-1500-CV-262828, to willfully state as true a material matter which said person
2 knew to be false, to wit: that SANDRA BARTON was the sole owner in fee simple title to 16947
3 Glendower Ave., North Edwards, CA Kern, California, and had acquired title to the property by
4 adverse possession under Code of Civil Procedure section 325 by occupying and claiming the
5 property continuously for more than five years (5) prior to the filing of the complaint, in violation
6 of Penal Code section 127, a felony.

7 **COUNT 255**
8 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

9 For a further and separate cause of complaint, being a different offense from but connected
10 in its commission with the charges set forth in Counts 1 through 254, the ATTORNEY
11 GENERAL further complains and states:

12 On and between July 18 and July 22, 2008, in the County of Fresno, Defendants CRAIG
13 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
14 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
15 AUTHORITIES IN SUPPORT OF APPLICATION FOR JUDGMENT QUIETING TITLE in
16 Kern County Superior Court Case No. S-1500-CV-262828 for APN 230-116-04 and APN 230-
17 116-00-3, with the street address of 16947 Glendower Ave., North Edwards, CA, to be filed,
18 registered, and recorded in a public office within this state, which instrument, if genuine, might be
19 filed, registered, and recorded under a law of this state or the United States, in violation of Penal
20 Code section 115, subdivision (a), a felony.

21 **COUNT 256**
22 **[PREPARING FALSE EVIDENCE]**

23 For a further and separate cause of complaint, being a different offense from but connected
24 in its commission with the charges set forth in Counts 1 through 255, the ATTORNEY
25 GENERAL further complains and states:

26 On and between July 18 and July 22, 2008, in the County of Fresno, Defendants CRAIG
27 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
28 papers, records, instruments in writing, and other matters and things, with intent to produce them,

1 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
2 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
3 section 134, a felony.

4 **COUNT 257**
5 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 256, the ATTORNEY
8 GENERAL further complains and states:

9 On and between January 7 and January 22, 2008, in the County of Fresno, Defendants
10 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
11 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Kern
12 County Superior Court Case No. S-1500-CV-262829 for APN 244-342-15 and APN 244-342-15-
13 00-5, with the street address of 26945 Nichols St., Boron, CA, to be filed, registered, and
14 recorded in a public office within this state, which instrument, if genuine, might be filed,
15 registered, and recorded under a law of this state or the United States, in violation of Penal Code
16 section 115, subdivision (a), a felony.

17 **COUNT 258**
18 **[PREPARING FALSE EVIDENCE]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 257, the ATTORNEY
21 GENERAL further complains and states:

22 On and between January 7 and January 22, 2008, in the County of Fresno, Defendants
23 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
24 books, papers, records, instruments in writing, and other matters and things, with intent to
25 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
26 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
27 of Penal Code section 134, a felony.

28 **COUNT 259**
[PERJURY BY DECLARATION]

1
2 For a further and separate cause of complaint, being a different offense from but connected
3 in its commission with the charges set forth in Counts 1 through 258, the ATTORNEY
4 GENERAL further complains and states:

5 On or about January 15, 2008, in the County of Fresno, Defendant SANDRA BARTON did
6 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
7 was the sole owner in fee simple to 26945 Nichols St., Boron, CA, and had acquired title to the
8 property by adverse possession under Code of Civil Procedure section 325 by occupying and
9 claiming the property continuously for more than five years prior to the filing of the complaint, as
10 declared in the VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern
11 County Superior Court Case No. S-1500-CV-262829, in violation of Penal Code section 118,
12 subdivision (a), a felony.

13 **COUNT 260**
14 **[SUBORNATION OF PERJURY]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 259, the ATTORNEY
17 GENERAL further complains and states:

18 On January 15, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN did
19 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON , to
20 commit perjury in that he procured said person, who was to take an oath that she would testify,
21 declare, depose, and certify under penalty of perjury in a case in which such testimony,
22 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
23 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior
24 Court Case No. S-1500-CV-262829, to willfully state as true a material matter which said person
25 knew to be false, to wit: that SANDRA BARTON was the sole owner in fee simple to 26945
26 Nichols St., Boron, CA, and had acquired title to the property by adverse possession under Code
27 of Civil Procedure section 325 by occupying and claiming the property continuously for more
28

1 than five years prior to the filing of the complaint, in violation of Penal Code section 127, a
2 felony.

