

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

<p>THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BRADLEY MATHESON, <i>dob</i> [REDACTED]</p> <p>MARGARET MATHESON, <i>dob</i> [REDACTED]</p> <p style="text-align: right;">Defendants</p>	<p>CT No. SCD266429 DA No. AEG198</p> <p>INDICTMENT</p>
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PC296 DNA TEST STATUS SUMMARY

Defendant	DNA Testing Requirements
MATHESON, BRADLEY	DNA sample required upon conviction
MATHESON, MARGARET	DNA sample required upon conviction

The Grand Jury of the County of San Diego, State of California, accuses the Defendant(s) of committing, in the County of San Diego, State of California, before the finding of this Indictment, the following crime(s):

CHARGES

COUNT 1 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between April 15, 2016 and January 21, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 2 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between April 15, 2016 and January 18, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED], in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 3 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between April 15, 2016 and January 21, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED], of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 4 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 6, 2017 and February 22, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 5 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 6, 2017 and February 25, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED], in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 6 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 6, 2017 and February 25, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED], of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 7 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between January 12, 2016 and April 17, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 8 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 12, 2016 and April 17, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 9 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 12, 2016 and April 17, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 10 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 15, 2016 and February 1, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 11 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 15, 2016 and February 4, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED], in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 12 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 15, 2016 and February 4, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED], of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 13 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between January 29, 2016 and February 1, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 14 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 29, 2016 and February 4, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 15 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 29, 2016 and February 4, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 16 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 1, 2016 and June 29, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 17 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 1, 2016 and July 2, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 18 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 1, 2016 and July 2, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 19 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about January 1, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 20 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 1, 2017 and January 16, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 21 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2016 and January 16, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 22 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS

On or about and between January 12, 2016 and January 23, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased or to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(a) AND 17550.14. [REDACTED]

CHARGES (cont'd)

COUNT 23 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS

On or about and between January 12, 2016 and February 6, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel to wit: [REDACTED] did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(a).

COUNT 24 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 20, 2016 and February 28, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 25 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 20, 2016 and March 3, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 26 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 20, 2016 and March 3, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 27 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 11, 2016 and February 22, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 28 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 11, 2016 and February 25, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 29 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 11, 2016 and February 25, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 30 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about March 1, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 31 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 1, 2017 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 32 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 1, 2017 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 33 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 28, 2016 and February 2, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 34 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 28, 2016 and February 5, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 35 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 28, 2016 and February 5, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 36 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between January 30, 2016 and February 1, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 37 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 30, 2016 and February 5, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 38 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 30, 2016 and February 5, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 39 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 25, 2016 and October 24, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 40 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 25, 2016 and October 27, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 41 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 25, 2016 and October 27, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 42 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 27, 2016 and December 29, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 43 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 27, 2016 and January 2, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 44 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 27, 2016 and January 2, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 45 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 19, 2016 and February 17, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 46 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 19, 2016 and February 20, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] [REDACTED], in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 47 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 19, 2016 and February 20, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 48 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 1, 2016 and December 29, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] and [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 49 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 1, 2016 and January 2, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] and [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 50 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 1, 2016 and January 2, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 51 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between October 7, 2016 and March 15, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 52 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between October 7, 2016 and March 18, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 53 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between October 7, 2016 and March 18, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 54 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 18, 2016 and March 31, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 55 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 18, 2016 and April 3, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 56 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 18, 2016 and April 3, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 57 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 26, 2016 and August 16, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 58 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 26, 2016 and August 16, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 59 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 26, 2016 and August 16, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 60 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between October 22, 2016 and March 30, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 61 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between October 22, 2016 and April 3, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 62 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between October 22, 2016 and April 3, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 63 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between September 18, 2016 and October 9, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 64 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between September 18, 2016 and October 12, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 65 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between September 18, 2016 and October 12, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 66 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 24, 2016 and April 10, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 67 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 24, 2016 and April 10, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED], in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 68 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 24, 2016 and April 10, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 69 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 7, 2016 and June 12, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 70 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 7, 2016 and June 15, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 71 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 7, 2016 and June 15, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 72 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 9, 2016 and February 14, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 73 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 9, 2016 and February 17, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 74 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 9, 2016 and February 17, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 75 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 1, 2016 and March 7, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 76 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 1, 2016 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 77 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 1, 2016 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 78 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between January 31, 2016 and February 14, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 79 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 31, 2016 and February 17, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 80 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 31, 2016 and February 17, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 81 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between February 1, 2016 and December 27, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 82 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between February 1, 2016 and December 31, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

CHARGES (cont'd)

COUNT 83 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between February 1, 2016 and December 31, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 84 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 2, 2017 and March 7, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 85 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 2, 2017 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 86 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 2, 2017 and March 10, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 87 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between November 3, 2016 and March 15, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 88 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between November 3, 2016 and March 18, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 89 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between November 3, 2016 and March 18, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 90 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between January 12, 2016 and March 11, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

CHARGES (cont'd)

COUNT 91 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between January 12, 2016 and March 24, 2017, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 92 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 12, 2016 and March 24, 2017, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 93 - SELLER OF TRAVEL - FAILURE TO RETURN FUNDS >\$950

On or about and between March 30, 2016 and July 7, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel, and having received from a passenger moneys for air and sea transportation and travel services, did unlawfully fail to provide the transportation and services purchased and to make a refund to the passenger within the periods specified by Business and Professions Code Section 17550.14, and further, the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.19(b) AND 17550.14.

COUNT 94 - SELLER OF TRAVEL - FAILURE TO DEPOSIT FUNDS GREATER THAN \$950

On or about and between March 30, 2016 and July 7, 2016, BRADLEY MATHESON and MARGARET MATHESON, being a seller of travel and having received payments for air and sea transportation for a person and for travel services offered by the seller of travel, did unlawfully fail to deposit 100 percent of all funds received into a trust account in a federally insured bank, savings and loan association, and credit union, as specified in Business and Professions Code section 17550.15, and further the payment and payments by and on behalf of any one passenger exceeded in the aggregate nine hundred fifty dollars (\$950) in a 12-month period, to wit: [REDACTED] in violation of BUSINESS AND PROFESSIONS CODE SECTIONS 17550.15(b) and 17550.19(b).

COUNT 95 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 30, 2016 and July 7, 2016, BRADLEY MATHESON and MARGARET MATHESON did unlawfully take and steal money and personal property of [REDACTED] of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

ALLEGATIONS AS TO BOTH DEFENDANTS AND ALL COUNTS:

And it is further alleged that in the commission and attempted commission of the crimes alleged, the aggregate losses to the victims from all the charges arise from a common scheme and plan and exceeds sixty-five thousand dollars (\$65,000), within the meaning of PENAL CODE SECTIONS 12022.6(a)(1) and 12022.6(b).

And it is further alleged that in the commission and attempted commission of the crimes alleged, the aggregate losses to the victims from all the charges arise from a common scheme and plan and exceeds sixty-five thousand dollars (\$65,000), within the meaning of PENAL CODE SECTIONS 12022.6(a)(1) and 12022.6(b).



THIS INDICTMENT, NUMBERED SCD266429, CONSISTS OF 95 COUNTS.

"A TRUE BILL"

Summer Stephan

District Attorney, County of San Diego, State of California

Foreman of the Grand Jury

Deputy District Attorney

DATE: _____

DATE: _____