

1 KAMALA D. HARRIS
Attorney General of California
2 JAMES G. ROOT
Supervising Deputy Attorney General
3 KRISTOPHER S. YOUNG (SBN: 220013)
Deputy Attorney General
4 300 S. Spring Street, Suite 1702
Los Angeles, CA 90063
5 Telephone: (213) 620-6355
Fax: (213) 897-2802
6 E-mail: Kristopher.Young@doj.ca.gov
Attorneys for the People of the State of California

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ORIGINAL FILED
Superior Court of California
County of Los Angeles

SEP 24 2014

Sherri R. Garter, Executive Officer/Clerk
By Gloria Barreras Deputy
Gloria Barreras

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 PEOPLE OF THE STATE OF CALIFORNIA,

Case No.: BA425130

12 Plaintiff,

13 v.

SUPPLEMENTAL TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE RE: PRELIMINARY
INJUNCTION PURSUANT TO PENAL
CODE § 186.11

14 ERIC JOHNATHAN WOLFE,
15 JACKALYN MARIE BASHARA,
DEANNA BASHARA, JOSEPH JAIME,
16 BRIAN DEDEN, DELIA MAY WOLFE,
17 JERED BRYANT, BILLIE BRYANT,
GERALD G. "JERRY" BRYANT, JAMES
18 STYRING and LINDSAY PETTY,

19 Defendants.

20 TO: ERIC JOHNATHAN WOLFE; JACKALYN MARIE BASHARA, AKA
21 JACKALYN BRYANT; DEANNA BASHARA; JOSEPH JAIME; BRIAN DEDEN; DELIA
MAY WOLFE; JERED BRYANT; BILLIE BRYANT; GERALD G. "JERRY" BRYANT;
22 JAMES STYRING; LINDSAY PETTY; BADLANDS HOLDINGS; PUEBLO SECO; 35th
STREET 2 LLC; VENTURE CAPITAL GROUP; PERRIS ACQUISITIONS; ACQUICAP
23 BANCORP LLC, DBA PACIFIC COAST TITLE AND ESCROW; GINSBERG, WEISS,
LITTMAN & CO LLC; FK BANCORP INC, DBA FIDELITY KEEGAN; FINIAN
24 FITZWALTER LLC; SAFE HAVEN TITLE SERVICE INC; JERRY BRYANT, DBA JB
RACING; JERRY BRYANT, DBA WORLD WIDE APPRAISALS; KEITH CALHOUN;
25 STANLEY ROLAND WOLFE; ROBERT BASHARA; JERRY E. BRYANT; MARY L.
KINCHELOE; BRYANT LIVING TRUST, JERRY BRYANT AND BILLIE LEE
26 BRYANT AS TRUSTEES; BRADLEY T. WOLFE; FK BANCORP INC, ESCROW
DIVISION TRUST ACCOUNT; PINNACLE GROUP REALTY FUND; APEX CAPITAL
27 SECURITY; WILLOUGHBY BEAN LLC; FARMERS AND MERCHANTS BANK;
CITIBANK, N.A.; JP MORGAN CHASE, N.A.; US BANK, N.A.; BANK OF AMERICA,
28 N.A.; FIRST FINANCIAL BANK; TD AMERITRADE; SCOTTRADE; MERRIL

1 LYNCH; AND EVERY PERSON WHO MAY HAVE ANY INTEREST IN ANY ASSET
2 OR PROPERTY SPECIFIED HEREIN, BANKING, FINANCIAL, OR ESCROW
3 INSTITUTIONS PRESENTLY OR PREVIOUSLY ENGAGED IN BUSINESS WITH AN
4 ABOVE-NAMED DEFENDANT AND/OR IN THE CUSTODY OR CONTROL OF AN
5 ABOVE-NAMED DEFENDANT'S ASSETS, AND/OR AN ABOVE-NAMED
6 DEFENDANT'S AGENT, SERVANT ASSIGN AND ALL THOSE ACTING IN
7 CONCERT OR PARTICIPATING WITH AN ABOVE NAMED DEFENDANT:

8 1. **ORDER TO SHOW CAUSE:** The court having read and considered the *EX PARTE*
9 PETITION, PURSUANT TO PENAL CODE § 186.11 FOR PROTECTIVE RELIEF
10 NECESSARY TO PRESERVE PROPERTY AND ASSETS, INCLUDING
11 TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE:
12 PRELIMINARY INJUNCTION filed by the People of the State of California with the
13 clerk of this court on this September 22, 2014,

14 YOU AND EACH OF YOU ARE HEREBY ORDERED TO SHOW CAUSE at 9:00 a.m.
15 on December 8, 2014, or as soon thereafter as counsel may be heard in Department 108 of the
16 above-entitled court, located at 210 West Temple St., Los Angeles, CA 90012, as to why you
17 and/or your respective counsel, your agents, servants, assigns and all those acting in concert or
18 participating with you, should not be restrained and enjoined pending trial and imposition of
19 sentence in the above-captioned case, from directly or indirectly permitting, causing and/or
20 engaging in the withdrawal, transference, disbursement, encumbrance, hypothecation, or other
21 disposal, dissipation or secreting of the property delineated in the temporary restraining order
22 contained herein.