3 **COUNT 261**
4 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 260, the ATTORNEY
7 GENERAL further complains and states:

8 On and between July 18 and July 22, 2008, in the County of Fresno, Defendants CRAIG
9 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
10 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
11 AUTHORITIES IN SUPPORT OF APPLICATION FOR JUDGMENT QUIETING TITLE in
12 Kern County Superior Court Case No. S-1500-CV-262829 for APN 244-342-15 and APN 244-
13 342-15-00-5, with the street address of 26945 Nichols St., Boron, CA, to be filed, registered, and
14 recorded in a public office within this state, which instrument, if genuine, might be filed,
15 registered, and recorded under a law of this state or the United States, in violation of Penal Code
16 section 115, subdivision (a), a felony.

17 **COUNT 262**
18 **[PREPARING FALSE EVIDENCE]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 261, the ATTORNEY
21 GENERAL further complains and states:

22 On and between July 18 and July 22, 2008, in the County of Fresno, Defendants CRAIG
23 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
24 papers, records, instruments in writing, and other matters and things, with intent to produce them,
25 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
26 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
27 section 134, a felony.

28 **COUNT 263**
[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 262, the ATTORNEY
3 GENERAL further complains and states:

4 On and between October 23 and October 29, 2008, in the County of Fresno, Defendants
5 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
6 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Kern
7 County Superior Court Case No. S-1500-CV-265487 for APN 508-061-37-004 and APN 508-61-
8 37, with the street address of 1153 Brady St., Ridgecrest, CA, to be filed, registered, and recorded
9 in a public office within this state, which instrument, if genuine, might be filed, registered, and
10 recorded under a law of this state or the United States, in violation of Penal Code section 115,
11 subdivision (a), a felony.

12 **COUNT 264**
13 **[PREPARING FALSE EVIDENCE]**

14 For a further and separate cause of complaint, being a different offense from but connected
15 in its commission with the charges set forth in Counts 1 through 263, the ATTORNEY
16 GENERAL further complains and states:

17 On and between October 23 and October 29, 2008, in the County of Fresno, Defendants
18 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
19 books, papers, records, instruments in writing, and other matters and things, with intent to
20 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
21 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
22 of Penal Code section 134, a felony.

23 **COUNT 265**
24 **[PERJURY BY DECLARATION]**

25 For a further and separate cause of complaint, being a different offense from but connected
26 in its commission with the charges set forth in Counts 1 through 264, the ATTORNEY
27 GENERAL further complains and states:

28

1 On or about October 23, 2008, in the County of Fresno, Defendant SANDRA BARTON
2 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
3 “Plaintiff alleges: . . . [d]efendants herein named . . . and all persons unknown, claiming any legal
4 . . . interest in the property described in a complaint *adverse to Plaintiff’s title* [APN 508-061-37-
5 004 and APN 508--61-37] *or any cloud on Plaintiff’s title thereto . . .*,” as declared in the
6 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior
7 Court Case No. S-1500-CV-265487, in violation of Penal Code section 118, subdivision (a), a
8 felony.

9 **COUNT 266**
10 **[SUBORNATION OF PERJURY]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 265, the ATTORNEY
13 GENERAL further complains and states:

14 On or about October 23, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN
15 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
16 to commit perjury in that he procured said person, who was to take an oath that she would testify,
17 declare, depose, and certify under penalty of perjury in a case in which such testimony,
18 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
19 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior
20 Court Case No. S-1500-CV-265487, to willfully state as true a material matter which said person
21 knew to be false, to wit: that “Plaintiff alleges: . . . [d]efendants herein named . . . and all persons
22 unknown, claiming any legal . . . interest in the property described in a complaint *adverse to*
23 *Plaintiff’s title* [APN 508-061-37-004 and APN 508--61-37] *or any cloud on Plaintiff’s title*
24 *thereto . . .*,” in violation of Penal Code section 127, a felony.

25 **COUNT 267**
26 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

1 For a further and separate cause of complaint, being a different offense from but connected
2 in its commission with the charges set forth in Counts 1 through 266, the ATTORNEY
3 GENERAL further complains and states:

4 On and between May 4 and May 5, 2008, in the County of Fresno, Defendants CRAIG
5 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
6 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
7 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
8 Kern County Superior Court Case No. S-1500-CV-265487 for APN 508-061-37-004 and APN
9 508--61-37, with the street address of 1153 Brady St., Ridgecrest, CA, to be filed, registered, and
10 recorded in a public office within this state, which instrument, if genuine, might be filed,
11 registered, and recorded under a law of this state or the United States, in violation of Penal Code
12 section 115, subdivision (a), a felony.

