

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

<p>THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff,</p> <p style="text-align:center">v.</p> <p>01 CLEMENT IGNATIUS LANCELOT CHICHESTER and 02 BRITTNEY JADE SIAS, aka ROSALIE SIAS</p> <p style="text-align:right">Defendant(s).</p>	<p>CASE NO. BA465233</p> <p><i>FELONY COMPLAINT FOR ARREST WARRANT</i></p>
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The undersigned is informed and believes that:

COUNT 1

On or about March 6, 2015, in the County of Los Angeles, the crime of THEFT FROM ELDER OR DEPENDENT ADULT, in violation of PENAL CODE SECTION 368(d), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER and BRITTNEY JADE SIAS, who did unlawfully commit theft, embezzlement, forgery, fraud, and identity theft with respect to the property and personal identifying information of an elder and dependent adult, said property, moneys, labor, goods, and services taken and obtained having a value exceeding \$950.00, and knew and reasonably should have known that said person, LORRAINE SECOR, was an elder and dependent adult.

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COUNT 6

On or about December 1, 2017, in the County of Los Angeles, the crime of PASSING A NON-SUFFICIENT FUNDS CHECK EXCEEDING \$950, in violation of PENAL CODE SECTION 476a(a), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who willfully, with intent to defraud, made, drew, uttered and/or delivered the following check, draft or order upon a bank, depository, person, firm or corporation, for the payment of money in an amount exceeding nine hundred fifty dollars (\$950), knowing that the maker, drawer or corporation had not sufficient funds or credit for the payment of that check, draft, or order and all other checks, drafts, or orders upon funds then outstanding, in full upon its presentation:

<u>Date</u>	<u>Payee</u>	<u>Bank</u>	<u>Amount</u>
12/01/2017	Lorraine Secor	Wells Fargo	\$1,000.00

* * * * *

COUNT 7

On or about September 10, 2012, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 22

On or about May 21, 2015, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 23

On or about September 3, 2015, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 24

On or about September 24, 2015, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 25

On or about January 11, 2016, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 26

On or about March 30, 2016, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 27

On or about August 9, 2016, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

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COUNT 28

On or about August 18, 2016, in the County of Los Angeles, the crime of Communications containing Untrue Statements and Omissions of Material Facts, in violation of CORPORATIONS CODE SECTION 25401-25540(B), a Felony, was committed by CLEMENT IGNATIUS LANCELOT CHICHESTER, who did willfully and unlawfully offer to sell and sell a security to Lorraine Secor, by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in light of the circumstances under which it was given, not misleading, in violation of Corporations Code 25401.

Furthermore, as to count(s) 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 and 28 the offenses alleged are related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct, and the pattern of related felony conduct involved the taking of, and resulted in the loss by LORRAINE SECOR of, more than five hundred thousand dollars (\$500,000), thus subjecting to the additional punishment provided for in Penal Code sections 186.11(a)(2).

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 and 28 , offenses described in Penal Code section 803(c), that the above violation was not discovered until June 12, 2016 by Investigator Tamara Kessler after she received a referral to investigate a case of possible financial elder abuse and spoke to Lorraine Secor regarding the sale of the rental property and her life and annuity investments on January 6, 2017, and that no victim of said violation and no law enforcement agency chargeable with the investigation and prosecution of said violation had actual and constructive knowledge of said violation prior to said January 6, 2017, because the crimes involved fraud and deceit, within the meaning of Penal Code section 803(c).

It is further alleged as to count(s) 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 and 28 that in the commission of the above offense(s) the said defendant(s), CLEMENT IGNATIUS LANCELOT CHICHESTER, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$200,000, within the meaning of Penal Code section 12022.6(a)(2).

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form (“PPR”) pursuant to Penal Code § 29810.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) CLEMENT IGNATIUS LANCELOT CHICHESTER and BRITTNEY JADE SIAS for the above-listed crimes. Wherefore, a warrant of arrest is requested for CLEMENT IGNATIUS LANCELOT CHICHESTER and BRITTNEY JADE SIAS.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER BA465233, CONSISTS OF 28 COUNT(S).

Executed at LOS ANGELES, County of Los Angeles, on February 5, 2018.


TAMARA KESSLER
DECLARANT AND COMPLAINANT

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JACKIE LACEY, DISTRICT ATTORNEY

BY: 
SHARON RANSOM, DEPUTY

AGENCY: CALIF DEPT OF INSURANCE I/O: TAMARA KESSLER ID NO.: 236 PHONE: (661) 253-7415
DR NO.: VA201600352 OPERATOR: YM PRELIM. TIME EST.: 8 HOUR(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
LANCELOT CHICHESTER, CLEMENT IGNATIUS SIAS, BRITTNEY JADE	027677953		\$1,450,000	
	024284989		\$450,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

CLEMENT LANCELOT CHICHESTER

BAIL: \$ _____

BRITTNEY SIAS

BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