23 2. **TEMPORARY RESTRAINING ORDER: GOOD CAUSE APPEARING, IT IS**
24 **HEREBY ORDERED THAT: PENDING HEARING** on the above ORDER TO SHOW CAUSE,
25 you and/or your respective counsel, your agents, servants, assigns and all those acting in concert
26 or participating with you, **ARE HEREBY RESTRAINED, AND ENJOINED,** from directly or
27 indirectly permitting, causing and/or engaging in the withdrawal, transference, disbursement,
28 encumbrance, hypothecation, or other disposal, dissipation or secreting of the following property:

I. REAL PROPERTY

- 1) 33425 Highway 60, Banning, CA 92220
Owner: Badlands Holdings (Brad T. Wolfe, manager for Badlands Holdings)
Parcel No.: 422-050-026-3 (Riverside County).

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II. PERSONAL PROPERTY: FINANCIAL ACCOUNTS

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A. IF YOU ARE A BANKING OR FINANCIAL INSTITUTION, OR AN ESCROW COMPANY, PRESENTLY OR PREVIOUSLY ENGAGED IN BUSINESS WITH ANY OF THE ABOVE-NAMED DEFENDANTS, you and each of your agents or representatives are HEREBY ORDERED:

I. to immediately disclose and issue a report to a California peace officer who presents a copy of this order:

(i) all account numbers, past or present, held by the above-named individuals or entities;

(ii) present or past values of assets held in the above referenced accounts;

(iii) name(s) in which the above-referenced account is held;

(iv) name(s) of all or past authorized signers for the above-referenced accounts;

(v) information as to the amount and disposition of funds disbursed to a defendant on a date after September 1, 2007;

1 (vi) account addresses;

2 (vii) all documents associated with the accounts including, without limitation, account
3 applications, account signature cards, articles of incorporation, resolutions or bylaws of
4 account holder, personal identifications of account holders/signatories, power of attorneys,
5 fictitious business name statements and business licenses;

6 (viii) account statements;

7 (ix) copies of checks, wire statements, deposit slips;

8 (x) all correspondence between account holders and financial institution.

9 II. to hold assets in all accounts disclosed pursuant to paragraph 2 of this order pending
10 notification and receipt of such a supplemental order within reasonable time as is described
11 below; you are to consider all assets in such accounts subject to this order, notwithstanding
12 the absence of any specification of these assets herein. Furthermore, you will make such
13 assets unavailable for any and all purposes to either the above-named defendants, and/or
14 their respective counsel, agents, servants, assigns and all those acting in concert or
15 participating with any of the defendants.

16 III. Consider all assets subject to this Order, notwithstanding the absence of any
17 specification of these assets held therein, and make such assets unavailable for any and all
18 purposes to the above-named individuals or entities, and/or their respective counsel, agents,
19 servants, assigns, and all those acting in concert or participating with such individuals.

20 3. **IT IS FURTHER ORDERED THAT** within 15 business days after receipt of the
21 information specified in paragraph 2 above, the Office of the Attorney General shall file with this
22 Court a Supplemental Petition specifically identifying additional accounts subject to this order.
23 The Office of the Attorney General shall serve a copy of said Supplemental Petition, together
24 with any additional related order of this Court, upon any banking or financial institution, or
25 escrow company that complied with Paragraph 2 above within 15 business days of filing a
26 Supplemental Petition.

1 4. **IT IS FURTHER ORDERED THAT** within 30 business days after service of this order or
2 any related supplemental order upon any party, the Office of the Attorney General shall file proof
3 of such service with the clerk of this Court

4 5. **IT IS FURTHER ORDERED THAT** copies of all documents entitled NOTICE OF
5 PENDENCY OF ACTION (LIS PENDENS), received, reviewed and signed by this court shall be
6 filed by the People of the State of California with the County Recorder in the County in which the
7 property is located. The *LIS PENDENS* is for the one (1) piece of real property listed in
8 Paragraph 2 above. Copies of all documents entitled NOTICE OF PENDENCY OF ACTION
9 (LIS PENDENS), received and reviewed by this court contemporaneously with the PETITION,
10 will be deemed to have been timely recorded within the meaning on Penal Code section 186.11,
11 subdivision (e)(4), if recorded on or before September 26, 2014.

12 7. This ORDER TO SHOW CAUSE and supporting papers shall be served on the defendants
13 through their respective counsel and all parties named herein on page one (1), not later than the
14 hour of 5:00 p.m., September 25, 2014. Proof of such service shall be filed and delivered to this
15 court 10 days prior to the hearing of the Order to Show Cause.

16 8. The following briefing schedule shall apply to the hearing on this ORDER TO SHOW
17 CAUSE: Any opposition papers shall be filed with the clerk of this Court and served on the
18 Office of the Attorney General no later than November 1, 2014. Any reply papers to such
19 opposition shall be filed with the clerk of this Court and served on Defendants and other parties
20 opposing this Order to Show Cause no later than December 1, 2014.

21 Requested By:

22 KAMALA D. HARRIS
23 Attorney General of California
24 KRISTOPHER S. YOUNG (SBN: 220013)
25 Deputy Attorney General
26 300 S. Spring Street, Suite 1702
27 Los Angeles, CA 90063
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DATED: This 24th day of September, 2014



SAM OHTA
HONORABLE SAM OHTA
JUDGE OF THE SUPERIOR COURT
COUNTY OF LOS ANGELES