13 **COUNT 268**
14 **[PREPARING FALSE EVIDENCE]**

15 For a further and separate cause of complaint, being a different offense from but connected
16 in its commission with the charges set forth in Counts 1 through 267, the ATTORNEY
17 GENERAL further complains and states:

18 On and between May 4 and May 5, 2008, in the County of Fresno, Defendants CRAIG
19 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
20 papers, records, instruments in writing, and other matters and things, with intent to produce them,
21 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
22 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
23 section 134, a felony.

24 **COUNT 269**
25 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

26 For a further and separate cause of complaint, being a different offense from but connected
27 in its commission with the charges set forth in Counts 1 through 268, the ATTORNEY
28 GENERAL further complains and states:

1 On and between October 23 and October 29, 2008, in the County of Fresno, Defendants
2 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
3 offer, or cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Kern
4 County Superior Court Case No. S-1500-CV-265481 for APN 260-083-10-00, with the street
5 address of 3508 Montana Trail, Frazier Park, CA, to be filed, registered, and recorded in a public
6 office within this state, which instrument, if genuine, might be filed, registered, and recorded
7 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
8 (a), a felony.

9 **COUNT 270**
10 **[PREPARING FALSE EVIDENCE]**

11 For a further and separate cause of complaint, being a different offense from but connected
12 in its commission with the charges set forth in Counts 1 through 269, the ATTORNEY
13 GENERAL further complains and states:

14 On and between October 23 and October 29, 2008, in the County of Fresno, Defendants
15 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
16 books, papers, records, instruments in writing, and other matters and things, with intent to
17 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
18 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
19 of Penal Code section 134, a felony.

20 **COUNT 271**
21 **[PERJURY BY DECLARATION]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 270, the ATTORNEY
24 GENERAL further complains and states:

25 On or about October 23, 2008, in the County of Fresno, Defendant SANDRA BARTON
26 did unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit:
27 she was the sole owner in fee simple title to 3508 Montana Trail, Frazier Park, CA, and had
28 acquired title to the property by adverse possession under Code of Civil Procedure section 325

1 by occupying and claiming the property continuously for more than five years prior to the filing
2 of the complaint, as declared in the VERIFICATION attached to the COMPLAINT TO QUIET
3 TITLE in Kern County Superior Court Case No. S-1500-CV-265481, in violation of Penal Code
4 section 118, subdivision (a), a felony.

5 **COUNT 272**
6 **[SUBORNATION OF PERJURY]**

7 For a further and separate cause of complaint, being a different offense from but connected
8 in its commission with the charges set forth in Counts 1 through 271, the ATTORNEY
9 GENERAL further complains and states:

10 On or about October 23, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN
11 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
12 to commit perjury in that he procured said person, who was to take an oath that she would testify,
13 declare, depose, and certify under penalty of perjury in a case in which such testimony,
14 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
15 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior
16 Court Case No. S-1500-CV-265481, to willfully state as true a material matter which said person
17 knew to be false, to wit: that SANDRA BARTON was the sole owner in fee simple title to 3508
18 Montana Trail, Frazier Park, CA, and had acquired title to the property by adverse possession
19 under Code of Civil Procedure section 325 by occupying and claiming the property continuously
20 for more than five years prior to the filing of the complaint, in violation of Penal Code section
21 127, a felony.

22 **COUNT 273**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 272, the ATTORNEY
26 GENERAL further complains and states:

27 On and between April 24 and April 27, 2008, in the County of Fresno, Defendants CRAIG
28 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or

1 cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
2 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in
3 Kern County Superior Court Case No. S-1500-CV-265481 for APN 260-083-10-00, with the
4 street address of 3508 Montana Trail, Frazier Park, CA, to be filed, registered, and recorded in a
5 public office within this state, which instrument, if genuine, might be filed, registered, and
6 recorded under a law of this state or the United States, in violation of Penal Code section 115,
7 subdivision (a), a felony.

8 **COUNT 274**
9 **[PREPARING FALSE EVIDENCE]**

10 For a further and separate cause of complaint, being a different offense from but connected
11 in its commission with the charges set forth in Counts 1 through 273, the ATTORNEY
12 GENERAL further complains and states:

13 On and between April 24 and April 27, 2008, in the County of Fresno, Defendants CRAIG
14 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
15 papers, records, instruments in writing, and other matters and things, with intent to produce them,
16 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
17 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
18 section 134, a felony.

