

Update to charges Level IV – Professional / Civil / Federal Regulatory / Derivable / Ancillary Counts for Leverage

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MASTER CHARGING MATRIX – FULL EXPANDED REFERRAL LIST

Guidance:

- This matrix lists all federal and state codes that could be charged from the documented acts of fraud, extortion, obstruction, elder abuse, and consumer deception found in Open AI and i pages.
- Each offense cross-indexes to exhibits and timelines in the portal (T1–T25, C7, ros.pdf, and related attachments).
- Federal priority: RICO (§1962), Wire/Mail Fraud (§1343/§1341), Money Laundering (§1956), and Obstruction (§1512).
- State priority: Extortion (§518), Forgery (§470), Elder Abuse (§368), and Attorney Deceit (B&P §6128).
- Civil overlay ensures recovery under UCL (§17200), Elder Abuse (§3345), and Consumer Fraud (15 U.S.C. §45).

Level I – Federal Felony (Primary / Predicate)

Statute	Title / Conduct
18 U.S.C. § 1962 (RICO)	Racketeering through mail, wire, and property fraud; conspiracy across agencies / franchise entities.
18 U.S.C. § 1341 / 1343 (Mail / Wire Fraud)	False documents and communications to obtain money or property.
18 U.S.C. § 1344 (Bank Fraud)	Use of financial-institution accounts to divert tenant funds.
18 U.S.C. § 1028A	Aggravated identity fraud – use of corporate logos / seals without authority.
18 U.S.C. § 1503 / 1512 / 1519	Obstruction of justice / tampering / destruction or concealment of evidence.
18 U.S.C. § 1621 / 1623	Perjury and false declarations before court.
18 U.S.C. § 1951 (Hobbs Act Extortion)	Obtaining money under color of official right or threat of force.
18 U.S.C. § 1956 / 1957 (Money Laundering)	Re-routing rents and retainers through personal accounts.
18 U.S.C. § 371	Conspiracy to commit fraud, obstruction, or theft.
26 U.S.C. § 7201 / 7206	Tax evasion / false returns linked to undeclared rental income.
18 U.S.C. § 1030 (Computer Fraud and Abuse Act)	Unauthorized access or data alteration (e-signature and portal records).

Level II – California Felonies / Wobblers

Code	Conduct
PC § 518–524	Extortion / Attempt Extortion (Threat or Color of Authority)
PC § 470 / § 475	Forgery / Possession of Forged Documents
PC § 118 / § 131	Perjury / Preparation of False Evidence
PC § 487 / § 484g	Grand Theft / Theft by False Pretenses (> \$950)
PC § 496(c)	Receiving / Concealing Stolen Property
PC § 182(a)(1)	Criminal Conspiracy between owner, agent, and attorney.
PC § 470b	Possession of Counterfeit Seal / Signature.
PC § 368(d)	Elder Theft / Abuse of Elder Adult (> 65)
PC § 459 / § 530.5	Bureau / office entry with intent to commit fraud / identity theft.
PC § 115	Filing False Instrument with Public Agency or Court.
PC § 141 / § 135	Destroying or Concealing Evidence.
PC § 529 / § 532	False Personation / Fraudulent Inducement.
Bus.&Prof. Code § 6128(a)	Attorney Deceit / Collusion to Deceive Court or Party.
Civ. Code § 3345 / W&I § 15610.30	Senior Financial Abuse (Enhanced Damages).
Gov. Code § 6200	Falsification of Public Records.
Rev.& Tax. Code § 19705	Tax Fraud / Failure to Report Income.

Level III – Misdemeanor / Administrative / Consumer

Code	Conduct
Civ. Code § 1950.5	Deposit Retention / Conversion
Civ. Code § 1947.12 / § 1942.5	Rent Cap Violation / Retaliatory Eviction
Bus.&Prof. Code § 10176 / § 10177	Agent Misrepresentation / Broker Neglect
Bus.&Prof. Code § 17500	False Advertising (“& Associates”).
Health & Safety Code § 17920.3	Habitability / Mold Violation.
Gov. Code § 12955(f)	Discrimination / Retaliation in Housing.
15 U.S.C. § 45 / FTC Act	Unfair or Deceptive Business Practices (consumer fraud).
Penal Code § 602.5	Unauthorized Entry of Dwelling / Trespass.
Penal Code § 415	Disturbing the Peace (Intimidation incident).
CA Bus.&Prof. Code § 17200 (UCL)	Unlawful business acts / practices aggregate.
CA Penal Code § 653m	Harassing Communications (text / email).

Local Municipal Codes	Building / Zoning / HOA violations tied to rental property.
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Level IV – Professional / Civil / Federal Regulatory

Authority	Violation Type
CRPC 1.3, 1.4, 1.16(d)	Attorney Neglect / Failure to Communicate.
CRPC 3.1 – 8.4	Frivolous claims / dishonesty / conduct prejudicial to justice.
HUD Reg. § 100.400	Harassment / Coercion in Housing Transactions.
DRE Reg. 2831	Trust-fund handling violations by broker / agent.
IRS Circular 230	Misuse of client funds or false statements to federal agency.
ABA Model Rule 8.4(c)	Conduct involving dishonesty / fraud / misrepresentation.
Consumer Financial Protection Act § 1031	Unfair rental finance practices / deceptive fee collection.
USC 42 § 3617 (Fair Housing Act)	Coercion or intimidation of tenant for asserting rights.

Derivable / Ancillary Counts for Leverage

Statute	Description
18 U.S.C. § 1001	False Statements to Federal Investigators (DOJ / FBI interviews).
18 U.S.C. § 1622	Subornation of Perjury (attorney directing false testimony).
18 U.S.C. § 1349	Attempt and Conspiracy to Commit Fraud.
18 U.S.C. § 1952	Interstate Travel in Aid of Racketeering (communication across state lines).
Penal Code § 182.5	Criminal Organization Participation (state-level RICO analog).
Penal Code § 529a	False Filing of Financial Statement.
Penal Code § 147 / § 149	Public Officer Misconduct (if licensed real estate under state commission authority).
Penal Code § 664	Attempt Counts (for each incomplete offense).

Guidance:

- This matrix lists all federal and state codes that could be charged from the documented acts of fraud, extortion, obstruction, elder abuse, and consumer deception.
- Prosecutors may choose any combination as lead counts and hold the remainder for plea negotiation.
- Each offense cross-indexes to exhibits and timelines in the portal (T1–T25, C7, ros.pdf, and related attachments).
- Federal priority: RICO (§1962), Wire/Mail Fraud (§1343/§1341), Money Laundering (§1956), and Obstruction (§1512).
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