19 **COUNT 275**
20 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

21 For a further and separate cause of complaint, being a different offense from but connected
22 in its commission with the charges set forth in Counts 1 through 274, the ATTORNEY
23 GENERAL further complains and states:

24 On and between April 10 and April 27, 2008, in the County of Fresno, Defendants CRAIG
25 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or
26 cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA BARTON IN
27 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Kern County Superior
28 Court Case No. S-1500-CV-265481 for APN 260-083-10-00, with the street address of 3508

1 Montana Trail, Frazier Park, CA, to be filed, registered, and recorded in a public office within this
2 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
3 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

4 **COUNT 276**
5 **[PREPARING FALSE EVIDENCE]**

6 For a further and separate cause of complaint, being a different offense from but connected
7 in its commission with the charges set forth in Counts 1 through 275, the ATTORNEY
8 GENERAL further complains and states:

9 On and between April 10 and April 27, 2008, in the County of Fresno, Defendants CRAIG
10 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
11 papers, records, instruments in writing, and other matters and things, with intent to produce them,
12 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
13 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
14 section 134, a felony.

15 **COUNT 277**
16 **[PERJURY BY DECLARATION]**

17 For a further and separate cause of complaint, being a different offense from but connected
18 in its commission with the charges set forth in Counts 1 through 276, the ATTORNEY
19 GENERAL further complains and states:

20 On or about April 10, 2008, in the County of Fresno, Defendant SANDRA BARTON did
21 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
22 moved into it [3508 Montana Trail, Frazier Park, CA] with the intent of obtaining it through
23 adverse possession . . . I moved in the subject house in February 2003. Since then, my family
24 members including my brothers and sisters and parents have lived in or used the home
25 specifically for their personal residence. [¶] I constructed a fence surrounding the property in
26 April of 2003 [¶] I have resided in or stayed at the property on a regular basis, sometimes on
27 a weekly basis, over the last 6 years,” as declared in the DECLARATION OF SANDRA
28 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Kern

1 County Superior Court Case No. S-1500-CV-265481, in violation of Penal Code section 118,
2 subdivision (a), a felony.

3 **COUNT 278**
4 **[SUBORNATION OF PERJURY]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 277, the ATTORNEY
7 GENERAL further complains and states:

8 On or about April 10, 2008, in the County of Fresno, Defendant CRAIG MORTENSEN did
9 willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON , to
10 commit perjury in that he procured said person, who was to take an oath that she would testify,
11 declare, depose, and certify under penalty of perjury in a case in which such testimony,
12 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
13 DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER
14 DEFAULT JUDGMENT in Kern County Superior Court Case No. S-1500-CV-265481, to
15 willfully state as true a material matter which said person knew to be false, to wit: that SANDRA
16 BARTON mmoved into it [3508 Montana Trail, Frazier Park, CA] with the intent of obtaining it
17 through adverse possession . . . I moved in the subject house in February 2003. Since then, my
18 family members including my brothers and sisters and parents have lived in or used the home
19 specifically for their personal residence. [¶] I constructed a fence surrounding the property in
20 April of 2003 [] I have resided in or stayed at the property on a regular basis, sometimes on
21 a weekly basis, over the last 6 years,” in violation of Penal Code section 127, a felony.

22 **COUNT 279**
23 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

24 For a further and separate cause of complaint, being a different offense from but connected
25 in its commission with the charges set forth in Counts 1 through 278, the ATTORNEY
26 GENERAL further complains and states:

27 On and between July 23 and July 28, 2009, in the County of Fresno, Defendants CRAIG
28 MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and offer, or

1 cause, a false or forged instrument, to wit: the COMPLAINT TO QUIET TITLE in Kern County
2 Superior Court Case No. S-1500-CV-267915 for APN 016-300-11, with the street address of 714
3 Dolores St., Bakersfield, CA, to be filed, registered, and recorded in a public office within this
4 state, which instrument, if genuine, might be filed, registered, and recorded under a law of this
5 state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

6 **COUNT 280**
7 **[PREPARING FALSE EVIDENCE]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts 1 through 279, the ATTORNEY
10 GENERAL further complains and states:

11 On and between July 23 and July 28, 2009, in the County of Fresno, Defendants CRAIG
12 MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated books,
13 papers, records, instruments in writing, and other matters and things, with intent to produce them,
14 and to allow them to be produced for a fraudulent and deceitful purpose, as genuine and true,
15 upon a trial, proceeding, and inquiry whatever, authorized by law, in violation of Penal Code
16 section 134, a felony.

17 **COUNT 281**
18 **[PERJURY BY DECLARATION]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 280, the ATTORNEY
21 GENERAL further complains and states:

22 On or about July 23, 2009, in the County of Fresno, Defendant SANDRA BARTON did
23 unlawfully, under penalty of perjury, declare as true, that which was known to be false, to wit: she
24 was the sole owner in fee simple title to certain real property with a street address of 714 Dolores
25 Street, Bakersfield, California, and had acquired title to the property by adverse possession under
26 Code of Civil Procedure section 325 by occupying and claiming the property continuously for
27 more than five years prior to the filing of the complaint, as declared in the VERIFICATION
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1 attached to the COMPLAINT TO QUIET TITLE in Kern County Superior Court Case No. S-
2 1500-CV-265481, in violation of Penal Code section 118, subdivision (a), a felony.

3 **COUNT 282**
4 **[SUBORNATION OF PERJURY]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 281, the ATTORNEY
7 GENERAL further complains and states:

8 On or about October 23, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN
9 did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON ,
10 to commit perjury in that he procured said person, who was to take an oath that she would testify,
11 declare, depose, and certify under penalty of perjury in a case in which such testimony,
12 declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the
13 VERIFICATION attached to the COMPLAINT TO QUIET TITLE in Kern County Superior
14 Court Case No. S-1500-CV-265481, to willfully state as true a material matter which said person
15 knew to be false, to wit: that SANDRA BARTON was the sole owner in fee simple title to certain
16 real property with a street address of 714 Dolores Street, Bakersfield, California, and had
17 acquired title to the property by adverse possession under Code of Civil Procedure section 325
18 by occupying and claiming the property continuously for more than five years prior to the filing
19 of the complaint, in violation of Penal Code section 127, a felony.

20 **COUNT 283**
21 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

22 For a further and separate cause of complaint, being a different offense from but connected
23 in its commission with the charges set forth in Counts 1 through 282, the ATTORNEY
24 GENERAL further complains and states:

25 On and between November 19 and December 9, 2009, in the County of Fresno, Defendants
26 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
27 offer, or cause, a false or forged instrument, to wit: the MEMORANDUM OF POINTS AND
28 AUTHORITIES IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in

1 Kern County Superior Court Case No. S-1500-CV-267915 for APN 016-300-11, with the street
2 address of 714 Dolores St., Bakersfield, CA, to be filed, registered, and recorded in a public
3 office within this state, which instrument, if genuine, might be filed, registered, and recorded
4 under a law of this state or the United States, in violation of Penal Code section 115, subdivision
5 (a), a felony.

6 **COUNT 284**
7 **[PREPARING FALSE EVIDENCE]**

8 For a further and separate cause of complaint, being a different offense from but connected
9 in its commission with the charges set forth in Counts 1 through 283, the ATTORNEY
10 GENERAL further complains and states:

11 On and between November 19 and December 9, 2009, in the County of Fresno, Defendants
12 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
13 books, papers, records, instruments in writing, and other matters and things, with intent to
14 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
15 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
16 of Penal Code section 134, a felony.

17 **COUNT 285**
18 **[OFFERING FALSE OR FORGED INSTRUMENT FOR FILING]**

19 For a further and separate cause of complaint, being a different offense from but connected
20 in its commission with the charges set forth in Counts 1 through 284, the ATTORNEY
21 GENERAL further complains and states:

22 On and between November 20 and December 9, 2009, in the County of Fresno, Defendants
23 CRAIG MORTENSEN and SANDRA BARTON did unlawfully and knowingly procure and
24 offer, or cause, a false or forged instrument, to wit: the DECLARATION OF SANDRA
25 BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Kern
26 County Superior Court Case No. S-1500-CV-267915 for APN 016-300-11, with the street address
27 of 714 Dolores St., Bakersfield, CA, to be filed, registered, and recorded in a public office within
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1 this state, which instrument, if genuine, might be filed, registered, and recorded under a law of
2 this state or the United States, in violation of Penal Code section 115, subdivision (a), a felony.

3 **COUNT 286**
4 **[PREPARING FALSE EVIDENCE]**

5 For a further and separate cause of complaint, being a different offense from but connected
6 in its commission with the charges set forth in Counts 1 through 285, the ATTORNEY
7 GENERAL further complains and states:

8 On and between November 20 and December 9, 2009, in the County of Fresno, Defendants
9 CRAIG MORTENSEN and SANDRA BARTON, did unlawfully prepare false and ante-dated
10 books, papers, records, instruments in writing, and other matters and things, with intent to
11 produce them, and to allow them to be produced for a fraudulent and deceitful purpose, as
12 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, in violation
13 of Penal Code section 134, a felony.

14 **COUNT 287**
15 **[PERJURY BY DECLARATION]**

16 For a further and separate cause of complaint, being a different offense from but connected
17 in its commission with the charges set forth in Counts 1 through 286, the ATTORNEY
18 GENERAL further complains and states:

19 On and between November 20 and December 9, 2009, in the County of Fresno, Defendant
20 SANDRA BARTON did unlawfully, under penalty of perjury, declare as true, that which was
21 known to be false, to wit: she “moved into it [714 Dolores St., Bakersfield, CA] with the intent of
22 obtaining it through adverse possession,” and “began to control and safeguard the subject house
23 in February of 2004.” [¶] “I have maintained the yard and stayed at the property on a regular
24 basis over the last six years,” as declared in the DECLARATION OF SANDRA BARTON IN
25 SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Kern County Superior
26 Court Case No. S-1500-CV-267915, in violation of Penal Code section 118, subdivision (a), a
27 felony.
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COUNT 288
[SUBORNATION OF PERJURY]

For a further and separate cause of complaint, being a different offense from but connected in its commission with the charges set forth in Counts 1 through 287, the ATTORNEY GENERAL further complains and states:

On and between November 20 and December 9, 2009, in the County of Fresno, Defendant CRAIG MORTENSEN did willfully and unlawfully procure another person, to wit, Defendant SANDRA BARTON, to commit perjury in that he procured said person, who was to take an oath that she would testify, declare, depose, and certify under penalty of perjury in a case in which such testimony, declaration, deposition, and certification is permitted by law under penalty of perjury, to wit, the DECLARATION OF SANDRA BARTON IN SUPPORT OF APPLICATION TO ENTER DEFAULT JUDGMENT in Kern County Superior Court Case No. S-1500-CV-267915, to willfully state as true a material matter which said person knew to be false, to wit: that SANDRA BARTON “moved into it [714 Dolores St., Bakersfield, CA] with the intent of obtaining it through adverse possession,” and “began to control and safeguard the subject house in February of 2004.” [¶] “I have maintained the yard and stayed at the property on a regular basis over the last six years,” in violation of Penal Code section 127, a felony.

SPECIAL ALLEGATION ONE
Four-Year Statute of Limitations—Late Discovery (Pen. Code §§ 801.5, 803, subd. (c), 803.5)

It is further alleged that the offenses described in *all Counts except* Counts 23 through 34, 51 through 56, 123 through 132, 163 through 172, and 221 through 234, were not discovered until December 15, 2010. On April 19, 2005, Nancy Zelepsy inherited 261 Tognazzini Avenue, Guadalupe, CA in the County of Santa Barbara from her longtime companion Donald Prestridge after his having passed away in 2003. In early December 2010, Zelepsy contacted a local title company to ask about getting a loan on the property. The title company informed her that “Sandra Barton” was listed as the record owner of her residence. The court had quieted title in SANDRA on July 7, 2010. At the time, SANDRA’s attorney was MORTENSEN with the Fresno law firm of Lozano Smith. Until early December 2010, Zelepsy lacked any knowledge of SANDRA’s existence, let alone SANDRA’s claim of ownership of Zelepsy’s home. Moreover,

1 since SANDRA and MORTENSEN assumed, wrongly, that no one lived at 261 Tognazzini
2 Avenue at the time they perpetrated their fraud on the court, they never sent anything to that
3 address notifying Zelepsy or anyone of their ownership claim. Thus, Zelepsy could not have
4 known of the SANDRA's claim before the middle of December 2010.

5 Zelepsy promptly acted on her discovery in mid-December 2010 by consulting attorney
6 Ronald Kelly of the Legal Aid Foundation of Santa Barbara County (LAF). In early January
7 2011, while continuing to review the matter with the LAF, Zelepsy received a letter addressed to
8 "Current Tenant" dated January 5, 2011 from MORTENSEN, who by then had left Lozano Smith
9 for a solo practice. The letter stated that Zelepsy was a hold-over tenant, SANDRA was the
10 owner of 261 Tognazzini Avenue, and eviction proceedings would not commence if Zelepsy
11 tendered rent of \$950 within 10 days. MORTENSEN included a lease for Zelepsy to sign.
12 Suspecting fraud afoot, Zelepsy and LAF attorney Kelly teamed up with real estate attorney
13 Brian Simas of the Kirk and Simas Law Firm to sort out the issues. On February 11, 2011,
14 Zelepsy and her attorneys reported to the Guadalupe Police Department that Zelepsy had been
15 the victim of fraud.

16 No other victim besides Zelepsy suspected or reported fraud to any law enforcement
17 agency before Zelepsy's report to the Guadalupe Police Department in February 2011. Indeed,
18 since virtually all of the properties were actually vacant at the time of a Barton defendant's claim
19 of adverse possession, there would be no one to suspect or report fraud to law enforcement.
20 Zelepsy's attorneys noted in their motion to set aside and vacate default judgment filed February
21 2, 2011 that they had discovered similar frauds committed in Fresno, Tulare, and Kern Counties.
22 The date of their discovery is unclear but must necessarily fall between mid-December 2010
23 when Zelepsy learned that SANDRA owned her house, and February 2, 2011, the first report to
24 law enforcement. Therefore, and calculating conservatively, December 15, 2010 would be the
25 earliest date the applicable four-year statute of limitations for the offenses in sections 115, 118a,
26 and 134 would commence to run. Thus, as to these crimes, the statute of limitations could not run
27 its course earlier than approximately December 14, 2014. (§§ 803, 803.5.)

28 It is further alleged that the four-year limitations period also applies to all section 127,
subornation of perjury violations, i.e., Counts 4, 8, 12, 16, 22, 26, 30, 34, 38, 42, 46, 50, 56, 60,
64, 70, 74, 80, 82, 86, 90, 94, 98, 102, 108, 112, 116, 122, 126, 133, 136, 144, 150, 154, 158, 162,
166, 172, 176, 180, 184, 188, 192, 198, 202, 206, 212, 216, 220, 224, 228, 234, 238, 244, 248,

1 254, 260, 266, 272, 278, 282, and 288. Therefore, the four-year statute of limitations applies to all
2 crimes charged in the complaint.

3 **SPECIAL ALLEGATION TWO**

4 **Aggravated White Collar Crime Enhancement (Pen. Code §§ 186.11(a)(2) & 12022.6(a))**

5 It is further alleged, pursuant to Penal Code sections 186.11, subdivision (a)(2) and
6 12022.6, subdivision (a), that the offenses set forth in Counts One, Thirty-Five, One Hundred and
7 Nine, One Hundred and Twenty-Three, One Hundred and Thirty-Three, One Hundred and Forty-
8 Seven, One Hundred and Ninety-Nine, Two Hundred and Twenty-Five, Two Hundred and
9 Thirty-Five, Two Hundred and Fifty-one, Two Hundred and Fifty-Seven, Two Hundred and
10 Sixty-Three, Two Hundred and Sixty-Nine, and Two Hundred and Seventy-Nine are related
11 felonies, a material element of which is fraud and embezzlement, which involve a pattern of
12 related felony conduct, and the pattern of related felony conduct involves the taking of more than
13 Five Hundred Thousand Dollars (\$500,000).

14 NOTICE: If found true, convictions imposed in this matter shall be served in State Prison
15 pursuant to Penal Code Section 1170(h)(3)(D).

16
17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed this 13th day of January, 2014, at Fresno, California.

19
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21 _____
22 LESLIE W. WESTMORELAND
23 Deputy Attorney General
24 Special Crimes Unit

25 BAIL RECOMMENDATION:

26 **Craig Mortensen: \$2,165,000; Sandra Barton: \$1,000,000; Christopher Barton: \$65,000;**
27 **Cambria Barton: \$95,000; Daniel Vedenoff: \$70,000; Sheldon Feigel: \$255,000**

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DISCOVERY REQUEST

Pursuant to the provisions of Penal Code sections 1054.5, subdivision (b) and 1054.3, it is hereby requested that all materials and information as set forth in Penal Code section 1054.3, subdivisions (a) and (b) be provided to the People.